Medicines & Healthcare products Regulatory Agency

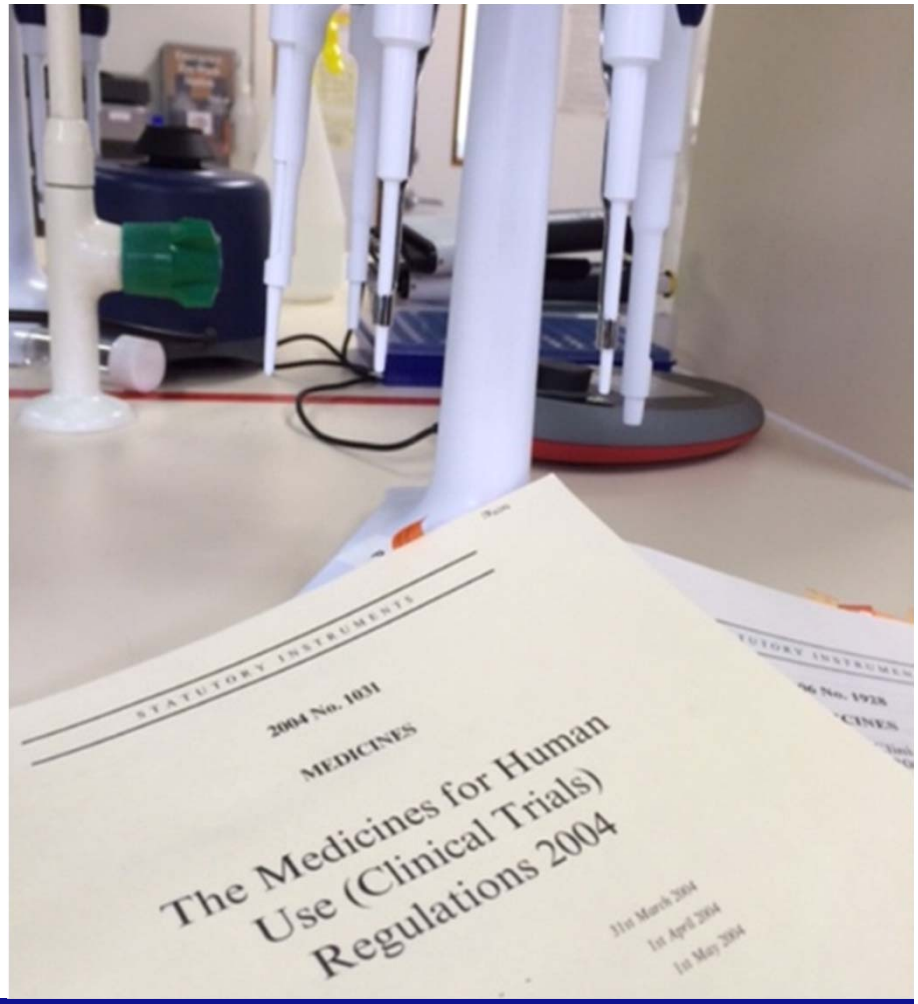
MHRA

GCP Labs Stakeholder Engagement Meeting

Tuesday 7th May 2019

Agenda

- Introduction to the stakeholder group – participants, purpose and terms of reference
- Inspectorate sources of information and communication channels
- Introduction to the GCP labs inspection programme
- Safety labs
- Clinical trial sample analysis and BS EN ISO 15189:2012
- Multi-track analysers
- GCP training for laboratory staff
- Further discussion and questions
- Feedback - what do you want from this stakeholder group?



Regulatory Background

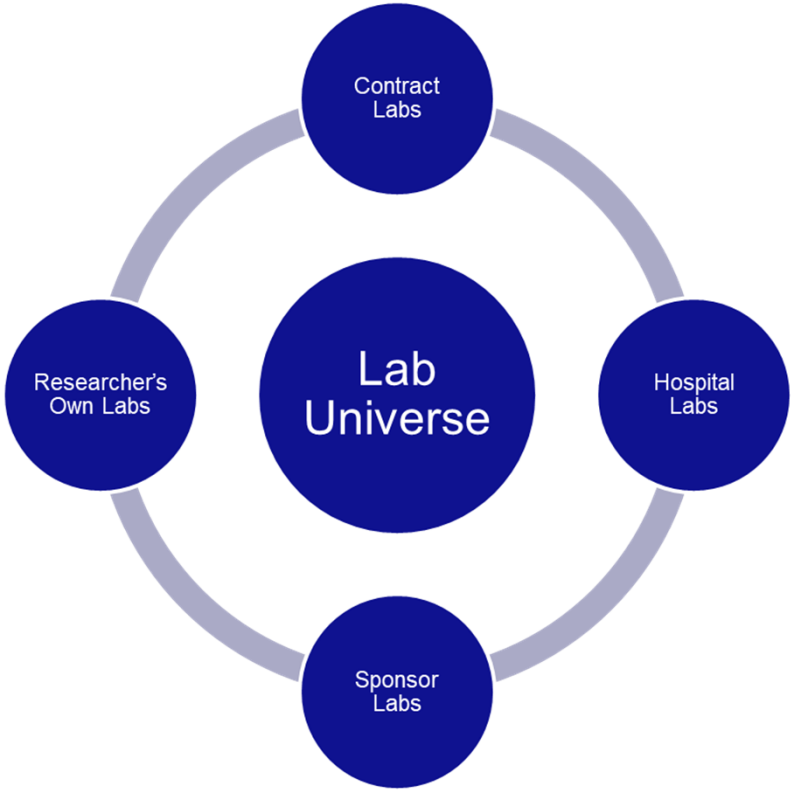
"The verification of compliance with the standards of good clinical practice and the need to subject data, information and documents to inspection in order to confirm that they have been properly generated, recorded and reported are essential in order to justify the involvement of human subjects in clinical trials." (2001/20/EC (15))

"To verify compliance with the provisions on good clinical and manufacturing practice, Member States shall appoint inspectors to inspect the sites concerned by any clinical trial conducted, particularly the trial site or sites, the manufacturing site of the investigational medicinal product, any laboratory used for analyses in the clinical trial and/or the sponsor's premises" (2001/20/EC Article 15)

Inspection Programme Introduction

- Increased use of laboratory data
- EMA Data collection exercise (data from 2012 – 2018)
- Questionnaires to facilities (September 2016 onwards)
- Started with GLP/GCP joint labs

- 209 UK sites currently identified (multiple labs at some locations)



Risk-Based Inspection Programme

- ‘Stand-alone’ inspections
- Joint inspections (GCP/GLP)
- Phase I labs
- Investigator sites
- Triggered inspections
  - Licensing
  - Serious breaches / issues

UK only at present but likely to expand in the future

Common Issues

Dossier / information submission

- What trials are we involved with? Cross-checks
- CT vs routine practice (common with eligibility assessment tests and safety bloods)

Trial Selection

- Retrieval of data
- Electronic data

Common Issues (2)

Data Integrity

- Controls
- Permissions / shared log-ins
- Audit trails
- ‘Touch-points’ between systems

Use of kits / adapted kits

Method validation

Common Issues (3)

- Sample analysis
- Equipment & facilities
- Data acceptance criteria

- Due diligence – approvals / consent

- Reporting
- QA activities

Safety Labs

- Focus of inspection programme is labs generating data to support primary and secondary objectives or where used for key decision making (dose escalation, eligibility)
- Legislation and guidance does not differentiate between these labs / tests and those performing routine safety bloods or those generating data not directly linked to the trial (same applies to exploratory endpoints)
- Required that all labs implement appropriate measures to assure the quality and integrity of the data whilst ensuring subject rights are no compromised

Safety Labs (2)

- Focus is on trial specific analysis
- May look at some aspects of safety / routine lab analysis but not generally the focus
- Don’t tend to review sample processing for external analysis if this is all that is done for a particular trial
- Control of blinded information reviewed

Discussion and Questions

GCP vs ISO EN 15189

- Demonstrates existing, externally reviewed, quality system
- ISO 15189 does not include GCP specifics
- Common to spend less time on QMS, training etc when accredited lab and focus on GCP aspects and trial data but some review still required for trial specific activities
- Have previously worked with UKAS/CPA to look at common topics and audit/inspection approaches

Discussion and Questions

Multi-track Analysers

- Only analyse what you have permission for
- No additional tests
- Protocol input and study set-up important

Ethical dilemma –

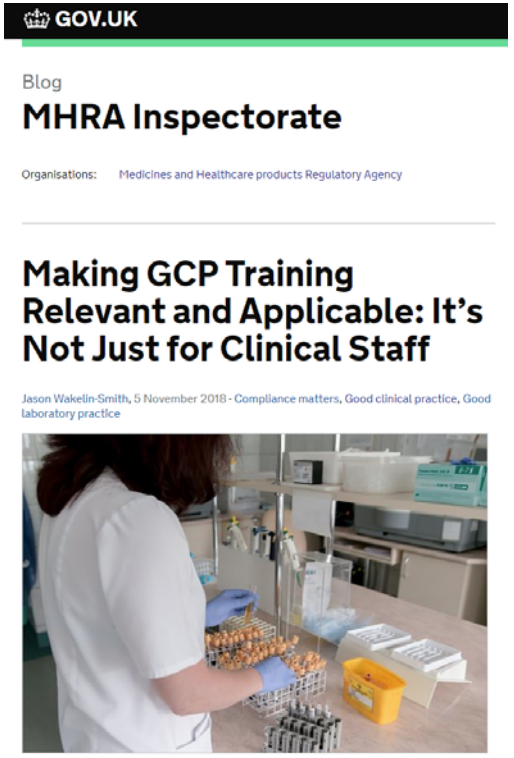
What to do if you analyse additional parameters that you don't have consent for and it comes back with a significant result?

Discussion and Questions

GCP training for Laboratory Staff

General GCP training expectations:

- Appropriate knowledge, experience & training
- Awareness of roles and responsibilities (organisation's set-up & trial conduct)
- Training appropriate & proportionate for the role
- Documented training, experience & competence



Relevant and Proportionate…

Clinically significant deviations:

- What is a clinically significant deviation?
- Mechanism for notifying the PI & escalation
- Protection of trial blinding

Informed consent:

- Need to know that can only perform the tests described in the protocol and informed consent form
- Don’t need to know about the process of consent

Wider Awareness

Lots of guidance out there!

Think broadly…

Discussion and Questions

Engagement – What Do You Want?

Hope that you will bring topics and questions for discussion

Submit in advance if possible