GCP Inspection Dossier template

The following information is requested specifically in relation to clinical trials undertaken (for Investigational Medicinal Products) **within the UK** and should be provided within **30** days of the advance notice email date.

**General Requirements of GCP Inspection Dossier**

The purpose of this dossier is to assist the inspector in developing an overview of your organisation prior to the inspection and to assist in defining the inspection scope and developing the inspection plan.

The information should be submitted **electronically** to the **GCP Inspection dossier mailbox (****GCP.Inspectiondossier@mhra.gov.uk****)**

The dossier should be in a format that is easy for the inspectors to navigate and search. Ideally it should be submitted as a **bookmarked PDF document** (with the exception of section 1 items 3 and 5, and section 2 item 3 which should be submitted as an excel spreadsheet). **An electronic list of contents should be included that gives clear document references and the total number of pages for each section/item supplied** (to enable an initial complete assessment on receipt, i.e., each page need not necessarily be numbered provided this assessment can be made).

Please limit the electronic copy of the GCP Inspection Dossier to a maximum of 100 pages and ensure the information it contains is relevant to the planning of your inspection.

A checklist is provided for you to review your GCP Inspection Dossier for completeness prior to submission to the MHRA.

**SECTION 1**

**Item 1: Organisation Charts**

(i) Please provide organisation charts relating to clinical trial activities with staff names and brief summaries of responsibilities (directly related to the activities in Section 2), if not obvious from department/function name. **For organisations that are located globally, please only provide organisation charts for the UK operations and a top-level organisation chart for key functions outside the UK.**

OR

(ii) **For non-commercial organisations**, please provide an organisation chart for the department responsible for research (e.g., the R&D department in Trusts) and a list of key contact points (i.e., those staff in involved in delivering processes) for support departments involved in clinical trials e.g., pharmacy, laboratories, imaging etc.

The information supplied is used to assist the inspector in allocating resource to the inspection and to assist in compiling the inspection plan. Therefore if necessary, please provide a brief over-view (maximum 1-2 pages) of the clinical trial research structures. Where these are collaborative in nature, include an over-view of these (for example, University/Trust or Trust/Charitable Research Organisation collaborations). Please also reference any service level agreements, Memoranda of Understanding or similar referral arrangements which it may be necessary for the Inspectors to take into consideration.

Please list areas where activities are undertaken jointly with another legal entity (for example, joint R&D office, clinical trial unit or statistics unit) and briefly describe with who the function is shared with and which organisation manages this area.

**Item 2: List of clinical trial processes**

Please provide a list of all your Policies/SOPs/Work Instructions and other documented procedures that cover the conduct of clinical trials in the UK. Please provide reference numbers, titles, issue numbers/dates.

This information provides the inspector with an overview of your organisations quality system related to clinical trials. Please explain where procedures are organisation wide or local/divisional/trial specific. Please also make clear any departments which have separate managerial reporting, such as internal Clinical Trial Research Units or similar.

[Note: Please do **not** provide copies of SOPs, except where specifically requested (for example relating to the TMF for selected trials – see Section 2:13)].

**Item 3: List of computer systems & validation status**

A list of all computer systems used in the conduct of clinical trials (for example, databases, electronic data capture (EDC) and IVRS, but excluding Microsoft Office type applications) and the collection and analysis of clinical trial data. Please include the system name, description of what it does, version history, reason for change, the validation status and by whom validation was done. This should also indicate if the systems are off-the-shelf packages or bespoke to your organisation.

The template spreadsheet named ‘Section 1.3 Computerised Systems’ that should be completed with this information is available at the following link: Good clinical practice for clinical trials - GOV.UK (www.gov.uk).

NOTE: You do not need to include details of hardware or operating systems used to run the applications detailed above.

**Item 4: For non-commercial organisations only**

An overview of any joint sponsorship or close collaborations, including details of those activities for which you are responsible in accordance with the terms of a collaboration/joint sponsorship agreement.

An over-view (with location) of all your organisation’s facilities located within the UK, which are involved in clinical trial activities.

We are interested in those service providers that are involved in key efficacy and/or safety processes only (i.e., those who you regularly contract with to perform essential clinical trial research services, section 2 gives details of the clinical trial activities of specific interest at this time). Unless you are a Primary Care Trust (PCT), please do not list commercial organisations, we are specifically interested in the non-commercial aspects of your clinical trial research.

**Item 5: List of clinical trials**

A spreadsheet containing a list of Investigational Medicinal Product (IMP) clinical trials that you have conducted since **your previous MHRA GCP inspection or at a minimum over the last 3 years (whichever is the greater).**

The template spreadsheet that should be completed is available at the following link: Good clinical practice for clinical trials - GOV.UK (www.gov.uk).

The first worksheet (labelled ‘Sponsored or Managed Trials’) in the spreadsheet is to be used to list clinical trials that are sponsored/co-sponsored by your organisation and are running (or have been conducted) in the UK. This worksheet is also to be completed by contract research organisations (CROs) to list trials they have managed or have been involved with, which are running (or have been conducted) in the UK.

The second worksheet (labelled ‘Non-Commercial Sponsor Hosted Trials’) is to be used by non-commercial organisations to list the clinical trials that they host that have non-commercial sponsors. These non-commercial organisations are not required to include trials that have an external commercial sponsor but are asked to detail any commercial organisations with whom they regularly work in the cover-letter so the inspectors can gauge the proportion of commercial to non-commercial work undertaken.

Both worksheets request your organisation indicates if any of the clinical trials have been categorised in accordance with the risk-adaptation categories (where this information is readily available).

Further information on the GCP Inspection frequency associated with risk adaption categories is available in section 7 (GCP Inspections) of the document that opens at the following link:

[MRC/DH/MHRA Joint Project (publishing.service.gov.uk)](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/343677/Risk-adapted_approaches_to_the_management_of_clinical_trials_of_investigational_medicinal_products.pdf)

Clinical trials categorised as Type A are not likely to be selected for inspection unless there is specific reason to do so or there are specific trial activities that are to be reviewed to gain an understanding of the general processes undertaken by that organisation. Please note that risk adaptation categories are not applicable for clinical trials approved prior to 01 April 2011.

NOTE:
(a) Where necessary, an Inspector will contact the named personnel (Section 2) to provide further specific information, on selected trials prior to the inspection.

(b) If you have a list which substantially covers the information requested (in the template spreadsheet) but is in a different format, this can be supplied instead and the Lead Inspector will request any further information if needed.

(c) Please flag any studies commenced prior to 1st May 2004 (i.e., DDX roll-overs or CTXs).

**Item 6: Significant changes since the last inspection**

An overview of any acquisitions/mergers or any major changes to the organisation or your quality system that has occurred. A summary of these and the impact on your organsiation should be provided. This should include a summary of when these occurred and also any plans and/or timelines etc.

**SECTION 2**

This section provides us with an over-view (with location) of all company facilities located within the UK involved in clinical trial activities, including key service providers\*, CROs\* and support services\* (as necessary in a generic form).

[Please use the activity descriptions listed, in preference to any in-house terminology you may currently employ.]

**Item 1: Your Organisation in UK**

If your organisation has an address in the UK, but it performs no activities in relation to clinical trials, please enter the contact details and select none in the table below.

|  |
| --- |
| **Your Organisation Name & Address** |
|  |
| **Telephone Number** | **Fax Number** | **Web Site Address** |
|  |  |  |
| **Primary Contact Name, Job Title & Address** *(if different from above – the inspector will liaise with this person to organise the inspection)* | **Direct Telephone Number** |
|  |  |
| **E-Mail Address** |
|  |
| Please indicate (by deleting as applicable) which activities are performed by your organisation (at the site named above) in the conduct of **clinical trials in investigational medicinal products**. |
| Contract and Agreement Preparation | Yes / No | Regulatory Affairs *(e.g., clinical trial applications etc.)*  | Yes / No |
| Quality System (Inc. training) | Yes / No | Quality Assurance | Yes / No |
| Project Management | Yes / No | Clinical Trial Monitoring | Yes / No |
| Clinical Trial Pharmacovigilance/Safety Reporting1 (Inc. Medical Expertise) | Yes / No | Investigational Medicinal Product2 | Yes / No |
| Data Management | Yes / No | Statistics | Yes / No |
| Clinical Trial Reporting | Yes / No | Use of Computer Systems3 | Yes / No |
| Filing of Essential Documents (Trial Master File) | Yes / No | Archiving4 | Yes / No |
| Clinical Facilities5 | Yes / No | Laboratory | Yes / No |
| Other (please specify) | Yes / No | None | Yes / No |
| 1 This covers any Pharmacovigilance activities being undertaken, except the initial reporting of SAEs.2 This covers the manufacture, supply AND oversight/management/ordering of IMP.3 This covers both off-the-shelf and bespoke computer software packages used for the collection, capture, analysis and reporting of clinical trial data. 4 This covers both short-term document retention of essential documents (i.e., the TMF or the relevant TMF sections held by your organisations) and long-term arching.5 Clinical facilities where patients or volunteers will be recruited, screened and dosed. |

**Item 2: Your Organisation outside UK**

If your organisation has facilities that perform clinical trial related activities in other countries, please complete the table below, otherwise, please select none.

|  |
| --- |
| Please indicate (by deleting as applicable) which activities are performed by your organisation and list the country location(s) which perform that activity in relation to the conduct of **clinical trials in investigational medicinal products** in the UK. |
| Contract and Agreement Preparation | Yes / No | Regulatory Affairs *(e.g., clinical trial applications etc.)*  | Yes / No |
| *Country(s):* | *Country(s):* |
| Quality System (Inc. training) | Yes / No | Quality Assurance | Yes / No |
| *Country(s):* | *Country(s):* |
| Project Management | Yes / No | Clinical Trial Monitoring | Yes / No |
| *Country(s):* | *Country(s):* |
| Clinical Trial Pharmacovigilance/safety Reporting1 (Inc. Medical Expertise) | Yes / No | Investigational Medicinal Product2 | Yes / No |
| *Country(s):* | *Country(s):* |
| Data Management | Yes / No | Statistics | Yes / No |
| *Country(s):* | *Country(s):* |
| Clinical Trial Reporting | Yes / No | Use of Computer Systems3 | Yes / No |
| *Country(s):* | *Country(s):* |
| Filing of Essential Documents (Trial Master File) | Yes / No | Archiving4 | Yes / No |
| *Country(s):* | *Country(s):* |
| Clinical Facilities5 | Yes / No | Laboratory | Yes / No |
| Other (please specify) | Yes / No | None | Yes / No |
| *Country(s):* | *Country(s):* |
| 1 This covers any Pharmacovigilance activities being undertaken, except the initial reporting of SAEs.2 This covers the manufacture, supply AND oversight/management/ordering of IMP.3 This covers both off-the-shelf and bespoke computer software packages used for the collection, capture, analysis and reporting of clinical trial data.4 This covers both short-term document retention of essential documents (i.e., the TMF or the relevant TMF sections held by your organisations) and long-term arching.5 Clinical facilities where patients or volunteers will be recruited, screened and dosed. |

**Item 3: Delegated Tasks to Third Party Service Providers**

Please indicate what activities are relevant to your organisation but are performed by a **Third Party Service Provider** (i.e. your key service providers with their locations and services explained). For CROs this will include any organisations you sub-contract services to on behalf of the sponsor.

The template spreadsheet named ‘Section 2.3 Delegated Tasks’ that should be completed with this information is available at the following link:

Good clinical practice for clinical trials - GOV.UK (www.gov.uk)

**Item 4: Summary information of your organisation’s clinical trial systems**

For the following section, please provide a brief summary to explain how your organisation functions in relation to clinical trials. These should be **no longer than 1 page** per section below. Please do **NOT** reference procedures and attach them. The use of diagrams/flowcharts to illustrate processes is highly recommended where appropriate. This section is for you to briefly explain your organisation to the Inspector. In relation to the activities, you should clearly reflect the location of these activities (i.e., whether they are performed in the UK or elsewhere).

**In addition, if applicable, please indicate where significant changes have been implemented since the previous inspection.**

[Note:
(a) For global organisations, please clearly show how the UK fits into the overarching organisational structure.

(b) For non-commercial organisations please clearly identify if this is a particular department (e.g., pharmacy), job function or delegated to the investigator/trust/clinical trials unit etc.]

1. **Contract and Agreement Preparation**
* Who is responsible for sourcing contractors/CROs/vendors/investigators and arranging contracts with them?
* If you are a CRO, how are sponsor contracts arranged – who does this?
* What procedures/systems are in place for arranging contracts and oversight/management of contractors and subcontractors?

**2. Regulatory Affairs**

* Who is responsible for submission of the CTA and any amendments (including RSI)?
* What other activities are performed by this group in relation to the conduct of clinical trials (i.e., other MHRA correspondence, activities relating to IMP/labelling etc.)?
* If this is not a specific department, who is responsible for these activities (i.e., non‑commercial organisations)

**3. Quality System (including training)**

* What is the structure of the quality system?
* Has it different levels?
* Who manages the quality system?
* What documents are controlled in the quality system?
* Does your organisation have multiple quality systems?

**4. Quality Assurance**

Quality Assurance is the independent audit function separate from the ongoing management and monitoring of the trial. This may be in the form of trial specific or systems audits, therefore, should cover the organisation as well as trial related aspects.

* How is quality assurance of your clinical trial activities organised?
* Who is responsible, where are they based?
* How are they independent of the trial management team?

**5. Project Management**

Please provide details of how your organisation manages clinical trials.

* Who is responsible?
* Where are they located?
* How is the conduct of the trial managed & tracked etc.?
* Where activities are outsourced, explain sponsor oversight mechanisms (including any differences between trial specific level and corporate level)?

In non-commercial organisations where the task of project management has been delegated to individual investigators, only details of the clinical trial research sponsorship and approval processes are required in this section.

**6. Clinical Trial Monitoring**

* How is monitoring of your clinical investigator sites arranged?
* Is there a risk proportionate approach to monitoring and how is this applied?
* What types of monitoring are performed (central, remote, on-site etc.)?
* Where are monitors based?
* Who is responsible for monitoring activities?

For **non-commercial organisations** please describe the link with the Research Governance Framework or if these systems are distinct (e.g., separate personnel)

**7. Pharmacovigilance** **(including medical expertise, if applicable)**

Please summarise your involvement in relation to pharmacovigilance and safety aspects of clinical trials.

* What activities are performed and by whom relating to Adverse Event reporting, Serious Adverse Event reporting and Suspected Unexpected Serious Adverse Reaction reporting from clinical trials (e.g., clinical operations, Drug Safety, R&D, investigators), as relevant to your organisation?
* Who reports what to where (expedited and annual reporting and urgent safety measures)?
* What is the RSI and how is this used?
* Who is responsible for the RSI and its review, update and approval?
* Who is responsible for the DSUR creation and submission?

If you are responsible for providing medical expertise:

* Who is responsible for providing medical expert opinion, on the trial, therapeutic area or IMP?
* How is this managed?

This will be relevant for pharmaceutical organisations and CROs that provide this service.

**8. Investigational Medicinal Products (IMP)**

Management/supply/oversight of Investigational Medicinal Product (IMP), Commercial and Comparator products within your organisation.

* Who is responsible for manufacture, ordering?
* Where is IMP stored?
* Where is the QP who provides technical certification based (if applicable)?
* What is the process for release to investigator sites?
* Also IMP handling activities including drug accountability, formulation, dispensing, packaging and labelling routines (if appropriate).

**9. Data Management**

* Where are data management activities conducted and who is responsible?
* What type of data collection systems are used (e.g., paper, electronic data capture (EDC), database packages etc.)?

**10. Statistics**

* Detail the process use to implement randomisation and control of blinding of IMP
* Where is the statistical input into clinical trials conducted?
* Is there any statistical monitoring performed?

**11. Clinical Trial Reporting**

* How are clinical trials reported (i.e., clinical study reports, publications etc.)?
* Who is responsible for writing these (i.e., investigators, medical writers)?

**12. Computer Systems**

* Who is responsible for computer systems used in clinical trials that are listed in section 1 item 3?
* Where are servers located (describe cloud systems and providers etc.)?
* What information/data is/are stored where?
* What back-up and disaster recovery plans are implemented?

**13. Trial Master File**

* Describe your organisations systems for the set-up and maintenance of the TMF (e.g., paper/electronic/hybrid).
* If the TMF is contracted out to a vendor managing the trial, please also describe how sponsor oversight is documented and retained.

It is a legal requirement that the sponsor keeps a Trial Master File and that it must be readily available at all reasonable times to the inspector upon request (UK statutory instrument 2004/1031 Regulation 31A (1) and (2). Following the selection of clinical trial(s) by the lead inspector, you must provide specific details of the filing arrangements for all the trial documentation that forms the Trial Master File(s) for these selected trials. The relevant policies, plans and procedures etc. together with the TMF index should be provided for the selected trial(s). You should discuss the arrangements for providing the TMF with the lead inspector prior to the inspection.

Please note: It is important that you know what your TMF is (e.g., all paper, electronic or a hybrid). If you have an electronic TMF you must ensure you know what systems make up the electronic aspects of the TMF. This is key information and failure to provide the TMF adequately during the inspection could result in a critical finding.

**14. Archiving**

* Is there an onsite facility?
* What are the arrangements if it is stored by an external facility?
* What happens to essential documents (paper and/or electronic) at the trial end?

For **non-commercial organisations please also supply** a brief description of medical record storage arrangements, including hard copy, electronic and investigator site information. Please specify where these vary by department, division or location (for example where the Trust has several hospitals).

**15. Clinical Facilities**

Relevant to those organisations that conduct volunteers studies (i.e. pharmaceutical and phase I units).

* An overview of the facilities in the organisation.
* How these are laid out with regards to recruitment, screening and ward/out-patient areas etc.
* A floor plan should be supplied in the Dossier, unless this has previously been supplied as part of the phase I accreditation application.

**16. Laboratories**

For the trials that you sponsor, (described in section 1, item 5), please provide details of any laboratories performing end-point analysis (e.g., primary or secondary endpoint pharmacodynamics, pharmacokinetics, biomarkers etc.) Do not include laboratories performing safety analyses.

* How are laboratory requirements organised?
* Is there an in-house facility?
* Who is responsible?

Please also supply details where academic laboratory support is provided for your clinical trials in section 2.

**17. Equipment Maintenance**

An over-view of how equipment is maintained, calibrated and serviced; if there is no central service function, please specify and advise where there are independent contractual arrangements with third parties (if applicable).