GCP INSPECTORATE

GCP INSPECTIONS METRICS REPORT

METRICS PERIOD: 1st April 2011 to 31st March 2012

DATE OF ISSUE: 24th March 2014

MHRA
Central Region Medicines Inspectorate
2 Falcon Way, Shire Park
Welwyn Garden City
Herts AL7 1TW
Telephone: 01707 299130

MHRA
Inspections, Enforcement and Standards
Block 14, First Floor, 14F A06/07
FERA (The Food and Environment Research Agency)
Sand Hutton, YORK, YO41 1LZ
Tel: 01904 406088

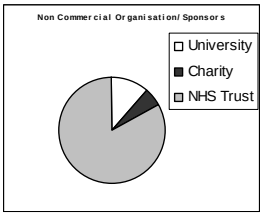
MHRA Head Office:
Inspection & Standards Division,
151 Buckingham Palace Road,
Victoria, London, SW1W 9SZ
Tel: 020 3080 6000

1. INTRODUCTION

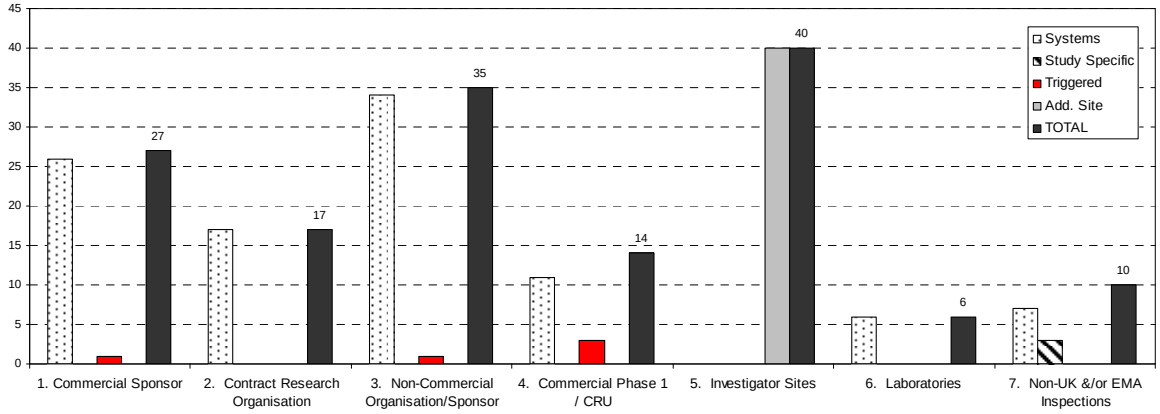
This report covers the metrics period 1st April 2011 to 31st March 2012.

2. GCP INSPECTIONS UNDERTAKEN

During the Metrics Period a total of 149 GCP Inspections were undertaken by the MHRA GCP Inspectorate. The types of inspections are presented below. For the 35 non-commercial sponsor inspections, 4 were of Universities, 29 were of NHS Trusts and 2 were of charitable organisations. The number of inspections of commercial sponsors was 27, Contract Research Organisations (CROs) was 17, 40 investigator sites and 14 phase 1 unit inspections. Triggered inspections were carried out as a result of information received by the GCP Inspectorate, for example in response to a serious breach report, and 5 triggered inspections were undertaken of different organisations. For triggered inspections, 1 was a commercial sponsor, 1 a non-commercial sponsor and 3 were of phase 1 units.



MHRA GCP INSPECTIONS
01/04/11 - 31/03/12



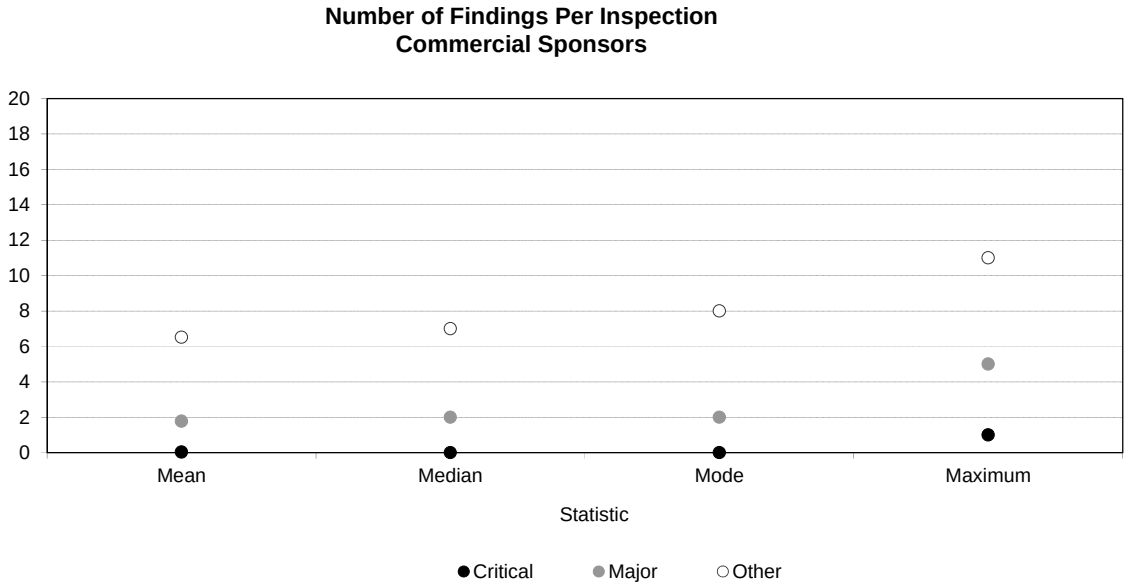
3. INSPECTION REPORTS AND FINDINGS

Reports relating only to the inspections carried out in the Metrics Period were reviewed. It is important to note that multiple inspections can be reported in one GCP Inspection Report, for example, a commercial sponsor GCP Inspection Report may consist of the sponsor inspection and associated investigator site inspections. Where an inspection was conducted before 1st April 2011 and the other associated inspections were conducted after 1st April 2011 (e.g. sponsor site then the investigator site(s)) the findings from the inspections conducted after 1st April 2011 (e.g. investigator site(s)) will be included in this metrics report, as these were inspections conducted during this Metrics Period. The findings reported in this document cover UK site inspections only. The findings reported in this document cover UK site inspections only. Metrics from inspections requested by the European Medicines Agency (EMA) are produced by the EMA. The findings are those that were contained in the inspection reports and do not take into account any inspection responses, apart from in the explanatory text for critical findings. The metrics data entry had an independent sample QC check.

3.1 Commercial Sponsors (Routine Systems, Study Specific and Triggered)

A total of 27 commercial sponsors were inspected and all have been reported.

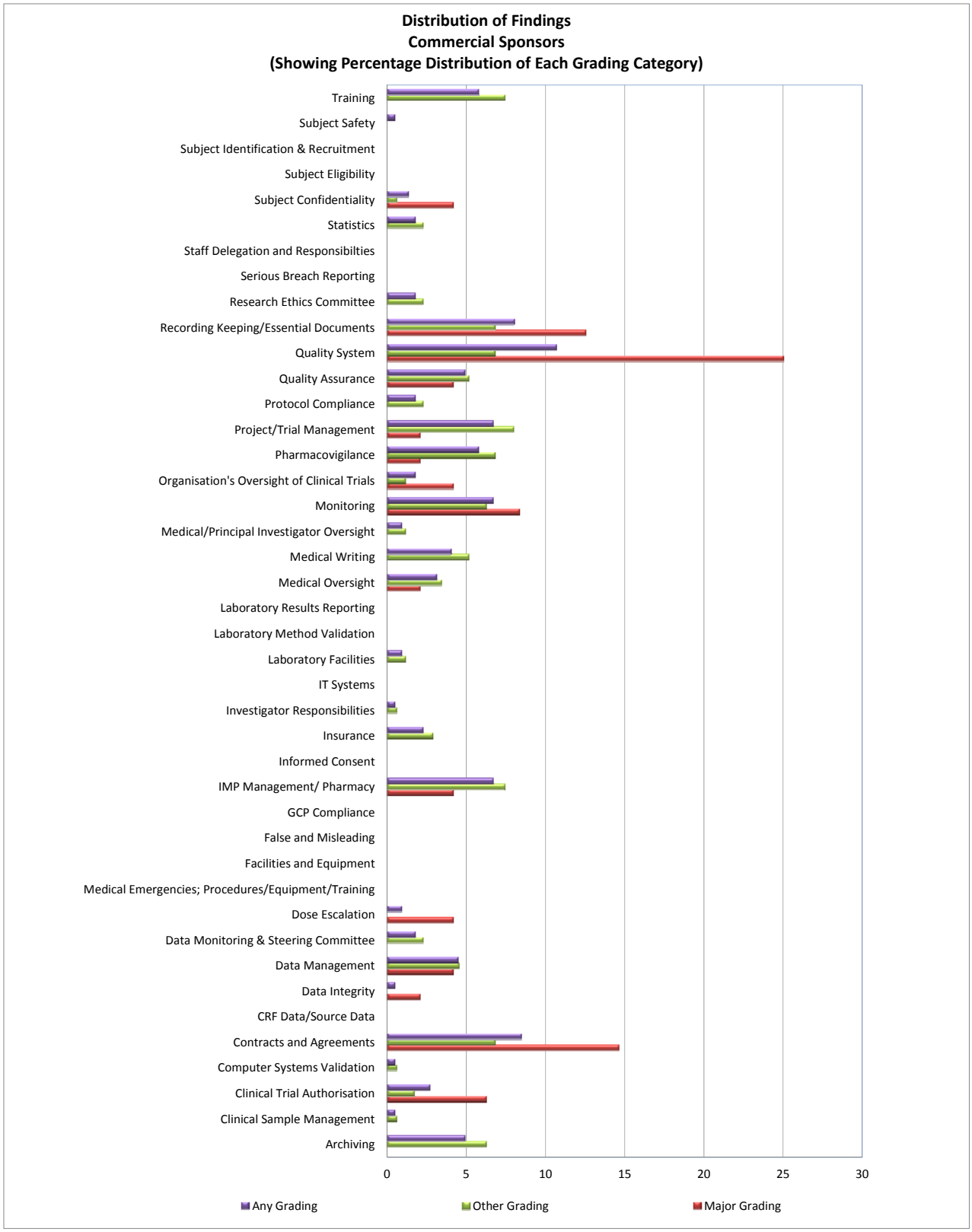
Of the 27 inspections, only 1 (3.7%) had at least one critical finding and 22 (81.5%) had at least one major and/or critical finding. The number of findings per inspection is represented on the figure below.



There was 1 critical finding from 1 organisation.

The critical finding was for subject safety and was given as a result of the sponsor failing to ensure that subjects had received the correct strength of the IMP following several incorrect deliveries of the IMP. Communication between the CRA and site personnel could not confirm that the supply was correct. The IMP supplier provided assurance that the correct strength had been supplied and the investigation was subsequently closed. It later transpired that a subject had received 18 vials of IMP which was 150% stronger than the dose required. Whilst there was no adverse clinical outcome for the subject, there was a significant potential for harm to the subject and an unacceptable delay by the organisation to take action following identification of this risk.

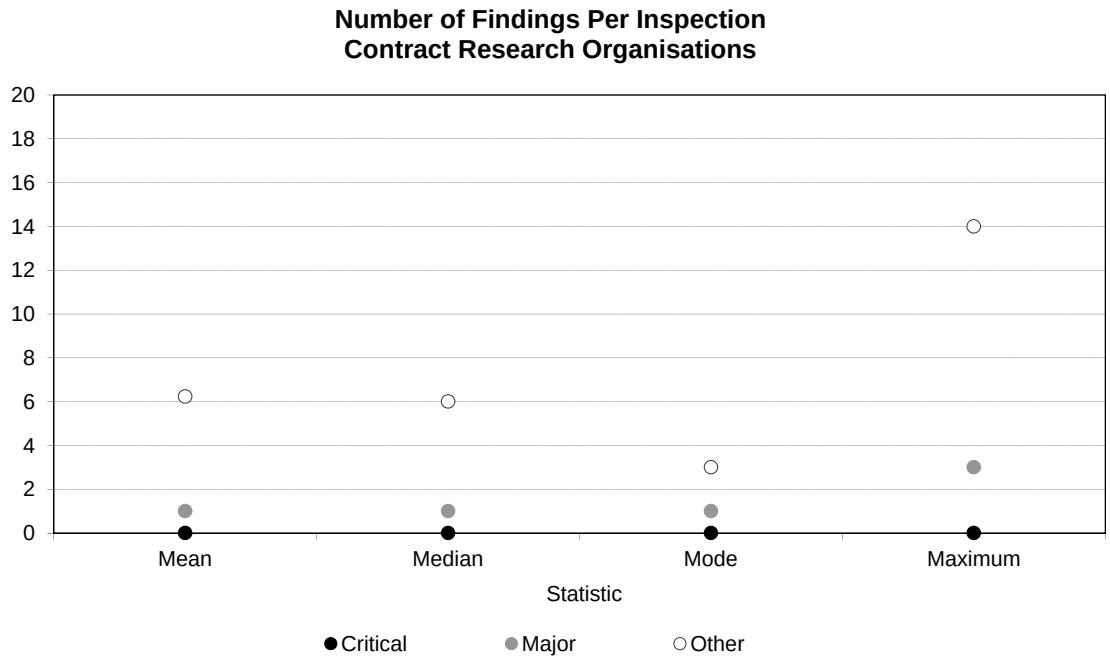
The figure on the following page shows the distribution of Major, Other and any grade of inspection findings. This identifies the areas where GCP inspectors have been making observations of non-compliance with GCP.


Distribution of Findings
Commercial Sponsors
(Showing Percentage Distribution of Each Grading Category)
Training
Subject Safety
Subject Identification & Recruitment
Subject Eligibility
Subject Confidentiality
Statistics
Staff Delegation and Responsibilties
Serious Breach Reporting
Research Ethics Committee
Recording Keeping/Essential Documents
Quality System
Quality Assurance
Protocol Compliance
Project/Trial Management
Pharmacovigilance
Organisation's Oversight of Clinical Trials
Monitoring
Medical/Principal Investigator Oversight
Medical Writing
Medical Oversight
Laboratory Results Reporting
Laboratory Method Validation
Laboratory Facilities
IT Systems
Investigator Responsibilities
Insurance
Informed Consent
IMP Management/ Pharmacy
GCP Compliance
False and Misleading
Facilities and Equipment
Medical Emergencies; Procedures/Equipment/Training
Dose Escalation
Data Monitoring & Steering Committee
Data Management
Data Integrity
CRF Data/Source Data
Contracts and Agreements
Computer Systems Validation
Clinical Trial Authorisation
Clinical Sample Management
Archiving
0
5
10
15
20
25
30
Any Grading
Other Grading
Major Grading

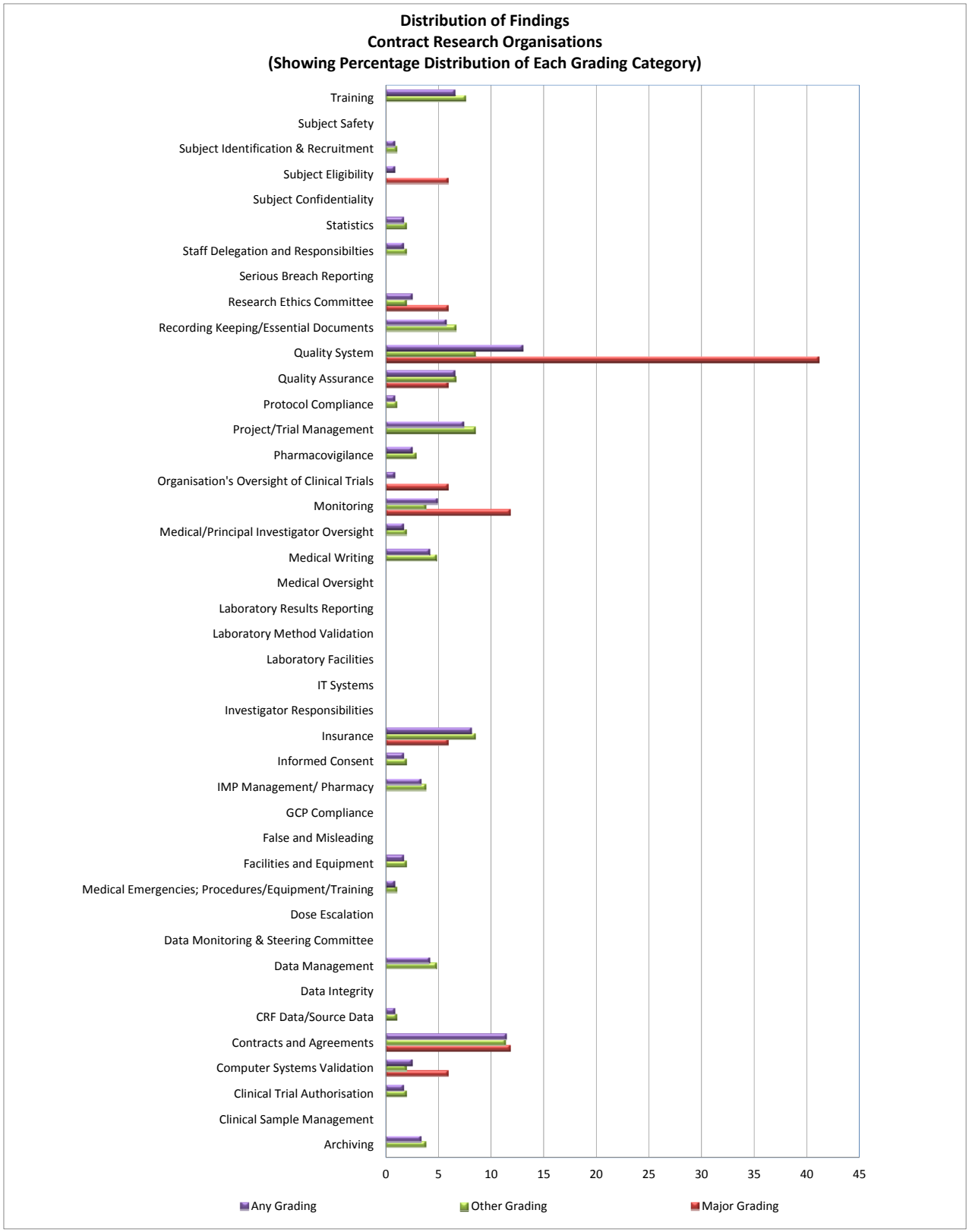
3.2 Contract Research Organisations (CRO) (Routine Systems and Triggered)

A total of 17 Contract Research Organisations were inspected and all have been reported.

Of the 17 inspections, none had any critical findings and 12 (70.6%) had at least one major finding. The number of findings per inspection is represented on the figure below.



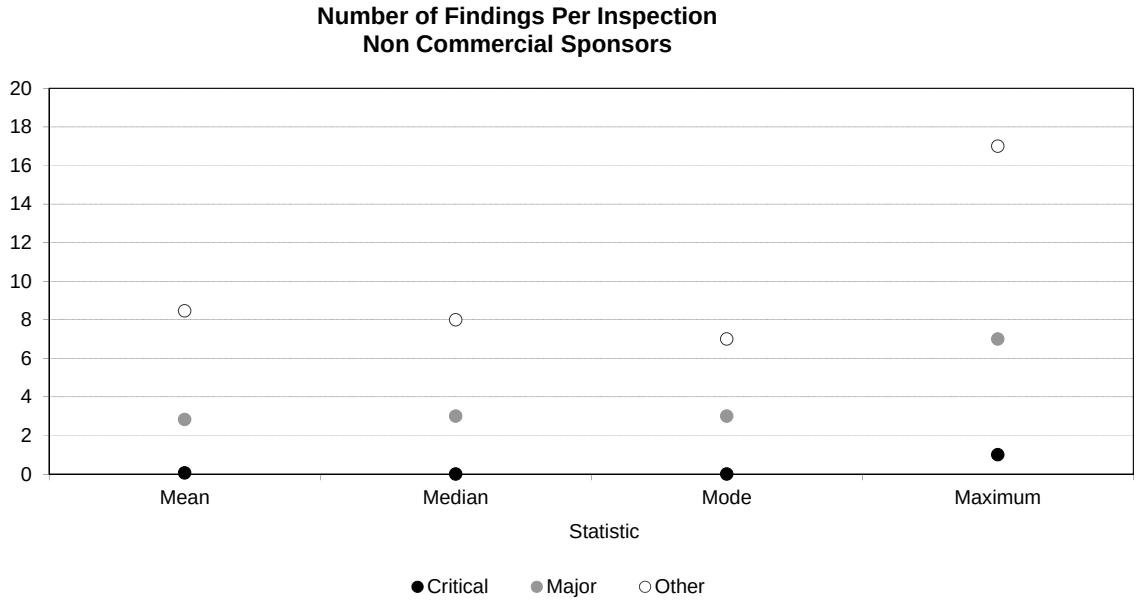
The figure on the following page shows the distribution of Major, Other and any grade of inspection findings. This identifies the areas where GCP inspectors have been making observations of non-compliance with GCP.


Distribution of Findings
Contract Research Organisations
(Showing Percentage Distribution of Each Grading Category)
Training
Subject Safety
Subject Identification & Recruitment
Subject Eligibility
Subject Confidentiality
Statistics
Staff Delegation and Responsibilties
Serious Breach Reporting
Research Ethics Committee
Recording Keeping/Essential Documents
Quality System
Quality Assurance
Protocol Compliance
Project/Trial Management
Pharmacovigilance
Organisation's Oversight of Clinical Trials
Monitoring
Medical/Principal Investigator Oversight
Medical Writing
Medical Oversight
Laboratory Results Reporting
Laboratory Method Validation
Laboratory Facilities
IT Systems
Investigator Responsibilities
Insurance
Informed Consent
IMP Management/ Pharmacy
GCP Compliance
False and Misleading
Facilities and Equipment
Medical Emergencies; Procedures/Equipment/Training
Dose Escalation
Data Monitoring & Steering Committee
Data Management
Data Integrity
CRF Data/Source Data
Contracts and Agreements
Computer Systems Validation
Clinical Trial Authorisation
Clinical Sample Management
Archiving
0
5
10
15
20
25
30
35
40
45
Any Grading
Other Grading
Major Grading

3.3 Non Commercial Organisations (Routine Systems and Triggered)

A total of 35 Non Commercial Organisations were inspected. 29 were NHS Trusts, 4 were Universities and 2 were charitable organisations. All have been reported.

Of the 35 inspections, 2 (5.7%) had at least one critical finding and 31 (88.6%) had at least one major and/or critical finding. The number of findings per inspection is represented on the figure below.



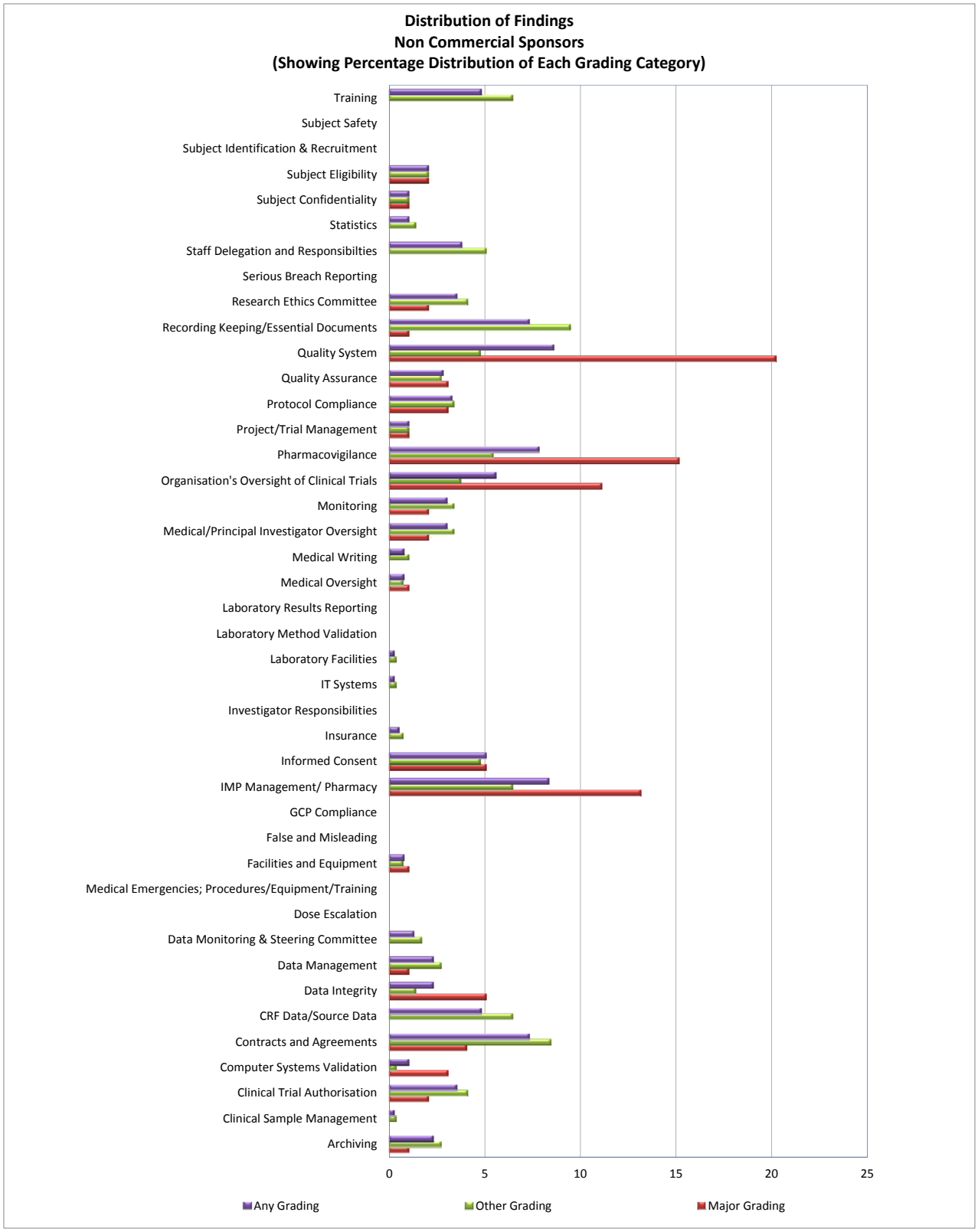
A total of 2 critical findings were identified from 2 organisations (both NHS Trusts).

The first organisation with a critical finding was as a result of a triggered inspection. The critical finding was in relation to Investigational Medicinal Product (IMP) Management for the study. The IMP was incorrectly stored at room temperature rather than refrigerated. It should not have been used if it had been stored for more than 48hours at room temperature, however the IMP was dosed on 2 separate occasions to a subject who deteriorated and subsequently died. It could not be established if the IMP storage error contributed to the deterioration and death of the subject.

The second organisation had a critical finding for Informed Consent due to the number of significant issues within this single area of GCP responsibility including the following:

- Missing consent forms. It was therefore not possible to verify that subjects had consented to participate in the study
- Lack of subject or researcher signature on the consent form to demonstrate agreement to participate in the study
- Unapproved consent form used for a study which referenced the wrong patient information sheet.
- Consent taken by those not delegated this activity and with no evidence of training for obtaining consent

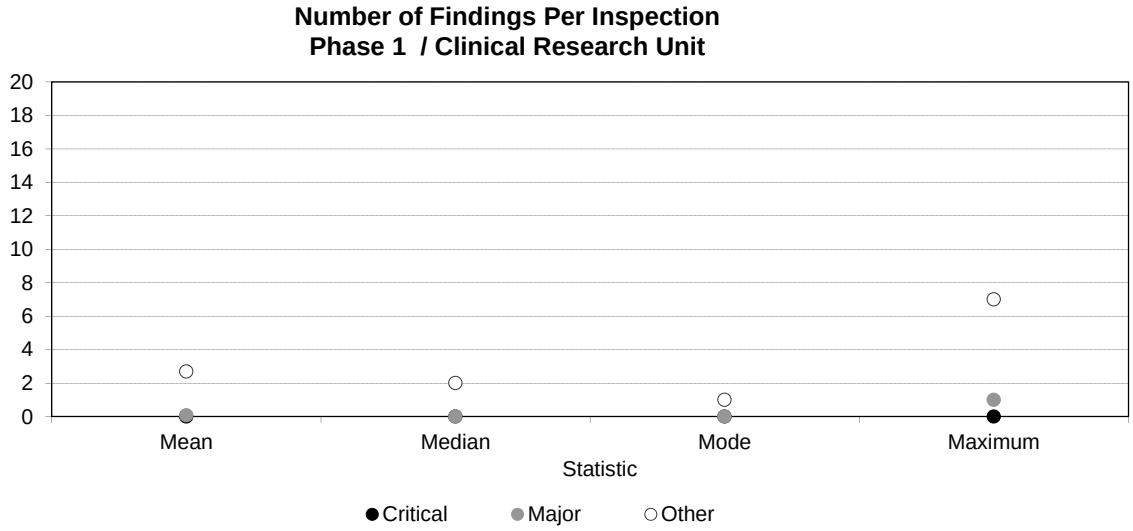
The figure on the following page shows the distribution of Major, Other and any grade of inspection findings. This identifies the areas where GCP inspectors have been making observations of non-compliance with GCP.


Distribution of Findings
Non Commercial Sponsors
(Showing Percentage Distribution of Each Grading Category)
Training
Subject Safety
Subject Identification & Recruitment
Subject Eligibility
Subject Confidentiality
Statistics
Staff Delegation and Responsibilties
Serious Breach Reporting
Research Ethics Committee
Recording Keeping/Essential Documents
Quality System
Quality Assurance
Protocol Compliance
Project/Trial Management
Pharmacovigilance
Organisation's Oversight of Clinical Trials
Monitoring
Medical/Principal Investigator Oversight
Medical Writing
Medical Oversight
Laboratory Results Reporting
Laboratory Method Validation
Laboratory Facilities
IT Systems
Investigator Responsibilities
Insurance
Informed Consent
IMP Management/ Pharmacy
GCP Compliance
False and Misleading
Facilities and Equipment
Medical Emergencies; Procedures/Equipment/Training
Dose Escalation
Data Monitoring & Steering Committee
Data Management
Data Integrity
CRF Data/Source Data
Contracts and Agreements
Computer Systems Validation
Clinical Trial Authorisation
Clinical Sample Management
Archiving
0
5
10
15
20
25
Any Grading
Other Grading
Major Grading

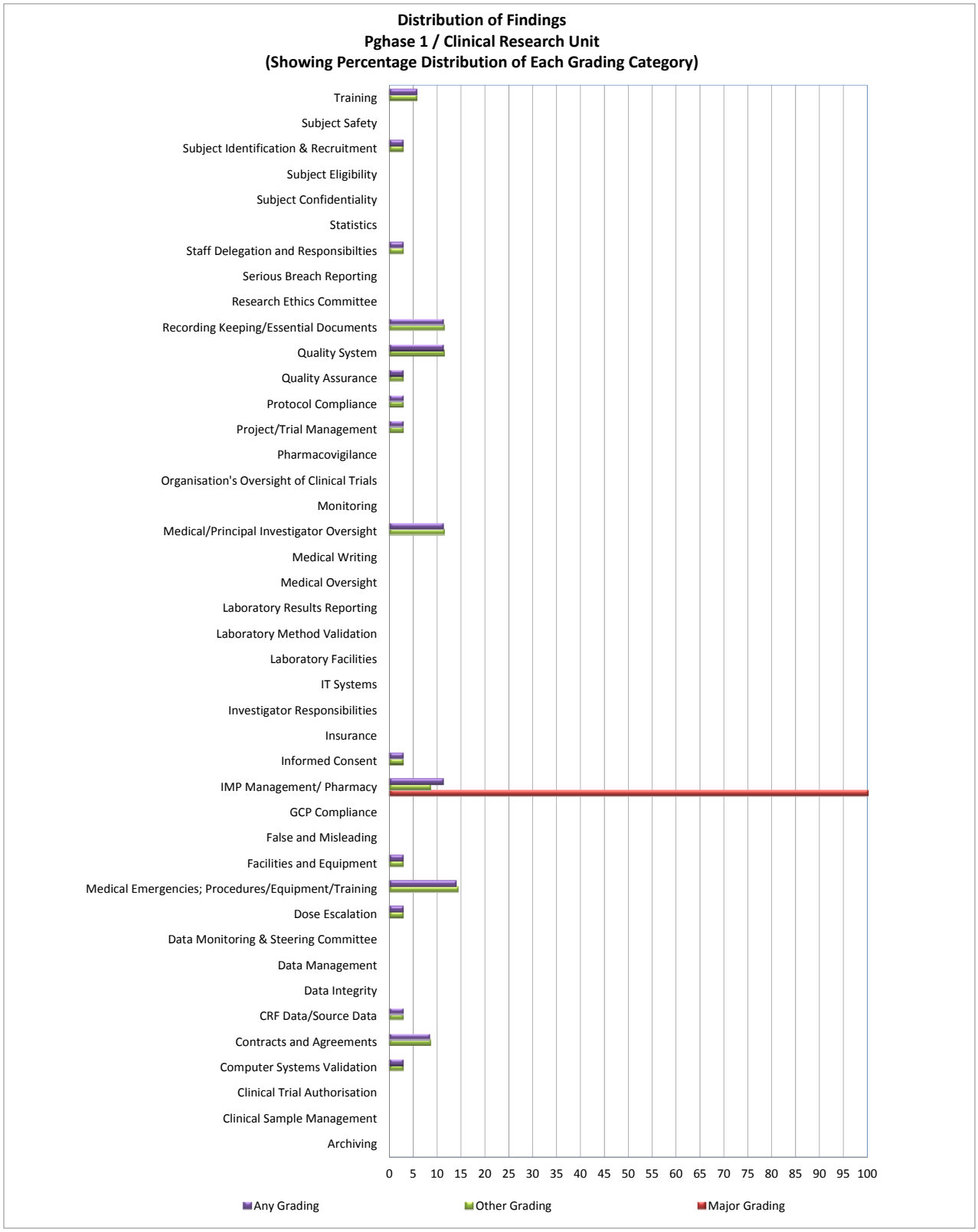
3.4 Commercial Phase 1 Units/Clinical Research Units (Routine Systems and Triggered)

A total of 14 inspections were done of Commercial Phase 1 Units/Clinical Research Units. 8 were also inspections for the MHRA voluntary phase 1 accreditation scheme. 1 of the inspections was not reported.

Of the 14 reported inspections, none had a critical finding and 1 (7.1%) had at least one major finding. The number of findings per inspection is represented on the figure below.



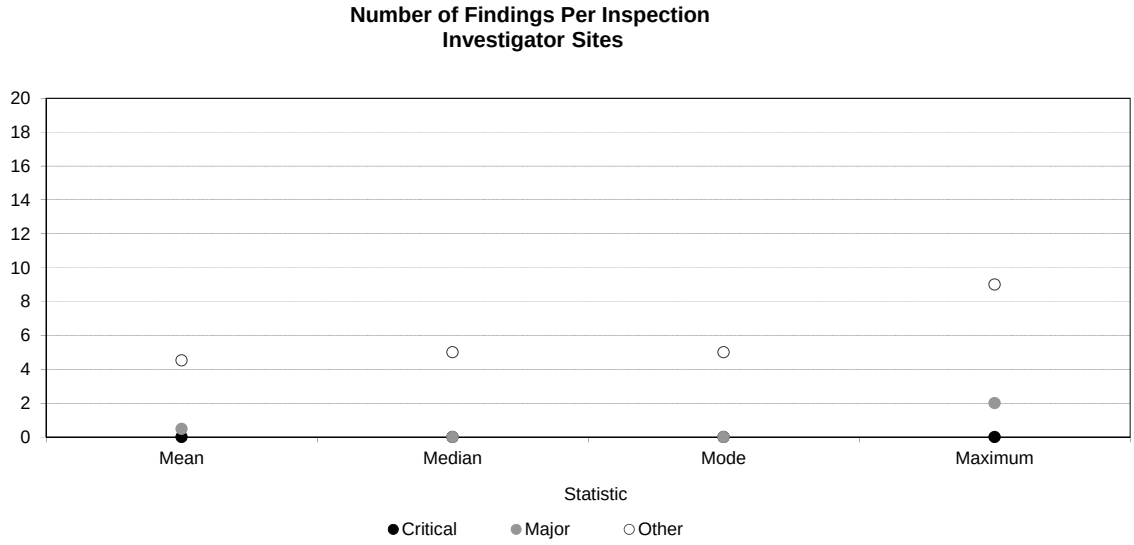
The figure on the following page shows the distribution of Major, Other and any grade of inspection findings. This identifies the areas where GCP inspectors have been making observations of non-compliance with GCP.


Distribution of Findings
Pghase 1 / Clinical Research Unit
(Showing Percentage Distribution of Each Grading Category)
Training
Subject Safety
Subject Identification & Recruitment
Subject Eligibility
Subject Confidentiality
Statistics
Staff Delegation and Responsibilties
Serious Breach Reporting
Research Ethics Committee
Recording Keeping/Essential Documents
Quality System
Quality Assurance
Protocol Compliance
Project/Trial Management
Pharmacovigilance
Organisation's Oversight of Clinical Trials
Monitoring
Medical/Principal Investigator Oversight
Medical Writing
Medical Oversight
Laboratory Results Reporting
Laboratory Method Validation
Laboratory Facilities
IT Systems
Investigator Responsibilities
Insurance
Informed Consent
IMP Management/ Pharmacy
GCP Compliance
False and Misleading
Facilities and Equipment
Medical Emergencies; Procedures/Equipment/Training
Dose Escalation
Data Monitoring & Steering Committee
Data Management
Data Integrity
CRF Data/Source Data
Contracts and Agreements
Computer Systems Validation
Clinical Trial Authorisation
Clinical Sample Management
Archiving
0 5 10 15 20 25 30 35 40 45 50 55 60 65 70 75 80 85 90 95 100
Any Grading
Other Grading
Major Grading

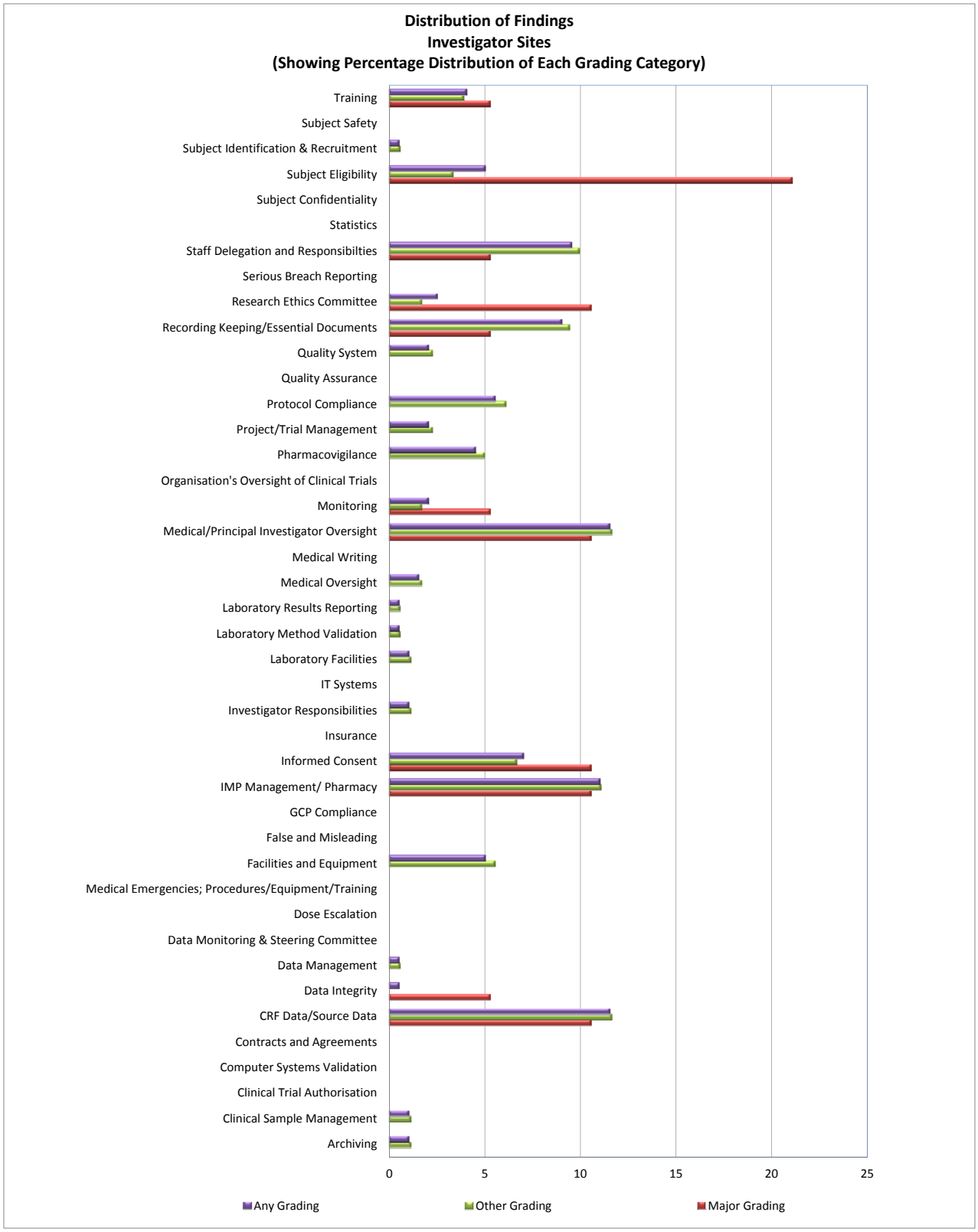
3.5 Investigator Sites (as part of Commercial/Non-commercial/CRO Routine Systems & Study Specific and Triggered)

A total of 40 investigator sites in the UK were inspected, all were as an associated site with a sponsor inspection.

Of the 40 inspections, none had a critical finding and 16 (40.0%) had at least one major finding. The number of findings per inspection is represented on the figure below. It should be noted that as associated sites, the emphasis of the inspection was on how the investigator site had been overseen by the sponsor/contracted CRO.



The figure on the following page shows the distribution of Major, Other and any grade of inspection findings. This identifies the areas where GCP inspectors have been making observations of non-compliance with GCP.


Distribution of Findings
Investigator Sites
(Showing Percentage Distribution of Each Grading Category)
Training
Subject Safety
Subject Identification & Recruitment
Subject Eligibility
Subject Confidentiality
Statistics
Staff Delegation and Responsibilties
Serious Breach Reporting
Research Ethics Committee
Recording Keeping/Essential Documents
Quality System
Quality Assurance
Protocol Compliance
Project/Trial Management
Pharmacovigilance
Organisation's Oversight of Clinical Trials
Monitoring
Medical/Principal Investigator Oversight
Medical Writing
Medical Oversight
Laboratory Results Reporting
Laboratory Method Validation
Laboratory Facilities
IT Systems
Investigator Responsibilities
Insurance
Informed Consent
IMP Management/ Pharmacy
GCP Compliance
False and Misleading
Facilities and Equipment
Medical Emergencies; Procedures/Equipment/Training
Dose Escalation
Data Monitoring & Steering Committee
Data Management
Data Integrity
CRF Data/Source Data
Contracts and Agreements
Computer Systems Validation
Clinical Trial Authorisation
Clinical Sample Management
Archiving
0
5
10
15
20
25
Any Grading
Other Grading
Major Grading