

# 5<sup>th</sup> Training Workshop for Micro-, Small- and Medium- Sized Enterprises (SMEs)

## GCP Requirements and Compliance

Dr. Katalina Mettke  
BfArM, Germany

# SME Workshop Agenda

- Specialities of Early Development Trials
  - Examples of Inspection Findings
- Specialities of SMEs
  - Examples of Inspection Findings
- Outsourcing
  - Examples of Inspection Findings

# SME Workshop

## Early Development Trials

- New drug
- New formulation, new kind of administration
- Safety profile has to be evaluated
- Dose range has to be investigated



# SME Workshop

## Early Development Trials

Specific care and attention needs to be taken to ensure subject's/patient's safety.

- Clinical trial protocol and trial documents (CRF, diary, questionnaires, instructions etc...) need to be clear, detailed and consistent
- Clear and exact communication/information lines needed to ensure timely and precise (in particular safety) information from investigator site(s) to sponsor

# SME Workshop

## Early Development Trials

- Special requisites for investigator site(s) (complexity of trial, special requirements with regard to subject's / patient's safety)
- Special focus on investigator site selection
- Adequate safety procedures at investigator and sponsor site
- Extensive training of trial personnel with regard to the investigational medicinal product, clinical trial protocol and the safety procedures

# SME Workshop

## Early Development Trials



### Inspection Findings

- Dose Limiting Toxicities (DLT) not adequately defined in phase 1 dose-escalation trial
- Safety reporting lines (AEs, SAEs, SUSARs; investigator, sponsor, CRO, Regulatory Authority, IEC/IRB) not clearly defined and communicated, responsibilities not clear
- Training of investigator insufficient, investigator is not familiar with investigational medicinal product and its safety profile

# SME Workshop

## Sponsor Responsibilities (ICH-GCP)



# SME Workshop

## SME Specialities

- Small size, small number of personnel
- Experts for certain fields not available
- Personnel fulfils several clinical trial functions in parallel:
  - Qualification sufficient for the functions taken?
  - Capacity of the individual?
  - Quality control impartial? Quality assurance independent?

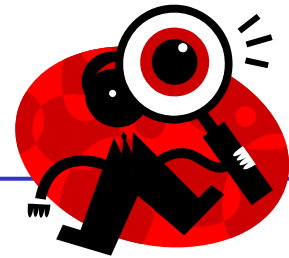
# SME Workshop

## SME Specialities

- Outside financing, tight time schedules
- Frequently one product in pipeline only, existence of SME depends on this product

# SME Workshop

## SME Specialities



### Inspection Finding

Chief Medical Officer is in parallel Coordinating Investigator and performs also audits for the trial:

- not independent from clinical trial / conflict of interest
- not qualified as auditor by training and experience

# SME Workshop Agenda

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- Specialities of SMEs
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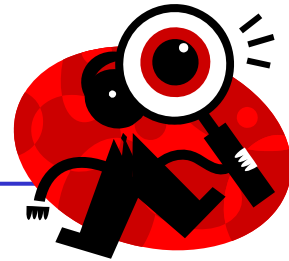
# SME Workshop Outsourcing

Even though a clinical trial is outsourced ('full-service') to CROs, qualified personnel is still needed at the sponsor site for oversight with regard to:

- Safety
- Medical Expertise
- IMP
- Trial Management / Management of CROs
- Quality Assurance



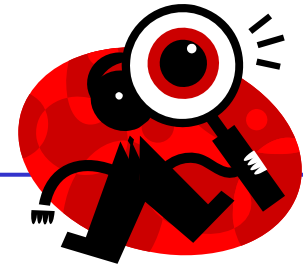
# SME Workshop Outsourcing



## Inspection Findings

- no documentation which tasks are delegated from the sponsor to the CRO (the only documentation is an e-mail: ‘...trial is out-sourced to.....’)
- CRO sub-contracts tasks to another CRO, sponsor is not aware of this fact
- no specification, which Standard Operating Procedures are to be used (sponsor’s or CRO’s)

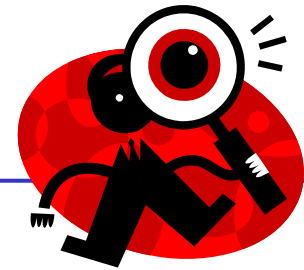
# SME Workshop Oversight



## Inspection Findings

- no clear communication lines between investigator, CROs and sponsor, lack of communication
- protocol violations/deviations not consistently and accurately collected

# SME Workshop Oversight



## Inspection Findings

- missing monitoring follow-up, monitoring report review
- audits insufficient
- audit follow-up inadequate
- major violations/misconduct/fraud not escalated

**THANK YOU  
FOR YOUR ATTENTION**

