

Inspection report on compliance with HTA licensing standards
Inspection dates: **21 July 2022 and 01 August 2022**



Tissue & Cell Technologies Ltd.
HTA licensing number 11020

Licensed under the Human Tissue (Quality and Safety for Human Application) Regulations 2007 (as amended)
and
Licensed under the Human Tissue Act 2004

Licensable activities carried out by the establishment

Licensed activities – Human Tissue (Quality and Safety for Human Application) Regulations 2007 (as amended)

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

‘TPA’ = Third party agreement; the establishment is licensed for this activity but another establishment (not licensed by the HTA) carries out the activity on their behalf.

Site	Procurement	Processing	Testing	Storage	Distribution	Import	Export
Tissue & Cell Technologies Ltd.	TPA	E	TPA	E	E/TPA		

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
Adipose; Adipose	Authorised	Authorised	Authorised	Authorised	Authorised		
Other; Hair Follicles	Authorised	Authorised	Authorised	Authorised	Authorised		
Skin; skin	Authorised*	Authorised*					

Licensed activities – Human Tissue Act 2004

The establishment is licensed for the storage of relevant material which has come from a human body for use for a scheduled purpose.

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 Tissue and Cell Technologies Ltd. (the establishment) had met many of the HTA's standards that were assessed during the inspection, four major and eight 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

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

Major shortfalls

Standard	Inspection findings	Level of shortfall
GQ1 All aspects of the establishment's work are supported by ratified documented policies and procedures as part of the overall governance process.		
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.	The establishment did not have a third-party agreement in place with the laboratory that carried out the mandatory serological testing for 13 hair follicle donors.	Major
GQ2 There is a documented system of quality management and audit.		
b) There is an internal audit system for all licensable activities.	Although desk based audits of the third party undertaking procurement and processing of the hair follicles were conducted since the last inspection these did not assess compliance against HTA standards. Furthermore, the establishment has not audited the laboratory undertaking testing of donors for the mandatory serological markers on its behalf.	Major

GQ2 There is a documented system of quality management and audit.

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.

The establishment's authorised preparation process dossier (PPD) sets out that adipose tissue is to be processed within 24-hours of harvest and that viability checks are carried out following receipt and, if applicable, post-thaw of the tissue products. However, examples were seen where adipose tissue products were received outside of the 24-hours from the point of harvest. In addition, the establishment does not routinely carry out viability checks for adipose tissue.

In response to the HTA raising this issue during the course of the inspection the establishment submitted some limited information in support of these changes. However, no PPD variation has been submitted for the processing of the adipose tissue to amend the critical processing parameter (CPP) of time and how this may affect the critical quality attribute of viability.

In addition, the establishment's procedure sets out that hair follicles, following collection, will be transported to the storage facility within 24-hours following tissue collection. Examples were seen where hair follicles were regularly received outside of these parameters.

Major

GQ7 There are systems to ensure that all adverse events 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.

Examples were seen where hair follicles were stored for longer than 48-hours by the third party responsible for the procurement and processing of these tissue products.

In addition, during the inspection examples were seen of non-conforming incoming units.

These were not logged and investigated internally nor reported to the HTA as serious adverse events as required.

The establishment submitted sufficient evidence to address this shortfall before the report was finalised.

Major

Minor Shortfalls

GQ1 All aspects of the establishment's work are supported by ratified documented policies and procedures as part of the overall governance process.		
<p>b) There are procedures for all licensable activities that ensure integrity of tissue and / or cells and minimise the risk of contamination.</p>	<p>The establishment's procedures do not always reflect current working practices. Examples include, but are not limited to:</p> <ul style="list-style-type: none">• The establishment's standard operating procedure (SOP) requires checks of the blood collected for mandatory serology testing to be carried out to see if it is clotted. This check is not recorded, and no assurance was provided that it takes place at the third-party establishment.• The nanocool transport container for hair follicles is not currently used by the establishment although its use is described within standard operating procedures.• The procedure on receipt, cryopreservation and receipt of hair follicles sets out that all units transported will have a temperature datalogger within the transport box. However, examples were seen where there was no datalogger in the shipment.• The establishment described that blood samples for mandatory serology testing are stored along with the vials that contain the hair follicles, in a temperature-monitored fridge before being sent for testing. Also, blood samples are not placed on dry ice and are transported at room temperature. This information is not captured within the relevant SOP.	<p>Minor</p>

<p>g) There are procedures to ensure that an authorised person verifies that tissues and / or cells received by the establishment meet required specifications.</p>	<p>The establishment's procedures are not sufficiently robust to identify tissue products received that do not meet required specifications. For example, hair follicles were stored at the third party for longer than 24-hours, which is not in line with the establishment's procedure on receipt, cryopreservation and transport of hair follicles to the storage facility.</p> <p>Also, the SOP that describes the transport of hair follicles from the third party to the establishment requires the use of a datalogger in every shipment. The establishment does not always receive hair follicles with a datalogger.</p> <p>Furthermore, examples were seen where adipose tissue was received longer than 24-hours from procurement, which is not in line with the establishment's validated procedures.</p>	<p>Minor</p>
<p>r) Third party agreements specify the responsibilities of the third party and meet the requirements set out in Directions 001/2021.</p>	<p>The establishment's third-party agreements do not always specify the responsibilities of the third parties including:</p> <ul style="list-style-type: none"> • The retention of raw data and traceability data for 10 and 30 years respectively. • The reporting of serious adverse events and reactions within 24 hours of discovery. <p>Furthermore, one of the third-party agreements refers to licensable activities which the establishment is not licensed for.</p>	<p>Minor</p>
<p>s) Third party agreements specify that the third party will inform the establishment in the event of a serious adverse reaction or event.</p>		

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

<p>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.</p>	<p>An example was seen where datalogger temperature monitoring data from the transport of a hair follicle unit to the establishment was overwritten and lost.</p> <p>Furthermore, the third party responsible for the procurement and processing of the hair follicles has no procedure for the retention of raw data for ten years after use, expiry or disposal of the tissues.</p>	<p>Minor</p>
<p>j) Records are kept of products and material coming into contact with the tissues and / or cells.</p>	<p>The establishment does not record lot information of all reagents and materials that come into contact with the hair follicles.</p>	<p>Minor</p>

GQ5 There are documented procedures for donor selection and exclusion, including donor criteria.

<p>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.</p>	<p>The manufacturer of the HTLV I/II testing kit used to test adipose and hair follicle donors requires blood samples to be centrifuged before shipping. This is to separate the serum or plasma from the clot, red cells or gel separator. This centrifugation step is not carried out by the establishment.</p>	<p>Minor</p>
---	---	---------------------

PFE2 Environmental controls are in place to avoid potential contamination.

<p>b) Where processing of tissues and / or cells involves exposure to the environment, it occurs in an appropriate, monitored environment as required by Directions 001/2021.</p>	<p>The establishment has classified the cleanrooms as Grade B as specified in the current European Guide to Good Manufacturing Practice, Volume 4, Annex 1.</p> <p>However, the environmental monitoring of the Grade B cleanrooms during aseptic processing is not in line with these requirements.</p>	<p>Minor</p>
---	--	---------------------

PFE3 There are appropriate facilities for the storage of bodies, body parts, tissues, cells, consumables and records.

<p>c) Tissues and / or cells are stored in controlled, monitored and recorded conditions that maintain tissue and / or cell integrity.</p>	<p>During the course of the inspection the establishment was unable to provide assurance that the third party has suitable temperature monitoring systems for the fridge, where hair follicles and blood samples for mandatory testing, are stored.</p> <p>Furthermore, the fridge at the third party where these tissue products are stored is not appropriately maintained and temperature mapped.</p> <p><i>The establishment submitted sufficient evidence to address this shortfall before the report was finalised.</i></p>	<p>Minor</p>
--	---	---------------------

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.	GQ1g	The DI is advised to update the receipt and compliance form for hair follicle procurement, cryopreservation and storage to include the date and time the bloods are sent to the testing laboratory and if the bloods have been centrifuged.
2.	GQ2c	The DI is advised to document details of the primary records, such as donor records, in-transit temperature monitoring data, processing records and mandatory serology testing results, reviewed as part of the establishment's independent audit.
3.	GQ2d	<p>The establishment's validated procedures set out that thawed adipose tissue needs to be used within 24-hours of release. However, the establishment has carried out work to extend the time from release to end-use up to 72-hours.</p> <p>The DI will be required to submit a PPD variation prior to going ahead with plans to make this change.</p>
4.	GQ8a	<p>The cleaning reagents for the clean rooms are stored in a temperature-monitored room. The manufacturer of the reagents requires the maximum storage temperature not to exceed 25°C. During the review of the records there was an instance where the temperature in the room briefly reached 25.4°C.</p> <p>The DI is advised to risk assess the storage of the cleaning reagents in light of the recent extreme external temperatures and what effect these may have on the efficacy of the cleaning reagents.</p>
5.	GQ8a	The establishment's validated procedures set out that tissues are to be processed within 24-hours of procurement. However, the establishment's distribution risk assessment only considers the risks to the

		tissue products if processed more than 72-hours after procurement. The DI is advised to consider as part of the risk assessment the risks to the tissue products if processed longer than 24-hours after procurement.
6.	PFE3a	The establishment regularly tests the alarm of the freezer and checks the back-up CO2 cylinder, which serves as a contingency in the event of freezer failure. The DI is advised to document these checks.
7.	PFE4g	The establishment has carried out validation of transport boxes to review the performance of various transport kits and their ability to maintain temperature between 0°C and 25° for the transport of thawed adipose tissue to end users. The best performing transport kit is single use as set out by the manufacturer. However, the establishment intends to re-use the pre-conditioned bricks that are used to maintain temperature. The DI is advised to continue with his plans of conducting additional testing of the efficacy of the bricks after re-freezing if the intention is to re-use them. The DI is also advised to review the suitability of these containers to maintain temperature as a result of the recent extreme external temperatures.

Background

Tissue and Cell Technologies (the establishment) has been licensed by the HTA since August 2006. This was the establishment's eighth inspection; the last inspection took place in October 2019. Since the previous inspection the establishment's validated procedure for adipose tissue processing and cryopreservation for use in reconstructive surgery has been approved. The establishment no longer stores bone and tendons as a contingency for another HTA-licensed establishment.

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, testing kit inserts, audits, maintenance records, risk assessments, staff training records, agreements and incidents.

Visual inspection

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

Audit of records

Representative records were reviewed from four adipose tissue and four hair follicle donors including: records related to consent, procurement dates and times, testing for the mandatory serological markers, microbiological sterility testing results, processing records and records of materials coming into contact with the tissues, environmental monitoring and, where applicable, the records of release for end use relating to one of the adipose tissue donors. Storage locations were cross checked against the electronic database for an adipose and a hair follicle donor. Whilst two minor discrepancies were found, these were not sufficient to amount to a shortfall.

Meetings with establishment staff

Discussions were held with the establishment's DI and a number of staff carrying out processes under the licence.

The establishment is also licensed for the storage of relevant material for use in a Scheduled Purpose. This activity was not reviewed as part of this inspection.

Report sent to DI for factual accuracy: 2022-09-05

Report returned from DI: 2023-01-04

Final report issued: 2023-02-03

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 HT Act 2004, the Human Tissue (Quality and Safety for Human Application) Regulations 2007 (as amended) 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 (as amended) 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 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.
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 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.
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 Medical Devices Regulation 2002 (SI 2002 618, as amended) (UK MDR 2002) and United Kingdom Conformity Assessed (UKCA).
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 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.
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.
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 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.
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 UKCA or CE marked diagnostic tests, in line with the requirements set out in Directions 001/2021.

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.

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.
b) Where processing of tissues and / or cells involves exposure to the environment, it occurs in an appropriate, monitored environment as required by Directions 001/2021.
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 001/2021.
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.

Human Tissue Act 2004 standards

Consent

Standard
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
a) Consent procedures are documented and these, along with any associated documents, comply with the HT Act and the HTA's Codes of Practice.
b) 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.
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.
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.
e) Language translations are available when appropriate.
f) Information is available in formats appropriate to the situation.

C2 Staff involved in seeking consent receive training and support in the essential requirements of taking consent
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.
b) Records demonstrate up-to-date staff training.
c) Competency is assessed and maintained.

Governance and Quality

Standard
GQ1 All aspects of the establishments work are governed by documented policies and procedures as part of the overall governance process
a) Ratified, documented and up-to-date policies and procedures are in place, covering all licensable activities.
b) There is a document control system.
c) There are change control mechanisms for the implementation of new operational procedures.
d) Matters relating to HTA-licensed activities are discussed at regular governance meetings, involving establishment staff.
e) There is a system for managing complaints.
GQ2 There is a documented system of audit
a) There is a documented schedule of audits covering licensable activities.
b) Audit findings include who is responsible for follow-up actions and the timeframes for completing these.

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

Standard
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

Standard
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.