

## **Site visit inspection report on compliance with HTA minimum standards**

**Hammersmith Hospital**

**HTA licensing number 11118**

**Licensed for the**

- **procurement, processing, testing, storage, distribution and export 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**

**10 and 11 April 2018**

### **Summary of inspection findings**

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

Although the HTA found that Hammersmith Hospital (the establishment) had met the majority of the HTA standards, six minor shortfalls were found in relation to Governance and Quality Systems and Premises, Facilities and Equipment. The shortfalls relate to the limited scope of internal and independent audits, as well as risk assessments; the requirement to ensure that practices in the clean room are consistent with the formal designation of these areas and the storage arrangements for reagents.

Particular 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.

### Licensable activities carried out by the establishment

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

'E\*' = Establishment is licensed to carry out this activity but is not currently carrying it out.

Tissue type	Procurement	Processing	Testing	Storage	Distribution	Export
Progenitor Cell, Hematopoietic, PBSC; PBSC	E	E	E	E	E	E*
Progenitor Cell, Hematopoietic, Bone Marrow; Bone marrow	E	E	E	E	E	E*
Mature Cell, T Cell (DLI); DLIs	E	E	E	E	E	E*
Progenitor Cell, Hematopoietic, Cord Blood; Cord Blood				E	E	E*

Other, Bone Marrow (ATMP)	E		E			
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### **Background to the establishment and description of inspection activities undertaken**

The Imperial College Healthcare NHS Trust has been running a stem cell programme since 1975. This report refers to the activities undertaken by Hammersmith Hospital which is part of the Imperial College Healthcare NHS Trust. The establishment has held a licence since 2006. Activities carried out under the licence include procurement, donor testing, processing, storage, distribution and export of human tissues and cells. Licensable activities take place at the Catherine Lewis Centre at Hammersmith Hospital (hub site) and two satellite sites (Charing Cross Hospital and St Mary's Hospital).

Procurement of peripheral blood stem cells (PBSCs) and bone marrow from adults (related or unrelated donors) takes place at the hub site, whilst procurement of bone marrow from paediatric donors takes place at the Department of Paediatrics, St Mary's Hospital. Donor testing and sterility testing of the cell products is undertaken at the Division of Infection and Immunity at Charing Cross Hospital. Donor serology testing is carried out using CE-marked and MHRA accredited assays and the laboratory is accredited by the United Kingdom Accreditation Service (UKAS).

The clinical laboratory at the hub site - The John Goldman Centre for Cellular Therapy (JGCCT) - undertakes processing and cryopreservation of bone marrow, PBSCs and donor lymphocytes for adoptive lymphocyte immunotherapy (DLI). Products can be infused fresh or after cryopreservation and storage. Stem cells from unrelated donors are received via registries and on rare occasions directed cord blood, sibling and peripheral blood stem cell (PBSC) is received from outside the European Economic Area (EEA). These products are sampled in order to assess their quality and then transported to the wards for end use.

Experienced Transplant Co-ordinators engage with donors and manage the patient pathway from donation of stem cells through to infusion. Interpreters are available if required. Clinicians involve parents in discussions when seeking consent for donation of stem cells from paediatric donors. Children under 16 years of age are encouraged to be actively involved in these discussions if they have a reasonable understanding of the procedure and related risks. The JGCCT provides bone marrow procurement kits to the theatres which are assembled in theatres by the Bone Marrow Transplant Coordinator. Bone marrow procurement at both the hub and satellite takes place on specified days and in dedicated theatres. The establishment routinely procures back-up bone marrow harvests from patients at risk of graft failure for storage and re-infusion in the event that engraftment does not take place following infusion of stem cells from allogeneic donors. Procured cells are transported to and from JGCCT by nursing staff, Transplant Co-ordinators or staff based at the JGCCT.

The JGCCT has two independent clean room suites each consisting of primary and secondary staff changing rooms, a grade C preparation room and grade B rooms. Each grade B room contains a grade A cabinet and a laminar flow area in which stem cell separators or cell sorting machines are placed when in use. Stem cells are cryopreserved after addition of prepared cryopreservative. They are then double-bagged and then subjected to controlled-rate freezing. The cryopreserved units are then transferred for long-term storage in liquid nitrogen tanks located in secure rooms. There is a dedicated tank for storing cells from known virology positive donors.

The establishment provides an Advanced Therapeutic Medicinal Products (ATMPs) service. Bone marrow aspirates are cultured into expanded mesenchymal stromal cells for allogenic use. For this work, only the procurement and testing activities fall under the scope of the establishment's HTA licence. All other activities are regulated by the Medicines and Healthcare products Regulatory Agency (MHRA). The establishment also undertakes CD34+ selection of stem cell harvests as required.

Since the last inspection, a new DI has been appointed who is also the new Head of Operations and Regulatory Affairs. This was the sixth routine site visit inspection of the establishment and included visual inspections of the hub and bone marrow procurement satellite sites. The testing laboratory at Charing Cross was not included in this visit as this facility was recently inspected as part of a different inspection. During this inspection, the focus of the visual inspection was the observation of processing activities at the JGCCT. An audit of the records associated with three products – an allogenic bone marrow procurement, a CD34+ depleted PBSC procurement and a directed cord blood from outside the EEA - was also carried out. Documents reviewed included consent forms, mandatory donor serology tests, processing and environmental monitoring records, standard operating procedures (SOPs), and equipment and training records. There were no discrepancies. Roundtable discussions were held with members of staff involved with procurement of bone marrow and PBSCs, quality systems, audits and incident reporting.

The establishment is also licensed for storage of relevant material from a human body for use for a scheduled purpose. This aspect of the licence was not inspected during this visit.

## 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

GQ2 There is a documented system of quality management and audit.		
b) There is an internal audit system for all licensable activities.	Internal audits are limited to activities in the processing laboratory.	<b>Minor</b>
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.	Independent audits are conducted by staff not associated with that particular activity. However, most of the audits that have been conducted have centred on checking the SOP and did not extend to auditing the process or reviewing associated records.	<b>Minor</b>
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.	The establishment has in place risk assessments; however, these were limited in scope and do not fully capture all the risks associated with activities that may affect the quality and safety of tissues and cells	<b>Minor</b>
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#### Premises, Facilities and Equipment

<b>Standard</b>	<b>Inspection findings</b>	<b>Level of shortfall</b>
PFE2 Environmental controls are in place to avoid potential contamination		
b) Where processing of tissues and / or cells involves exposure to the environment, it occurs in an appropriate, monitored environment as required by Directions 003/2010.	The establishment operates Grade A over B clean rooms. No microbiological monitoring of the Grade B area is undertaken during processing.	<b>Minor</b>
c) There are procedures for cleaning and decontamination	<p>Staff were observed to be wiping items into the Grade A laminar air flow cabinet using a circular motion instead of the recommended linear wiping motion, ensuring a new surface of the wipe is used on each occasion to prevent recontamination. The correct technique is described in the establishment's SOP.</p> <p>The SOP describing the reagent for cleaning of the clean room is different to the reagent in the cleaning schedule. In addition, this schedule does not describe the weekly cleaning of the controlled-rate freezer.</p>	<b>Minor</b>

PFE3 There are appropriate facilities for the storage of bodies, body parts, tissues, 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.	<p>The ACD-A solution is stored in a room next to the apheresis area. The temperature of the room is recorded daily Monday to Friday. However, this does not include a minimum / maximum recording of the temperature, nor is there an alarm if the temperature exceeds the manufacturer's upper set temperature of 25°C.</p> <p>A review of the recorded room temperature indicated a significant number of occasions when the temperature exceeded 25°C. There was no evidence that these were noted as temperature excursions or were investigated.</p> <p>The temperature log also stated that the acceptable temperature range for this product is 15.5°C- 27.7°C which is contrary to the manufacturer's limit of 0°C-25°C. There was no evidence from the manufacturer that supported the 15.5°C- 27.7°C temperature limit.</p>	<b>Minor</b>

## Advice

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

No.	Standard	Advice
1.	GQ1d	As documents come up for review, the DI is advised to ensure that references to Directions are amended from 003/2010 to 002/2018.
2.	GQ1e	The DI is advised to continue with plans to introduce a formal record of the on-going competency assessments of activities in the processing laboratory.
3.	GQ1s	The DI is advised to amend the third party agreement with the courier company to ensure that it more clearly states their responsibilities for reporting any serious adverse events to the establishment.
4.	GQ3e	There is currently no processing manager in place and as a result senior staff are carrying out the release of stem cell units. The DI is advised to acknowledge that staff have been authorised to carry out this activity in their formal training records.
5.	GQ5a	If the medical history or lifestyle questionnaire indicates high risk behaviour then Nucleic Amplification Testing (NAT) is undertaken on the donor's blood sample. The DI is advised to capture this in the relevant SOP.
6.	GQ5a	The DI is advised to include in the donor work-up SOP that donors receive a phone call to clear them to commence PBSC mobilisation.

7.	PFE1a	The establishment has purchased an additional apheresis machine. The DI is advised to risk assess the apheresis area to ensure that there is sufficient room for expansion.
8.	PFE5f	The cleaning log for the apheresis machine states that the pump rotors are cleaned/changed after every apheresis procedure. However, the records show that this is undertaken only once a week. The DI is advised to amend the apheresis machine cleaning log to reflect the SOP.

### **Concluding comments**

There were a number of strengths observed during this inspection. The establishment operates a traffic light sticker system for consumables so that staff know at a glance whether they are safe to use. Similarly, after the apheresis machine is cleaned, a green sticker is applied so that staff immediately know that it is safe to use. The establishment has a detailed checklist for the processing and release of stem cell units.

There are a number of areas of practice that require improvement, including six minor shortfalls. 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: 6 May 2018**

**Report returned from DI: 23 May 2018**

**Final report issued: 5 June 2018**

### **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: 21 January 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

#### Consent

Standard
C1 Consent is obtained in accordance with the requirements of the HT Act 2004, the Human Tissue (Quality and Safety for Human Application) Regulations 2007 and as set out in the HTA's Codes of Practice.
a) If the establishment acts as a procurer of tissues and / or cells, there is an established process for acquiring donor consent which meets the requirements of the HT Act 2004 the Human Tissue (Quality and Safety for Human Application) Regulations 2007 (Q&S Regulations) and the HTA's Codes of Practice
b) If there is a third party procuring tissues and / or cells on behalf of the establishment the third party agreement ensures that consent is obtained in accordance with the requirements of the HT Act 2004, the Q&S Regulations and the HTA's Codes of Practice.
c) The establishment or the third party's procedure on obtaining donor consent includes how potential donors are identified and who is able to take consent.
d) Consent forms comply with the HTA Codes of Practice.
e) Completed consent forms are included in records and are made accessible to those using or releasing tissue and / or cells for a Scheduled Purpose.
C2 Information about the consent process is provided and in a variety of formats.
a) The procedure on obtaining consent details what information will be provided to donors. As a minimum, the information specified by Directions 002/2018 is included.
b) If third parties act as procurers of tissues and / or cells, the third party agreement details what information will be provided to donors. As a minimum, the information specified by Directions 002/2018 is included.
c) Information is available in suitable formats and there is access to independent interpreters when required.
d) There are procedures to ensure that information is provided to the donor or donor's family by trained personnel.
C3 Staff involved in seeking consent receive training and support in the implications and essential requirements of taking consent.
a) Staff involved in obtaining consent are provided with training on how to take informed consent in accordance with the requirements of the HT Act 2004 and Code of Practice on Consent.
b) Training records are kept demonstrating attendance at training on consent.



## 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.
e) There are procedures for tissue and / or cell procurement, which ensure the safety of living donors.
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.
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

<b>Standard</b>
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.
d) Where appropriate, there are procedures to ensure that the premises are of a standard that ensures the dignity of deceased persons.

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.
g) Instruments and devices used for procurement are sterile, validated and regularly maintained.
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.

## 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
<b>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</b>
<ul style="list-style-type: none"><li>a) Consent procedures are documented and these, along with any associated documents, comply with the HT Act and the HTA's Codes of Practice.</li><li>b) Consent forms are available to those using or releasing relevant material for a scheduled purpose.</li><li>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.</li><li>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.</li><li>e) Language translations are available when appropriate.</li><li>f) Information is available in formats appropriate to the situation.</li></ul>
<b>C2 Staff involved in seeking consent receive training and support in the essential requirements of taking consent</b>
<ul style="list-style-type: none"><li>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.</li><li>b) Records demonstrate up-to-date staff training.</li><li>c) Competency is assessed and maintained.</li></ul>

  

Governance and quality system standards
<b>GQ1 All aspects of the establishments work are governed by documented policies and procedures as part of the overall governance process</b>
<ul style="list-style-type: none"><li>a) Ratified, documented and up-to-date policies and procedures are in place, covering all licensable activities.</li><li>b) There is a document control system.</li><li>c) There are change control mechanisms for the implementation of new operational procedures.</li><li>d) Matters relating to HTA-licensed activities are discussed at regular governance meetings, involving establishment staff.</li><li>e) There is a system for managing complaints.</li></ul>
<b>GQ2 There is a documented system of audit</b>
<ul style="list-style-type: none"><li>a) There is a documented schedule of audits covering licensable activities.</li><li>b) Audit findings include who is responsible for follow-up actions and the timeframes for completing these.</li></ul>

**GQ3 Staff are appropriately qualified and trained in techniques relevant to their work and are continuously updating their skills**

- a) Qualifications of staff and all training are recorded, records showing attendance at training.
- b) There are documented induction training programmes for new staff.
- c) Training provisions include those for visiting staff.
- d) Staff have appraisals and personal development plans.

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

- a) There are suitable systems for the creation, review, amendment, retention and destruction of records.
- b) There are provisions for back-up / recovery in the event of loss of records.
- c) Systems ensure data protection, confidentiality and public disclosure (whistleblowing).

**GQ5 There are systems to ensure that all adverse events are investigated promptly**

- a) Staff are instructed in how to use incident reporting systems.
- b) Effective corrective and preventive actions are taken where necessary and improvements in practice are made.

**GQ6 Risk assessments of the establishment's practices and processes are completed regularly, recorded and monitored**

- a) There are documented risk assessments for all practices and processes requiring compliance with the HT Act and the HTA's Codes of Practice.
- b) Risk assessments are reviewed regularly.
- c) Staff can access risk assessments and are made aware of risks during training.

**Traceability standards**

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

- a) There is an identification system which assigns a unique code to each donation and to each of the products associated with it.
- b) A register of donated material, and the associated products where relevant, is maintained.
- 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.
- 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.