



Site visit inspection report on compliance with HTA minimum standards

Bristol Dental School and Hospital

HTA licensing number 12200

Licensed under the Human Tissue Act 2004 for the

- **storage of relevant material which has come from a human body for use for a scheduled purpose**

12 November 2013

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.

Bristol Dental School and Hospital (the establishment) was found to have met all HTA standards. Advice is provided in three areas where the HTA identified opportunities for improving existing systems and procedures.

Examples of strengths and 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.

Background to the establishment and description of inspection activities undertaken

The establishment's licensed premises comprise a series of connected buildings that include: clinical and tutorial areas associated with the Dental Hospital, and; laboratories, offices and tutorial areas associated with the the University of Bristol School of Dentistry.

Two research tissue banks operate from the licensed premises: a tooth tissue bank and a saliva tissue bank. Both tissue banks maintain National Health Service Research Ethics Committee (NREC) approval with the authority to release samples to researchers under the conditions of the approval.

The establishment holds a number of human skulls within the licensed premises. These are stored, under the HTA licence, and used for teaching students attending lectures and tutorials under the School of Dentistry and for reference within the clinical areas of the Dental Hospital.

The establishment also holds various collections of dental tissue and associated wax blocks and microscope slides that relate to research conducted prior to 1 September 2006. These existing holdings have been extensively catalogued and are being stored, under the HTA licence, as a valuable source of research reference and future study.

This is the first site visit inspection of the establishment by the HTA. The timetable for inspection was developed and agreed following pre-inspection discussion with the Designated Individual (DI) and following consideration of the desk-based assessment conducted at the time of the initial licence application and the June 2011 self-assessment under HTA Directions 002/2011.

The scope of this inspection included visual inspection of the Dental Hospital clinical area, where teeth are donated for research, and the various storage locations within the School of Dentistry and the Dental Hospital; review of relevant documentation and interviews and discussion with the DI, Persons Designated (PD) and other members of staff involved with licensable activities. Review of each storage location included a traceability audit. Records were traced back to evidence of consent and checked against current inventories. The traceability audits included samples stored under the HTA licence and samples stored within both NREC approved tissue banks. The latter audits demonstrated that the establishment has a method to track and trace samples for which NREC approval may lapse or cease and, as such, would be stored under the establishment's HTA licence. The methods used to identify, store, classify, catalogue and track samples were found to be comprehensive and robust. All of the selected specimens were fully traceable.

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

All applicable HTA standards have been assessed as fully met.

Advice

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

No.	Standard	Advice
1.	GQ1	<p>The inspection provided an opportunity to review a number of documents. Although content was found to reflect working practice, there is some inconsistency in the use of policies and procedures whereby some documents that are entitled: 'policy' should be procedures.</p> <p>Also, not all controlled documents use the same template to ensure consistency of approach with regards to:</p> <ul style="list-style-type: none">○ Document number○ Version number○ Date of issue○ Review date○ Authorisation○ Storage location of master copy <p>The DI is advised to revisit the local procedure for preparing and issuing local policies and procedures to ensure clear definition of when to use each document and to provide consistency and uniformity across areas involved in licensable activities.</p>
2.	GQ4	<p>The DI is advised to remind members of staff not to use pencil for recording data on proforma sheets used to track and trace the use of relevant material during teaching and tutorial sessions in the School of Dentistry. Pencil does not provide an indelible record.</p>
3.	GQ6	<p>The DI is advised to revisit the control measures that are in place to maintain anonymity of samples that are donated to the saliva tissue bank by members of staff at the establishment. It is recommended that access to coded information is restricted to the DI and the Person Designated for the saliva tissue bank. This will reduce the risk of donors being identified by other members of staff working in the saliva tissue bank.</p>

Concluding comments

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

In the role of Research Manager, the DI has oversight of research projects, clinical trial work

and matters relating to biological safety as well as HTA licensable activities. Her work in similar roles at the establishment date back prior to the Human Tissue Act 2004 (HT Act). This experience has resulted in the implementation of robust systems and procedures for HTA licensable activities which are in line with HTA standards and applicable codes of practice.

The DI has employed effective use of the role of Persons Designated to maintain oversight of licensable activities for each area of storage. Members of staff involved in licensable activities demonstrate a good understanding of regulatory requirements and a strong commitment to meeting and maintaining HTA standards. There is good communication across members of staff involved in licensable activities.

Examples of good practice include:

- Colour coded system of inventory for skulls and associated jaw bones which allows students to compare and contrast specimens without the risk of loss or mix up;
- level of detail applied to the inventory of use and disposal of saliva tissue bank samples which includes use and disposal of aliquots of the principal sample;
- level of detail applied to the inventory of existing holdings and the use of photographic records to supplement the inventory.

The DI and extended team are well supported by the establishment's governance arrangements. In particular, the use of the Human Tissue Working Group to discuss matters relating to a number of HTA licences operated from the University of Bristol. There is evidence of good communication between the DIs who are involved with these licences. The University of Bristol operates a 'Research Governance Team'. This includes an individual in the role of 'Research and Human Tissue Specialist' whose activities include guidance and support on matters of research ethics, regulatory compliance, consent, training and audit.

Pieces of advice have been provided to the DI where the HTA identified opportunities for improvement to existing systems and procedures.

Report sent to DI for factual accuracy: 10 December 2013

Report returned from DI: 16 December 2013

Final report issued: 16 January 2014

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.

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
<ul style="list-style-type: none">• Consent forms comply with the HTA's Code of Practice• Consent forms are in records and are made accessible to those using or releasing relevant material for a scheduled purpose• If the establishment obtains consent, a process is in place for acquiring consent in accordance with the requirements of the HT Act 2004 and the HTA's Codes of Practice• Where applicable, there are agreements with third parties to ensure that consent is obtained in accordance with the requirements of the HT Act 2004 and the HTA's Codes of Practice• Consent procedures have been ethically approved
C2 Information about the consent process is provided and in a variety of formats
<ul style="list-style-type: none">• Standard operating procedures (SOPs) detail the procedure for providing information on consent• Agreements with third parties contain appropriate information• Independent interpreters are available when appropriate• Information is available in suitable formats, appropriate to the situation• Consent procedures have been ethically approved
C3 Staff involved in seeking consent receive training and support in the implications and essential requirements of taking consent
<ul style="list-style-type: none">• Standard operating procedures (SOPs) detail the consent process• Evidence of suitable training of staff involved in seeking consent• Records demonstrate up-to-date staff training• Competency is assessed and maintained
Governance and quality system standards
GQ1 All aspects of the establishments work are supported by ratified documented policies and procedures as part of the overall governance process
<ul style="list-style-type: none">• Policies and procedures are in place, covering all activities related to the storage of relevant material for research in connection with disorders, or the functioning, of the human body• Appropriate risk management systems are in place• Regular governance meetings are held; for example, health and safety and risk management

<p>committees, agendas and minutes</p> <ul style="list-style-type: none"> • Complaints system
<p>GQ2 There is a documented system of quality management and audit</p>
<ul style="list-style-type: none"> • A document control system, covering all documented policies and standard operating procedures (SOPs). • Schedule of audits • Change control mechanisms for the implementation of new operational procedures
<p>GQ3 Staff are appropriately qualified and trained in techniques relevant to their work and are continuously updating their skills</p>
<ul style="list-style-type: none"> • Qualifications of staff and training are recorded, records showing attendance at training • Orientation and induction programmes • Documented training programme, (e.g. health and safety, fire, risk management, infection control), including developmental training • Training and reference manuals • Staff appraisal / review records and personal development plans are in place
<p>GQ4 There is a systematic and planned approach to the management of records</p>
<ul style="list-style-type: none"> • Documented procedures for the creation, amendment, retention and destruction of records • Regular audit of record content to check for completeness, legibility and accuracy • Back-up / recovery facility in the event of loss of records • Systems ensure data protection, confidentiality and public disclosure (whistle-blowing)
<p>GQ5 There are documented procedures for distribution of body parts, tissues or cells</p>
<ul style="list-style-type: none"> • A process is in place to review the release of relevant material to other organisations • An agreement is in place between the establishment and the organisation to whom relevant material is supplied regarding the tracking and use of material and eventual disposal or return
<p>GQ6 A coding and records system facilitates traceability of bodies, body parts, tissues and cells, ensuring a robust audit trail</p>
<ul style="list-style-type: none"> • There is an identification system which assigns a unique code to each donation and to each of the products associated with it • An audit trail is maintained, which includes details of when and where the relevant material was acquired, the consent obtained, the uses to which the material was put, when the material was transferred and to whom

GQ7 There are systems to ensure that all adverse events are investigated promptly

- Corrective and preventive actions are taken where necessary and improvements in practice are made
- System to receive and distribute national and local information (e.g. HTA communications)

GQ8 Risk assessments of the establishment's practices and processes are completed regularly and are recorded and monitored appropriately

- Documented risk assessments for all practices and processes
- Risk assessments are reviewed when appropriate
- Staff can access risk assessments and are made aware of local hazards at training

Premises, facilities and equipment standards

PFE1 The premises are fit for purpose

- A risk assessment has been carried out of the premises to ensure that they are appropriate for the purpose
- Policies in place to review and maintain the safety of staff, authorised visitors and students
- The premises have sufficient space for procedures to be carried out safely and efficiently
- Policies are in place to ensure that the premises are secure and confidentiality is maintained

PFE 2 Environmental controls are in place to avoid potential contamination

- Documented cleaning and decontamination procedures
- Staff are provided with appropriate protective equipment and facilities that minimise risks from contamination
- Appropriate health and safety controls are in place

PFE3 There are appropriate facilities for the storage of bodies, body parts, tissues and cells, consumables and records.

- Relevant material, consumables and records are stored in suitable secure environments and precautions are taken to minimise risk of damage, theft or contamination
- Contingency plans are in place in case of failure in storage area
- Critical storage conditions are monitored and recorded
- System to deal with emergencies on 24 hour basis
- Records indicating where the material is stored in the premises

PFE 4 Systems are in place to protect the quality and integrity of bodies, body parts, tissues and cells during transport and delivery to a destination

- Documented policies and procedures for the appropriate transport of relevant material, including a risk assessment of transportation
- A system is in place to ensure that traceability of relevant material is maintained during transport
- Records of transportation and delivery
- Records are kept of any agreements with recipients of relevant material
- Records are kept of any agreements with courier or transport companies

PFE5 Equipment is appropriate for use, maintained, quality assured, validated and where appropriate monitored

- Records of calibration, validation and maintenance, including any agreements with maintenance companies
- Users have access to instructions for equipment and receive training in use and maintenance where appropriate
- Staff aware of how to report an equipment problem
- Contingency plan for equipment failure

Disposal Standards

D1 There is a clear and sensitive policy for disposing of human organs and tissue

- Documented disposal policy
- Policy is made available to the public
- Compliance with health and safety recommendations

D2 The reason for disposal and the methods used are carefully documented

- Standard operating procedures (SOPs) for tracking the disposal of relevant material detail the method and reason for disposal
- Where applicable, disposal arrangements reflect specified wishes

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 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 Human Tissue Act 2004 (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:

- (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 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 CoPs, 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 or 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. 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.