

Revision History					
Version	Review Date	Comment	Replaces	Reviewed by	
1.0		Date of first issue: 2005			
2.0	May 2007	Aligned to NPSA competencies	Version 1.0	BBT Team	
3.0	Dec 2009	Revisions and updating following full review incorporating user feedback and developments in transfusion practice	Version 2.0	BBT Team	
4.0	Jun 2013	Revisions and updating following full review incorporating user feedback and developments in transfusion practice	Version 3.0	BBT Team	
5.0	Jun 2016	Revision and restructure following full review incorporating user feedback and developments in transfusion practice	Version 4.0	BBT Team	
6.0	Mar 2021	Revision and restructure following full review incorporating user feedback and developments in transfusion practice	Version 5.0	AWTPG	

These materials were originally developed by the Education Subgroup of the Rational Blood Committee, have been updated and amended by the Education Subgroup of the Blood Implementation Group and further revised by the All Wales Transfusion Practitioner Group, and have been ratified by the Blood Health Team on behalf of the Blood Health National Oversight Group.

Full review history of latest version				
Review date	Summary of changes	Reviewed by		
March 2021	General review to ensure up to date terminology, and standards and performance criteria reflect best practice.	The All Wales Transfusion Practitioner Group (AWTPG)		
	Re-configuration of some performance criteria and knowledge assessment numbering.			
	• The term 'Gender' substituted with 'Sex'.	( - )		
	• Electronic systems no longer an 'additional' standard in collection (C9 in version 4.0), but now incorporated into standard C4.			
	<ul> <li>Additional performance criteria included in collection (PC C4<sup>E</sup>) to support use of electronic systems.</li> </ul>			
	Performance criteria for administration standard A2 re- ordered to mirror the All Wales Transfusion Record.			
	• Competency assessments in Appendices revised in line with changes to standards and performance criteria.			
	Guidance for assessors revised.			
	Associated competency workbooks revised alongside competency assessments.			

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## Disclaimer

The all Wales competency package is designed for use, and has been deemed fit for purpose, in the format presented here. The authors accept no responsibility for any subsequent local modifications.

It is intended to be used by an appropriately trained and authorised assessor.

When using the all Wales competency package it is the responsibility of the assessor to ensure that the documents are current and in date; if unsure, these can be found at:

https://wbs-intranet.cymru.nhs.uk/bht/all-wales-transfusion-competencies/

The competencies within this package are in addition to any assessment required locally for the underlying clinical practice, such as venepuncture or administration of intravenous therapies, and do not replace them.

The authors accept no responsibility for actual use of the training package or competency assessments, by either authorised or unauthorised persons.

The record of competence relates to performance at the time of assessment and does not guarantee future performance.

## Introduction

Blood transfusion is a complex multi-step process involving personnel from diverse clinical backgrounds with different levels of knowledge and understanding. In order to correctly and safely fulfil their role in the transfusion process each individual needs to be trained to the appropriate level. This will vary according to the particular task they need to perform as part of the process. Regardless of clinical background the essential common element remains correct patient identification (ID) at every stage.

These practice-based competencies were originally developed by the Better Blood Transfusion Team and the Welsh Transfusion Practitioner Network; and ratified by the National Clinical Lead for Blood Transfusion on behalf of the Welsh Government (WG) Blood Advisory Structure. Their purpose is to provide the necessary tools to facilitate assessment of staff who perform pre-transfusion sampling, collection and administration of blood components.

A requirement for compliance with **The Blood Safety and Quality Regulations 2005**<sup>1</sup> (as amended), which became UK law on 8<sup>th</sup> February 2005, is that all relevant staff receive formal, documented training in blood transfusion practice for distribution and traceability of blood components and in Adverse Event Reporting. This is part of the principles of good practice assessed by the Medicine and Healthcare Products Regulatory Agency (MHRA) in the annual Blood Compliance Report submission made by hospital transfusion laboratories and facilities.

The information in these competencies has been formally risk assessed against the competencies developed by the National Patient Safety Agency (NPSA) within their **Safer Practice Notice (14) Right Patient, Right Blood**<sup>2</sup>. The risk assessment confirms that these materials are fit for the purpose.

In 2014, following an all Wales consultation with stakeholders through Welsh Government's Chief Medical and Nursing Officer's departments, new guidance was released that proposed a pragmatic approach. This reinforced the professional responsibility of registered individuals to maintain their competence, and recommended that employing Health Boards would manage compliance for both registered and non-registered personnel through the appraisal process.

Subsequent revisions of the all Wales competency package have reflected changes in guidance.

Further information can be obtained from the Welsh Blood Service Blood Health Team: <u>WBS.BloodHealthTeam@wales.nhs.uk</u>

# The knowledge and understanding underpinning these competencies and supporting practice can be gained from:-

- All Wales Transfusion Competency Package Workbooks
- Local Transfusion Policy
- Local Infection Control Policy
- Professional standards and codes of conduct (e.g. the NMC Code)
- LearnBloodTransfusion e-learning Programme
- Blood Assist: blood component administration application (access at: <u>www.bloodassist.co.uk/</u> or download from Google Play or iTunes stores by searching NHS Blood Assist)

#### **References:**

- <sup>1.</sup> UK Statutory Instrument 2005/50. *The Blood Safety and Quality Regulations* (*BSQR*) 2005. Available at: <u>www.opsi.gov.uk/si/si2005/20050050.htm</u>
- <sup>2.</sup> National Patient Safety Agency (NPSA) (2006). Safer Practice Notice 14: Right patient, right blood. Available at: <u>https://webarchive.nationalarchives.gov.uk/20171030124554/http://www.nrls.npsa.nhs.uk/resources/collections/right-patient-right-blood/</u>
- <sup>3.</sup> NHS Knowledge and Skills Framework (KSF) (2004). Available at: <u>https://www.nhsemployers.org/SimplifiedKSF</u>
- <sup>4.</sup> Requirements for the Acceptance of Pre-transfusion Samples in Wales version 4 (June 2020). Available at: https://wbs-intranet.cymru.nhs.uk/bht/policies-guidance-forms/guidance/
- <sup>5.</sup> Welsh Health Circular 2007 (42), *Blood Transfusion Procedures*
- <sup>6</sup> British Society for Haematology (BSH) (2017). *The Administration of Blood Components*. Available at: <u>https://b-s-h.org.uk/</u>

# Section 1

# Pre-Transfusion Sampling

## Section 1 – Pre-Transfusion Sampling

Please refer to the All Wales Transfusion Competency Package Appendix 2 – 'Pre-Transfusion Sampling Assessment' to undertake an assessment.

Persons being assessed must have received adequate training and agree to undertake the assessment.

## Rationale

Implementation of these standards and assessment via the associated performance criteria should enable Health Boards to comply with the requirements of the **NPSA Safer Practice Notice (14) Right Patient, Right Blood**<sup>2</sup> (superseded by the SBAR in the Annex on page 21 of this document) and other relevant requirements.

## Objective

On successful completion of the assessment the candidate will be deemed competent to undertake the procedure.

#### Links

**Training**: All Wales Transfusion Competency Package Pre-Transfusion Sampling Workbook and/ or relevant Health Board training materials.

**Assessment**: This competency is linked to the following dimensions and levels in the NHS Knowledge and Skills Framework<sup>3</sup>:

**Core 5 Quality** Level 1 Indicators: a, b, c, d, e

*HWB* 6 Assessment and treatment planning Level 1 Indicators: a, b, c, d, e

HWB 8 Biomedical investigation and intervention Level 1 Indicators: b, e

## **Standards and Criteria**

These standards are the **minimum** required for safe practice and are aimed at reducing error in this part of the transfusion process. There are 5 standards with 6 associated performance criteria (PC).

#### Standard S1

There is a transfusion request form completed in accordance with the Requirements for the Acceptance of Pre-transfusion Samples in Wales<sup>4</sup>, Welsh Health Circular 2007 (42)<sup>5</sup> and BSH guidelines<sup>6</sup>.

#### Performance Criteria

**PC S1** Ensure that the request form contains the patient identifiers:

- First name
- Last name
- Date of birth (DOB)
- NHS / Hospital number
- First line of address

and the requester's:

- Signature
- Contact details

#### Standard S2

The patient having the sample taken is correctly identified<sup>2,5</sup>.

#### Performance Criteria

PC S2a Obtain positive patient identification (PPI) by asking the patient to state:

- First name
- Last name
- DOB
- First line of address

Where the patient is unconscious or otherwise unable to provide reliable PPI (e.g. neonates/ children, confused), ask a relative/ carer or responsible person to state these patient identifiers (where possible).

**PC S2b Inpatient/ Day-Case Patient** – Check the PPI given against the patient's wristband, and check these details <u>and</u> the NHS / Hospital number on the patient's wristband match those on the request form.

**Outpatient** – Check the PPI given against the request form (it is unlikely that a wristband will be worn).

#### Standard S3

The collection of the blood sample from the patient and subsequent labelling of the sample tube must be performed as one continuous, uninterrupted event at the patient's (bed)side involving one patient and one trained and competent member of staff only<sup>5</sup>.

#### Performance Criteria

**PC S3** The pre-transfusion sampling process is performed as one continuous, uninterrupted event at the patient's (bed)side.

#### Standard S4

The sample is labelled legibly and accurately by the person who took the sample<sup>5</sup> in accordance with the Requirements for the Acceptance of Pre-transfusion Samples in Wales<sup>4</sup>.

### Performance Criteria

- **PC S4** The sample is labelled by the person who took the sample, either by hand or by a validated on demand label printer. As a minimum, it must be labelled with:
  - Patients First name
    - Last name
    - DOB
    - NHS / Hospital number
    - Sex
  - Date sample taken
  - Time sample taken
  - Sample taker's signature

#### Standard S5

In accordance with the Requirements for the Acceptance of Pre-transfusion Samples in Wales<sup>5</sup>, the declaration section of the request form must be completed by the person who has positively identified the patient, and taken and labelled the sample, <u>after</u> taking the sample, to confirm they have followed the correct patient identification process; this also identifies them as the sample taker.

#### Performance Criteria

- **PC S5** The declaration section of the request form is completed after taking the sample, with:
  - Date sample taken
  - Time sample taken
  - Taken by (print name)
  - Sample taker's signature

# Section 2

# Collection and Delivery of Blood Components

## Section 2 – Collection and Delivery of Blood Components

Please refer to the All Wales Transfusion Competency Package Appendix 3 – 'Collection of Blood Components Assessment'.

# Persons being assessed must have received adequate training and agree to undertake the assessment.

## Rationale

Implementation of these standards and assessment via the associated performance criteria should enable Health Boards to comply with the requirements of the **NPSA Safer Practice Notice (14) Right Patient, Right Blood**<sup>2</sup> (superseded by the SBAR in the Annex on page 21 of this document), **The Blood Safety and Quality Regulations**<sup>1</sup>, and other relevant requirements.

## Objective

On successful completion of the assessment the candidate will be deemed competent to undertake the procedure.

#### Links

**Training**: All Wales Transfusion Competency Package Collection and Delivery of Blood Components Workbook and/ or relevant Health Board training materials.

**Assessment**: This competency is linked to the following dimensions and levels in the NHS Knowledge and Skills Framework<sup>3</sup>:

**Core 5 Quality** Level 1 Indicators: a, b, c, d, e

*EF 3 Transport and logistics* Level 1 Indicators: a, b, c, d, e

## **Standards and Criteria**

These standards are the **minimum** required for safe practice and are aimed at reducing error in this part of the transfusion process. There are 7 standards with 7 associated performance criteria (PC).

There is an additional standard and with associated performance criteria addressing transfer to satellite blood fridges where in use.

#### Standard C1

The person collecting blood components from an issue fridge or transfusion laboratory takes documentation containing all required patient identification details in accordance with Welsh Health Circular 2007 (42)<sup>5</sup> and BSH guidelines<sup>6</sup>.

#### Performance Criteria

- **PC C1** Locally approved documentation is used for the collection of blood components from the issue fridge or transfusion laboratory, which contains the patient identifiers.
  - First name
  - Last name
  - Date of birth (DOB)
  - NHS / Hospital number
  - First line of address (may be absent with electronic systems)

#### Standard C2

The person removing blood components from the issue fridge or transfusion laboratory ensures that they select the unit(s) for the intended patient.

## Performance Criteria

**PC C2** The patient identifiers on the collection documentation are matched with those on the compatibility label attached to the selected unit, and to signout documentation.

### Standard C3

The person removing blood components from the issue fridge or transfusion laboratory checks that the donation number on the compatibility label attached to the selected unit is the same as the donation number on the component pack label and on sign-out documentation.

#### Performance Criteria

**PC C3** The donation number on the compatibility label attached to the selected unit is matched with the donation number on the component pack label and on sign-out documentation.

#### Standard C4

The person removing blood components from the issue fridge or transfusion laboratory ensures the removal is documented / logged in accordance with Welsh Health Circular 2007 (42)<sup>5</sup> and BSH guidelines<sup>6</sup>.

#### Performance Criteria

### PC C4<sup>P</sup> – APPLICABLE WHERE A PAPER BASED SYSTEM IS IN USE

**PC C4<sup>P</sup>** Sign-out documentation is completed against the selected unit to include:

- Date of removal
- Time of removal
- Collector's signature

#### PC C4<sup>E</sup> – APPLICABLE WHERE AN ELECTRONIC SYSTEM IS IN USE

**PC C4<sup>E</sup>** The following are performed (as applicable to local system):

- Availability of blood component for the patient is checked
- Collection documentation is generated (where appropriate), and checked in accordance with **PC C1**
- Blood fridge is accessed using the collector's own ID barcode
- Unit is scanned out using collection documentation
- Compatibility label is produced and affixed to the component as per local policy; this is to be checked as per PC C2 & PC C3
- If removing more than one unit, scanning out and labelling of one unit is completed <u>before</u> removing the next
- Electronic system is exited on completion

#### Standard C5

Blood components are transported according to BSH guidelines<sup>5</sup> and local policy and procedure.

#### Performance Criteria

**PC C5** The unit is taken immediately to the clinical area and transported according to local policy and procedure.

#### Standard C6

The unit of blood component is delivered to an appropriate member of staff in the clinical area and receipt of the correct unit acknowledged on the documentation<sup>5</sup>.

#### Performance Criteria

**PC C6** The unit is handed to an appropriate member of staff and a record of receipt is obtained which includes the date and time and a signature.

#### Standard C7

The person returning units to the issue fridge documents/logs the return<sup>5</sup>.

#### Performance Criteria

**PC C7** When returning unused blood components to issue fridge / transfusion laboratory:

*Where paper based system is in use:* complete the documentation against the correct unit(s), including:

- Date of return
- Time of return
- Returner's signature

Where electronic system is in use: the unit(s) are scanned back in correctly

#### STANDARD C8 – APPLICABLE TO USE OF SATELLITE BLOOD FRIDGES

#### **Standard C8** (optional according to local requirements)

Blood component requested for a patient is transferred to a satellite blood fridge according to local policy and procedure.

#### Performance Criteria

**PC C8** Local procedure for transfer of blood components to a satellite blood fridge is followed.

# Section 3

# Administration of Blood Components

## Section 3 – Administration of Blood Components

Please refer to the All Wales Transfusion Competency Package Appendix 4 – 'Administration of Blood Components Assessment'.

Persons being assessed must have received adequate training and agree to undertake the assessment.

## Rationale

Implementation of these standards and assessment via the associated performance criteria should enable Health Boards to comply with the requirements of the **NPSA Safer Practice Notice (14) Right Patient, Right Blood**<sup>2</sup> (superseded by the SBAR in the Annex on page 21 of this document).

## Objective

On successful completion of the assessment the candidate will be deemed competent to undertake the procedure.

#### Links

**Training**: All Wales Transfusion Competency Package Administration of Blood Components Workbook and/ or relevant Health Board training materials.

**Assessment**: This competency is linked to the following dimensions and levels in the NHS Knowledge and Skills Framework<sup>3</sup>:

**Core 5 Quality** Level 1 Indicators: a, b, c, d, e

*HWB* 7 *Interventions and treatments* Level 1 Indicators: a, b, c, d, e

## **Standards and Criteria**

These standards are the **minimum** required for safe practice and are aimed at reducing error in this part of the transfusion process. There are 7 standards with 16 associated performance criteria (PC).

### Standard A1

Patients undergoing transfusion are identifiable with in accordance with Welsh Health Circular 2007 (42)<sup>5</sup> and BSH guidelines<sup>6</sup>.

## Performance Criteria

- **PC A1** The patient is wearing a wristband or has an approved alternative which contains the patient identifiers:
  - First name
  - Last name
  - Date of birth (DOB)
  - NHS / Hospital number
  - First line of address

#### Standard A2

Pre-transfusion checks are performed according to BSH guidelines<sup>5</sup>.

#### Performance Criteria

PC A2a Preliminary checks are performed:

- There is written authorisation (All Wales Transfusion Record) with:
  - Circulatory overload risk assessment confirmed, and documented in the patient notes
  - Indication for transfusion confirmed as being documented
  - Patient consent to transfusion confirmed (where possible)
  - Need for special requirements confirmed/indicated
  - Volume and rate of transfusion documented
  - Need to concomitant medication confirmed
- There is patent venous access
- All equipment necessary is available/prepared
- Pre-transfusion observations have been performed

**PC A2b** The component pack and compatibility label are checked to include:

- Patient identifiers on compatibility label and written authorisation match
- Correct component type as per the written authorisation
- Special requirements are met (if applicable)
- Expiry date (component is in date)
- Visual quality and integrity checks
- Component blood group is compatible with the patient blood group

• Donation number and component blood group on the compatibility label are the same as those on the component pack label

**PC A2c** Complete the final bedside check for each unit:

### Check the patient has a legible wristband or approved alternative

Obtain positive patient identification (PPI) by asking the patient to state:

- First name
- Last name
- DOB
- First line of address

Where the patient is unconscious or otherwise unable to provide reliable PPI (e.g. neonates/ children, confused), ask a relative/ carer or responsible person to state these patient identifiers (where possible)

Confirm ALL patient identifiers are correct and identical on:

- PPI (where given)
- Wristband or approved alternative
- Compatibility label attached to the blood component pack (first line of address may be absent with electronic systems)
- Written authorisation (All Wales Transfusion Record)

#### Standard A3

Transfusion of blood components are completed in accordance with the timeframes outlined in the BSH guidelines<sup>5</sup>.

#### Performance Criteria

**PC A3** Blood component transfusions are completed within the required time following removal from temperature controlled environment.

### Standard A4

Traceability monitoring method is completed according to local policy (manual or electronic method) and as required by the Blood Safety and Quality Regulations<sup>1</sup>.

#### Performance Criteria

**PC A4** All traceability documentation is completed, and traceability information is returned to the transfusion laboratory, in line with local guidelines.

#### Standard A5

The patient undergoing a blood transfusion is adequately monitored<sup>5</sup>.

#### Performance Criteria

- **PC A5** Observations are recorded on the All Wales Transfusion Record for each unit of blood component transfused:
  - No more than 60 minutes before the start of the transfusion
  - 15 minutes after the start of the transfusion
  - No more than 60 minutes after the end of the transfusion and must include
  - Temperature
  - Pulse
  - Blood pressure
  - Respiratory rate

#### **Standard A6**

Significant variation in observations is identified and appropriately acted upon.

#### Performance Criteria

PC A6 There is demonstrable knowledge of:

- What action to take when there are significant variations in observations
- Risks associated with inadequate patient observations
- What to do if there is a suspected transfusion reaction
- How to complete the All Wales Transfusion Record Adverse Reactions section

#### Standard A7

Transfusion documentation is completed in accordance with Welsh Health Circular 2007 (42)<sup>5</sup> and BSH guidelines<sup>6</sup>.

#### Performance Criteria

PC A7 Transfusion documentation is completed to include:

- Date and time transfusion commenced
- Donation number of the component transfused
- The volume transfused (in mLs)
- The person administering the transfusion
- Date and time transfusion completed

## <u>Annex</u>

## SBAR: NPSA Safer Practice Notice 14, 'Right Patient, Right Blood'

Situation	To address the recommendations of NPSA Safer Practice Notice (SPN) 14 <i>Right</i> <i>Patient, Right Blood,</i> (National Patient Safety Agency, 2006) hospitals in Wales provide competency based training and assessment for 3 stages of the transfusion process; sampling, collection and administration. Re-assessment of staff is recommended on a three-yearly basis for sampling and administration. Assessment for collection of blood components is recommended annually under the requirements of the Blood Safety and Quality Regulations (DH, 2005). Based on feedback from Transfusion Practitioners, assessment for sampling and administration is achieved with varying levels of success and is labour intensive. Additionally there is little or no evidence to show that repeated competency assessment guarantees continued error-free practice. A recent National Comparative Audit of Blood Sample Collection and Labelling demonstrated that in 61.5% of sampling errors in Wales, the sample taker had previously been assessed as competent. This compares to 64% for the UK (National Comparative Audit of Transfusion Project Group, 2012).
Background	The NPSA SPN 14 set out clear recommendations for hospitals based on evidence and expert opinion gathered during workshops leading up to publication. The aim was to make the transfusion process safer and reduce the risk of ABO incompatible transfusions. Hospitals in Wales implemented the recommendations of the SPN according to local needs. In some hospitals the Transfusion Practitioner took on the task of training and assessing anyone involved in the process, whilst others ensured that the responsibility remained with individual directorates and provided assessor training to key, identified individuals. Compliance was monitored by Regional Office until its dissolution. 'Blood management' now appears as Standard 17 of the Standards for Health Services in Wales and as such is part of the HB annual self assessment to the standards. The self assessment is validated by Health Inspectorate Wales.
Assessment	<ul> <li>Transfusion Practitioners report varying levels of success in achieving competency assessment of relevant staff. This is due to a range of factors</li> <li>Numbers and range of staff to be assessed</li> <li>Limited number of trained assessors</li> <li>Where there are trained assessors many are not undertaking assessments in their own areas</li> <li>Clinical staff have little time and opportunity to take on the additional demands of an assessor role whilst still fulfilling their commitment to their substantive role</li> <li>Access to staff for assessment</li> <li>Frequency of re-assessment too onerous</li> <li>Varied levels of support within Health Boards</li> <li>'Ownership' by the clinical areas is key to success</li> <li>Competency 'fatigue' with limited additional resource</li> <li>Lack of evidence to validate repeated competency assessment as a method of maintaining safe practice.</li> </ul>

## All Wales Transfusion Package – Competency Assessments

## <u>Annex</u>

## SBAR: NPSA Safer Practice Notice 14, 'Right Patient, Right Blood'

Recommendation	This SBAR was presented to the All-Wales Clinical Advisory Group and then to members of Welsh Government's All-Wales Alerts Working Group. All are in agreement with its content. The Nurse Directors and Medical Directors also considered and agreed the following solutions as a revised method of addressing the NPSA recommendations.
	<ul> <li>Initial competency assessment of relevant staff, e.g. newly qualified staff added to the individual's Electronic Staff Record (ESR)</li> <li>View evidence of competence for new employees assessed elsewhere and add to</li> </ul>
	ESR
	<ul> <li>Annual competence based educational updates for staff involved in collection of blood from the issue fridge/local storage facility, with assessment of competence as agreed locally in compliance with the BSQR (2005)1</li> </ul>
	• Biennial training for other staff involved in sampling and/or administration of
	blood as recommended by National guidelines (British Committee for Standards in Haematology, 2009) and recorded on ESR
	<ul> <li>Continued monitoring of competence of all relevant staff through the appraisal process</li> </ul>
	<ul> <li>Range of sanctions in response to incidents that is dependent on severity or frequency of the event, e.g. remedial training, re-assessment, supervised practice, or limiting scope of practice in accordance with capability and disciplinary policies</li> </ul>
	Existing 'tools' to support the process provided by BBT Team • E-learning package
	<ul> <li>Revised all-Wales competency package</li> <li>Assessor training package</li> </ul>
	• Train the trainer/assessor days
	<ul> <li>Further on-line resources to be developed</li> <li>All-Wales training package (standardised presentations)</li> <li>Educational videos</li> </ul>
	<ul> <li>Post training assessment – multiple choice questions</li> </ul>

Report prepared by Karen Shreeve, Manager Better Blood Transfusion Team, Welsh Blood Service

#### References

British Committee for Standards in Haematology (2009) Guideline on the adminstration of blood components, British Society for Haematology.

National Comparative Audit (2012) Audit of Blood Sample Collection & Labelling.

DH (2005) The Blood Safety and Quality Regulations, *Statutory Instrument No. 50*, United Kingdom: The Stationery Office. National Patient Safety Agency (2006) *Safer Practice Notice 14, Right Patient Right Blood.* 

<sup>&</sup>lt;sup>1</sup> The Medicines and Healthcare products Regulatory Agency as the Competent Authority for the Blood Safety and Quality Regulations (2005) expect a minimum of annual educational updates but may accept less frequent assessment of competence (e.g. two-yearly) if it can be demonstrated that there is a robust system in place for continual monitoring of persons collecting blood from the issue fridge. This is a statutory requirement that is over and above the requirements of the original NPSA Safer Practice Notice.