

Inspection report on compliance with HTA licensing standards
Inspection date: **22 (remote) and 23 (site visit) April 2024**



University of Oxford
HTA licensing number 12178

Licensed under the Human Tissue Act 2004

Licensed activities

Area	Carrying out of an anatomical 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 a body of a deceased person or relevant material which has come from a human body for use for a scheduled purpose	Storage of an anatomical specimen
University of Oxford	Licensed	Licensed	Licensed	Licensed

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.

The University of Oxford ('the establishment') was found to have met all HTA standards.

The HTA has assessed the establishment as suitable to be licensed for the activities specified.

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:

Number	Standard	Advice
1.	GQ2(a)	The DI is advised to increase the scope of internal audits to include horizontal audits by staff involved in the processes, to ensure that SOPs contain sufficient detail to accurately reflect current practices and to identify areas for improvement.
2.	GQ2(b)	The DI is advised to standardise internal audit reporting to ensure that all audits are documented in a consistent manner.
3.	GQ3(d)	The establishment has a Bequest secretary, who is responsible for all bequethals. In addition, the majority of audits are undertaken by the DI. The DI is advised to consider extending experience of these responsibilities to provide assurance that staff are available to support and cover the bequethal and audit roles should it be necessary.
4.	PFE1(b)	During the inspection, the DI outlined plans to increase CCTV coverage and to implement additional restricted swipe card access. The DI is encouraged to implement these plans as soon as is feasible to provide greater assurances on security.
5.	PFE2(c)	The DI is advised to add signs to fridges and freezers to define alarm set points for the temperature ranges so that staff are visually reminded of minimum and maximum temperatures.

6.	PFE2(c)	The DI is advised to review the temperature alarm range for fridges to provide an assurance the lower temperature is suitable for requirements.
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Background

Based at the Oxford University Medical Sciences Teaching Centre (MSTC), the establishment is licensed for the full suite of anatomy sector activities and provides training for Medical and Biomedical Sciences students. The establishment also provides surgical skills training to surgeons. The establishment receives bodies donated through its bequethal service, which are embalmed on site. In addition, the establishment also has a collection of potted specimens and skeletal material used for training purposes.

The University of Oxford has been licensed by the HTA since 2007. This was the third inspection of the establishment; the most recent previous inspection took place in September 2014.

Since the previous inspection, the establishment has appointed a new DI, a new Corporate Licence Holder contact, and added two Persons Designated.

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

All 47 HTA licensing standards were covered during the inspection (standards published 3 April 2017).

Review of governance documentation

Policies, procedural documents, and records relating to licensed activities, including SOPs, risk assessments, audits, traceability systems, adverse incidents, staff training records, governance meetings, visitor management policies and visitor codes of conduct were assessed.

Visual inspection

The inspection included a visual inspection of the anatomy suite. This included a review of the area where funeral staff deliver and collect bodies, the body storage and embalming area, the dissection room where anatomical examination and dissection is undertaken, storage areas for prosecutions and other relevant material, the preparation room where slides for histological training are stored, and the class room where neurological tissue is stored and training undertaken.

Audit of records

An audit was undertaken of records and labelling for:

- One embalmed body in refrigerated storage
- Five prosecutions
- Three potted specimens
- Four brain specimens including two coronal brain sections, a whole brain and a plastinated brain
- One skeletal specimen

There was full traceability for all material.

Meetings with establishment staff

The inspection included discussions with the DI, the University's HTA governance manager, the MSTC Chief Technologist, the Bequest Secretary and other staff working under the licence, including practical teaching staff and individuals responsible for prosecuting specimens.

Report sent to DI for factual accuracy: 14 May 2024

Report returned from DI: No factual accuracy or request for redaction comments were made by the DI

Final report issued: 20 May 2024

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 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 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 the 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 inspection
- a request for information that shows completion of actions
- monitoring of the action plan completion
- follow up at next routine inspection.

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