



MHRA Inspections from the CRO perspective

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Objectives

- Inspections at CROs
- Preparation of Data Management for an inspection
- Inspection activities
- Inspection outcomes
- Interactions with Sponsors

Inspection Benefits

- Hosting an inspection is an extremely stressful occasion
- However taken in a positive light it can also be very rewarding and effective in helping you to move forward
- Helps focus the minds of senior management to put resources into the required improvements

CRO Advantages

- Experience of continuous audits by clients
 - Systems in place
 - Staff trained in interview techniques
 - SOPs constantly reviewed
 - CVs, Training Records and Job Descriptions ready for inspection

Audits by Clients

- Past 12 Months
 - Client Audits in Total for Europe - 15
 - Full Service 3
 - TMF/Files 4
 - Data Management 2
 - Bio Stats 1
 - Safety 2
 - Clinical 3

 - Total including North America 60

Inspections in last 12 months

■ FDA (routine)	7
■ EMEA (For Cause)	1
■ Including PharmaNet	1
■ Sites	2
■ MHRA PV (Routine)	
■ Where PharmaNet is responsible	1

Inspection process

- The routine inspections of Pharma Companies and CROs is very similar
- Slight differences in the contents of the Inspection Dossier
- The inspection looks at processes and ensure that they are compliant with the requirements of the UK SIs and then ensure that personnel interviewed follow their processes

Dealing with Inspectors

- Communication
 - Both groups want the inspection to be a success
 - One point of contact
 - Keep the inspectors informed
 - Ask when unsure
 - When difficulties arise discuss them
 - Don't communicate unnecessarily

Dealing with Inspectors

■ Openness

- Be open and honest, a good relationship built in advance of an inspection helps the smooth conduct of it.
- Will not influence the outcome!
- Inspectors will have read previous inspection reports from CROs/sponsors with whom you may have worked
- Also dealings with other MHRA departments

■ Flexible

- Timings and programme
- It is likely that the programme will be continually evolving
- Requests from inspectors
- Check dietary and other requirements

Preparation – Data Management Team

- Representatives requested from:
 - Data Entry
 - Database Programming
 - Data Management Lead
 - NOT MANAGEMENT

- Observer – knowledge of DM
- Scribe – independent, could be admin

Preparation – Data Management Team (cont)

- Inspection training provided to ALL by QA department
- Expectations clearly explained
- Team selected and prepared
- Thorough knowledge of SOPs and Operating Guides
- Requirements of their specific role
- Practice Interviews

Preparation – Study Documentation

- Trial Master File complete for the stage of study
- Documentation is signed
- Ensure all relevant documentation is available
- Use other team members

Department Preparation

- Tidy up time!
- Distribute the agenda as early as possible
- Warning e-mail in advance of non-PharmaNet staff
- Remove any confidential information from sight
 - Close cupboards
 - Have no sponsor name in view
 - Only have on your desk things that you can explain
 - Don't forget the printers, faxes and recycling bins

Remit of Interviews

- When asked to describe your experience
 - Do not give a full CV
 - Link past experience to current job
- Be prepared to describe your role and responsibilities
- Answer the question – do not elaborate
- Don't volunteer information – wait until asked
- If you don't know say so
- Expect the unexpected

Expectation v Actual

- Expectation: all questions to the selected specialists, observer silent
- Actual: when one of the team said they didn't know the answer, observer was told it was acceptable for her to respond

- Expectation: inspector would remain in room until the 'official' tour on the agenda
- Actual: 'right, that's all the questions I have – now I want you to show me what happens to a CRF from arrival in the post to archive'

- Expectation: project management level staff not required
- Actual: sudden request to interview a PM of a stand-alone DM project, and examples of two stand-alone DM project contracts

Documents

- GCP Inspectors tend to ask for many documents
- Requires a clear and comprehensive process to be in place
- A dummy run is recommended if possible

Inspection Results

- A poor inspection for a CRO may result in any or all of the following
 - Loss of business
 - Loss of individual standing
 - Loss of job opportunities

- Much of this because trust is the most important part of the Pharma/CRO relationship

Role of CRO

- MHRA appears to rely on CROs to help to maintain compliance at Pharma companies
- The CRO should clearly demonstrate that it pushes back on its clients and ensures that the trial is compliant with regulations

Inspections Beyond PharmaNet

- CRO involvement not restricted to their own office

- Involvement in MHRA inspections of sponsors
 - Provide advice
 - Preparation of documents
 - Provision of copies of CRFs if required
 - Availability (by phone or in person) during inspection timeframe



Questions?

Document process

- Request for document received from inspectors
 - Contact appropriate department
 - Department locates document and QC's it confirming that it is the document requested
 - Documents sent to central document room
 - Document photocopied
 - Document reviewed by QA
 - Document forwarded to Inspector

Document Process

- Document room with restricted entry
- Photocopier, printer and access to company systems
- “Runners” available in each department
- Separate room for interviewees to gather