



The Royal College of **Pathologists**

Pathology: the science behind the cure

HTA's Codes of Practice and Standards consultation

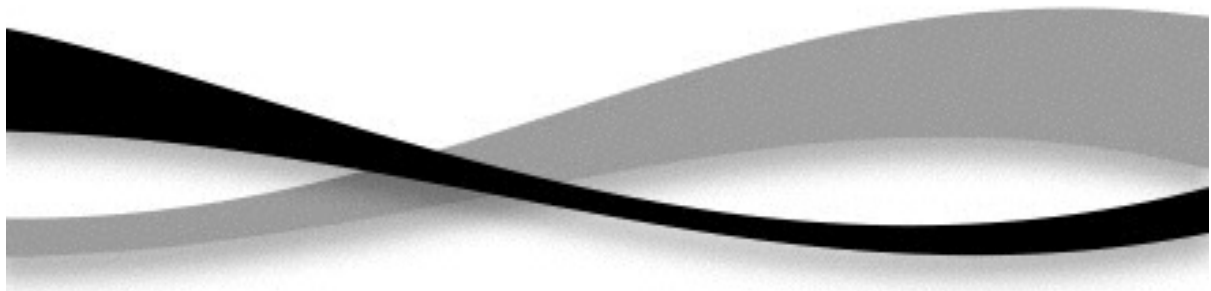
The Royal College of Pathologists' written submission

November 2015

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1 About the Royal College of Pathologists

1.1 The Royal College of Pathologists (RCPATH) is a professional membership organisation with charitable status. It is committed to setting and maintaining professional standards and to promoting excellence in the teaching and practice of pathology. Pathology is the science at the heart of modern medicine and is involved in 70 per cent of all diagnoses made within the National Health Service. The College aims to advance the science and practice of pathology, to provide public education, to promote research in pathology and to disseminate the results. We have over 10,000 members across 19 specialties working in hospital laboratories, universities and industry worldwide to diagnose, treat and prevent illness.

1.2 The Royal College of Pathologists comments on the HTA's Codes of Practice and Standards consultation. The following comments were made by Fellows of the College during the consultation which ran from 24th July until 30th October 2015 and collated by Dr Rachael Liebmann, Registrar.

2 General consultation responses:

2.1 In recent years RCPATH Fellows have become increasingly concerned that the standards applied by the regulators to hospitals [relating to body and tissue storage, handling, record keeping and audits of delays] were not being applied in a similar way to monitor and regulate undertaker services, nor the related work of the coroner's office and officers. This results in an unbalanced approach to accountability and does not give a framework for a whole systems approach to detect and address shortfalls and apply accountabilities appropriately. This may both have a negative impact on hospital staff involved and also may not be in the best overall public interest. Additionally the formal role of the Designated Individual (DI) and the emphasis within training as well as at site visits and in written communications from HTA of the potential personal legal accountability for breach of regulations has made it difficult to recruit into the DI role probably the most appropriate staff i.e. consultants involved directly in morbid anatomy provision.

2.2 The Royal College of Pathologists supports the recommendation by the Association of Anatomical Pathology Technology that two bodies should not be placed on a single mortuary fridge tray.

2.3 In addition Fellows considered that there was considerable overlap between the roles of pathology accreditation formally Clinical Pathology Accreditation (CPA) and now the United Kingdom Accreditation Service (UKAS) and the HTA. It would appear reasonable to extend the remit of UKAS to include the mortuary functions currently covered by the HTA to reduce duplication and therefore reduce costs.

2.4 The Fellowship find the involvement of the HTA in oversight of live organ donation in England entirely appropriate. The HTA are very efficient and extremely helpful when queries are made. They also maintain scrutiny of Independent Assessors and reassess performance on a yearly basis. Training sessions are provided for new recruits as well as refreshers for Independent Assessors of longer standing. The Fellowship fully support the ongoing involvement of the HTA in the live organ donation and transplantation area.