TGA Clinical Trials Update

Dr Tahli Fenner
Risk Management Section
Pharmacovigilance Branch, Medicines Regulation Division
Therapeutic Goods Administration (TGA)

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Are you aware of the TGA’s GCP inspection program?

ⓘ Start presenting to display the poll results on this slide.

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Do you think your site/study is in the scope of the GCP inspection program?

ⓘ Start presenting to display the poll results on this slide.

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Do you think you are ready for a TGA GCP inspection?

ⓘ Start presenting to display the poll results on this slide.

Overview

- Development of the Good Clinical Practice Inspection Program (GCPIP)
- Insights from the first year of routine inspections
- TGA's recent and upcoming clinical trials initiatives
    - Review and guidance for Clinical Trial Approval and Notification (CTA/CTN) schemes
    - Increased oversight of high risk medical device trials
    - Safety reporting form
- Q & A session

Good Clinical Practice (GCP) is an international ethical and scientific quality standard for designing, conducting, recording and reporting clinical trials.

Legislation

- **Therapeutic Goods Act 1989**
  - Regulates access to unapproved goods for use for experimental purposes in humans
- **Therapeutic Goods Regulations 1990**
  - Sets out the conditions that therapeutic goods used in clinical trials must comply with in order for the goods to be exempted from the Act
  - Specify inspection powers for trials approved under CTA scheme, and for trials notified to the TGA through the CTN scheme
- **The Therapeutic Goods (Clinical Trials Inspections) Specification (no.2) 2020**
  - Enables the Secretary to release the inspection report to approving authority for the trial site and to the Human Research Ethics Committee (HREC) and the approving authority

Development of the GCP Inspection Program (GCPIP)

01 2000: The *CPMP/ICH Note for Guidance on Good Clinical Practice* (CPMP/ICH/135/95) was recognised in Australia

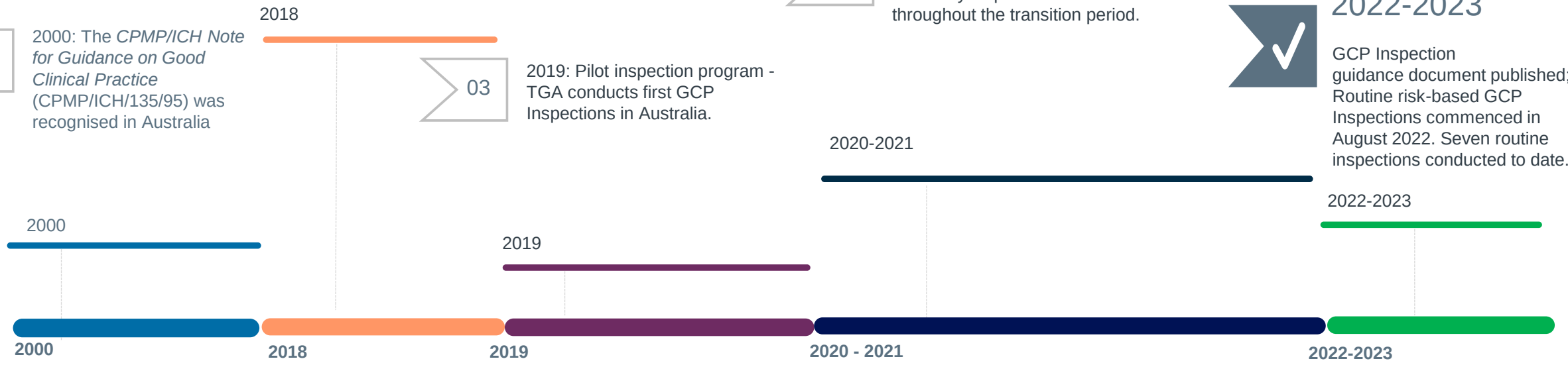
02 2018: The TGA annotated *ICH GCP E6R2* version 09 Nov 2016

03 2019: Pilot inspection program - TGA conducts first GCP Inspections in Australia.

04 2020: Endorsement of a routine risk based GCP Inspection Program. Voluntary inspections continue throughout the transition period.

2022-2023

GCP Inspection guidance document published; Routine risk-based GCP Inspections commenced in August 2022. Seven routine inspections conducted to date.



Note:
ICH stands for International Council for Harmonisation of technical requirements for pharmaceuticals in human use. The Note for Guidance on Good Clinical Practice (CPMP/ICH/135/95) is an internationally accepted standard for the designing, conducting, recording and reporting of clinical trials.
ICH GCP E6R2 stands for Integrated Addendum to ICH E6(Revision 1).

GCPIP Guidance

- Objectives and Scope
- Inspection Process
  - o Inspection Prioritisation
  - o Types of Inspection
  - o Process of Inspection
- Inspection Follow-up & Close-out
- Compliance and Enforcement

Objectives

1. Education

- Provide guidance and work with the site to ensure there are effective systems in place in alignment with Australian legislation and the relevant GCP guideline(s).

2. Compliance check

- Verify clinical trial sites are compliant with the GCP standard and have met their clinical trial responsibilities.

Scope

1. Clinical Trials included in the CTN or CTA scheme
    - Risk-based selection of a proportion of eligible clinical trials
2. Types of Investigational Products
    - Medicines or biologicals
    - Medical devices excluded
3. Clinical Trial Sites
    - Currently limited to inspections of investigational sites for medicines or biologicals

Inspection Prioritisation

1. Risk-based approach to scheduling using combination of:

- risk assessment
- internal and external intelligence

2. Risk assessment of clinical trials:

- risk assessment process as described in the *Risk-based Management and Monitoring of Clinical Trials Involving the Therapeutic Goods*, published in 2018 by National Health and Medical Research Council (NHMRC)
- risk criteria are grouped into 2 categories: the risks associated with
    - **investigational medicinal product (IMP)**
    - **trial conduct, design and methods**

GCP Inspection Types

- Onsite (preferred) vs remote inspections
- Routine
- ‘For cause’
- Announced and unannounced
- Reinspection

GCP Process (routine announced inspections)

Pre-inspection (≈28 days)

- Notification, planning and preparation
- Agenda and logistics with trial site
- Drafting and finalisation of Inspection plan

Inspection (≈3 days)

- Opening meeting
- Facility tour
- Documents and source data review
- Closing meeting with presentation of closing summary
- Collaboration and education

Post-inspection

- Issue of the inspection report (≤30 days)
- Initial CAPA* (≤30 days from the issue of the inspection report)
- Evaluation of CAPA and close-out of the inspection
- Collaboration and education

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Inspection Follow-up & Close-out

During inspection follow-up stage, the GCP Inspector will:

- **Assess** proposed actions
- **Provide comments** if the initial response to CAPA is not acceptable
- **Monitor** completion of CAPA through review of submitted evidence
- **Close out** the inspection

Grading of inspection deficiencies

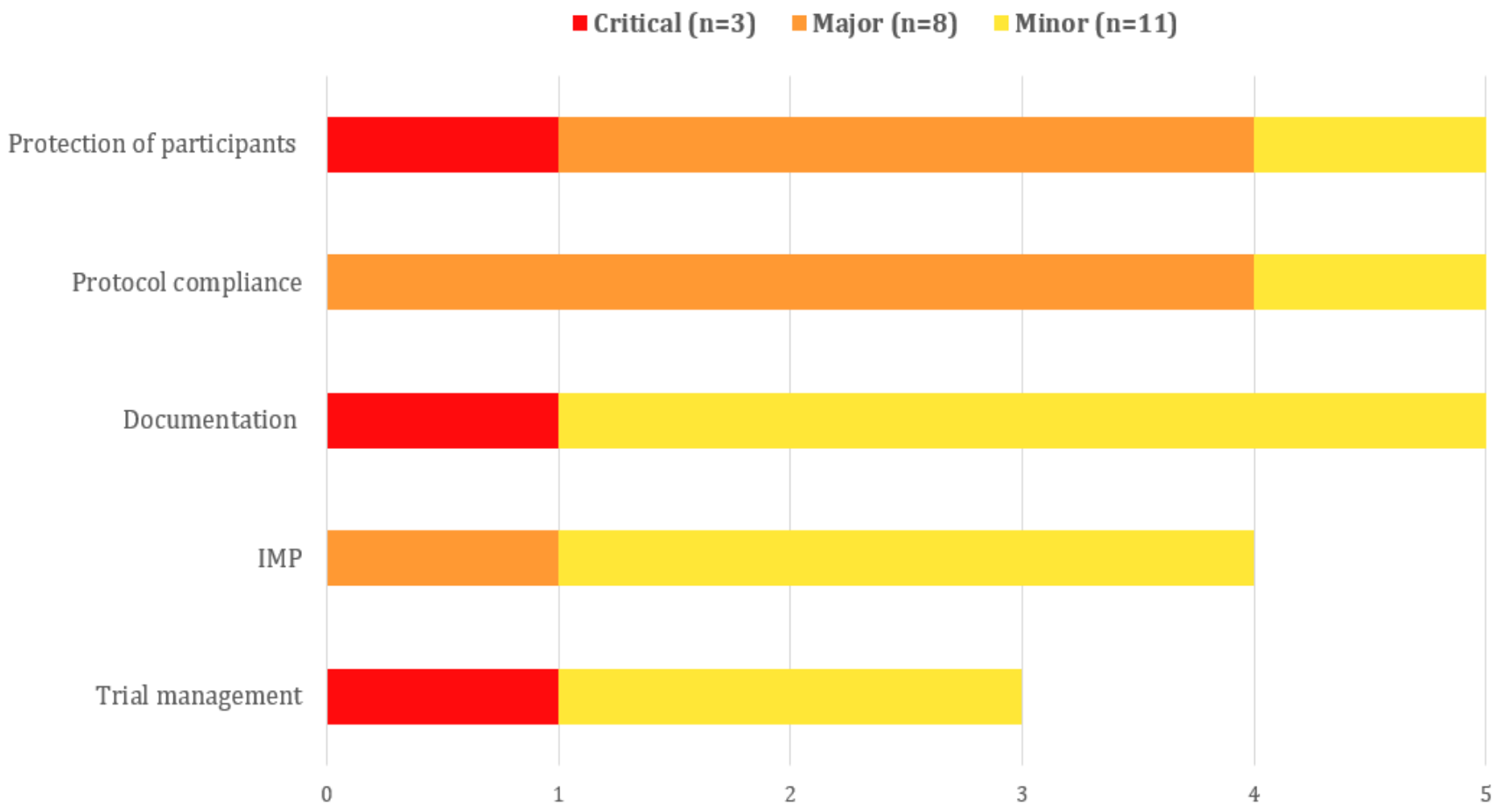
- Critical Deficiency
- Major Deficiency
- Minor Deficiency

Inspection Insights

Main category	No.	Sub-category
Protection of participants	1.1	Informed consent - Presence of informed consent
	1.2	Informed consent - Informed consent process
	1.3	Informed consent - Informed consent form content
	1.4	HREC/Approving authority - Favourable opinion
	1.5	HREC/Approving authority - Opinion, amendments, notifications
	1.6	HREC/Approving authority - Composition, functions, operations
	1.7	Participant protection - Personal data protection
	1.8	Participant protection - Safeguarding safety and well-being
Protocol compliance	2.1	Eligibility criteria
	2.2	Assessment of efficacy
	2.3	Safety reporting
	2.4	Non-compliance with safety reporting to HREC/RGO/TGA
	2.5	Reporting in case report form/diary as specified in the protocol
	2.6	Other protocol non-compliance not listed above
Documentation	3.1	Essential documents
	3.2	Source documentation
	3.3	Qualification and training
	3.4	Standard operating procedures
	3.5	Organisation and personnel
	3.6	Facilities and equipment
	3.7	Randomization, blinding and codes of study drug
	3.8	Direct access to data
	3.9	Contracts and agreements, including PI oversight of contractors/site-hired third-party vendors
Investigational Medicinal Product	4.1	Investigational Medicinal Product (IMP) accountability at site
	4.2	Supplying, storage, retrieving and destruction
	4.3	Prescription, administration and compliance
Trial management	5.1	Non-compliance with local regulatory requirements (other than safety reporting)
	5.2	Sponsor-investigator responsibilities

GCPIP 2022 metrics (1 July 2022 to 31 December 2022)

Summary of number of deficiencies by main category



GCPIP focus for 2023/24

Education and collaboration

- GCPIP metrics report
- Webinars
- Guidelines and resources
- Collaboration with external stakeholders.

Compliance

- Routine GCP inspections
- Seeking feedback from inspectees

1. Know the requirements that apply to your clinical trial and carefully plan the trial
2. Evidence of compliance – complete documentation is essential
3. If you are selected for inspection, maximise the educational opportunity

Do not wait until an inspection to be inspection-ready.

- Take time to **proactively understand** the TGA requirements and guidance on clinical trial conduct.
- Compliance with GCP should be **integrated** into the site's processes – it is not a standalone function.
- TGA GCP inspectors aim to work with clinical trial sites and provide education to improve compliance and protect clinical trial participants.

Recent and upcoming TGA clinical trials initiatives

- Review and guidance for Clinical Trial Approval and Notification (CTA/CTN) schemes
- Increased oversight of high risk medical device trials
- Safety reporting form

Medical devices public consultation outcomes

- **Broad support** for including medical devices in scope of the GCPIP
- **Mixed response** to mandating CTA for certain high-risk devices

Safety Reporting Form: preview

Australian Government

Department of Health and Aged Care

Therapeutic Goods Administration

TGA USE ONLY

This form, when completed, will be classified as 'For official use only'.
For guidance on how your information will be treated by the TGA see: Treatment of information provided to the TGA at <https://www.tga.gov.au/treatment-information-provided-tga>.

Clinical Trial Safety Reporting Form

Website and link references

Clinical trials | TGA	https://www.tga.gov.au/clinical-trials
Good Clinical Practice (GCP) inspection program | TGA: guidance and metrics report	https://www.tga.gov.au/resource/good-clinical-practice-gcp-inspection-program
Clinical Trials Toolkit | Australian Clinical Trials	https://www.australianclinicaltrials.gov.au/clinical-trials-toolkit
Consultation on proposed regulatory changes for clinical trials of medical devices I TGA	https://www.tga.gov.au/sites/default/files/2022-08/consultation-proposed-regulatory-changes-clinical-trials-medical-devices.pdf
Learning Modules | Australian Clinical Trials	https://www.australianclinicaltrials.gov.au/_files/elearn/index.html
Resources for Clinical Trials in Australia | Australian Clinical Trials	https://www.australianclinicaltrials.gov.au/resources-clinical-trials-australia
ICH Guideline for Good Clinical Practice | TGA	https://www.tga.gov.au/publication/note-guidance-good-clinical-practice
About health and medical research in Australia | Department of Health and Aged Care	https://www.health.gov.au/topics/health-data-and-medical-research/about-health-and-medical-research
National Standard Operating Procedures for Clinical Trials | Australian Government Department of Health and Aged Care	https://www.health.gov.au/resources/publications/national-standard-operating-procedures-for-clinical-trials
The National Statement 2018 | National Health and Medical Research Council (NHMRC)	https://www.nhmrc.gov.au/about-us/publications/national-statement-ethical-conduct-human-research-2007-updated-2018
Safety monitoring and reporting in clinical trials involving therapeutic goods | NHMRC	https://www.nhmrc.gov.au/about-us/publications/safety-monitoring-and-reporting-clinical-trials-involving-therapeutic-goods

Therapeutic Goods Administration (TGA)

Exhibition booth **No.1**

Want to chat with me further? Come visit us.

Contact Us

Clinical trials enquiries

clinical.trials@health.gov.au

GCP enquiries

GCP.Inspection@health.gov.au

Questions?

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