Quality Management in PV

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Quality Management in PV

- Pharmacovigilance System
- Overall Quality objectives in PV
- Quality Management System overview
- Quality Management System requirements
- Quality Management essentials
- Responsibilites of the MAH
- Quality Management procedures
- Inspections

Quality Management in PV Pharmacovigilance System

- Defined as a system used by an organisation to fulfil its legal tasks and responsibilities in relation to pharmacovigilance and designed to monitor the safety of authorised medicinal products and detect any change to their risk-benefit balance
- Responsibilty for the MAH but also competent authorities of member states and the agency to establish and use quality systems that are adequate and effective for this performance

Quality Management in PV
Overall quality objectives in PV

- Comply with the legal requirements for pharmacovigilance tasks and responsibilities
- Prevent harm from adverse reactions in humans arising from the use of authorised medicinal products within or outside the terms of marketing authorisation or from occupational exposure
- Promote the safe and effective use of medicinal products, in particular through providing timely information about the safety of medicinal products to patients, healthcare professionals and the public
- Contribute to the **protection of patients' and public health**

Quality Management in PV
Quality Management System Overview

- The quality system is part of the PV system and consists of its own structures and processes
- Must be adequate and effective for performing PV activities
- Must be documented in a systematic manner in the form of written policies and procedures
- Consistent with ISO 9000 standards for quality management

Quality Management in PV
Quality Management System Overview

Quality Management in PV
Quality Management System Overview

- Quality planning
  - Establishing structures and consistent processes
- Quality adherence
  - Carrying out tasks and reponsibilities in accordance with quality requirements
- Quality control and assurance
  - Monitoring and evaluating the effectiveness of the sturctures and processes
  - Monitoring how effectively the processes are being carried out
- Quality improvements
  - Correct and improve the structures and processes where necessary

Quality Management in PV
Quality Management System Overview

- Quality is the degree to which a set of inherent characteristics fulfills requirements

According to the ISO 9000 Standard

- A Quality Management System is defined as:

The Organisational structure, responsiblities, procedures, processes and resources for implementing quality management

According to US FDA CFR 820

Quality Management in PV
Quality Management System requirements

- Meet needs related to safety of medecines for patients, HCPs and public
- Strong leadership from upper management
- Involvement of all members of the organisation and engagement in continuous quality improvement
- Adequate organisation of resources and tasks
- Collection of all information related to benefit-risk balance and good decision making
- Good collaboration between MAH, competent authorities, public health organisation, HCPs, patients, etc.

Quality Management in PV
Quality Management System requirements

- Organisational structure & facilities
  - Roles and functions clearly defined in job descriptions & organisational charts with reporting lines and escalation processes
  - Secured access to facilities
- Right documents
  - Policies and procedures describing PV processes
  - Pharmacovigilance agreements with 3rd parties

Quality Management in PV
Quality Management System requirements

- Adequate dedicated and trained staff
  - Sufficient, competent, motivated, qualified and trained staff
  - Back up roles
  - Documented initial and ongoing training
  - Reliable and up to date training records
  - Training efficacy measures

Quality Management in PV
Quality Management System requirements

- Compliance monitoring

➔ Define KPIs (key performance indicators)

- Expedited reporting
- Periodic reporting
- Internal case processing activities
- Compliance with timelines for exchange with 3rd parties
- Updates to RSI
- Signal detection/evaluation activities
- CAPA management (including audit/inspection responses)
- …

➔ Periodic reports on compliance

- QPPV oversight
- MAH upper management responsibilities

Quality Management in PV
Quality Management System requirements

- Documentation of the quality system
  - IN EU, the quality system is described in the PSMF*
  - Documents should be stored in structured and easily accessible compliant system(s)
  - Change control of documents & documented decision processes

* Pharmacovigilance System Master File

Quality Management in PV
Quality Management System requirements

- Audits

  - Periodic audits based on risk based approach with defined audit plan

    →To ensure compliance with the quality system requirements

    →To determine their effectiveness

    →Outsources activites must also be covered by an audit plan

  - Should be carried out by knowledgeable and independent people (no implication in PV)

  - Documented reports and follow-up in CAPA plans

Quality Management in PV
Quality Management System requirements

- CAPA management
  - Must be defined in SOPs to track, manage and periodically review corrective and preventative actions
  - Senior management musts have overview of CAPA status
  - Most critical findings in PSMF

Quality Management in PV
Essential components

- **Continuous safety monitoring** and benefit-risk evaluation
- Managing **risk management systems** and evaluation of their effectiveness
- Management of safety information:
  - ICSRs
  - Signals
  - PSURs
- Meeting **regulatory commitments**
- Effective interaction between PV and product quality system
- **Communication** of safety concerns to CA, HCPs, patients
- Keeping product information up to date
- **Business continuity** planning

Quality Management in PV Responsibilities of the MAH

- In EU, MA must appoint a suitably qualified person (QPPV) and inform CA
- Must have a detailed job description
- MAH must ensure that QPPV has sufficient authority to influence the performance of the quality system and PV related activities
- MAH must provide QPPV with all relevant safety data
  - Emerging safety concerns
  - Ongoing clinical trials (safety related)

Quality Management in PV Responsibilities of the MAH

- Adapt their PV system and quality system to their organisation
- Monitor the performance of their PV system
- Identify issues
- Take necessary corrective and preventative actions
- Adopt a risk-based approach

Quality Management in PV – PV relevant procedures

- Policies
  - Safety governance
  - Quality management
  - Handling of confidential information
- Procedures (SOPs)
  - Collection, assessment and reporting of safety related information
  - Literature monitoring
  - Risk management plans
  - Signal detection
  - Periodic reports preparation and submission

Quality Management in PV – PV relevant procedures

- QPPV – role and back up
- Business continuity plan
- Managing the PSMF
- Post-autorisation safety studies
- Updates to reference safety information
- Communication to HCPs and public
- Reconcilation with different sources of safety data
- Management of safety data exchange agreements

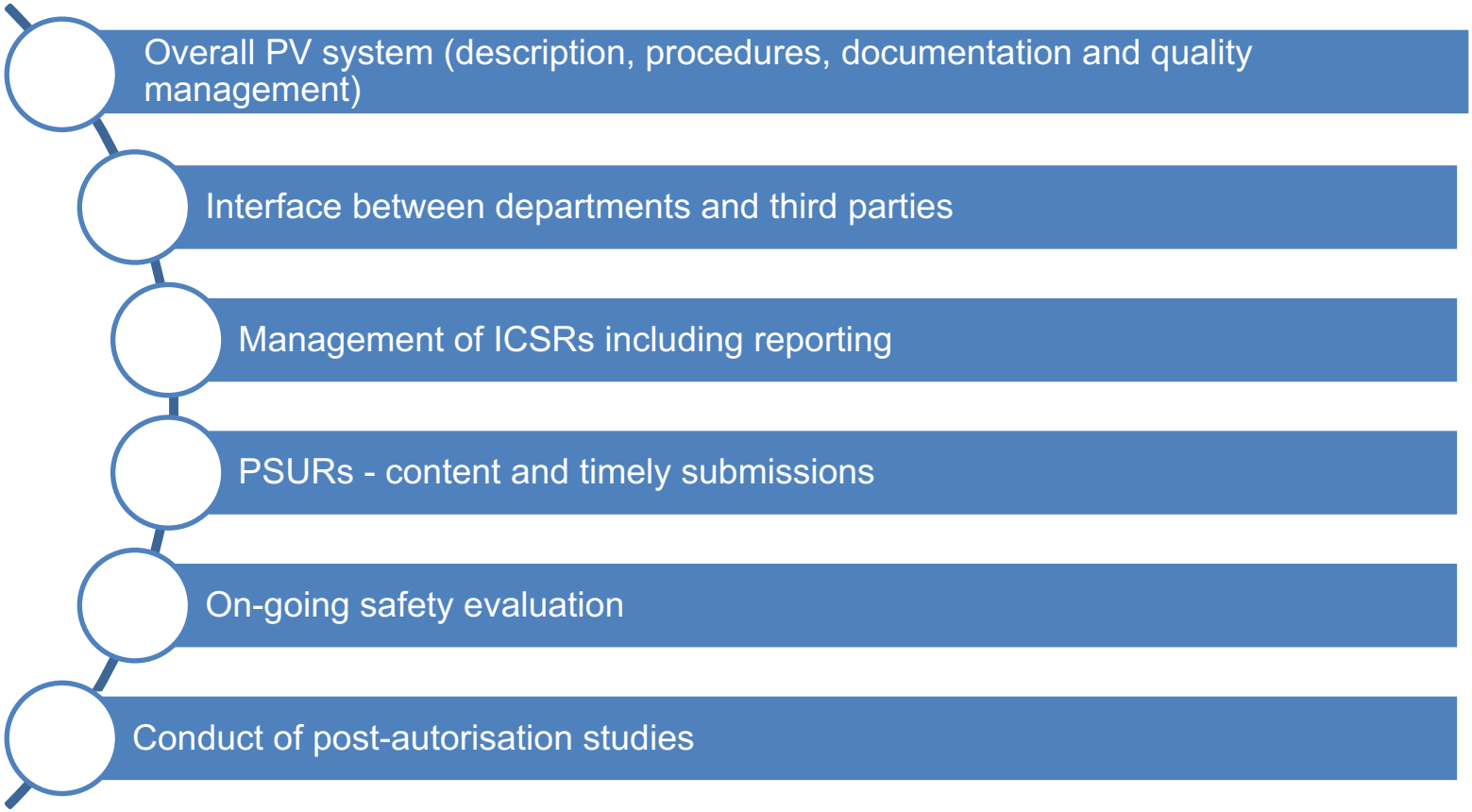
Quality Management in PV Inspections

- Routine – risk based approach on scheduling
- For cause, triggered by:
  - Changes in B/R assessment or failure to communicate changes
  - Non-compliance in reporting
  - Failure to provide requested information to CA
  - Failure to fulfil commitments
  - Delays in implementing CAPAs
  - Concerns over PSMF
  - Highlighted concerns from other CAs
- Re-inspections

Quality Management in PV Inspections

- Conducted by a regulatory authority to assess MAH compliance with applicable regulatory requirements
- Type of inspections
  - Initial inspection
  - Routine re-inspection
  - Triggered (previous cirtical findings)
  - Requestes by a CA or CHMP

Quality Management in PV Inspections



Quality Management in PV Inspections

Finding are categorised in:

Critical

- Adversely affects the whole PV system and/or the rights, safety or well-being of patients, or that poses a potential risk to public health and/or represents a serious violation of applicable legislation

Major

- Potentially adversely affects the rights, safety or well-being of patients and/or could potentially pose a risk to public health and/or represents a violation of applicable legislation & guidelines which is howevernot considered serious

Minor

- Not expected to adversely affect the whole PV system or process and/or the rights, safety and well being of patients

Quality Management in PV Inspections

Most frequent findings

- Lack of QPPV oversight
- Quality Management Systems
- PSMF
- Risk Management System
- Signal management
- Contracts and agreements
- Periodic reports
- Reference safety information including timings for updates

Quality Management in PV Inspections – outcomes

In case of failure to comply with PV obligations

- other MS, CA and EMA will be informed
- Information may be publicly available
- May result in sanctions for MAH
  - Product recall
  - MA withdrawal
  - Administrative fines
  - Criminal prosecution
  - Amendements to MA
  - Warning letter
  - …