UNIVERSITY OF LEEDS

The Leeds Teaching Hospitals NHS Trust

Preparing for a LTHT & UoL CTIMP GCP MHRA inspection

1) What is a MHRA GCP systems inspection?

The Medicines and Healthcare products Regulatory Agency (MHRA) are required under law to inspect Clinical Trials of Investigational Medicinal Products (CTIMPs) conducted by both commercial and non-commercial organisations.

The inspectors will select a number of clinical trials to examine how the organisation's trial procedures are applied.

In particular, the MHRA assess whether organisations sponsoring and/or conducting CTIMPs have appropriate systems & processes in place to meet the requirements of the Clinical Trials Regulations.

2) When is the next UoL / LTHT inspection due?

As there is one Quality Assurance office managing CTIMPs for **both** the University of Leeds (UoL) and Leeds Teaching Hospitals NHS Trust (LTHT) Sponsored activity, the MHRA decided that from 2013, the organisations would be inspected jointly.

We have been verbally informed by the MHRA that the next **joint inspection** will likely take place **any time before May 2018.**

3) Can my trial be selected for review?

The MHRA may select your trial for review providing it meets the following requirements:

- It is a CTIMP Sponsored by LTHT or UoL
  AND
- If it has been active* within the last 3 years

**Active is defined as any trial which has received MHRA approval and not yet submitted an end of trial declaration to the MHRA. For example, if your trial began in 2010 but remained active until 2016, it still falls under the inspection remit.*

4) How much notice will I get if my trial is selected?

The MHRA often provide little notice to Sponsoring organisations regarding the exact date of an inspection and which trials will be selected for review.

As a result, all Trial Master Files for in house LTHT / UoL Sponsored trials must be maintained to "inspection ready" standards at all times.

As LTHT and UoL **delegate TMF maintenance to the Chief Investigator/Research Teams**, adherence to Sponsor processes, timely completion of monitoring visit actions and timely filing of trial documents/correspondence is imperative.

5) What documentation would I need to provide?

The complete Trial Master File (TMF) is the basis for inspection and all the documents in it must be made available to the inspectors. This includes any **electronic documents and emails**.

You'll need to discuss the provision of **all aspects of the TMF** (e.g. pharmacy documentation, laboratory documentation, electronic documentation) with the Sponsor QA office ahead of inspection to ensure any equipment/software needed to access electronic documents is provided to the inspector.

In addition to the TMF, the following documents will be requested:

- The **case report forms** and supporting **source data** for the trial (e.g. patients medical records)
- **Training files** for all personnel selected for interview (training file requirements can be located in Sponsor QA SOP *QCRES 06*).
- **SOPs relating to the management of the trial** (e.g. trial specific SOPs, laboratory work instructions, database / eCRF design and validation documentation.)

6) What if some of my data is electronic?

Electronic Patient Records:

At present **there is no process in place to allow Inspectors direct access to electronic patient health records**, therefore in order to verify the details captured in the CRF the inspectors will be **reliant on print outs** of PPM annotations and results server reports.

Additional electronic data required to verify the CRF:

The MHRA do not expect all data to be physically combined with the paper TMF, but the TMF should contain a source data location sheet directing an inspector to any alternative location of source data.

If the trial involves additional electronic data (e.g. research specific scan images saved on a University server, laboratory data maintained within the lab, images stored on a piece of equipment), you **must** have a mechanism in place to provide the inspector with direct access to this data during inspection (e.g. downloading scan images to a CD).

7) What is the format of an inspection?

The inspection includes interviews with relevant staff working on the trials selected for inspection, and a review of the above trial documentation.

The inspection team will be based at either LTHT or UoL for the entirety of the inspection and may visit:

- The Sponsor QA office
- Research teams at LTHT
- Data management units (if applicable)
- Archives
- LTHT Pharmacy
- LTHT and UoL laboratories feeding into primary and secondary endpoints

Know where your lab work is being undertaken and be prepared that the inspectors may want a walk around during the visit!

8) How do I prepare for interview?

Should you be selected for interview, the QA team will assist in your preparation by performing mock interview exercises and share hints and tips acquired from previous inspections.

The inspectors will be looking to confirm that your knowledge of the protocol is commensurate with your delegated duties within the trial.

Know your protocol and your trial specific responsibilities!

Since the last inspection in 2015, the Sponsor QA office have published increased **researcher facing guidance and SOPs** to assist researchers in the management of clinical trials within a regulated environment.

As a Chief Investigator or member of staff working on an LTHT and UoL Sponsored trial, you must be familiar with this documentation and be able to demonstrate an understanding of the systems and processes during interview.

Know the role of the Sponsor office and be able to evidence how you engage with the Sponsor throughout the trial!

9) What happens next?

Once the Sponsor QA office receives notification of the inspection, the Sponsor office will need to submit a dossier to the MHRA including a summary of LTHT and UoL's facilities, research structures and a list of all trials falling within the inspection timeframe.

All research teams working on LTHT and UoL Sponsored CTIMPs will be contacted to verify key trial details (e.g. laboratory contact details, patient recruitment figures, location of TMF, etc,). This information is required to complete the dossier and is the first opportunity we have to impress the inspectors ahead of inspection.

The dossier is required within **30 days of notification** - **a prompt reply to any data requests is crucial!**

Key Resources & Further Reading:

MHRA website	MHRA	https://www.gov.uk/guidance/good-clinical-practice-for-clinical-trials#inspections-under-the-risk-based-compliance-programme
MHRA Inspectorate Blog	MHRA	https://mhrainspectorate.blog.gov.uk/
Good Clinical Practice Guide	*MHRA*	https://www.tsoshop.co.uk/MHRA/Good-Clinical-Practice-Guide/
Sponsor CTIMP SOPs and Bulletins	Sponsor QA office	http://www.leedsth.nhs.uk/research/information-for-researchers/key-documents/

*** Should you have any queries or concerns, or would like further information regarding the content of this bulletin, * then please do not hesitate to contact the Sponsor Quality Assurance Office on Tel: 0113 30 60465**