

Site visit inspection report on compliance with HTA minimum standards

SCI Southampton

HTA licensing number 11053

Licensed for the

- **processing, storage and distribution of human tissues and cells for human application under the Human Tissue (Quality and Safety for Human Application) Regulations 2007 (as amended)**
- **storage of relevant material which has come from a human body for use for a scheduled purpose**

11 and 12 March 2019

Summary of inspection findings

The HTA found the Designated Individual, the Licence Holder, the premises and the practices to be suitable in accordance with the requirements of the legislation.

Although the HTA found that SCI Southampton (the establishment) had met the majority of the HTA standards, one minor shortfall was identified in relation to the application and use of the Single European Code (SEC).

Particular examples of good practice are included in the concluding comments section of the report.

The HTA's regulatory requirements

The HTA must assure itself that the Designated Individual, Licence Holder, premises and practices are suitable.

The statutory duties of the Designated Individual 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.

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. The HTA inspects the establishments it licences against four groups of standards:

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

This is an exception-based report: only those standards that have been assessed as not met are included. Where the HTA determines that a standard is not met, 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 given to the DI.

Reports of HTA inspections carried out from 1 November 2010 are published on the HTA's website.

Licensable activities carried out by the establishment

'E' = Establishment is licensed to carry out this activity.

Tissue Category; Tissue Type	Procurement	Processing	Testing	Storage	Distribution	Import	Export
Progenitor Cell, Haematopoietic, PBSC; PBSC		E		E	E		
Progenitor Cell, Haematopoietic, Bone Marrow; Bone Marrow		E		E	E		
Mature Cell, T Cell (DLI); DLI		E		E	E		
Progenitor cell, Haematopoietic, Cord Blood; Cord Blood				E			
Reproductive, Ovarian; Ovarian Tissue		E		E	E		

Background to the establishment and description of inspection activities undertaken

NHS Blood and Transplant (NHSBT) is responsible for the operation of a series of stem cell processing laboratories that make up the Special Health Authority's Stem Cells and Immunotherapies (SCI) service. SCI Southampton (the establishment) is one of the stem cell processing laboratories that make up this function. The establishment is located adjacent to the Southampton General Hospital (SGH) and is also known as The Steve Mills Stem Cell

Laboratory. SCI Southampton processes approximately 350 PBSC units per year, both for autologous and allogeneic use. They also regularly process DLI units and occasionally process Bone Marrow units, and Ovarian Tissue (OT) from women that are due to undergo cancer treatment that may render them infertile. NHSBT has moved a number of units stored in liquid nitrogen to SCI Southampton making this establishment a major storage facility within the SCI service/network. The establishment is accredited by the Joint Accreditation Committee – International Society for Cellular Therapy and the European Society for Blood and Marrow Transplantation (JACIE).

SCI Southampton has service level agreements (SLAs) in place with a number of establishments that are licensed by the HTA for the procurement and donor testing of PBSC, BM and cells for DLI. During the document review it was noted that one of the SLAs had expired, and there was no current agreement in place. Units that are received are checked for correct packaging and that there is a sufficient volume according to set limits for each type of product. PBSC and other stem cells are either processed within the laboratory using a closed sterile docking system or within a microbiological safety cabinet (MSC) in one of the establishment's two clean rooms (background grade B). OT is procured at a neighbouring hospital. Procured OT is only processed within an MSC within a dedicated clean room. All tissue and cell products for cryopreservation are frozen in controlled-rate freezers and a printout detailing the freezing profile is included in the processing records. There is a separate controlled-rate freezer primarily used for the OT and other controlled-rate freezers are programmed as back-up units.

A number of quality control checks are carried out on each tissue type. These are carried out on incoming materials, during processing, and on finished products as described in the appropriate standard operating procedures (SOPs). The tests include, for PBSC, total nucleated, mononuclear, CD34+, and viable cell counts in addition to an assessment of CD45 and CD3 lymphocyte populations in starting and finished products prior to cryopreservation. Finished products are also tested by anaerobic and aerobic bacteriology culture prior to cryopreservation to ensure sterility. In addition, allogeneic and Bone Marrow products also undergo pre-processing sterility tests. All stem cell products that have been cryopreserved for more than five years are subjected to cell potency assays (colony forming units). OT is examined for the appropriate thickness of tissue slices, the presence of primordial follicles and the absence of malignant cells. Anaerobic and aerobic bacteriology cultures are also performed on the solutions that have been in contact with the tissue as well as samples of the pre-, during- and post- processing tissue product before cryopreservation. Environmental monitoring is carried out according to a national NHSBT procedure and local results are discussed at monthly quality meetings.

Overall governance of the SCI functions is achieved through the use of national NHSBT SOPs, monthly Senior Management Team meetings attended by Heads of all SCI laboratories and a quarterly Quality Forum attended by nominated quality representatives of all SCI laboratories. In addition, SCI Southampton has regular operational meetings and representatives attend meetings with the local clinical users of the service.

This was a routine site visit to SCI Southampton and consisted of a visual inspection of the clean rooms, general laboratory areas and liquid nitrogen store. Interviews were carried out with the Laboratory Director, a specialist biomedical scientist for stem cells, and the individual acting on behalf of the Designated Individual. In addition, round table discussions with members of staff involved with sample receipt, storage and transport, processing, environmental monitoring, and quality management, incident management, document control, risk assessments and audits at the site also took place. Documentation including SOPs, policies, service level agreements, training records, meeting minutes, equipment records and examples of quality incidents were looked at during the inspection. The inspection team also looked at processing records from two PBSC products, two Bone Marrow products and two

Ovarian Tissue products. Traceability of units receipted into the establishment to storage locations as noted in computer records was also checked. All products are currently received into SCI Southampton without a full Single European Code (SEC) or SEC-Donor Identification (DI) being applied, although this is applied during processing for all stem cell products. The establishment occasionally receive allogeneic products from a donor registry that will have a SEC-DI on the label, however, no material was currently in storage and no anomalies were found in the records audited during the inspection. No Ovarian Tissue products were labelled with the SEC. However, all products were fully traceable and there were no other anomalies found.

Inspection findings

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

Compliance with HTA standards

Governance and Quality

Standard	Inspection findings	Level of shortfall
GQ6 A coding and records system facilitates traceability of bodies, body parts, tissues and cells, ensuring a robust audit trail.		
d) The requirements of the Single European Code are adhered to as set out in Directions 002/2018.	<p>The establishment receive PBSC and BM samples, for processing, from other establishments. When the product is received it has not been labelled with the SEC-DI, nor is the SEC-DI contained within the accompanying paperwork, as is required by Directions 002/2018.</p> <p>At the time of inspection the software used for tracking and traceability of products was only capable of using the SCI Southampton establishment code. Current procedures at the establishment required the establishment to relabel any products with a SEC, or SEC-DI, with a new SEC containing the SCI Southampton establishment code. This procedure was in place for all the establishments within the network.</p> <p>In addition, while stem cell products are labelled with the SEC during processing the establishment does not currently label OT products with the SEC.</p>	Minor

Advice

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

No.	Standard	Advice
1.	GQ1l	The establishment currently stores products for a number of other establishments within the extended NHSBT/SCI network. As they hold a significant amount of product, and act as contingency for several other sites within the network, the DI is advised to review current arrangements and ensure that there is alternative space available for the transfer of stored tissue and/or cells in the event of termination of activities.
2.	GQ1p	The SLA with one of the procurement establishments was out of date. It was explained to the inspection team that this was due to delays at the other establishment. The DI should ensure that the SLA is completed as soon as possible.
3.	GQ1r	The SLAs related to stem cell processing refer to NAT testing of all samples, removing the need for 180 day testing. While this testing is undertaken for the OT the statement has been removed from the SLA. The DI should add the text back into the SLA related to OT.
4.	GQ2c	The establishment undertakes a regular 'Self Inspection' audit by an independent member of the parent organisation. This audit results in an audit report detailing any non-compliances, including those against the HTA standards. A document detailing the audit specifics is appended to the report and provides an assurance that the audit was against all of the HTA standards, detailing compliant results in addition to the non-compliances contained within the report. The most recent audit report did not have the supporting document attached, and while the auditor has confirmed he completed the audit following procedure, has been unable to find the supporting documentation. The DI is advised to institute a review/QA process, to ensure that such supporting documentation is retained.
5.	GQ6d	None of the SLA's reviewed contained references to the requirement for labelling with the SEC-DI (at procurement) or with the full SEC (after processing). The DI should ensure that this information is added to the SLAs, along with the requirement for all end user establishments to record the SEC in recipient patient records.
6.	PFE3c	The DI is advised to institute regular testing of the O2 alarms in the cryorepository. In addition, many of the vapour phase LN2 tanks are used for long term storage and rarely accessed; the DI is advised to regularly test the alarm systems to ensure they remain functional on the individual units.

Concluding comments

The establishment has good quality management systems ensuring that there are robust systems to ensure traceability throughout the receipt, processing, storage and distribution steps. However, there was a minor shortfall identified that related to the application of the Single European Code (SEC) to stem cell and ovarian tissue products. The HTA has given

advice to the Designated Individual with respect to Service Level Agreements (SLAs) and independent audits.

The HTA requires that the Designated Individual addresses the shortfalls by submitting a completed corrective and preventative action (CAPA) plan 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.

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.

Report sent to DI for factual accuracy: 08 April 2019

Report returned from DI: 18 April 2019

Final report issued: 13 May 2019

Completion of corrective and preventative actions (CAPA) plan

Based on information provided, the HTA is satisfied that the establishment has completed the agreed actions in the CAPA plan and in doing so has taken sufficient action to correct all shortfalls addressed in the Inspection Report.

Date: 07 February 2020

Appendix 1: HTA standards

The HTA standards applicable to this establishment are shown below; those not assessed during the inspection are shown in grey text. Individual standards which are not applicable to this establishment have been excluded.

Human Tissue (Quality and Safety for Human Application) Regulations 2007 Standards

Governance and Quality

Standard
GQ1 All aspects of the establishment's work are supported by ratified documented policies and procedures as part of the overall governance process.
a) There is an organisational chart clearly defining the lines of accountability and reporting relationships.
b) There are procedures for all licensable activities that ensure integrity of tissue and / or cells and minimise the risk of contamination.
c) There are regular governance meetings, for example health and safety, risk management and clinical governance committees, which are recorded by agendas and minutes.
d) There is a document control system to ensure that changes to documents are reviewed, approved, dated and documented by an authorised person and only current documents are in use.
g) There are procedures to ensure that an authorised person verifies that tissues and / or cells received by the establishment meet required specifications.
h) There are procedures for the management and quarantine of non-conforming consignments or those with incomplete test results, to ensure no risk of cross contamination.
i) There are procedures to ensure tissues and / or cells are not released from quarantine until verification has been completed and recorded.
j) There are procedures detailing the critical materials and reagents used and where applicable, materials and reagents meet the standards laid down by the European directives on medical devices and in vitro diagnostic medical devices.
k) There is a procedure for handling returned products.
l) There are procedures to ensure that in the event of termination of activities for whatever reason, stored tissues and / or cells are transferred to another licensed establishment or establishments.
m) The criteria for allocating tissues and / or cells to patients and health care institutions are documented and made available to these parties on request.
n) The establishment ensures imports from non EEA states meet the standards of quality and safety set out in Directions 002/2018.
o) There is a complaints system in place.
p) There are written agreements with third parties whenever an activity takes place that has the potential to influence the quality and safety of human tissues and / or cells.
q) There is a record of agreements established with third parties.

r) Third party agreements specify the responsibilities of the third party and meet the requirements set out in Directions 002/2018.
s) Third party agreements specify that the third party will inform the establishment in the event of a serious adverse reaction or event.
t) There are procedures for the re-provision of service in an emergency.
GQ2 There is a documented system of quality management and audit.
a) There is a quality management system which ensures continuous and systematic improvement.
b) There is an internal audit system for all licensable activities.
c) An audit is conducted in an independent manner at least every two years to verify compliance with protocols and HTA standards, and any findings and corrective actions are documented.
d) Processes affecting the quality and safety of tissues and / or cells are validated and undergo regular evaluation to ensure they continue to achieve the intended results.
GQ3 Staff are appropriately qualified and trained in techniques relevant to their work and are continuously updating their skills.
a) There are clearly documented job descriptions for all staff.
b) There are orientation and induction programmes for new staff.
c) There are continuous professional development (CPD) plans for staff and attendance at training is recorded.
d) There is annual documented mandatory training (e.g. health and safety and fire).
e) Personnel are trained in all tasks relevant to their work and their competence is recorded.
f) There is a documented training programme that ensures that staff have adequate knowledge of the scientific and ethical principles relevant to their work, and the regulatory context.
g) There is a documented training programme that ensures that staff understand the organisational structure and the quality systems used within the establishment.
h) There is a system of staff appraisal.
i) Where appropriate, staff are registered with a professional or statutory body.
j) There are training and reference manuals available.
k) The establishment is sufficiently staffed to carry out its activities.
GQ4 There is a systematic and planned approach to the management of records.
a) There are procedures for the creation, identification, maintenance, access, amendment, retention and destruction of records.
b) There is a system for the regular audit of records and their content to check for completeness, legibility and accuracy and to resolve any discrepancies found.

c) Written records are legible and indelible. Records kept in other formats such as computerised records are stored on a validated system.
d) There is a system for back-up / recovery in the event of loss of computerised records.
e) The establishment keeps a register of the types and quantities of tissues and / or cells that are procured, tested, preserved, processed, stored and distributed or otherwise disposed of, and on the origin and destination of tissues and cells intended for human application.
f) There are procedures to ensure that donor documentation, as specified by Directions 002/2018, is collected and maintained.
g) There is a system to ensure records are secure and that donor confidentiality is maintained in accordance with Directions 002/2018.
h) Raw data which are critical to the safety and quality of tissues and cells are kept for 10 years after the use, expiry date or disposal of tissues and / or cells.
i) The minimum data to ensure traceability from donor to recipient as required by Directions 002/2018 are kept for 30 years after the use, expiry or disposal of tissues and / or cells.
j) Records are kept of products and material coming into contact with the tissues and / or cells.
k) There are documented agreements with end users to ensure they record and store the data required by Directions 002/2018.
l) The establishment records the acceptance or rejection of tissue and / or cells that it receives and in the case of rejection why this rejection occurred.
m) In the event of termination of activities of the establishment a contingency plan to ensure records of traceability are maintained for 10 or 30 years as required.
GQ5 There are documented procedures for donor selection and exclusion, including donor criteria.
a) Donors are selected either by the establishment or the third party acting on its behalf in accordance with the criteria required by Directions 002/2018.
b) The testing of donors by the establishment or a third party on behalf of the establishment is carried out in accordance with the requirements of Directions 002/2018.
c) In cases other than autologous donors, donor selection is carried out by authorised personnel and signed and reviewed by a qualified health professional.
d) There is a system in place either at the establishment or at a third party acting on its behalf to record results of donor selection and associated tests.
e) Testing of donor samples is carried out using CE marked diagnostic tests.
f) Samples taken for donor testing are clearly labelled with the time and place the sample was taken and a unique donor identification code.
GQ6 A coding and records system facilitates traceability of tissues and / or cells, ensuring a robust audit trail.
a) There is a donor identification system which assigns a unique code to each donation and to each of the products associated with it.

b) An audit trail is maintained, which includes details of when the tissues and / or cells were acquired and from where, the uses to which the tissues and / or cells were put, when the tissues and / or cells were transferred elsewhere and to whom.
c) The establishment has procedures to ensure that tissues and / or cells imported, procured, processed, stored, distributed and exported are traceable from donor to recipient and vice versa.
d) The requirements of the Single European Code are adhered to as set out in Directions 002/2018.
GQ7 There are systems to ensure that all adverse events, reactions and/or incidents are investigated promptly.
a) There are procedures for the identification, reporting, investigation and recording of adverse events and reactions, including documentation of any corrective or preventative actions.
b) There is a system to receive and distribute national and local information (e.g. HTA regulatory alerts) and notify the HTA and other establishments as necessary of serious adverse events or reactions.
c) The responsibilities of personnel investigating adverse events and reactions are clearly defined.
d) There are procedures to identify and decide the fate of tissues and / or cells affected by an adverse event, reaction or deviation from the required quality and safety standards.
e) In the event of a recall, there are personnel authorised within the establishment to assess the need for a recall and if appropriate initiate and coordinate a recall.
f) There is an effective, documented recall procedure which includes a description of responsibilities and actions to be taken in the event of a recall including notification of the HTA and pre-defined times in which actions must be taken.
g) Establishments distributing tissue and / or cells provide information to end users on how to report a serious adverse event or reaction and have agreements with them specifying that they will report these events or reactions.
h) Establishments distributing tissues and / or cells have systems to receive notifications of serious adverse events and reactions from end users and notify the HTA.
GQ8 Risk assessments of the establishment's practices and processes are completed regularly and are recorded and monitored appropriately.
a) There are documented risk assessments for all practices and processes.
b) Risk assessments are reviewed regularly, as a minimum annually or when any changes are made that may affect the quality and safety of tissues and cells.
c) Staff can access risk assessments and are made aware of local hazards at training.
d) A documented risk assessment is carried out to decide the fate of any tissue and / or cells stored prior to the introduction of a new donor selection criteria or a new processing step, which enhances the quality and safety of tissue and / or cells.

Premises, Facilities and Equipment

Standard
PFE1 The premises are fit for purpose.
a) A risk assessment has been carried out of the premises to ensure that they are fit for purpose.
b) There are procedures to review and maintain the safety of staff, visitors and patients.
c) The premises have sufficient space for procedures to be carried out safely and efficiently.
e) There are procedures to ensure that the premises are secure and confidentiality is maintained.
f) There is access to a nominated, registered medical practitioner and / or a scientific advisor to provide advice and oversee the establishment's medical and scientific activities.
PFE2 Environmental controls are in place to avoid potential contamination.
a) Tissues and / or cells stored in quarantine are stored separately from tissue and / or cells that have been released from quarantine.
b) Where processing of tissues and / or cells involves exposure to the environment, it occurs in an appropriate, monitored environment as required by Directions 002/2018.
c) There are procedures for cleaning and decontamination.
d) Staff are provided with appropriate protective clothing and equipment that minimise the risk of contamination of tissue and / or cells and the risk of infection to themselves.
PFE3 There are appropriate facilities for the storage of tissues and / or cells, consumables and records.
a) Tissues, cells, consumables and records are stored in secure environments and precautions are taken to minimise risk of damage, theft or contamination.
b) There are systems to deal with emergencies on a 24 hour basis.
c) Tissues and / or cells are stored in controlled, monitored and recorded conditions that maintain tissue and / or cell integrity.
d) There is a documented, specified maximum storage period for tissues and / or cells.
PFE4 Systems are in place to protect the quality and integrity of tissues and / or cells during transport and delivery to its destination.
a) There is a system to ensure tissue and / or cells are not distributed until they meet the standards laid down by Directions 002/2018.
b) There are procedures for the transport of tissues and / or cells which reflect identified risks associated with transport.
c) There is a system to ensure that traceability of tissues and / or cells is maintained during transport.
d) Records are kept of transportation and delivery.

e) Tissues and / or cells are packaged and transported in a manner and under conditions that minimise the risk of contamination and ensure their safety and quality.
f) There are third party agreements with courier or transport companies to ensure that any specific transport conditions required are maintained.
g) Critical transport conditions required to maintain the properties of tissue and / or cells are defined and documented.
h) Packaging and containers used for transportation are validated to ensure they are fit for purpose.
i) Primary packaging containing tissues and / or cells is labelled with the information required by Directions.
j) Shipping packaging containing tissues and / or cells is labelled with the information required by Directions.
PFE5 Equipment is appropriate for use, maintained, quality assured, validated and where appropriate monitored.
a) Critical equipment and technical devices are identified, validated, regularly inspected and records are maintained.
b) Critical equipment is maintained and serviced in accordance with the manufacturer's instructions.
c) Equipment affecting critical processes and storage parameters is identified and monitored to detect malfunctions and defects and procedures are in place to take any corrective actions.
d) New and repaired equipment is validated before use and this is documented.
e) There are documented agreements with maintenance companies.
f) Cleaning, disinfection and sanitation of critical equipment is performed regularly and this is recorded.
h) Users have access to instructions for equipment and receive training in the use of equipment and maintenance where appropriate.
i) Staff are aware of how to report an equipment problem.
j) For each critical process, the materials, equipment and personnel are identified and documented.
k) There are contingency plans for equipment failure.

Disposal

Standard
D1 There is a clear and sensitive policy for disposing of tissues and / or cells.
a) The disposal policy complies with HTA's Codes of Practice.
b) The disposal procedure complies with Health and Safety recommendations.
c) There is a documented procedure on disposal which ensures that there is no cross contamination.

D2 The reasons for disposal and the methods used are carefully documented.
a) There is a procedure for tracking the disposal of tissue and / or cells that details the method and reason for disposal.
b) Disposal arrangements reflect (where applicable) the consent given for disposal.

Human Tissue Act 2004 Standards

Consent standards
C1 Consent is obtained in accordance with the requirements of the Human Tissue Act 2004 (HT Act) and as set out in the code of practice
<p>a) Consent procedures are documented and these, along with any associated documents, comply with the HT Act and the HTA's Codes of Practice.</p> <p>b) Consent forms are available to those using or releasing relevant material for a scheduled purpose.</p> <p>c) Where applicable, there are agreements with other parties to ensure that consent is obtained in accordance with the requirements of the HT Act and the HTA's Codes of Practice.</p> <p>d) Written information is provided to those from whom consent is sought, which reflects the requirements of the HT Act and the HTA's Codes of Practice.</p> <p>e) Language translations are available when appropriate.</p> <p>f) Information is available in formats appropriate to the situation.</p>
C2 Staff involved in seeking consent receive training and support in the essential requirements of taking consent
<p>a) There is suitable training and support of staff involved in seeking consent, which addresses the requirements of the HT Act and the HTA's Codes of Practice.</p> <p>b) Records demonstrate up-to-date staff training.</p> <p>c) Competency is assessed and maintained.</p>

Governance and quality system standards
GQ1 All aspects of the establishments work are governed by documented policies and procedures as part of the overall governance process
<p>a) Ratified, documented and up-to-date policies and procedures are in place, covering all licensable activities.</p> <p>b) There is a document control system.</p> <p>c) There are change control mechanisms for the implementation of new operational procedures.</p> <p>d) Matters relating to HTA-licensed activities are discussed at regular governance meetings, involving establishment staff.</p> <p>e) There is a system for managing complaints.</p>

GQ2 There is a documented system of audit
<p>a) There is a documented schedule of audits covering licensable activities.</p> <p>b) Audit findings include who is responsible for follow-up actions and the timeframes for completing these.</p>
GQ3 Staff are appropriately qualified and trained in techniques relevant to their work and are continuously updating their skills
<p>a) Qualifications of staff and all training are recorded, records showing attendance at training.</p> <p>b) There are documented induction training programmes for new staff.</p> <p>c) Training provisions include those for visiting staff.</p> <p>d) Staff have appraisals and personal development plans.</p>
GQ4 There is a systematic and planned approach to the management of records
<p>a) There are suitable systems for the creation, review, amendment, retention and destruction of records.</p> <p>b) There are provisions for back-up / recovery in the event of loss of records.</p> <p>c) Systems ensure data protection, confidentiality and public disclosure (whistleblowing).</p>
GQ5 There are systems to ensure that all adverse events are investigated promptly
<p>a) Staff are instructed in how to use incident reporting systems.</p> <p>b) Effective corrective and preventive actions are taken where necessary and improvements in practice are made.</p>
GQ6 Risk assessments of the establishment's practices and processes are completed regularly, recorded and monitored
<p>a) There are documented risk assessments for all practices and processes requiring compliance with the HT Act and the HTA's Codes of Practice.</p> <p>b) Risk assessments are reviewed regularly.</p> <p>c) Staff can access risk assessments and are made aware of risks during training.</p>

Traceability standards
T1 A coding and records system facilitates the traceability of bodies and human tissue, ensuring a robust audit trail
<p>a) There is an identification system which assigns a unique code to each donation and to each of the products associated with it.</p> <p>b) A register of donated material, and the associated products where relevant, is maintained.</p> <p>c) An audit trail is maintained, which includes details of: when and where the bodies or tissue were acquired and received; the consent obtained; all sample storage locations; the uses to which any material was put; when and where the material was transferred, and to whom.</p>

- d) A system is in place to ensure that traceability of relevant material is maintained during transport.
- e) Records of transportation and delivery are kept.
- f) Records of any agreements with courier or transport companies are kept.
- g) Records of any agreements with recipients of relevant material are kept.

T2 Bodies and human tissue are disposed of in an appropriate manner

- a) Disposal is carried out in accordance with the HTA's Codes of Practice.
- b) The date, reason for disposal and the method used are documented.

Premises, facilities and equipment standards

PFE1 The premises are secure and fit for purpose

- a) An assessment of the premises has been carried out to ensure that they are appropriate for the purpose.
- b) Arrangements are in place to ensure that the premises are secure and confidentiality is maintained.
- c) There are documented cleaning and decontamination procedures.

PFE2 There are appropriate facilities for the storage of bodies and human tissue

- a) There is sufficient storage capacity.
- b) Where relevant, storage arrangements ensure the dignity of the deceased.
- c) Storage conditions are monitored, recorded and acted on when required.
- d) There are documented contingency plans in place in case of failure in storage area.

PFE3 Equipment is appropriate for use, maintained, validated and where appropriate monitored

- a) Equipment is subject to recommended calibration, validation, maintenance, monitoring, and records are kept.
- b) Users have access to instructions for equipment and are aware of how to report an equipment problem.
- c) Staff are provided with suitable personal protective equipment.

Appendix 2: Classification of the level of shortfall (HA)

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 HT Act or associated Directions.

1. Critical shortfall:

A shortfall which poses a significant direct risk of causing harm to a recipient patient or to a living donor,

Or

A number of 'major' shortfalls, none of which is critical on its own, but viewed cumulatively represent a systemic failure and therefore are considered 'critical'.

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

- (1) A notice of proposal being issued to revoke the licence
- (2) 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.
- (3) A notice of suspension of licensable activities
- (4) Additional conditions being proposed
- (5) Directions being issued requiring specific action to be taken straightaway

2. Major shortfall:

A non-critical shortfall.

A shortfall in the carrying out of licensable activities which poses an indirect risk to the safety of a donor or a recipient

or

A shortfall in the establishment's quality and safety procedures which poses an indirect risk to the safety of a donor or a recipient;

or

A shortfall which indicates a major deviation from the Human Tissue (Quality and Safety for Human Application) Regulations 2007 or the HTA Directions;

or

A shortfall which indicates a failure to carry out satisfactory procedures for the release of tissues and cells or a failure on the part of the designated individual to fulfil his or her legal duties;

or

A combination of several 'minor' shortfalls, none of which is major on its own, but which, viewed cumulatively, could constitute a major shortfall by adversely affecting the quality and safety of the tissues and cells.

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 and, which can be addressed by further development by the establishment.

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 inspection.

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. You 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 desk-based or site-visit inspection.

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