Laboratories Regulatory Update

MAY 2018

NEW DOCUMENTS OR DRAFTS FOR COMMENT

The following documents have recently been released as final or for comment.

MHRA documents issued as final:

- 'GXP' Data Integrity Guidance and Definitions.
  Issued March 2018
  https://www.gov.uk/government/publications/guidance-on-gxp-data-integrity

The final version of the document which had been much anticipated provides clarity on the expectations for companies not just with regards to procedures but also ensuring quality culture within the organisation. As expected, there is no grace period for implementation and major findings have been issued to GLP facilities who did not have a data governance procedure in place.

OECD documents issued as final:

- Advisory Document of the Working Group on Good Laboratory Practice on the Management, Characterisation and Use of Test Items.
  Issued 19 April 2018
  http://www.oecd.org/officialdocuments/publicdisplaydocumentpdf/?cote=env/jm/mono(2018)6&doclanguage=en

This new Advisory Document provides clarity for test facilities on the expectations of national Good Laboratory Practice (GLP) compliance monitoring authorities regarding how test items are transported, received, identified, labelled, sampled, handled, stored, characterised, archived and disposed according to the Principles of OECD GLP. The document consolidates existing OECD guidance on test items that are used in studies conducted in compliance with the Principles of GLP. It also aims to promote a consistent approach that is appropriate to the objective of the study and the nature of the test item.

MHRA GLP DEFICIENCY DATA 2016 / 2017

https://mhrainspectorate.blog.gov.uk/2017/07/04/glp-inspections-metrics-reflections/

The deficiency data now brings us almost up to date and includes data from last years' monitoring program.

- There were 9 critical findings:

- 6 Study Conduct
- 2 QA
- 1 Organisation and Personnel

This is an increase from 2014/2015 in number although the areas remain similar.

- 42 Major:
  - Study conduct (25)
    Majors classified as study conduct majors were fairly evenly distributed across 16 areas with four attached to reporting and two each in essential document retention, multisite, reconstruction and recording. We can see that data integrity is still causing concern for the agency.
  - Quality Assurance (8)
    QA once again included 5 majors related to the audit programme; 3 for study based / critical phases and 2 for risk based and management of the programme. There were also one each for delay or failure to undertake corrective and preventative actions and for the audit of QA
  - Organisation and personnel (4)
    These encapsulate training, CVs and Job descriptions.
  - Computerised Systems (3)
    All 3 related to inadequate or no validation of systems
  - Archives and SOPs (1 each)

  While the number of majors against computerised systems has dropped since 2014/2015, there is an increase in major findings against study conduct.
- 590 Other
  - Study conduct (261)
  - Facilities (74)
  - QA (74)
  - Organisation and Personnel (58)
  - Archives (58)
  - SOPs (51)
  - Computerised Systems (14)

  Similar to major deficiencies, there is a decrease in findings against computerised systems while all other areas and category numbers remain fairly stable.

CORRECTION AND CORRECTIVE ACTIONS (CACA)

As we see from the deficiencies breakdown where there was a major deficiency against QA for delay or failure to undertake corrective and preventative actions, there is a focus on appropriate corrective action processes within GLP which historically have been centred on remediations on a per study basis.

Both from GLP inspections and in the MHRA laboratory symposium held in February, the MHRA inspectorate have made it clear they expect companies to ensure learnings are appropriately assessed, implemented and escalated if required. Companies are required to have in place mechanisms for tracking deficiencies and ensuring decisions made relating to actions are implemented and assessed for effectiveness.

While it is understood there is no need for a GMP style CAPA process to be implemented, companies should be able to prove the process they undertake meets the expectations and should include:

- Processes to track observations or deficiencies to ensure learnings from individual departments / studies are utilised across areas if appropriate
- Timelines for performance and closure of activities and including escalation where required
- Actions to be taken where effectiveness is not proven.