Medicines & Healthcare products
Regulatory Agency

UK GLPMA GUIDANCE ON THE CONTENT OF QUALITY ASSURANCE STATEMENTS

The purpose of the Quality Assurance (QA) statement is to provide evidence that there has been sufficient and relevant quality assurance monitoring to assure the GLP compliance of the study concerned.

Requirements of the Regulations

Schedule 1, Part II **2.** (d) of the UK GLP Regulations requires quality assurance to inspect the final report "*to confirm that the methods, procedures, and observations are accurately and completely described, and that the reported results accurately and completely reflect the raw data of the regulatory study.*"

Schedule 1, Part II **2.** (f) of the UK GLP Regulations requires quality assurance personnel to "*Prepare and sign a statement, to be included with the final report, which specifies the types of inspections and their dates, including the phase of a study inspected, and the dates inspection results were reported to management and the study director and any principal investigator, if applicable. This statement would also serve to confirm that the final report reflects the raw data.* This requirement is then re-emphasised in Schedule 1, Part IX **2.** (d).

There is additional guidance within OECD Consensus Document Number 4 "Quality Assurance and GLP" that states "*The format of the quality assurance statement will be specific to the nature of the report. It is required that the statement includes full study identification and the dates and phases of relevant quality assurance monitoring activities. Where individual study-based inspections have not been part of the scheduled quality assurance programme, a statement detailing the monitoring inspections that did take place should be included."*

QA are therefore required to produce a statement that details the QA monitoring of the study in question, and this statement is also used to record the inspection of the final report and that the reported results accurately and completely reflect the study raw data.

Information required on the quality assurance statement

1 Study identification

The statement must clearly identify the study and study status to which it relates. In the case of a statement that relates to the QA monitoring of a complete study this will be the unique study number and study title.

If the statement relates only to the monitoring of a phase of a study conducted under the direct control of a Principal Investigator, then the statement should clearly identify both the study to which it relates, and the phase of the study that was subject to monitoring by that QA unit. It is important to make clear that such QA statements only relate to the defined phase of the study, and not the entire study.

2 Types of inspections

Schedule 1, Part II 2.(c) of the UK GLP Regulations state that "*inspections can be of three types, as specified by quality assurance programme standard operating procedures:-*

- *study based inspections*
- *facility based inspections*
- *process based inspections*

A facility should have a well defined QA programme that ensures that all necessary critical phases of studies and GLP supporting activities are inspected at an appropriate frequency.

Study-based inspections

Study based inspections are those which relate to the inspection of a particular study. These inspections must be included on the QA statement since they are of direct relevance to the study in question.

Process-based inspections

Process based inspections are performed independently of specific studies. These inspections take place when a process is undertaken frequently and it is considered inefficient or impractical to undertake study-based inspections on every study of a particular type. Any process-based inspection programme must cover all areas and teams of personnel that would be conducting the study activities overseen in this way. Process-based inspections may be conducted using a risk based approach and the GLPMA have published separate guidance on this topic.

For a study type that is routine and repetitive in nature and is reliant on a process based inspection programme for adequate QA coverage then the statement for that study must detail the monitoring inspections relevant to the study type, or associated processes and procedures that did take place. This will usually be the relevant inspections that took place concurrently with the experimental phase of the study to which the statement relates, or those which took place shortly before, and/or after, the experimental phase of the study. The relevance of the QA inspections should determine their inclusion on the statement. When a risk based inspection programme is used the QA statement should detail the use of this approach.

Where adequate study-based inspections have been performed to assure GLP compliance of all key study activities, then any concurrent process-based inspections need not be specifically detailed on the QA statement . When applicable there should be a general note indicating that in addition to the detailed study-based inspections a series of routine process-based inspections were also conducted and reported to management and Study Directors (or Principal Investigators).

Facility-based inspections

These are inspections that cover the general facilities and activities within a test facility. Such inspections are a requirement of an effective QA programme that complies with the GLP principles. All areas of the test facility and all basic GLP systems should be inspected at approximately 12 monthly intervals. TQA statement should include a general note indicating that routine facility-based inspections are conducted within the test facility and specify the frequency at which these inspections are conducted.

Inspection of the final report/data

It is required that the inspection of the final report, or the phase report if assuring the quality of the work of a Principal Investigator, will be detailed on the statement since it is of direct relevance to the study.

Verification that the study-plan complies with GLP

QA are required to verify that the content of the study plan complies with the requirements of GLP. There is no requirement for the verification to be included in the QA statement.

3. Activity inspected

When study-based inspections are conducted it is necessary to identify the phase inspected. Process-based inspections detailed on the statement should not simply refer to “study conduct” but should identify the activity inspected – e.g. “sample preparation”, “dosing” etc. The level of detail will depend on the nature of the study.

4. Approval

The Quality Assurance statement should be signed and dated by a representative of the QA unit. For multi-site studies the statement will include details of QA inspections conducted at test sites and it should be made clear which inspections were undertaken by the test facility Quality Assurance unit and which were conducted by the QA unit at the test site.

Schedule 1 Part II 2.- (f) and Schedule 1 Part IX 2.- (d) of the UK GLP Regulations requires a quality assurance statement to be included in the final report and that the statement should be signed. Consequently, for the Study Director’s statement of compliance to be valid when it is signed, the QA Statement should already be in place.