



Trinity College Dublin Anatomy Department Inspection Report 2023



Comhairle na nDochtúirí Leighis
Medical Council

About the Medical Council

The Medical Council is the regulatory body for doctors. It has a statutory role in protecting the public by promoting the highest professional standards amongst doctors practising in the Republic of Ireland.

The Council has a majority of non-medical members. The 25-member Council consists of 13 non-medical members and 12 medical members. The Council receives no State funding and is funded primarily by doctors' registration fees.

The Medical Council maintains the Register of Medical Practitioners - the Register of all doctors who are legally permitted to carry out medical work in Ireland. The Council also sets the standards for medical education and training in Ireland. It oversees lifelong learning and skills development throughout doctors' professional careers through its professional competence requirements. It is charged with promoting good medical practice. The Medical Council is also where the public may make a complaint against a doctor.



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Statement with regard to the Freedom of Information Act, 2014, the General Data Protection Regulation ('GDPR') and the Data Protection Acts 1988 - 2018

The Medical Council routinely makes information available to the public in relation to its functions and activities and, in line with that practice, this report will be available on the Council's website, www.medicalcouncil.ie in due course.

The Freedom of Information Act is designed to allow public access to information held by public bodies which is not routinely available through other sources and access to this document may be sought in accordance with that Act. The Medical Council complies fully with the terms of the Freedom of Information Act. It should be noted that access to information under the Freedom of Information Act is subject to certain exemptions and one or more of those exemptions may apply in relation to some or all of this report.

As a Data Controller, the Medical Council is also subject to the requirements of the General Data Protection Regulation ('GDPR') and the Data Protection Acts 1988 – 2018. The Medical Council complies with its obligations as a Data Controller under the relevant legislation. Any person on whom the Medical Council holds personal information has certain rights, known as 'Subject Access Rights'. Further information on both Freedom of Information and Data Protection legislation is available on our website at: <https://www.medicalcouncil.ie/FOI-Data-Protection/>

Anatomy responsibilities

Licensing Authority

The Medical Council is the licensing authority for the practise of Anatomy in the State in accordance with the Anatomy Act 1832 as outlined in Section 106 of the Medical Practitioners Act (MPA) 2007:

-The Council—

(a) is, by virtue of this section, authorised to—

- (i) grant a licence to practise Anatomy in the State,
- (ii) appoint inspectors of places in the State where Anatomy is carried on, and
- (iii) be the person to whom such inspectors shall make returns, under and in accordance with the Anatomy Act 1832, and

(b) shall, at the request of the Minister and as soon as is practicable after it receives the request, provide the Minister with such information concerning its functions under the Anatomy Act 1832 as the Minister specifies in the request.

The Inspector of Anatomy

Following the introduction of the 2007 Act the Council appointed Professor Ceri Davies as the Inspector of Anatomy.

The Inspector of Anatomy was appointed by Council to perform the following functions:

- Advise the Council on the granting of licences to practice Anatomy in the State
- Inspect places in the State where Anatomy is practised
- Make returns to Council under and in accordance with the Anatomy Act 1832
- Advise the Council on the information sought by or to be provided to the Minister regarding the Council's functions under the Anatomy Act 1832
- Advise the Council on the teaching of Anatomy by any bodies approved under Section 88 (2) (a) (i) (ii) and/or Section 89 (3) (a) (ii) of the Act.

Inspection Team

At each inspection visit, the Inspector of Anatomy is supported by a non-medical member of the Medical Council (with no background in Anatomy or Pathology to ensure appropriate lay representation), as well as a member of the Medical Council Executive. The Medical Council's Code of Practice for Anatomical Examination provides the framework for the inspections of Anatomy Departments.

Code of Practice for Anatomical Examination

In the absence of up-to-date legislation, the Medical Council published the [Code of Practice for Anatomical Examination](#), in 2015. This Code was designed to help safeguard public confidence in the practice of Anatomy in Ireland and support continuous improvement within the Anatomy Departments whilst awaiting updated legislation in the form of the Human Tissue Act. Specifically, the Code of Practice aims to:

- Support institutions and individuals in the State to engage in best practice that reflects current society, science, medicine, education and ethics norms.
- Enable members of the public to better understand current best practice employed by institutions and individuals in the State that undertake Anatomical Examination, to ensure that trust in these practices is maintained.
- Provide a framework for inspections conducted by the Medical Council, through the Inspector of Anatomy, pursuant to its role under Section 106 of the Medical Practitioners Act 2007, as the licensing authority under the Anatomy Act 1832.

Anatomy Department Inspection Report

Trinity College Dublin

License holder: Dr Denis Barry

Inspection team:

Prof. D. C. Davies, Inspector of Anatomy for the Medical Council

Mr John Murray, Medical Council member

Mr Cormac Glynn, Quality Assurance Executive, Medical Council

Date of inspection: 13 April 2023

SECTION 1 – ORGANISATIONAL CAPACITY AND CAPABILITY

1. LICENSING, AUTHORITY, RESPONSIBILITY AND ACCOUNTABILITY

The lead individual holding the licence for Anatomical Examination at TCD changed in 2022 and is now Dr Denis Barry. This change was notified to the Medical Council and the required annual returns have been made to the Medical Council since the last inspection.

2. GOVERNANCE AND QUALITY SYSTEMS

I met with Dr Barry, the Chief Technical Officers and other technical staff. The technical staff are a long-serving experienced unit and understand their responsibilities in relation to their role in Anatomical Examination. All staff are appropriately qualified and trained for their work and TCD has appropriate annual performance management and development appraisals.

A suitable systematic record management system that ensures data protection, confidentiality and with suitable provision for data back-up is in place. Comprehensive risk assessments for the practices and processes related to Anatomical Examination are in place, as are Standard Operating Procedures for working in the discipline of Anatomy. These were reviewed and updated in 2023. A Service Level Agreement between the Dublin Medical Schools (including TCD) and their undertakers, Corrigan & Sons is in place. The Glasnevin Trust has been approached by the consortium of Dublin Medical Schools, but is reluctant to enter into a service level agreement.

SECTION 2 – RECOMMENDED PRACTICES

1. CONSENT

The consent form used by TCD does not include all of the options for retention contained in the model consent form published as an appendix to the Code of Practice for Anatomical Examination. Although TCD only retains donors for a maximum of three years, its consent form does seek consent for a body to be offered to another Medical School within the island of Ireland if it is not required by TCD. Therefore, it is recommended that the TCD consent form is amended to include all of the options for retention in the model consent form, to facilitate acceptance by another Medical School if required. The TCD consent form meets all of the other recommendations within the Code of Practice. The comprehensive information booklet for potential donors and their families gives appropriate information for the donors' consent to be fully informed.

2. PREMISES, FACILITIES AND EQUIPMENT

Trinity Biosciences Institute

The premises, facilities and equipment were inspected from the entrance point of a donor's remains, through the embalming and storage facility, to the dissecting room. The security of the undertaker's entrance is good and there is a dedicated secure lift to the embalming / storage area. There is storage for forty cadavers and there have not been any material changes to the embalming / storage area since the last inspection. The embalming / storage area opens directly onto the dissecting room and all entrances to the Anatomy facilities within the Trinity Biosciences Institute are alarmed and access is by swipe card. Security of the dissecting room is good because all students and visitors must pass by the window of the technician's office to enter it. Entry to the research laboratory that can only be accessed via the dissecting room is controlled appropriately and its users are aware of their responsibilities in relation to the dissecting room. The signage in and around the dissecting room is appropriate. The facilities in the dissecting room are excellent. There is secure storage for the Anatomy Department in the basement of the building; this does not contain cadaveric material, but is used to store historical osteological specimens.

Old Anatomy Building

The facilities and contents of the Old Anatomy Building were not inspected, because the Medical Council no longer considers that the human remains it contains, fall under its remit.

3. RECORD KEEPING / TRACEABILITY

Paper copy donation records are stored in a fire-proof cabinet. Donor details are also entered into an electronic database. Scanned copies of consent forms and other donation records for donors accepted for Anatomical Examination are entered into the database. An audit of traceability was successfully conducted by randomly selecting cadavers undergoing Anatomical Examination and tracing them to consent forms and other relevant records. Retained parts from cadavers donated under the Anatomy Act are not held at TCD. A digital image database of the historical pots used for teaching will be completed by summer 2023. All historical osteology specimens have now been itemized and marked and they will be added to the digital database. An annual audit of the potted and osteological specimens should be carried out. Following recent requests that have been shared with the inspectorate, an internal committee has constituted to consider proposals for using material donated for Anatomical Examination for research purposes and external courses.

4. SENSITIVE DISPOSAL

The comprehensive donation information booklet provides full information about the options available for disposal of the donors' remains, which are either interred in Glasnevin Cemetery or returned to their relatives.

5. LOAN / TRANSFER OF CADAVERIC MATERIAL

TCD does not currently loan or transfer any cadaveric material, or currently facilitate postgraduate courses.

Conclusion

Following the inspection of the Trinity College Dublin Anatomy Department on 13th April 2023, I recommend that:

1. Trinity College Dublin should continue to be licensed for the practice of Anatomical Examination. This recommendation is made on the grounds that the visiting Medical Council team found that the site is adhering to the standards set out in the Medical Council's Code of Practice for Anatomical Examination.

Continuation of the licence for the Trinity College Dublin is subject to ongoing approval by the Medical Council.



D. C Davies
Inspector of Anatomy

26/4/2023



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Medical Council

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