Site visit inspection report on compliance with HTA licensing standards Inspection date: **11 February 2020** 



# **Liverpool City Mortuary**HTA licensing number 12033

Licensed under the Human Tissue Act 2004

#### Licensed activities

The table below shows the activities this establishment is licensed for and the activities currently undertaken at the establishment.

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
Liverpool City Mortuary	Licensed	Licensed	Licensed
Mortuary	Carried out	Carried out	Carried out

#### **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 Liverpool City Mortuary (the establishment) had met the majority of the HTA's standards, three major and six minor shortfalls were found against standards for Governance and Quality, 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**

# Major shortfalls

Inspection findings	
vork are governed by documented policies and procedures	
Standard operating procedures (SOPs) for identification of bodies do not include sufficient details of procedures. The SOPs for viewings, release of bodies from the mortuary and post-mortem (PM) examination do not include sufficient details of what identifiers could be used to identify the deceased and how identification checks should be performed.	Major
T1 A coding and records system facilitates traceability of bodies and human tissue, ensuring a robust audit trail	
Bodies are released from the mortuary using less than three identifiers of the deceased provided by funeral directors. Whilst the establishment checks three identifiers of the deceased between the mortuary records, this does not meet the standard required.	Major
maintained and safeguard the dignity of the deceased and the integrity of huma	n tissue.
The gates to the mortuary entrance for funeral directors cannot be closed or locked behind funeral directors' vehicles. The entrance is on a public road. This poses a risk of unauthorised access to the premises and passers-by overseeing release of bodies from the mortuary.  There is a gap between the doors of the viewing room. This means that visitors	Major
	Standard operating procedures (SOPs) for identification of bodies do not include sufficient details of procedures. The SOPs for viewings, release of bodies from the mortuary and post-mortem (PM) examination do not include sufficient details of what identifiers could be used to identify the deceased and how identification checks should be performed.  Bodies are released from the mortuary using less than three identifiers of the deceased provided by funeral directors. Whilst the establishment checks three identifiers of the deceased between the mortuary records, this does not meet the standard required.  The gates to the mortuary entrance for funeral directors cannot be closed or locked behind funeral directors' vehicles. The entrance is on a public road. This poses a risk of unauthorised access to the premises and passers-by overseeing release of bodies from the mortuary.

## Minor Shortfalls

Standard	Inspection findings	
GQ1 All aspects of the establishment's v	vork are governed by documented policies and procedures	
d) Policies and SOPs are reviewed regularly by someone other than the author, ratified and version controlled. Only the latest versions are available for use	SOPs have not been reviewed by someone other than the author.  The establishment submitted sufficient evidence to address this shortfall before the report was finalised.	Minor
h) Matters relating to HTA-licensed activities are discussed at regular governance meetings involving establishment staff	Matters relating to HTA-licensed activities are not discussed at regular governance meetings involving establishment staff.	Minor
GQ4 There is a systematic and planned a	approach to the management of records	
a) There is a system for managing records which includes which records must be maintained, how they are backed up, where records are kept, how long each type of record is retained and who has access to each type of record	There is no formal system for management of records. There is no SOP detailing how records should be managed.	
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	Not all procedures relating to licensed activities have been risk assessed. Most risk assessments relate to health and safety risks only.	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	<ul> <li>Some areas of the premises require maintenance:</li> <li>There is an area between the floor and the base of one refrigerated unit in the body store that has not been resealed following maintenance.</li> <li>There are small areas of exposed plaster in the body store.</li> <li>A service panel in the wall of the PM room has not been refitted following maintenance.</li> <li>These defects represent a departure from the expected standard but do not affect the cleanliness of the premises at present.</li> </ul>	Minor
PFE3 Equipment is appropriate for use, maintained, validated and where appropriate monitored		
c) The ventilation system provides the necessary ten air changes per hour and is checked and maintained at least annually	The ventilation system service records do not provide evidence of the number of air changes per hour and what standard the system has been assessed against.	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:

Num	ber Standa	ard	Advice
1.	GQ1(e)	)	The DI is advised to ensure that the lists of staff who have signed to acknowledge they have read and understood SOPs are legible. Staff currently sign and do not print their names on these lists, and this means that some records are difficult to read.

2.	GQ4(b)	The DI is advised to ensure written amendments to records are completed in a consistent manner and in a way that allows changes to records to be audited.
3.	T2(b)	The DI is advised to ensure that the family's wishes for the fate of PM samples are sought from the appropriate person in accordance with the requirements of the Human Tissue Act 2004 (HT Act). The next of kin or personal representative of the deceased, with whom the coroner's office liaises, may not be the person ranked highest in the list of qualifying relationships under the HT Act.
4.	PFE2(e)	The DI is advised to document the alarm trigger point temperatures for the fridges and freezers.
5.	PFE2(f)	The DI is advised to ensure the temperatures of fridges and freezers during the daily checks are recorded.

## **Background**

Liverpool City Mortuary has been licensed by the HTA since July 2007. This was the fourth site visit inspection of the establishment; the most recent previous inspection took place in November 2015. Since the previous inspection, there was a change of the DI in January 2017. No other significant changes to the licence arrangements or the activities carried out under the licence have occurred.

## 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

60 of the total 72 HTA standards were covered during this inspection (standards published 3 April 2017). Standards covered at this inspection are listed in Appendix 3. Any standards that were not applicable to the establishment have been deleted from this table.

#### Review of governance documentation

The inspection team reviewed policies and procedural documents relating to licensed activities, cleaning records for the mortuary and PM room, contracts for servicing of equipment and records of servicing, ventilation reports, audits, risk assessments, incident reporting and staff training records.

Visual inspection

The inspection team carried out a visual inspection of the body store area, PM room and viewing room.

Audit of records

The inspection team performed traceability audits of four bodies in storage. Identification details were crosschecked between the identification bands on the bodies, information on the door of the storage unit, and the mortuary and fridge registers. No discrepancies in traceability were

identified.

Audits were conducted of tissue taken at PM examination for four cases. Information was crosschecked between the mortuary documentation from the time of the PM examination, the mortuary tissue register, and records of transfer of material and courier receipt documentation. No

discrepancies in traceability were identified.

Meetings with establishment staff

The inspection team met with staff carrying out processes under the licence. Meetings were also held with the DI and the Persons Designated who works in the council Bereavement Services department.

Report sent to DI for factual accuracy: 05 March 2020

Report returned from DI: 10 March 2020

Final report issued: 16 March 2020

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

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has taken sufficient action to correct all shortfalls addressed in the Inspection Report.

Date: 11 September 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.

#### Appendix 3: Standards assessed during site visit inspection

#### **Governance and quality systems**

## GQ1 All aspects of the establishment's work are governed by documented policies and procedures

- a) Documented policies and SOPs cover all mortuary/laboratory procedures relevant to the licensed activity, take account of relevant Health and Safety legislation and guidance and, where applicable, reflect guidance from RCPath. These include:
  - i. post-mortem examination, including the responsibilities of Anatomical Pathology Technologists (APTs) and Pathologists and the management of cases where there is increased risk;
  - ii. practices relating to the storage of bodies, including long term storage and when bodies should be moved into frozen storage;
  - iii. practices relating to evisceration and reconstruction of bodies;
  - iv. systems of traceability of bodies and tissue samples;
  - v. record keeping;
  - vi. receipt and release of bodies, which reflect out of hours arrangements;
  - vii. lone working in the mortuary;
  - viii. viewing of bodies, including those in long-term storage, by family members and others such as the police;
  - ix. transfer of bodies internally, for example, for MRI scanning;
  - x. transfer of bodies and tissue (including blocks and slides) off site or to other establishments;
  - xi. movement of multiple bodies from the mortuary to other premises, for example, in the event that capacity is reached;
  - xii. disposal of tissue (including blocks and slides), which ensures disposal in line with the wishes of the deceased person's family;
  - xiii. access to the mortuary by non-mortuary staff, contractors and visitors;
  - xiv. contingency storage arrangements.

#### Guidance

SOPs should reflect guidance contained in the HSE's document: Managing the risks of infection in the mortuary, post mortem room, funeral premises and exhumation.

Individual SOPs for each activity are not required. Some SOPs will cover more than one activity.

- b) Procedures on evisceration ensure that this is not undertaken by an APT unless the body has first been examined by the pathologist who has instructed the APT to proceed.
- c) Procedures on body storage prevent practices that disregard the dignity of the deceased.

#### Guidance

For example, placing more than one body on a tray, placing bodies unshrouded on trays, or storing bodies in unrefrigerated storage should not take place. The family's permission should be obtained for any 'cosmetic' adjustments or other invasive procedures prior to release of bodies, for example, sewing the deceased's mouth to close it or the removal of a pacemaker. It is also good practice to discuss with the family any condition that may cause them distress, for example when viewing or preparing the body for burial, such as oedema, skin slippage of signs of decomposition.

If identification of the body is to take place before a post-mortem examination, if available, a Police Family Liaison or Coroner's Officer should have a discussion with the family about the injures and let them know that reconstruction may be required.

However, the Pathologist should see the body without any changes being made, so if there is a need to reconstruct or clean a body before the post-mortem examination, it should be with the agreement of both the Pathologist and the Coroner. In Home Office cases, a viewing cannot normally take place until after the post-mortem examination.

- d) Policies and SOPs are reviewed regularly by someone other than the author, ratified and version controlled. Only the latest versions are available for use.
- e) There is a system for recording that staff have read and understood the latest versions of these documents.
- f) Deviations from documented SOPs are recorded and monitored via scheduled audit activity.
- g) All areas where activities are carried out under an HTA licence are incorporated within the establishment's governance framework. Guidance

These areas include maternity wards where storage of fetuses and still born babies takes place, areas where material is stored for research, the Accident and Emergency Department where removal of samples may take place in cases of sudden unexpected death in infancy. There should be an identified Person Designated in areas of the establishment remote from the main premises.

h) Matters relating to HTA-licensed activities are discussed at regular governance meetings involving establishment staff. *Guidance*  Meeting minutes should be recorded and made available to staff.

## GQ2 There is a documented system of audit

a) There is a documented schedule of audits.

Guidance

As a minimum, the schedule should include a range of vertical and horizontal audits checking compliance with documented procedures, the completion of records and traceability.

b) Audit findings document who is responsible for follow-up actions and the timeframe for completing these.

Guidance

Staff should be made aware of the outcomes of audits and where improvements have been identified.

c) Regular audits are carried out of tissue being stored so that staff are fully aware of what is held and why and to enable timely disposal of tissue where consent has not been given for continued retention.

Guidance

Audits of stored tissue should include samples held under the authority of the police, where applicable.

## GQ3 Staff are appropriately qualified and trained in techniques relevant to their work and demonstrate competence in key tasks

a) All staff who are involved in mortuary duties are appropriately trained/qualified or supervised.

Guidance

This includes portering staff, who have responsibility for bringing bodies to the mortuary out of hours and who may not be aware of the potential risks to the deceased during transfer into refrigerated storage, and unqualified mortuary 'assistant' staff.

APTs should be trained in reconstruction techniques to ensure that the appearance of the deceased is as natural as possible. APTs should be encouraged to work towards the achievement of the RSPH Level 3 Diploma in Anatomical Pathology Technology.

b) There are clear reporting lines and accountability.

c) Staff are assessed as competent for the tasks they perform.

Guidance

Assessment of competence should include the standard of APTs' reconstruction work.

- d) Staff have annual appraisals and personal development plans.
- e) Staff are given opportunities to attend training courses, either internally or externally.

Guidance: attendance by staff at training events should be recorded.

- f) There is a documented induction and training programme for new mortuary staff.
- g) Visiting / external staff are appropriately trained and receive an induction which includes the establishment's policies and procedures.

Guidance

The qualifications of locum staff should be checked prior to them commencing work in the mortuary and their competency to undertake each task should be assessed.

Contractors, visiting and temporary staff and funeral service staff bringing bodies out of hours should be required to read relevant standard operating procedures and sign to confirm their understanding.

#### GQ4 There is a systematic and planned approach to the management of records

a) There is a system for managing records which includes which records must be maintained, how they are backed up, where records are kept, how long each type of record is retained and who has access to each type of record.

Guidance

Records include mortuary registers, PM examination records, tissue retention forms and records of transfer and return of organs/tissue sent elsewhere for examination.

- b) There are documented SOPs for record management which include how errors in written records should be corrected.
- c) Systems ensure data protection, confidentiality and public disclosure (whistle-blowing).

#### GQ5 There are systems to ensure that all untoward incidents are investigated promptly

a) Staff know how to identify and report incidents, including those that must be reported to the HTA.

#### Guidance

HTA-reportable incidents must be reported within five days of the date of the incident or date of discovery.

Incidents that relate to a failure of hospital staff to carry out end of life care adequately should be reported internally and the incidence of these monitored.

- b) The incident reporting system clearly outlines responsibilities for reporting, investigating and follow up for incidents.
- c) The incident reporting system ensures that follow up actions are identified (i.e. corrective and preventative actions) and completed.
- d) Information about incidents is shared with all staff to avoid repeat errors.
- e) The establishment adopts a policy of candour when dealing with serious incidents.

#### 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.

#### Guidance

Risks to the dignity and integrity of bodies and stored tissue should be covered. The HTA's reportable incident categories provide a good basis for risk assessments. Risk assessments should be reviewed at regular intervals, for example every 1-3 years or when circumstances change. Staff should be involved in the risk assessment process.

b) Risk assessments include how to mitigate the identified risks. This includes actions that need to be taken, who is responsible for each action, deadlines for completing actions and confirmation that actions have been completed.

#### Guidance

Relevant staff should have knowledge of risks and the control measures that have been taken to mitigate them.

c) Significant risks, for example to the establishment's ability to deliver post-mortem services, are incorporated into the Trust's organisational risk register.

#### **Traceability**

## T1 A coding and records system facilitates traceability of bodies and human tissue, ensuring a robust audit trail

a) Bodies are tagged/labelled upon arrival at the mortuary.

Guidance

The condition and labelling of bodies received in body bags should always be checked and their identity confirmed. They should be labelled on the wrist and/or toe. Body bags should not be labelled in place of the body.

b) There is a system to track each body from admission to the mortuary to release for burial or cremation (for example mortuary register, patient file, transport records).

Guidance

Body receipt and release details should be logged in the mortuary register, including the date and name of the person who received/released the body and, in the case of release, to whom it was released. This includes bodies sent to another establishment for PM examination or bodies which are sent off site for short-term storage which are subsequently returned before release to funeral service staff.

c) Three identifiers are used to identify bodies and tissue, (for example post mortem number, name, date of birth/death), including at least one unique identifier.

Guidance

Identification details should not be written on bodies. Where bodies are moved off site for contingency storage the DI should ensure that suitable systems are in place to identify same or similar names.

- d) There is system for flagging up same or similar names of the deceased.
- e) Identification checks take place each time a body is moved whether inside the mortuary or from the mortuary to other premises.

Guidance

Mortuary white boards containing the names of a deceased give potential for error if wipes clean (such as when visitors attend for reasons of confidentiality), and should not be relied upon as the sole source of information about the locations of bodies.

- f) There are procedures for releasing a body that has been in long term storage and is therefore not in the current register.
- g) Organs or tissue taken during post-mortem examination are fully traceable, including blocks and slides (including police holdings). The traceability system ensures that the following details are recorded:
  - i. material sent for analysis on or off-site, including confirmation of arrival
  - ii. receipt upon return to the laboratory or mortuary
  - iii. the number of blocks and slides made
  - iv. repatriation with the body
  - v. return for burial or cremation
  - vi. disposal or retention for future use.

#### Guidance

Consent information which covers retention/disposal of tissues should be made available to the other site, as appropriate.

h) There are documented procedures for transportation of bodies and tissue anywhere outside the mortuary, (such as to the lab or another establishment), including record-keeping requirements.

#### Guidance

Formal written agreements with funeral services are recommended. Coroners usually have their own agreements for transportation of bodies and tissue; however, documentation for traceability purposes must still be maintained by the establishment for these cases.

## T2 Disposal of tissue is carried out in an appropriate manner and in line with the HTA's codes of practice.

- a) Tissue is disposed of as soon as reasonably possible once it is no longer needed, such as when the coroner's or police authority over its retention ends or the consented post-mortem examination process is complete.
- b) There are effective systems for communicating with the Coroner's Office, which ensure tissue is not kept for longer than necessary.
- c) Disposal is in line with the wishes of the deceased's family.

#### Guidance

Organs and tissue returned to the body prior to its release should be contained in clear viscera bags, which prevent leakage, are biodegradable and pose no

issues for crematoria in relation to emissions and pollution. Clinical waste bags or household bin bags should not be used for this purpose.

Tissue blocks and glass slides should not be placed inside the body for the purpose of reuniting tissues with the deceased. Blocks and slides should be placed in a suitable container and transported with the body should the family wish to delay the funeral until the slides are returned.

d) The method and date of disposal are recorded.

#### Premises, facilities and equipment

#### 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.

Guidance

Floors, walls and work surfaces should be of non-porous construction and free of cracks and chips. The premises should be subject to a programme of planned preventative maintenance, which ensures that the premises, facilities and equipment remain fit for purpose.

- b) There is demarcation of clear, dirty and transitional areas of the mortuary, which is observed by staff and visitors.
- c) There are documented cleaning and decontamination procedures and a schedule of cleaning.
- d) The premises are secure (for example there is controlled access to the body storage area(s) and PM room and the use of CCTV to monitor access). *Guidance*

Relatives who visit for a viewing should not be able to access the body store area. Security systems and lone working arrangements should take into account viewings which take place out of hours.

e) Security arrangements protect against unauthorised access and ensure oversight of visitors and contractors who have a legitimate right of access.

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

a) Storage arrangements ensure the dignity of the deceased.

Guidance

Refrigeration of bodies should be at a temperature of approximately 4 degrees Celsius. The optimal operating temperature for freezer storage is around -20 Celsius, +/- 4 degrees.

b) There is sufficient capacity for storage of bodies, organs and tissue samples, which takes into account predicated peaks of activity.

Guidance

Capacity should be regularly reviewed, particularly if contingency arrangements are used for an extended period.

c) Storage for long-term storage of bodies and bariatric bodies is sufficient to meet needs.

Guidance

There should be sufficient frozen storage for the long-term storage of bodies; the HTA advises that bodies should be moved into frozen storage after 30-days in refrigerated storage if there is no indication they are soon to be released or further examined, or before, depending on the condition of the body. Where there is insufficient freezer storage to meet needs, there should be arrangements with other establishments, or other contingency steps, to ensure that bodies can be stored appropriately.

Bodies in long-term storage should be checked regularly; this should include confirmation of their identity and the reason for their continued storage. Where new fridges are installed, these should measure 24"-26" in width and consideration should be given to the proportion that should be larger to accommodate bariatric bodies.

- d) Fridge and freezer units are in good working condition and well maintained.
- e) Fridge and freezer units are alarmed and the alarms are tested regularly to ensure that they trigger when temperatures go out of upper or lower set range.
- f) Temperatures of fridges and freezers are monitored on a regular basis.

Guidance

Temperature monitoring should enable the establishment to identify trends and may mitigate the risk of a possible fridge failure.

- g) Bodies are shrouded or in body bags whilst in storage.
- i) There are documented contingency plans in place should there be a power failure or insufficient numbers of refrigerated storage spaces during peak periods.

#### Guidance

Where contingency arrangements involve the transfer of bodies to other premises, these should be assessed to ensure that they are suitable and that traceability systems are of the required standard. Stacking bodies on the same fridge tray is not considered suitable practice.

Establishments should have documented agreements with any funeral services that they may use for contingency storage. Consideration should be given to whether the funeral service provides contingency storage for other mortuaries. SOPs should address issues such as risk assessments and same/similar name systems.

The hire of temporary storage units should not be the sole contingency arrangement for an establishment. Establishments should put in place other formally agreed arrangements for contingency storage. Where the hire of temporary storage facilities forms part of establishments' contingency arrangements, consideration should be given well in advance and steps taken to ensure availability of funds, and of units for hire.

Establishments should consider entering in to Mutual Aid Agreements with neighbouring organisations in order that they can provide and obtain support during periods of capacity shortages.

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

- a) Items of equipment in the mortuary are in a good condition and appropriate for use:
  - i. fridges / freezers
  - ii. hydraulic trolleys
  - iii. post mortem tables
  - iv. hoists
  - v. saws (manual and/or oscillating)

#### Guidance

Equipment should be made of material that is easy to clean, impervious, non-rusting, non-decaying and non-staining.

b) Equipment is appropriate for the management of bariatric bodies.

c) The ventilation system provides the necessary ten air changes per hour and is checked and maintained at least annually.

Guidance

COSHH requires a thorough examination of the ventilation system at 14-month intervals, and sets out what the examination should cover.

d) Staff have access to necessary PPE.

Guidance

Where face masks should be worn, they should be face fitted.

- e) Where chemicals are used for preservation of tissue samples, there is adequate ventilation.
- f) Key items of equipment, including fridges/freezers, trolleys and post mortem tables (if downdraught) are subject to regular maintenance and records are kept.

Guidance

This includes fridges in Maternity where fetuses or still born babies are stored prior to examination. Maintenance records may be held by the mortuary or centrally by the Trust, such as the Estates Department. They should be available for review during inspection by the HTA.