

Poplar Public Mortuary
HTA licensing number 12087

Licensed under the Human Tissue Act 2004

Licensed activities

The table below denotes whether the site is licensed to carry out an activity and whether or not the activity is currently carried out in that area.

Area	Making of a post-mortem examination	Removal from the body of a deceased person (otherwise than in the course of an anatomical examination or post-mortem examination) of relevant material of which the body consists or which it contains, for use for a scheduled purpose other than transplantation	Storage of the body of a deceased person or relevant material which has come from a human body for use for a scheduled purpose
Poplar Public Mortuary	Licensed	Licensed	Licensed
Mortuary	<i>Carried out</i>	<i>Carried out</i>	<i>Carried out</i>

Summary of inspection findings

The HTA found the Designated Individual (DI) and the Licence Holder (LH) to be suitable in accordance with the requirements of the legislation.

Although the HTA found that Poplar Public Mortuary (the establishment) had met the majority of the HTA's standards, four minor shortfalls were found against standards for Governance and Quality systems, Traceability and Premises, Facilities and Equipment.

The HTA has assessed the establishment as suitable to be licensed for the activities specified, subject to corrective and preventative actions being implemented to meet the shortfalls identified during the inspection.

Compliance with HTA standards

Minor Shortfalls

Standard	Inspection findings	Level of shortfall
GQ2 There is a documented system of audit		
a) There is a documented schedule of audits	The scope of the audit schedules for licensed activities conducted under the licence is limited. The audit schedules do not include sufficient vertical or horizontal audits to check compliance with documented procedures, the completion of records and traceability of bodies or tissues.	Minor
GQ6 Risk assessments of the establishment's practices and processes are completed regularly, recorded and monitored		
a) All procedures related to the licensed activities (as outlined in standard GQ1) are risk assessed on a regular basis	Documented risk assessments of licensed activities do not cover all HTA reportable incident (HTARI) categories and risks of incidents occurring.	Minor
T1 A coding and records system facilitates traceability of bodies and human tissue, ensuring a robust audit trail		
g) Organs or tissue taken during post-mortem examination are fully traceable, including blocks and slides (including police holdings).	The establishment does not receive confirmation that post-mortem (PM) specimens are received at the relevant histopathology or toxicology laboratories. The DI cannot be fully assured of PM specimen traceability.	Minor
PFE1 The premises are secure and well maintained and safeguard the dignity of the deceased and the integrity of human tissue.		

a) The premises are clean and well maintained	<p>The mortuary is showing signs of wear and requires some maintenance to remain fit for purpose. There are areas of damage to doors, leading to exposed porous wood. There are areas of rust on the metal surrounds on the floor of the body store. This means that these areas are difficult to clean and disinfect adequately.</p> <p>The inspection team's visual inspection of the PM suite found that some areas of the facility had not been cleaned to an appropriate standard. There was an accumulation of debris in the drain and hair on the floor.</p>	Minor
---	---	--------------

The HTA requires the DI to submit a completed corrective and preventative action (CAPA) plan setting out how the shortfalls will be addressed, within 14 days of receipt of the final report (refer to Appendix 2 for recommended timeframes within which to complete actions). The HTA will then inform the establishment of the evidence required to demonstrate that the actions agreed in the plan have been completed.

Advice

The HTA advises the DI to consider the following to further improve practice:

Number	Standard	Advice
1.	GQ2(c)	The DI is advised to continue auditing PM tissue forms to ensure all paperwork has been received from the Coroner regarding the family's wishes for the fate of tissue.
2.	GQ5(a)	The DI is advised to raise awareness of the HTARI reporting requirements and incident reporting procedure, for funeral directors working in the mortuary. This may include placing signs in the mortuary detailing the HTARI categories and the incident reporting procedure.

Background

Poplar Public Mortuary is licensed for the making of a PM examination, removal of relevant material from the deceased and storage of bodies of the deceased and relevant material for use for scheduled purposes.

Poplar Public Mortuary has been licensed by the HTA since August 2009. This was the third site visit inspection of the establishment; the most recent previous inspection took place in July 2015.

Since the previous inspection, there have been no significant changes to the licence arrangements or the activities carried out under the licence.

Description of inspection activities undertaken

The HTA's regulatory requirements are set out in Appendix 1. The inspection team covered the following areas during the inspection:

Standards assessed against during inspection

Consent standards C1 and C2 were not assessed during the inspection as they are not applicable to the licensed activity undertaken. The remaining 61 HTA licensing standards (standards published 3 April 2017) were assessed.

Review of governance documentation

The inspection included a review of the establishment's governance documentation relating to licensed activities. This included policies and procedural documents relating to licensed activities, cleaning records for the mortuary and PM suite, contracts for servicing of equipment and records of servicing, ventilation reports, audits, risk assessments, meeting minutes, temperature monitoring for the storage units, reported incidents, and staff training records.

Visual inspection

The inspection included a visual inspection of the mortuary body store, PM suite and viewing room.

Audit of records

Audits were conducted for four bodies in refrigerated storage. Body location and identification details on bodies were crosschecked against the information recorded in the mortuary register and relevant documentation.

Audits of traceability were conducted for tissue samples taken from four PM cases, including audits of the consent documentation for the retention of tissues. Information was crosschecked against paper and electronic records. No discrepancies in the traceability of these tissues were found.

Meetings with establishment staff

Staff carrying out processes under the licence were interviewed including the mortuary manager, a consultant pathologist and the DI.

Materials held for the police

Under section 39 of the HT Act, relevant material held for criminal justice purposes is outside the scope of HTA regulation and is not subject to the licensing requirements for storage. However, in response to a recommendation resulting from the 2012 report of the Association of Chief Police Officers' audit of tissue held under police authority, that police exhibits held on HTA licensed premises should be included within the regular HTA inspection process, police holdings stored in a designated area in the PM suite were reviewed by the HTA during the inspection. Any findings in relation to police holdings have been shared with the Home Office, but do not appear in this report as they are outside the scope of the HT Act.

Report sent to DI for factual accuracy: 11.12.2019

Report returned from DI: 24.12.2019

Final report issued: 06.02.2020

Appendix 1: The HTA's regulatory requirements

Prior to the grant of a licence, the HTA must assure itself that the DI is a suitable person to supervise the activity authorised by the licence and that the premises are suitable for the activity.

The statutory duties of the DI are set down in Section 18 of the Human Tissue Act 2004. They are to secure that:

- the other persons to whom the licence applies are suitable persons to participate in the carrying-on of the licensed activity;
- suitable practices are used in the course of carrying on that activity; and
- the conditions of the licence are complied with.

Its programme of site visit inspections to assess compliance with HTA licensing standards is one of the assurance mechanisms used by the HTA.

The HTA developed its licensing standards with input from its stakeholders. They are designed to ensure the safe and ethical use of human tissue and the dignified and respectful treatment of the deceased. They are grouped under four headings:

- consent
- governance and quality systems
- traceability
- premises facilities and equipment.

This is an exception-based report: only those standards that have been assessed as not met are included. Where the HTA determines that there has been a shortfall against a standard, the level of the shortfall is classified as 'Critical', 'Major' or 'Minor' (see Appendix 2: Classification of the level of shortfall). Where HTA standards are fully met, but the HTA has identified an area of practice that could be further improved, advice is provided.

HTA inspection reports are published on the HTA's website.

Appendix 2: Classification of the level of shortfall

Where the HTA determines that a licensing standard is not met, the improvements required will be stated and the level of the shortfall will be classified as 'Critical', 'Major' or 'Minor'. Where the HTA is not presented with evidence that an establishment meets the requirements of an expected standard, it works on the premise that a lack of evidence indicates a shortfall.

The action an establishment will be required to make following the identification of a shortfall is based on the HTA's assessment of risk of harm and/or a breach of the Human Tissue Act 2004 (HT Act) or associated Directions.

1. Critical shortfall:

A shortfall which poses a significant risk to human safety and/or dignity or is a breach of the HT Act or associated Directions

or

A combination of several major shortfalls, none of which is critical on its own, but which together could constitute a critical shortfall and should be explained and reported as such.

A critical shortfall may result in one or more of the following:

- A notice of proposal being issued to revoke the licence
- Some or all of the licensable activity at the establishment ceasing with immediate effect until a corrective action plan is developed, agreed by the HTA and implemented.
- A notice of suspension of licensable activities
- Additional conditions being proposed
- Directions being issued requiring specific action to be taken straightaway

2. Major shortfall:

A non-critical shortfall that:

- poses a risk to human safety and/or dignity, or
- indicates a failure to carry out satisfactory procedures, or
- indicates a breach of the relevant Codes of Practice, the HT Act and other relevant professional and statutory guidelines, or

- has the potential to become a critical shortfall unless addressed

or

A combination of several minor shortfalls, none of which is major on its own, but which, together, could constitute a major shortfall and should be explained and reported as such.

In response to a major shortfall, an establishment is expected to implement corrective and preventative actions within 1-2 months of the issue of the final inspection report. Major shortfalls pose a higher level of risk and therefore a shorter deadline is given, compared to minor shortfalls, to ensure the level of risk is reduced in an appropriate timeframe.

3. Minor shortfall:

A shortfall which cannot be classified as either critical or major, but which indicates a departure from expected standards.

This category of shortfall requires the development of a corrective action plan, the results of which will usually be assessed by the HTA either by desk based review or at the time of the next site visit.

In response to a minor shortfall, an establishment is expected to implement corrective and preventative actions within 3-4 months of the issue of the final inspection report.

Follow up actions

A template corrective and preventative action plan will be sent as a separate Word document with both the draft and final inspection report. Establishments must complete this template and return it to the HTA within 14 days of the issue of the final report.

Based on the level of the shortfall, the HTA will consider the most suitable type of follow-up of the completion of the corrective and preventative action plan. This may include a combination of

- a follow-up site visit inspection
- a request for information that shows completion of actions
- monitoring of the action plan completion
- follow up at next routine site visit inspection.

After an assessment of the proposed action plan establishments will be notified of the follow-up approach the HTA will take.