

Testing & Technical Hurdles

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SMTL

About SMTL

- Provide testing and technical services on medical devices to
 - the NHS in Wales & Welsh Government
 - the UK Health Service (NHS SC)
 - Industry
- 16 staff, including pharmacists, microbiologists, technicians
- UKAS accredited for testing
- Sit on
 - MHRA CSD
 - Standards: BSI, CEN, ISO
 - SALG
 - WG WNCRG
- Funded by WHSSC (WG) and Commercial Testing

Procurement Support

Services

- Provision of technical advice
 - standards selection & application
 - test selection
 - assessment of data submissions
- Product testing
 - to standards
 - to clinicians requirements
 - e.g., drug storage in syringes
 - test method development
 - e.g., British Standard for bandages
- Defect & Incident Investigation

A typical contract

- Planning
 - 12+ months before contract starts
 - Relevant products for SMTL input
- Test programme
 - Which standards
 - Which tests
- Samples -> SMTL
- Product testing
- QA for audit
- Issue report to Procurement
- Post contract monitoring

TEST REPORTS

Glove powder

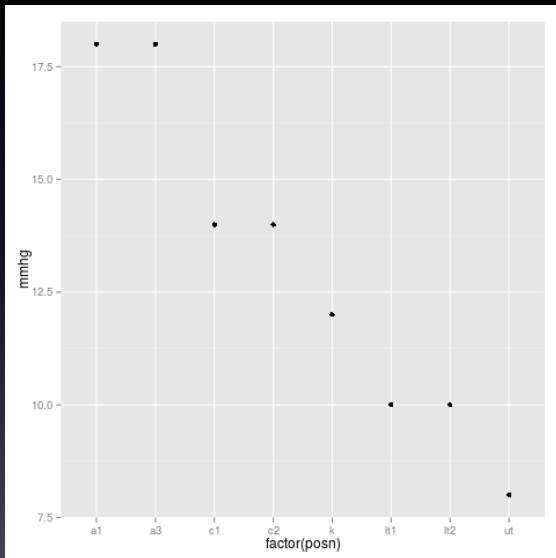
Manufacturer	Mass mg/glove	Pass/ Fail
A	0.32	PASS
B	0.02	PASS
C	0.04	PASS
D	7.34	FAIL
E	0.56	PASS
F	0.16	PASS
G	0.16	PASS

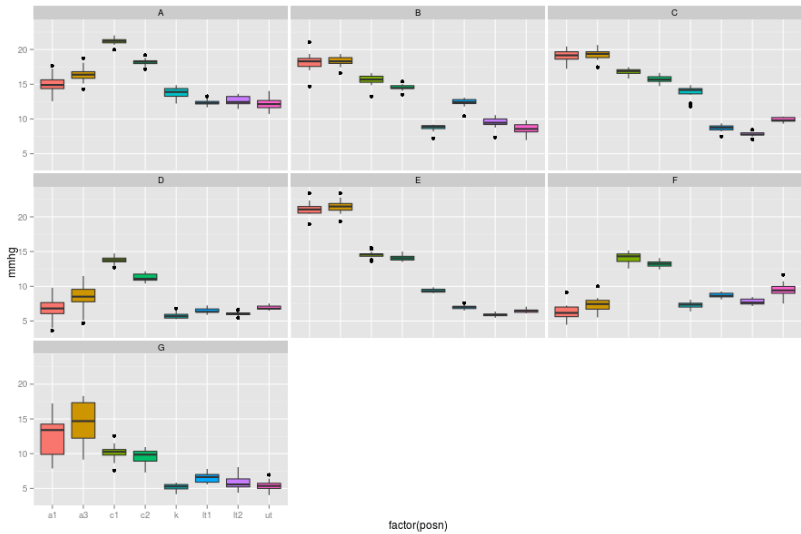
Table 1: Powder Free Latex Results 2011

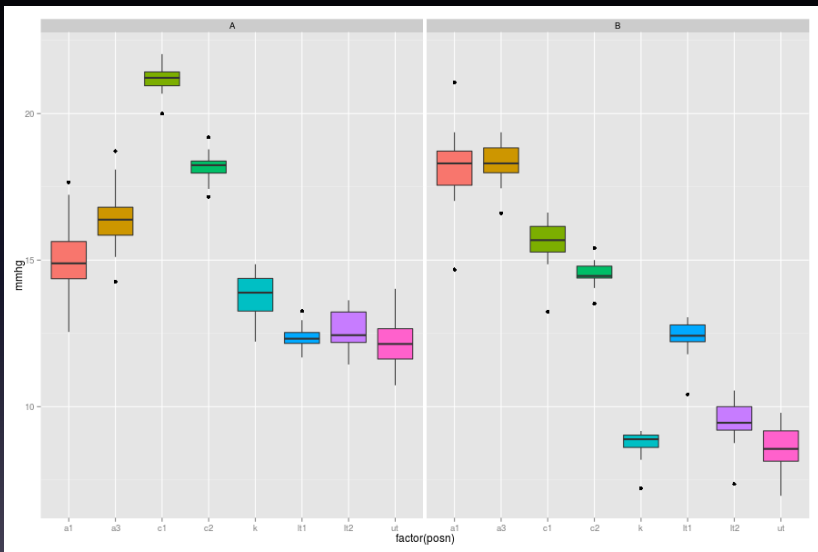
- EN 455-3 - Limit of 2mg/glove

AE Stockings

Siegel Profile







Tonsillectomy

Background

- 2000/2001- SEAC advice:
 - Tonsil/Adenoid surgery - performed with single-use instruments
- Immediate clinical problems
 - post op bleeds - 1.6% (pre 2001) to 4.4% (during 2001)
 - instrument malfunction - 20% operations
- WAG steering group
 - SMTL, WHS, Alun Tomkinson (ENT, UHW)
 - Paper audit
 - Lab testing
 - Benchtop analysis
 - Compared reusables with single use devices
 - Suppliers audited

Results

- Significant instrument design issues
 - One design on the 4th revision
- Systematic QA problems
 - One supplier had 15% defective instrument rate
 - relied on 100% inspection to weed out poor quality
- Only one acceptable supplier
- Bleed rates returned to pre-2001 (1.5%)
- Surveillance funded through an 'on-cost'

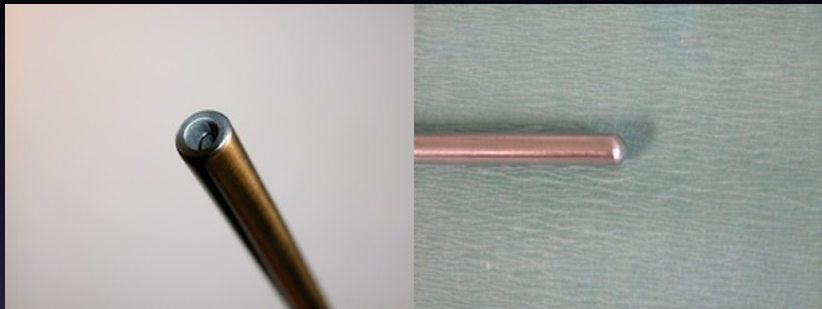


Figure 1: Draffin Rod

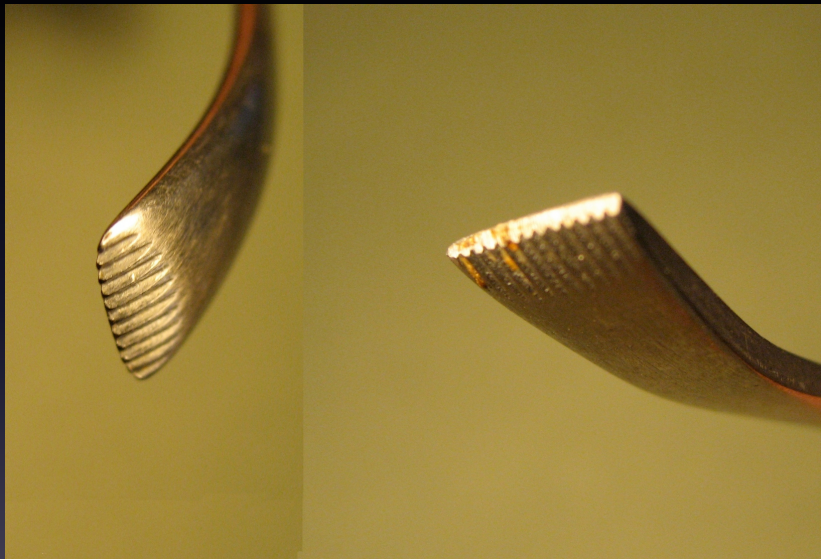


Figure 2:Gwynne Evans Dissector

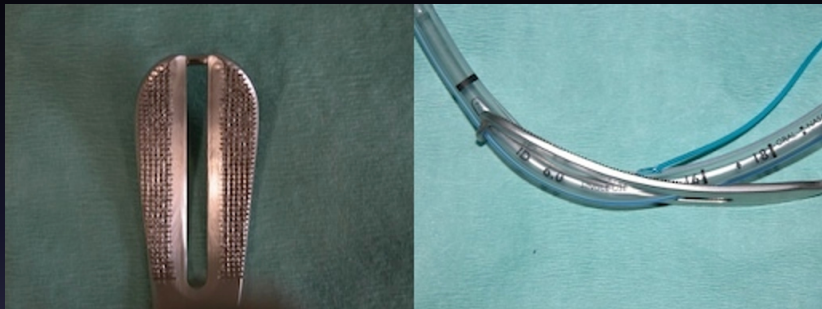


Figure 3: Tongue Plate

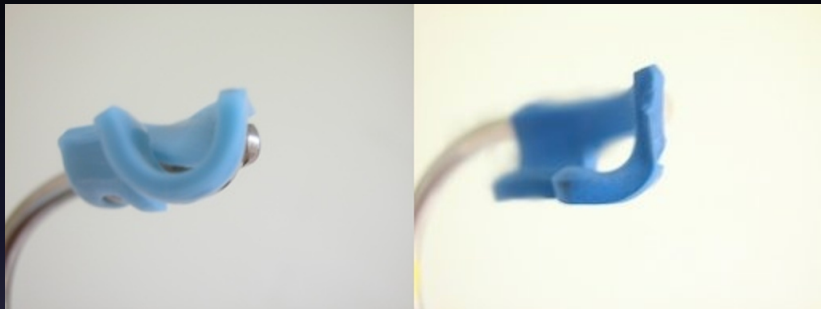


Figure 4:Tooth Guard

Clinical Incidents

- Draffin rods slip
- Mouth gag disengages off teeth
- Gag comes out of mouth
- ... taking the tongue plate out
- ... dragging the ET tube out of the patient

Data assessments

Test Report submissions

- If no SMTL testing required or possible
 - Independent data may be requested
 - Evidence that devices meet minimum quality threshold
 - Expect data from certified labs
 - Usually require 17025 accreditation
 - Independent data is preferred
- **Internal non-accredited is not usually acceptable**

Certification

- ISO 13485
 - Pretty much mandatory for any potential medical device supplier
- MDD certification
- ISO 17025
 - For test lab reports

Submission Problems & Issues

Competence

- Post contract monitoring glove contract 2007
- Gloves failed FAB (just over 6N - limit was $\geq 9N$)
- Other batches from stores failed
- UK supplier disputed results
 - Chinese test reports were reporting $>12N$
- Observed testing at SMTL
- Visited Chinese manufacturer
 - Were using a 6mm cutting die instead of 3mm
 - therefore all results were effectively doubled (wrongly!)

Cherry Picking

“On balance, I’ll go through the data we have and pick out some prime reports that will give things a bit of extra ‘zing’.”

Fraud ...

- Drawings submitted for surgical instruments
- Not possible to actually make instruments to the drawings

2002-2003 Drawing

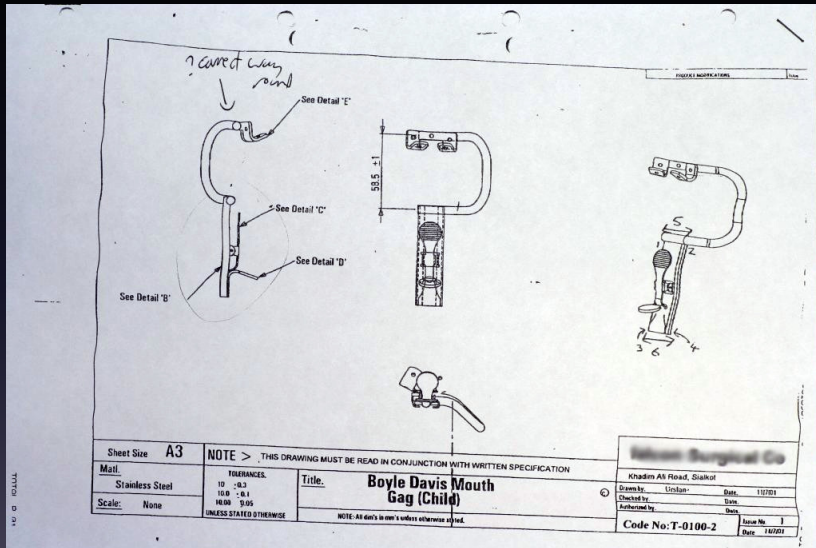


Figure 5: Boyle Davis Gag

2003-2004 Drawing

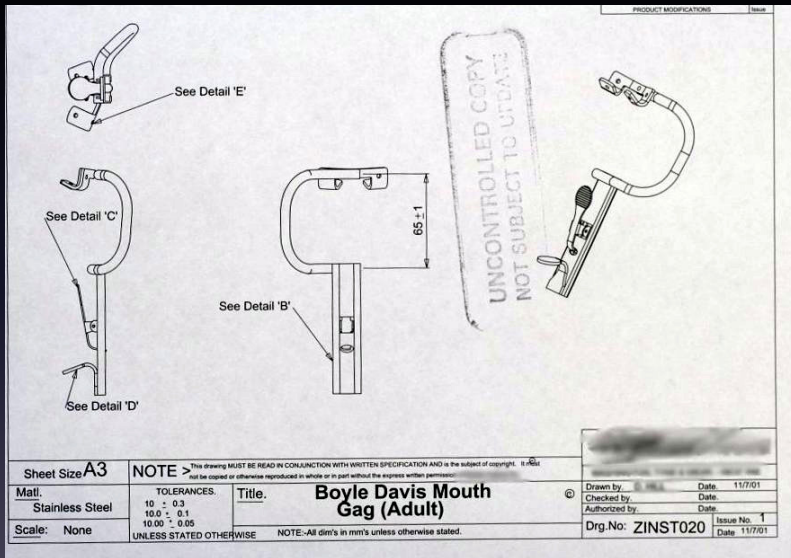


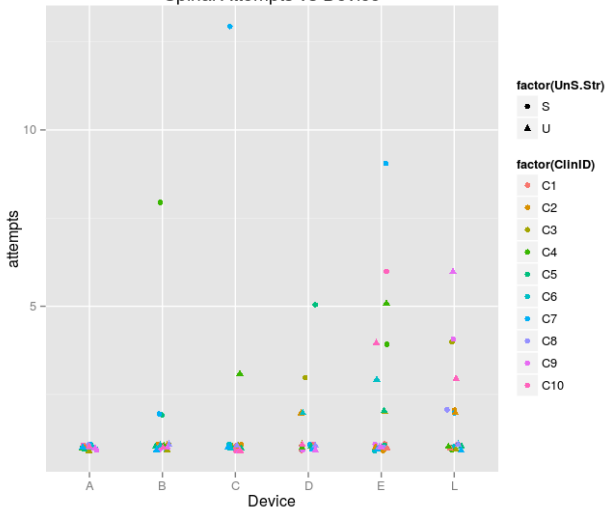
Figure 6:Boyle Davis Gag

Human Factors Testing

Non-Luer Devices

- Wayne Jowett died from intrathecal vincristine 2001
- Toft report - non-luer devices would prevent wrong route injections
- Around 50% English NHS using proprietary solution
- ISO standard under development
- Scotland, Ireland, Wales all presently waiting for ISO
- Wales developing Human Factors capability
- Testing ISO design over the Summer
- Likely to use more frequently in future

Spinal Attempts vs Device



Conclusion

SMTL help NHS Wales with

- Evidence based procurement
- Standards compliance
- Patient safety
- Compliant contracting
- Clinician confidence
- Level playing field for manufacturers

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