Inspection report on compliance with HTA licensing standards Inspection date: **27 March 2025** 



# **East London Forensic Centre**

HTA licensing number 12420

Licensed under the Human Tissue Act 2004

# Licensed activities

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

Area	Making of a post- mortem examination	Removal from the body of a deceased person (otherwise than in the course of an anatomical examination or post-mortem examination) of relevant material of which the body consists or which it contains, for use for a scheduled purpose other than transplantation	Storage of the body of a deceased person or relevant material which has come from a human body for use for a scheduled purpose
East London Forensic Centre	Licensed	Licensed	Licensed
Mortuary	Carried out	Carried out	Carried out

# Summary of inspection findings

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

This targeted unannounced site visit of East London Forensic Centre ('the establishment') found one minor shortfall regarding an internal door, which was rectified before the report was published.

The HTA has assessed the establishment as suitable to be licensed for the activities specified, subject to corrective and preventative actions being implemented to meet the shortfalls identified during the inspection.

# **Compliance with HTA standards**

#### **Minor Shortfalls**

PFE1 The premises are secure and well maintained and safeguard the dignity of the deceased and the integrity of human tissue.

e) Security arrangements protect against unauthorised access and ensure oversight of visitors and contractors who have a legitimate right of access	The inspection team noted that an automatic closing system to one internal door failed, and the door was left insecure. This increased the risk of unauthorised access to the restricted areas of the mortuary. The establishment submitted sufficient evidence to address this shortfall before the report was finalised.	Minor
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The HTA requires the DI to submit a completed corrective and preventative action (CAPA) plan setting out how the shortfalls will be addressed, within 14 days of receipt of the final report (refer to Appendix 2 for recommended timeframes within which to complete actions). The HTA will then inform the establishment of the evidence required to demonstrate that the actions agreed in the plan have been completed.

#### Advice

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

Number	Standard	Advice
1.	GQ1(c)	The DI is advised to review the mechanism of recording the condition of bodies as whilst this takes place on a regular basis and condition details are recorded, there is currently no dedicated free text box for recording condition.

# Background

East London Forensic Centre, formally Walthamstow Public Mortuary, has been licensed by the HTA since June 2007. This was the sixth inspection of the establishment; the most recent previous inspection took place in March 2024.

Since the previous inspection, the refurbishment of the facilities has been completed and there have been no changes to the licence arrangements, or the activities carried out under the licence.

A decision to undertake an unannounced visit was made by the HTA's Director of Regulation at a Regulatory Decision-Making meeting on 21 March 2025. This followed concerns relating to body storage and conditions that may impact dignity of the deceased. Accordingly, this inspection focused on the following standards: GQ1 (c & e), GQ3 (a, c, & f), T1(b), PFE1 (a, c, d, & e) and PFE2 (a, b, d, g, & i).

# 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:

## Review of governance documentation

A review of cleaning documentation, staff inductions, training and competency assessments was undertaken. No concerns were identified. A full review of the remaining governance documentation will be undertaken at the next routine inspection to be scheduled.

#### Visual inspection

The inspection team undertook a visual inspection of the establishment's external and internal security arrangements and body storage areas. The inspection team completed an audit on the traceability, condition and postmortem reconstruction of eight bodies within refrigerated storage, and two bodies within frozen storage. All remaining bodies from both refrigerator and freezer storage were visually checked. No concerns were identified.

#### Meetings with establishment staff

The inspection team met with staff carrying out processes under the licence. This included the Anatomical Pathology Technologists, administration staff and support workers. Feedback was discussed with the mortuary team on site and further feedback was provided to the Designated Individual and Corporate Licence Holder Contact on 01 April 2025.

# Report sent to DI for factual accuracy: 08 April 2025

Report returned from DI: 22 April 2025

Final report issued: 25 April 2025

#### 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 both the draft and final inspection report. Establishments must complete this template and return it to the HTA within 14 days of the issue of the final report.

Based on the level of the shortfall, the HTA will consider the most suitable type of follow-up of the completion of the corrective and preventative action plan. This may include a combination of

- a follow-up 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.