

Audit report on compliance with licensing assessment criteria

Date: 19 July 2023



Portsmouth Hospitals University NHS Trust

HTA licensing number 40020

Licensed under the Human Tissue Quality and Safety of Organs Intended for Transplantation Regulations 2012 (as amended).

Licensed activities – Procurement

Organ type	Kidney
Adult (living donor)	DC, OC, P, T, R

Procurement Activities: donor characterisation (DC), organ characterisation (OC), preservation of an organ (P), making arrangements to transport an organ (T), retrieval of an organ (R)

Licensed activities – Transplant

Organ type	Kidney
Adult recipient	OC, P, T, I

Transplantation Activities: organ characterisation (OC), preservation of an organ (P), making arrangements to transport an organ (T), implantation of an organ (I)

Summary of audit findings

Although the HTA found that Portsmouth Hospitals University NHS Trust (the establishment) had met the majority of the HTA's assessment criteria that were assessed as part of the audit, one minor shortfall was found against assessment criteria for Organ preservation.

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 shortfall identified during the audit.

Compliance with [HTA assessment criteria](#)

Minor Shortfall

Assessment criteria	Audit findings	Level of shortfall
Organ preservation		
P1) Material and equipment used in organ preservation meet the requirements of The Medical Devices Regulations 2002 (SI 2002/618), where these apply, and there is an operating procedure in place to demonstrate how this requirement is complied with.	To meet the requirements of the Medical Devices Regulations 2002 (SI 2002/618) (as amended) (UK MDR 2002), manufacturers must stipulate the storage conditions for material and equipment used in organ preservation. The perfusion fluid used by the establishment should be maintained at 2-8°C and protected from light. The establishment stores stocks of perfusion fluid in two separate fridges. The temperature for both fridges is monitored using a minimum/maximum thermometer and these temperature readings, as well as the digital reading on the fridges, are recorded in a logbook. A review of the recorded temperatures indicated the minimum and maximum temperatures recorded were outside the required temperature limits. There was no commentary to detail if any action had been taken to investigate these temperature excursions.	Minor

The HTA requires the establishment 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 establishment to consider the following to further improve practice:

Number	Assessment Criterion	Advice
1.	General	The perfusion fluid used by the establishment should be protected from light. The bags of fluid are removed from their packaging before being refrigerated. The establishment is advised to review the storage arrangements to ensure that the fluids are adequately protected from light.
2.	CT6	Information about an offer is transcribed from the electronic offering system (EOS) onto a form. This transcribed information is used to inform the transplanting surgeon and nephrologist. During the audit an example of a partially filled form was reviewed. The establishment is advised to consider the need to transcribe information since both the surgeon and nephrologist already review the information on EOS.
3.	General	Potential donors in the living donation programme are provided with a Human Tissue Authority factsheet outlining the options when an organ cannot be transplanted into the intended recipient. Whilst the information is correct, the HTA no longer publishes this factsheet. The establishment is advised to consider rebranding the factsheet.

Background

The establishment has been licensed by the HTA since December 2012. This was the establishment's third audit. Prior to that two site visits of the establishment have been conducted; the most recent previous audit took place in July 2018.

Since the audit in 2018, the establishment has implemented some changes to the living donor pathway. The anaesthetic procedure has been changed, donors are now admitted to the general surgical ward and there is an enhanced recovery pathway resulting in a shorter stay. The follow up programme has also been modified. The transplant coordinators conduct regular phone calls with the donors after discharge and donors are seen six weeks after surgery, followed by a six-month check-up then annually unless there is a clinical need.

Previously, the transplant ward had 14 beds this has now been changed to a six-bed unit with each bed in an isolated side room. There are two protected beds for kidney offers. Currently, the transplant ward is not open to visitors and staff continue to wear masks. The length of in-patient stay has also been reduced. Hospital follow ups of transplant patients has been reduced from three times a week to twice a week and where suitable, there are virtual follow ups.

Building on a longstanding partnership with Portsmouth University the establishment was awarded, in 2020, university hospital status.

Description of audit activities undertaken

Criteria assessed against during the audit

All HTA assessment criteria apart from CT1, which is not applicable, were reviewed as part of the audit.

Review of governance documentation

The following documents were reviewed: Procedural documents relating to licensed activities, accreditation certificates for the Histocompatibility and Immunogenetics (H&I), Histopathology and Microbiology laboratories, the procurement policy demonstrating how the Medical Devices Regulations 2002 (SI 2002/618) (as amended) (UK MDR 2002) requirement is complied with and certification of the sterile services provider.

In addition, four incidents were reviewed and discussed with establishment staff including details of the investigation and how any learnings were shared with the transplant team. Training procedures for nursing, medical and surgical staff were also discussed.

Visual inspection

The pathway following how organs are received at the establishment was reviewed, and included the area where kidneys are stored prior to transplant. The audit team visited the areas where perfusion fluids are stored.

Audit of records

The following transplant records were reviewed:

Three sets of living kidney donation transplant records, two for directed donations and one from a non-directed altruistic donor.

Three sets of deceased kidney transplant records, two from donors following death by neurological criteria (DBD) and one from a donor whose death had been confirmed using circulatory criteria (DCD).

The records reviewed included HTA-A and HTA-B forms, recipient consent, records of receipt of the organs, copies of donor information from EOS, medical and social history questionnaire, records of perfusion fluids used and transplant coordinator notes. No anomalies were identified as part of the review.

Report sent for factual accuracy: 26 July 2023

Report returned with comments: 16 August 2023

Final report issued: 16 August 2023

Completion of corrective and preventative actions (CAPA) plan

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

Date: 16 August 2023

Appendix 1: The HTA's regulatory requirements

The HTA shall ensure that licence holders are audited for the purposes of ensuring compliance with the licensing conditions in schedule 1 of The Quality and Safety of Organs Intended for Transplantation Regulations 2012 (as amended) and any requirements imposed by directions made under these Regulations.

The assessment criteria reflect the requirements of the statutory conditions outlined in schedule 1 and the HTA's directions. They are designed to promote the safe use of human organs and ensure traceability is maintained between donor and recipient. The HTA audits establishments it licences against eight groups of assessment criteria:

- Donor characterisation and organ characterisation
- Retrieval of organs for transplantation
- Organ preservation
- Making arrangements to transport an organ
- Implantation
- Traceability
- Serious adverse events and serious adverse reactions
- General (apply to all licences)

Reports of HTA audits are published on the HTA's website.

Throughout the audit process, the HTA assesses the establishment against the assessment criteria. Where the HTA determines that an assessment criteria 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 assessment criteria are fully met, but the HTA has identified an area of practice that could be further improved, advice is provided in this report.

Appendix 2: Classification of the level of shortfall

Where the HTA determines that an assessment criterion 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 assessment criterion, 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 the 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 the quality of an organ intended for transplantation or which poses a significant direct risk of causing harm to a donor or recipient.

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 quality and safety of an organ intended for transplantation or which poses an indirect risk to the safety of a donor or recipient

or

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

or

A shortfall which indicates a major deviation from the **Human Tissue (The Quality and Safety of Organs Intended for Transplantation) Regulations 2012 (as amended)** or the **Documentary Framework for the Quality and Safety of Organs Intended for Transplantation**;

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 quality and safety of an organ intended for transplantation or the safety of a donor or recipient;

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 audit 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 audit.

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 audit report.

Follow up actions

A template corrective and preventative action plan will be sent as a separate Word document with the final audit report. The establishment 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 audit
- a request for information that shows completion of actions
- monitoring of the action plan completion
- follow up at next routine site-visit audit

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

Appendix 3: HTA Assessment criteria

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

Donor Characterisation and Organ Characterisation

CT1) Where a donor is deceased, a registered medical practitioner, or a person acting under the supervision of a registered medical practitioner, has endeavored to obtain information from the relatives or other persons about the donor, and has explained the importance of swift transmission of information.

(The establishment is not responsible for obtaining information relating to a deceased donor. This will be carried out by the specialist nurse – organ donation (SN-OD) under NHSBT's licence).

CT2) Donors and organs are characterised before implantation by the collection of information specified in Annex A of The Quality and Safety of Organs Intended for Transplantation: A documentary framework.

CT3) Donors and organs are characterised before implantation by, where considered appropriate, the collection of information specified in Annex B of The Quality and Safety of Organs Intended for Transplantation: A documentary framework.

CT4) All information relating to donor and organ characterisation is kept for a period of 30 years from the date of retrieval of the organ and there is an operating procedure in place to demonstrate how this requirement is complied with.

CT5) Tests required for donor and organ characterisation are carried out by laboratories with United Kingdom Accreditation Service (UKAS) accreditation (to ISO15189:2021).

CT6) Information on organ and donor characterisation reaches the person who will be implanting an organ within a time period that would not compromise the quality and safety of the organ and there is an operating procedure in place to demonstrate how this requirement is complied with.

Retrieval of Organs for transplantation

R1) Procurement is only carried out after all the requirements relating to consent (or authorisation in Scotland) have been met.

R2) Material and equipment used in retrieval meets the requirements of The Medical Devices Regulations 2002 (SI 2002/618) (as amended) (UK MDR 2002), where these apply, and there is an operating procedure in place to demonstrate how this requirement is complied with.

R3) Reusable instruments used in retrieval are subject to a validated cleaning and sterilisation procedure for removal of infectious agents, which is documented.

R4) Endeavours are made to follow-up a living donor for the purposes of identifying and managing any event potentially relating to the quality and safety of the donated organ and any serious adverse reaction in the living donor that may result from the donation

Organ preservation

P1) Material and equipment used in organ preservation meet the requirements of The Medical Devices Regulations 2002 (SI 2002/618) (as amended) (UK MDR 2002), where these apply, and there is an operating procedure in place to demonstrate how this requirement is complied with.

P2) Reusable instruments used in organ preservation are subject to a validated cleaning and sterilisation procedure for removal of infectious agents, which is documented.

P3) Records of perfusion fluid coming into contact with organs are made on the appropriate HTA A and B forms.

Making arrangements to transport an organ

TP1) The integrity of the organ is maintained during transport and the transport time is suitable to ensure the quality and safety of the organ, and there is an operating procedure in place to demonstrate how this requirement is complied with.

TP2) The organ shipping container is suitable for transport of the specified organ.

TP3) The organ shipping container used for transporting organs from the licensed premises is labelled with the information specified in The Quality and Safety of Organs Intended for Transplantation: A documentary framework, and there is an operating procedure in place to demonstrate how this requirement is complied with.

TP4) Transported organs are accompanied by a report on the organ and donor characterisation, and there is an operating procedure in place to demonstrate how this requirement is complied with.

TP5) Arrangements are in place to ensure that any organisations transporting organs on behalf of the licence holder meet the requirements for transportation and serious adverse event and reaction reporting specified in the framework document.

Implantation

I1) The identification of the donor and the collection of the information in Annex A and B of The Quality and Safety of Organs Intended for transplantation: A documentary framework, are verified prior proceeding to implant an organ, and there is an operating procedure in place to demonstrate how this requirement is complied with.

I2) Compliance with the conditions of preservation and transport outlined in The Quality and Safety of Organs Intended for Transplantation: A documentary framework are verified prior to proceeding to implant an organ.

I3) Where any of the information specified in Annex A of The Quality and Safety of Organs Intended for Transplantation: A documentary framework is not available; a risk-benefit analysis is conducted to determine whether the expected benefits for the recipient of the organ outweigh the risks posed by the lack of any information.

Traceability – *(these criteria apply to all licensed activities)*

TC1) The data required to ensure traceability of organs are recorded using the HTA A and B forms, which are returned to NHSBT within 7 days, and there is an operating procedure in place to demonstrate how this requirement is complied with.

TC2) There is an identification system for donor and recipient to identify each donation and each of the organs and recipients

associated with it.

TC3) A record (date and time) of the transportation of organs arriving at and/or leaving the establishment is kept for 30 years as part of the traceability information.

Serious adverse events and adverse reactions (SAEARs) – (these criteria apply to all licensed activities)

S1) Operating procedures are in place for the management of a serious adverse event or a serious adverse reaction.

S2) Serious adverse events and reactions are reported to NHSBT within 24 hours of discovery, a follow-up report is provided within 90 days, and there is an operating procedure in place to demonstrate how this requirement is complied with.

S3) Third parties, such as those undertaking testing or transportation, are instructed to report any serious adverse events and reactions to the licence holder within 24 hours of discovery.

General – (these criteria apply to all licensed activities)

GN1) Healthcare personnel directly involved in the chain from donation to the transplantation or disposal of an organ are competent and suitably qualified or trained to perform their tasks.

GN2) Healthcare personnel directly involved in the chain from donation to the transplantation or disposal of an organ are provided with the training necessary to perform their tasks.

GN3) Medical activities are performed under the advice and guidance of a registered medical practitioner, and there are operating procedures in place to demonstrate this.