



University College Cork

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 D. 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

University College Cork

License holder: Professor Aideen Sullivan

Inspection team:

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

Mr John Murray, Medical Council member

Ms Aoise O'Reilly, Quality Assurance Manager, Medical Council

Date of inspection: 28 September 2023

SECTION 1 – ORGANISATIONAL CAPACITY AND CAPABILITY

1. LICENSING, AUTHORITY, RESPONSIBILITY AND ACCOUNTABILITY

The lead individual holding the licence for Anatomical Examination at UCC (Professor Aideen Sullivan) has not changed since the 2022 inspection and the required annual returns for 2022 have been made to the Medical Council.

2. GOVERNANCE AND QUALITY SYSTEMS

We met with Professor Sullivan and senior members of technical and academic staff. The Department is predominantly an experienced unit and its members by and large understand their responsibilities in relation to their role in Anatomical Examination. However, further training in the requirements of the Medical Council's Code of Practice for Anatomical Examination is required. The UCC staff Performance and Development Review System, which was suspended during the COVID pandemic recommenced in January 2023.

Since the last inspection in 2022, a Policies and Procedures document covering the Anatomical Donation Programme and management of Anatomical Materials at UCC has been developed and feedback has been given on this document.

A record management system is in place that ensures data protection and confidentiality. Comprehensive risk assessments of the practices and processes related to Anatomical Examination are in place. UCC now has a service level agreement with their undertakers, Fordes Funeral Homes Ltd, who now transfer all donors to the Department of Anatomy and Neuroscience. UCC now also has a service level agreement with the Island Crematorium. The service level agreements between UCC and Fordes and the Island Crematorium were inspected and in force.

A Committee has now been constituted to vet applications to run external courses and to conduct anatomical research at UCC, to ensure that they comply with current legislation, the Code of Practice for Anatomical Examination and the expectations of donors and their families. This committee, which comprises 12 individuals, a number of who do not have any direct role in the use of cadaveric material, has not met to consider any applications since its inception. It is recommended that a smaller group is formed of individuals with a detailed knowledge of the Code of Practice for Anatomical Examination and direct involvement with the Dissecting Room.

SECTION 2 – RECOMMENDED PRACTICES

1. CONSENT

UCC continues to use the model consent form published as an appendix to the Code of Practice for Anatomical Examination. This consent form meets all of the 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. A sample consent form used by Science Care, the company that exports 'fresh frozen' body parts from the USA to the Department of Anatomy and Neuroscience for use in the ASSERT Centre was inspected. The consent given by Science Care donors covers their use in the ASSERT Centre and allows export from and does not require repatriation to the USA. Science Care is a 'for profit' company.

It is a requirement of the Code of Practice for Anatomical Examination that a copy of the Medical Certificate of the Cause of Death and the Death Registration Certificate should be kept at the institution receiving a donor's body. Neither of these documents were found to be kept at the Department of Anatomy and Neuroscience with the donors' records and none of the relevant staff appeared to know what these documents are. Most of the information contained on medical Certificates of the Cause of Death appeared to be recorded, but copies of the legal documents were not present.

2. PREMISES, FACILITIES AND EQUIPMENT

A detailed inspection of the premises, facilities and equipment of the Facility for Learning Anatomy, Morphology and Embryology (FLAME), was not carried out, because it was only a year since that last inspection, when all were found to be satisfactory. There has been one change to the premises / facilities since the last inspection, the plastination suite has now been decommissioned.

The Application of Science to Simulation based Education, Research and Training (ASSERT) Centre in the, Brookfield Campus that is a postgraduate surgical anatomy training centre, run in partnership with the Stryker Corporation has re-opened since the last inspection and is running training courses again. A detailed inspection of the premises, facilities and equipment was not carried out, because all were satisfactory at the 2022 inspection. The credentials of course faculty and delegates are vetted in advance and a record is kept of attendees. It is recommended that where applicable, professional registration details should be recorded, as well as professional contact details. Records of all imported fresh-frozen cadaveric material are held in the FLAME laboratory and records of all cadaveric material *in situ* in the ASSERT Centre are also held in the ASSERT centre. A traceability audit of anatomical material in the ASSERT centre was successfully carried out.

3. RECORD KEEPING / TRACEABILITY

Hard copy donation records are stored in a lockable fire-proof cabinet on-site and historical documents are stored off-site. UCC has a service level agreement with Iron Mountain Ireland, for secure off-site storage. Copies of consent forms and other donation records for cadavers and prosecutions / body parts held in the Department of Anatomy and Neuroscience have been scanned and entered into a custom-made database on a secure server. Records for new donors will be added as they arrive in the Department.

An audit of traceability was successfully conducted by randomly selecting whole cadavers, prosected parts, wet organs, potted specimens, plastinated specimens and bones and tracing them back to databases and consent forms. Therefore, the whole collection of anatomical specimens held in the Department of Anatomy and Neuroscience now appears to have been catalogued. However,

an integrated database has not been completed, it was not possible to trace prosecutions and organs back to their original source cadavers and records within the same database.

4. SENSITIVE DISPOSAL

The comprehensive donation information booklet provides full information about the options available for disposal of the donors' remains. Remains continue to be interred in the University Burial Ground in St Mary's Cemetery, cremated at the Island Crematorium, or returned to relatives.

5. LOAN / TRANSFER OF CADAVERIC MATERIAL

The Department of Anatomy and Neuroscience does not currently loan or transfer any cadaveric material. However, it is temporarily securely storing a Historical Pathology Collection, which includes some anatomical osteology specimens, on behalf of the UCC Pathology Department. The Collection is stored in the old plastination suite under a loan agreement and under the terms of that agreement, it will be returned to UCC Pathology department before the end of 2023. The Collection is fully catalogued, and a sample audit was carried out successfully.

Conclusion

Following the inspection of the University College Cork Department of Anatomy and Neuroscience on 28 September 2023, it is recommended that:

1. University College Cork must address the following requirements, within the stated timeframe, to ensure the continued approval from the Medical Council to be licensed for the practice of Anatomical Examination.
 - 1.1 UCC must ensure they obtain and keep a copy of The Medical Certificate of the Cause of Death (MCCD) and The Death Registration Certificate (or parts 1 and 2 of the DNF1 form) for each donor received, as required by the Medical Council's Code of Practice for Anatomical Examination. Confirmation of implementation of the above must be provided to the Medical Council **within 6 months of the date of inspection.**
 - 1.2 Training in the of the requirements of the Medical Council's Code of Practice for Anatomical Examination is required for all staff involved in any aspect of Anatomical Examination. Confirmation of the development and implementation of training and attendance by relevant staff must be provided to the Medical Council **within 6 months of the date of approval.**

Continuation of the approval of the licence for University College Cork's Department of Anatomy and Neuroscience is subject to the above requirements being met within the stated timeframe.



D. C Davies
Inspector of Anatomy

08/01/2024

A handwritten signature in black ink, appearing to read "John Murray". The signature is written in a cursive, somewhat stylized font.

Mr John Murray
Medical Council Member

08/01/2024



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