**GOOD LABORATORY PRACTICE**

**GUIDANCE ON THE CONTENT OF QUALITY ASSURANCE STATEMENTS**

Background

During routine GLP compliance monitoring inspections, GLP inspectors will review completed regulatory studies. During the review of these studies, inspectors occasionally encounter issues relating to the information contained within the quality assurance Statement. The purpose of this note is to provide guidance on current GLPMA expectations for the content of Quality Assurance Statements.

What do the Regulations require?

Schedule 1, Part II **2.** (d) of the UK GLP Regulations requires that quality assurance 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.*"

It is clear that quality assurance must inspect the final report and relevant data from each regulatory study.

Schedule 1, Part II **2.** (f) of the UK GLP Regulations requires that quality assurance should "*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 tells us that quality assurance must produce a statement that contains information that is pertinent to the quality assurance monitoring of the study in question, and indicates that this statement could be used to record the inspection of the final report. This requirement is re-emphasised in Schedule 1, Part IX **2.** (d)

There is some additional guidance within the OECD Consensus Document on quality assurance. "*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."*

What information is required on the quality assurance statement?

1. **Study identification**

The statement must clearly identify the study to which it relates. In the case of a statement that relates to the quality assurance 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 quality assurance unit.

It is important to make clear that such quality assurance 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*"

Study-based inspections

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

Process-based inspections

Process based inspections are performed independently of specific studies. They are conducted to monitor procedures or processes of a repetitive nature. These inspections take place when a process is undertaken frequently within a laboratory and it is considered inefficient or impractical to undertake study-based inspections on every study of a particular type. If a process-based inspection programme is adopted, the GLPMA expect the monitoring inspections *of all relevant process and procedures* to be carried out at least once every three months. Any process-based inspection programme must cover all laboratory areas or teams of personnel that would be conducting the studies monitored in this way. An increased inspection frequency may be appropriate if particularly large numbers of studies are monitored in this way.

For a study that is of short duration, and is routine and repetitive in nature, if there have not been any study-based inspections, then the quality assurance 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 process based 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 quality assurance inspections is what should determine their inclusion on the statement.

Some test facilities may, as part of their quality assurance programme, conduct additional inspections of particular processes and procedures even though all regulatory studies are subject to study-based inspections. In this situation it is recommended that any relevant process based inspections conducted concurrently with the experimental phase of the study should be included within the statement.

When a study has been subject to adequate study-based inspections to assure GLP compliance of all key study activities, then any concurrent process-based inspections need not be specifically detailed on the statement. There should however, when applicable, be a general note indicating that in addition to the detailed study-based inspections a series of routine process-based inspections were also being 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 quality assurance programme that complies with the GLP principles. The GLPMA expects that all areas of the test facility and all basic GLP systems are inspected at approximately 12 monthly intervals. The GLPMA require that the QA 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 expected that the inspection of the final report, or the phase report if assuring the quality of the work of a principal investigator, will normally be detailed on the statement since it is of direct relevance to the study.

Verification that the study-plan complies with GLP

Quality assurance 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.

GLPMA Expectations

The purpose of the quality assurance statement is to provide evidence that there has been adequate, and relevant, quality assurance monitoring to assure the GLP compliance of the study concerned. For this reason the statement must always detail any study-based inspections, including the final (or phase) report inspection. For short-term studies that are monitored by means of a process-based inspection programme all relevant process or procedural inspections (i.e. those concurrent with, or close to, the experimental phase of the study concerned) must be detailed. Other process-based or facility-based inspections may be detailed on the statement, or may be referred to in a general comment. Process-based and facility-based inspections need only be specifically detailed on the statement if they are an essential element in the assurance of the GLP compliance of the study concerned.

## 3. Activity inspected

When study-based inspections are conducted it is necessary to identify the phase inspected. In simple terms what this means is that any 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. Signed and dated

The quality assurance statement should be signed and dated by a representative of the quality assurance unit. Where the statement includes details of quality assurance inspections conducted at test sites, it should be made clear which inspections were undertaken by the test facility quality assurance unit and which were conducted by the quality assurance unit at the test site.