

St Thomas' Hospital HTA licensing number 22711

Licensed under the Human Tissue (Quality and Safety for Human Application) Regulations 2007 (as amended)

Licensable activities carried out by the establishment

'E' = Establishment is licensed to carry out this activity and is currently carrying it out.

Site	Procurement	Processing	Testing	Storage	Distribution	Import	Export
St Thomas'							
Hospital				E .		E	

Tissue types authorised for licensed activities

Authorised = Establishment is authorised to carry out this activity and is currently carrying it out.

Authorised* = Establishment is authorised to carry out this activity but is not currently carrying it out.

Tissue Category; Tissue Type	Procurement	Processing	Testing	Storage	Distribution	Import	Export
Ocular, Cornea; Cornea				Authorised		Authorised	
Membrane, Amniotic; Amniotic Membrane				Authorised*			

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.

Although the HTA found that St Thomas' Hospital (the establishment) had met the majority of the HTA's standards that were assessed during the inspection, nine minor shortfalls were found against standards for Governance and Quality, and Premises, Facilities and Equipment.

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

Standard	Inspection findings	Level of shortfall		
GQ1 All aspects of the establishment overall governance process.	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.	The establishment does not have an organisational chart that sets out the lines of accountability and reporting relationships.	Minor		

b) There are procedures for all licensable activities that ensure integrity of tissue and / or cells and minimise the risk of contamination.

The establishment does not have standard operating procedures (SOPs) in place for:

- the storage of amniotic membranes;
- the management of samples the have been stored outside of recommended temperature range; and
- the transfer of tissue to a back-up refrigerator in the event of a refrigerator failure.

In addition, some practices that were reviewed and/or discussed did not reflect the establishment's SOP for the receipt and storage of corneal products. Examples of omissions identified within the SOP include:

- procedures for checking the integrity of the packaging and for checking potential colour changes of the transport medium;
- procedures for quarantining non-conforming tissue products;
- procedures for checking alerts sent by the third country supplier (3CS) when tissue products have been shipped to allow tracking of the product; and
- procedures where imported tissue products received on Saturdays are redirected to a different clinic.

The SOP for receipt and storage also includes a redundant step to email the updated tissue register spreadsheet to a designated staff member upon receipt of a tissue product, which is no longer being performed.

Minor

GQ2 There is a documented system of quality management and audit.			
b) There is an internal audit system for all licensable activities.	The establishment's internal and independent audits are not sufficiently broad in scope to demonstrate compliance with all applicable HTA standards. In	Minor	
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.	addition the audits have not been formalised in reports that detail the information reviewed as evidence of compliance, conclusions of the audit and findings, if any.		

GQ3 Staff are appropriately qualified and trained in techniques relevant to their work and are continuously updating their skills.		
e) Personnel are trained in all tasks relevant to their work and their competence is recorded.	There is no formal training programme that documents competency of staff working with tissue products or regulatory context of the work.	Minor
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.		

GQ7 There are systems to ensure that all adverse events, reactions and/or incidents are investigated promptly.				
a) There are precedures for	The establishment's SOR for	reporting perious adverse events and regetions	М	

a) There are procedures for the identification, reporting, investigation and recording of adverse events and reactions, including documentation of any corrective or preventative actions. The establishment's SOP for reporting serious adverse events and reactions (SAEARs) does not stipulate the required 24 hour timeframe for reporting to the HTA, from discovery of the event.

Minor

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's risk assessments do not cover risks associated with transport of the product during import, for example risk of delays or loss of shipment. The risk assessments also do not consider risks related to the storage of the tissue products or the process whereby tissue products are redirected to a separate clinic on Saturdays when the goods inwards department is closed.

Minor

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.	The establishment's risk assessments are not reviewed annually. The establishment submitted sufficient evidence to address this shortfall before the report was finalised	Minor
c) Staff can access risk assessments and are made aware of local hazards at training.	The establishment's risk assessments are not readily accessible by staff working under the licence.	Minor

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.	The establishment has not risk assessed the security of the goods inwards department where the tissue products are received and delivered to the ophthalmology department.	Minor

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.

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

Number	Standard	Advice
1.	GQ1b	The establishment currently logs the donor identification number (DIN) and the tissue product catalogue number, instead of the tissue product's unique ID, as its means of recording the receipt and use of the corneal graft. There is no loss of traceability resulting from this practice as the tissue product's unique ID can be established using a combination of the DIN and tissue product catalogue number. However, the DI is advised to review this procedure to ensure the process of logging the corneal graft is sufficiently streamlined, and to ensure that in the event of any recall that the cornea product and the transplanted patient are readily identifiable.
2.	GQ1d	The DI is advised to ensure SOPs and risk assessments are saved as 'read-only' on the shared drives and are version controlled when updated.
3.	GQ1n/GQ2b	The DI should include in periodic audits a review of primary records from donors of tissue products received at the establishment, as a means of obtaining assurance that tissue products imported are in line with stipulations set out in the agreement with the 3CS.
4.	GQ6b	The 3CS is provided with details of the intended recipient of the tissue prior to import. If the tissue is reassigned to a different recipient for transplant, the DI is advised to update the 3CS with details of the new patient to help ensure a robust audit trail.
5.	GQ7a	The DI is advised to amend the SOP for SAEARs reporting to include that Persons Designate (PDs) can also report SAEARs. The DI is also advised to consider appointing more PDs to ensure reporting takes place within the required timeframe should the DI and current PD not be available.

6.	PFE3c	The DI is advised to implement a procedure for determining when a tissue is no longer suitable for transplant following a temperature excursion.
7.	PFE5b	The refrigerator used for the storage of corneas is under warranty. The supplier has guaranteed that the refrigerator will not need to be serviced for the first five years from purchase. As such, there is no regular schedule of maintenance currently in place. The DI is advised to ensure that regular servicing and maintenance of the storage refrigerator is commissioned when the five year period has lapsed.
8.	-	The establishment's tissue register currently has an option for unused tissue products to be stored for research purposes. The establishment does not hold a HTA licence for the storage of relevant material under the Human Tissue Act 2004 (HT Act). The DI is advised to remove the option for the tissue to be used for research or to apply for a storage licence under the HT Act.
9.	-	The DI is reminded that it is a standard condition of the licence that a copy of the Certificate of Licence (first page of the licence) must be displayed where it can be read easily by persons who are involved in the carrying out of the licensed activities.

Background

The establishment is part of the Guy's and St Thomas' NHS Foundation Trust. The establishment is licensed for the import and storage of corneal tissue from a 3CS for human application. The establishment's procedures are for imported tissue to arrive the day before surgery, but on occasions it may be stored over the weekend. The establishment is also licensed for the storage of amniotic membrane, although at the time of the inspection all amniotic membrane products are used within 48 hours of receipt.

The establishment has been licensed by the HTA since May 2023. This was the establishment's first inspection; the licence application assessment visit took place in March 2023.

There have been no significant changes to the licence arrangements or the activities carried out under the licence since the previous inspection.

Description of inspection activities undertaken

The HTA's regulatory requirements are set out in Appendix 1. The following areas were covered during the inspection:

Review of governance documentation

A review of selected documentation relevant to the establishment's licensable activities and quality management system was undertaken, including a review of policies and procedural documents, temperature monitoring records, incidents, audits and risk assessments.

Visual inspection

A review of the facilities was conducted at the establishment, including areas where receipt and storage of the tissue products take place.

Audit of records

Records were reviewed for the import of two corneas, including records related to consent, donor selection and medical history assessment, dates and times blood was obtained for mandatory serological tests, donor serological tests, processing records, shipment records, records of storage at the establishment and patient transplant records. In addition to the above review, the storage of one corneal tissue product was cross-checked against the tissue receipt log. No discrepancies were identified.

Meetings with establishment staff

Discussions were held with the establishment's DI and key staff working under the licence.

Report sent to DI for factual accuracy: 29 July 2025

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

Final report issued: 18 August 2025

Appendix 1: The HTA's regulatory requirements

The HTA must assure itself that the DI, Licence Holder, premises and practices are suitable.

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.

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.

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, Human Tissue (Quality and Safety for Human Application) Regulations 2007 (as amended), 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:

- 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.

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 (as amended) 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 on-site 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.

Appendix 3: 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 (as amended) Consent

Standard

- C1 Consent is obtained in accordance with the requirements of the Human Tissue Act 2004 (HT Act), the Human Tissue (Quality and Safety for Human Application) Regulations 2007 (as amended) and as set out in 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 Human Tissue (Quality and Safety for Human Application) Regulations 2007 (as amended) 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.
- 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 001/2021 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 001/2021 is included.

d) There are procedures to ensure that information is provided to the donor or donor's family by trained personnel.

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.
- 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 Medical Devices Regulation 2002 (SI 2002 618, as amended) (UK MDR 2002) and United Kingdom Conformity Assessed (UKCA).
- I) 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.
- n) The establishment ensures imports from third countries meet the standards of quality and safety set out in Directions 001/2021.
- 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 001/2021.
- 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 001/2021, is collected and maintained.
- g) There is a system to ensure records are secure and that donor confidentiality is maintained in accordance with Directions 001/2021.
- 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 001/2021 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 001/2021.

- I) 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 is in place to ensure raw data and records of traceability are maintained for 10 or 30 years respectively, 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 001/2021.
- 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 001/2021.
- 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.

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.

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

Standard

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.
- 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.
- 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.

- 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 001/2021.

j) Shipping packaging containing tissues and / or cells is labelled with the information required by Directions 001/2021.

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.