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SCIENCE MEDICINES HEALTH

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Good Clinical Practice Inspectors Working Group (GCP IWG)

ANNEX IV TO PROCEDURE FOR CONDUCTING GCP INSPECTIONS REQUESTED BY THE CHMP: SPONSOR AND CRO

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1. Introduction

This annex compiles specific items that may be verified at the sponsor site or the Contract/Clinical Research Organisations (CROs) performing sponsor's trial-related duties.

There could be two different approaches:

- *System inspection (developed under Section 2).*
- *Specific clinical trial inspection (developed under Section 3).*

The selection of the items that will be inspected will depend on the scope of the inspection and should be established in the local inspection plan. In general, an appropriate sample of data/documents/items from specific trials should be checked during the inspection, to confirm the functioning of the process described. Where specific trials form part of the inspection request, this sample will come primarily from these trials.

As the Regulation (EU) No 536/2014 provides the basis for the application of a risk proportionate approach to the design and conduct of clinical trials, inspectors should take this into account during the inspection when such an approach is implemented in the conduct of the clinical trial inspected. Risk adaptations should be clearly described and justified in a risk assessment and mitigation plan (see reference iv for further information). Risk proportionate approaches applied to a trial may affect the content of the TMF, in the sense that some documents may be combined or absent, depending on the risk adaptations performed and in line with the risk assessment and mitigation plan.

2. Sponsor or CRO quality system inspection

The aim of this kind of inspection is to evaluate the quality assurance and quality control systems established by the sponsor/CRO in order to assure that clinical trials are conducted adequately for the purpose of ensuring trial participant rights and safety and data generated in clinical trials is recorded, handled, reported and stored in compliance with the protocol, GCP and applicable regulatory requirements to ensure robustness and reliability.

The following items should be reviewed in a sponsor/CRO system inspection:

2.1. Organisation and personnel

Inspectors should evaluate if the sponsor/CRO has a well-established organisation for clinical research activities and has a sufficient number of properly qualified and trained personnel for each area.

Review:

- Organisational charts that identify the key personnel in each area.
- The independence of the quality assurance unit.
- The job description, qualifications and training of the individuals involved at any stage of the clinical trial process.

2.2. Facilities and equipment

Inspectors should identify and evaluate the facilities (e.g. archiving, investigational medicinal product storage) as well as the equipment used. Special attention should be paid to computer systems (hardware, software, communication, etc.), in order to evaluate their validation status, and their adequacy for the requirements of the trial(s) being inspected.

2.3. Sponsor/CRO Operating Procedures

Inspectors should evaluate the system for standard operating procedures and associated documents (e.g. forms, templates, policies). Individual procedures should be reviewed in order to verify their compliance with GCP standards and applicable regulations.

2.3.1. Implementation and termination of the clinical trial

Inspectors should evaluate the procedures established for the implementation and termination of clinical trials.

Review the procedures for:

- Document preparation: format and content and distribution of protocol, protocol modifications, informed consent documents, investigator brochure, CRF and any other trial documents.
- Investigators selection and training.
- Regulatory compliance: obtaining IEC approval/favourable opinion and necessary authorisations as required by EU requirements as set out in Eudralex Volume 10 and national regulatory requirements.

2.3.2. Monitoring

Inspectors should evaluate the system established for monitoring clinical trials.

Determine if procedures include:

- Description of risk proportionate approach to monitoring, if applicable.
- Description of the rationale for chosen monitoring strategy in trial specific monitoring plans: planning, frequency, extent and nature of monitoring activities (visits, data review, etc.), monitoring responsibilities, etc.
- Description of on-site and central monitoring activities.
- Content, handling and follow up of monitoring reports.
- Agreements for direct access to source documents by the sponsor personnel (or their appointed representatives) and by regulatory authorities and confidentiality of information about trial participants.
- Training and oversight of monitors (e.g. co-monitoring, issue escalation, resourcing).

2.3.3. Investigational Medicinal Product

Inspectors should determine if sponsor's procedures for different stages of the investigational medicinal product cycle are in accordance with current EU GMP and GCP requirements.

Determine if these procedures establish provisions for:

- risk proportionate approach to IMP management, if applicable;
- quality control requirements;
- manufacturing, packaging and labelling;
- storage and transport;
- supplying, accountability, returns and destruction;
- randomisation and code breaking;
- validation of computer systems used.

2.3.4. Sample management

The procedures established for handling samples obtained in clinical trials should be reviewed.

2.3.5. Safety and adverse events reporting

Inspectors should verify procedures for reviewing and communicating findings that could adversely affect the safety of trial participants and the reporting of serious adverse events to regulatory authorities, investigators and IECs, where applicable.

Review procedures for:

- risk proportionate approach to safety and adverse events reporting, if applicable;
- identification of AE/SAE/SUSAR by the investigator and/or sponsor;
- expedited Adverse Drug Reaction reporting to regulatory authority(ies), investigators and IEC, where applicable;
- serious adverse events notification by investigators;
- management of the serious adverse events reported by investigators;
- safety updates and periodic safety reports;
- preparation, implementation and use of IB and RSI, ongoing safety monitoring/profiling, handling of information from DSMBs, if applicable;
- validation of computer systems used.

2.3.6. Non-compliance

The procedures established for handling significant non-compliance in clinical trials should be reviewed (e.g. review and submission of potential and actual serious breaches, including log, confirmations for decisions, outcomes and CAPAs).

2.3.7. Data handling and clinical study report

The aim is to evaluate the system established by the sponsor/CRO for handling the data obtained during the clinical trial and reporting it in the clinical study report.

Determine if the procedures establish:

- data handling, data analysis and their control procedures;
- clinical study report preparation according to ICH standards;
- validation of the computerised systems used;
- audit trails (for paper and computer systems).

2.3.8. Documentation archiving

The aim is to determine whether the system established by the sponsor/CRO guarantees that the essential documentation which has to be archived at the sponsor/CRO site (according to Eudralex Volume 10, chapter V, GCP compliance for trial master file (TMF)) is available, complete and maintained in good conditions during the period of time established. Risk proportionate approach applied to a trial may affect the content of the TMF.

Determine if procedures include:

- system for archiving and retrieval of documents. The storage system (irrespective of the media used) should provide for document identification, search and retrieval;
- controlled access to the archives/electronic systems.

2.3.9. Sponsor audit and quality assurance system

The aim is to determine if the sponsor/CRO has established an audit system, as part of its own quality assurance system, in order to evaluate its activities related to clinical trials.

It should be determined if the procedures include:

- audits of key clinical trial processes, including monitoring, data management, safety reporting, clinical study report production, archiving and computer system validation activities;
- audits of contractors/sub-contractors.

The inspectors should also review:

- the processes for communicating and addressing audit findings, including the format and distribution of audit reports;
- the procedures for dealing with serious and/or persistent GCP non-compliance;
- audit trails;
- procedures for generation and implementation of audit programme(s)/plan(s);
- risk based quality management, if applicable.

2.3.10. Delegation of duties

The aim is to verify the procedures for contracting/subcontracting of trial-related duties. Inspectors should examine the procedures related with:

- pre-selection and ongoing assessment of contractor/subcontractors;
- documentation of duty delegation and its time recording;
- handling contracts and contract amendments;

- oversight of any trial-related duties and functions performed by contractors/subcontractors;
- project management and general oversight of the trial both internally and externally.

Contracts should be reviewed (either specific ones or a sample).

3. Specific clinical trial inspection

The aim of this type of inspections is to verify if the trial has been conducted, data has been generated, documented and reported in compliance with the protocol, GCP principles, applicable regulatory requirements and sponsor procedures. The procedures and requirements applicable at the time of the trial should be considered and compared where relevant to those applicable at the time of the inspection.

The specific clinical trial inspections could also be conducted to answer questions listed in the request for a GCP inspection.

The aspects that should be checked are:

3.1. Implementation and termination of the clinical trial

The aim is to determine if all legal and administrative aspects of the clinical trial have been accomplished.

Review:

- Distribution of sponsor's duties or functions. Oversight of any trial-related duties and functions in-house and performed by contractors/subcontractors.
- Information given to investigators and/or specific training.
- Investigator selection and agreements.
- Fulfilment of regulatory requirements: IEC approval/favourable opinion and necessary authorisations.
- Submission and approval of modifications, urgent safety measures, serious breaches, review of protocol deviations
- Critical dates: IEC approval/favourable opinion, regulatory authorisation (where required), initiation of the study, patient enrolment period, closing of the trial sites, termination of the study.

3.2. Monitoring

Check:

- Description of risk proportionate approach to monitoring, if applicable.
- Monitoring plan/SOPs (availability, content and compliance with it).
- Frequency and extent of the monitoring activities made.
- Monitors' qualifications.
- Monitoring visit reports and the review of the reports by sponsor/CRO.
- Central monitoring activities and the review of the reports by sponsor/CRO.

- Corrective actions induced by monitoring visits.

3.3. Investigational Medicinal Product

Check:

- Risk proportionate approach to IMP management, if applicable.
- Manufacturing, packaging, labelling and quality control.
- Supplying, accountability, returns and destruction (IMP tracking system).
- Randomisation and code breaking.
- Blinding.
- Shipment, including regulatory authorisation for IMP supply.
- Condition of shipped product on receipt and during storage.
- Validation of computer systems used.

3.4. Safety and adverse events reporting

Check:

- Risk proportionate approach to safety and adverse events reporting, if applicable.
- Notification, follow up and reporting of serious adverse events and other non-serious adverse events requiring expedited reporting according to the protocol.
- Safety updates and their communication.
- Preparation, implementation and use of IBs and RSI, ongoing safety monitoring/profiling, handling of information from DSMBs, if applicable.
- Validation of computer systems used.

3.5. Case Report Form data verification

A selected number of CRFs should be checked to verify:

- Adherence with the protocol as well as data accuracy, completeness, legibility and timeliness.
- CRF corrections and audit trail.
- Correspondence of the dates of first patient included and last patient with the dates of the study initiation and completion as well with investigational product delivery.

3.6. Data handling and clinical study report

Check:

- Data tracking system from CRF to the database.
- Validation of computer systems used.
- Data management.

- Statistical analysis as established in the protocol.
- Clinical study report content.
- Quality control applied.
- System for review of clinical study report, including signatures.

3.7. Clinical trial documentation and archiving

Determine if all essential documents listed in the Eudralex Volume 10, chapter V, GCP compliance for trial master file (TMF) and other essential documents for the specific trial are available and retrievable during the inspection. Risk proportionate approach applied to a trial may affect the content of the TMF.

3.8. Audit

Determine:

- if the clinical trial was audited and if the audit reports exist;
- qualifications of the auditors.

4. References

- i. Regulation (EU) No 536/2014 of the European Parliament and of the Council of 16 April 2014 on clinical trials on medicinal products for human use, and repealing Directive 2001/20/EC.
- ii. Commission Implementing Act on detailed arrangements for clinical trials inspection procedures including the qualifications and training requirements for inspectors, pursuant to Article 78(7) of Regulation (EU) No 536/2014 Directive 2001/83/EC of the European Parliament and of the Council of 6 November 2001 on the community code relating to medicinal products for human use, as amended.
- iii. Regulation (EC) No 726/2004 of the European Parliament and of the Council of 31 March 2004 laying down Community procedures for the authorisation and supervision of medicinal products for human and veterinary use and establishing a European Medicines Agency.
- iv. Risk proportionate approaches in clinical trials. Recommendations of the expert group on clinical trials for the implementation of Regulation (EU) No 536/2014 on clinical trials on medicinal products for human use.
- v. EUDRALEX "Guidelines for Clinical Trials", Volume 10 of the Rules Governing Medicinal Products in the European Union.