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# Data Integrity Quality Oversight in the QC Laboratory

Ensuring Data Integrity

With Post Conference Workshop Audit Trail Review for Laboratory Systems 20 June 2018, Berlin, Germany

# SPEAKERS:



Dr Chris Burgess Chairman of the ECA Analytical Quality Control Group



Dr Markus Dathe F. Hoffmann-La Roche AG, Basel, Switzerland



Dr Bob McDowall Member of the ECA IT Compliance Interest Group

All participants get a free copy of the current version of the ECA "Data Governance and Data Integrity for GMP Regulated Facilities" Guidance



# 18-19 June 2018, Berlin, Germany

# HIGHLIGHTS:

- Regulatory Guidance for Data Integrity Quality Oversight
- Knowing and Managing Data Integrity Risk
- Data Process Mapping
- Role of Quality Assurance in Control of Master Templates and Blank Forms
- Raising Data Integrity Concerns
- Case Study: Handling Data Integrity Concerns
- Data Integrity Audits:
  - Priority and Frequency
  - Coverage
- Data Integrity Investigation:
  - Determining the Scope
  - Findings, Root Cause and CAPAs
- Plus 6 Workshops



This education course is recognised for the ECA GMP Certification Programme "Certified Data Integrity Manager". Please find details at www.gmp-certification.eu

# Data Integrity Quality Oversight in the QC Laboratory

18-19 June 2018, Berlin, Germany

# Objectives

The involvement of Quality Assurance in ensuring data integrity in GMP regulated laboratories is discussed in both the PIC/S and WHO guidance documents. However, turning guidance document recommendations into practice can be difficult, especially if members of QA are not familiar with the topics covered in these guides. This two day, interactive workshop-based course is intended to fill this gap in the training spectrum. After an introduction covering the scope and regulatory requirements of quality oversight for GMP regulated laboratories there are presentations, discussions and workshops on the main topics of the course:

- Understanding process and record risk by using data process mapping
- Controlling master templates and blank forms
- Raising and handling data integrity concerns
- Data integrity audits
- Data integrity investigations

The workshop material is based on case studies so that attendees can work with real world examples and gain experience that they can take back to their own organisations.

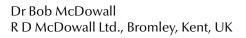
# Background

Data integrity is a major topic in the pharmaceutical industry and organisations supporting it such as contrast research and manufacturing organisations. The regulatory focus has been in Quality Control and Analytical Development laboratories working to GMP especially since 2012 with the updated FDA Compliance Programme Guide 7346.832 for Pre-Approval Inspections. This guide has as objective 3 the data integrity audit. Therefore, it is important that Quality Assurance be aware of the FDA approach as well as ensuring that laboratory activities are under control, compliant and ensure data integrity.

# **Target Audience**

- Managers and staff from Quality Control and Analytical Development Laboratories of pharmaceutical companies
- Contract Research Organisation and Contract Manufacturing Organisation laboratory personnel
- Quality Assurance staff involved in reviewing laboratory data or performing data integrity audits
- Auditors (internal and external) responsible for performing self-inspections or external audits and needing to understand and assess data integrity

# Moderator



# Programme

# Introduction to the Course

- What will be covered in the course
- Introduction to the teaching team
- Roles of Quality Assurance and Quality Control defined and discussed

# Regulatory Guidance for Data Integrity Quality Oversight

- Review of data integrity guidances: PIC/S, WHO, EMA, MHRA, GAMP Guide for quality assurance role in data integrity and data governance
- Building a framework for quality oversight for DI in a GMP analytical laboratory within the QMS
- How culture can impact data integrity
- Identifying key QA roles in the Data Integrity programme

#### **Knowing and Managing Data Integrity Risk**

- Data Process Mapping for Paper and Computerised Processes
- Identifying risk to records and mitigating them

# Role of Quality Assurance in Control of Master Templates and Blank Forms

- Overview of regulatory guidance for blank forms 1993 to date
- Process flows for master templates and blank form use
- Identifying the QA role in the process
- Look at alternative options from paper

# Workshop 1:

# **Data Process Mapping**

- Review of data process maps for paper and hybrid process
- Identification of record and data integrity risks
- Proposals for risk mitigation
- Course feedback and discussion

# **Raising Data Integrity Concerns**

- Process for handling concerns outlined
- Confidentiality of the people and process
- How to handle whistle blowers

# Workshop 2:

- Handling Data Integrity Concerns; a Case Study
- How should a concern be raised and to whom?
- How will the matter be kept confidential?
- Generating a high-level scope and action plan

Recap of Day 1 and Introduction to Day 2

# **Overview of Data Integrity Audits and Investigations**

- Regulatory guidance
- Approaches for DI audits computer system inventories, paper processes and critical data identified
- Preventing overlap with computer system periodic reviews
- Dealing with data integrity violations: the DI investigation

# Workshop 3:

### Identifying Data Integrity Audit Priority and Frequency

- From a list of processes and systems attendees will identify the priority order of processes and systems to be audited
- From the priority, the audit schedule will be developed
- Frequency of DI audit of critical systems and paper processes

#### Workshop 4:

#### Developing the Data Integrity Audit Coverage

- Scope of the data integrity audit
- What will you audit?
- How will you audit a computerised system v a paper process?

#### Workshop 5:

#### **Data Integrity Investigation – Determining the Scope**

- A data integrity violation has been found during a data integrity audit and an investigation is to be launched
- In a facilitated discussion, the course will define the scope and boundaries of the investigation

#### Workshop 6:

# Data Integrity Investigation – Findings, Root Cause and CAPAs

- A list of findings from the investigation will be given and attendees must determine if they are poor data management errors or falsification
- Identification of the root cause
- What are the CAPAs: immediate fixes and long-term remediation actions?

#### **Key Learning Points**

# Post Conference Workshop Audit Trail Review for Laboratory Systems 20 June 2018

### Programme

#### Why Is An Audit Trail and Its Review Important?

- Part 11 and Annex 11 / Chapter 4 requirements for audit trail
- Regulatory requirements for audit trail review
- Guidance documents for audit trail review
- Do I really need an audit trail?
- Static data and dynamic data impacts on audit trail functionality

#### When is an Audit Trail not an Audit Trail?

- What do we look for in an application for auditing?
- Pros and cons for event logs and audit logs?
- Audit trail(s)?
- Part 11 compliant system does this help data integrity?

#### Workshop 1: Which Audit Trail to Review?

Attendees will be presented with an overview of the audit trails within an application and the content of each one. Which audit trails should be reviewed and when in the context of the work performed by the laboratory data system?

#### What are GMP-relevant Data?

- Annex 11 requires that audit trails monitor GMP-relevant data – what are GMP relevant data?
- What are critical data?

# Workshop 2: Identifying GMP-relevant Data

Attendees will be presented with a list of records to identify if they are GMP records and how critical they are to help focus the second person review of audit trail data.

#### **Review of Audit Trail Entries**

- What are we looking for in an audit trail review?
- Process versus system: avoiding missing data integrity issues
- Regulatory requirement is "frequent review" of audit trails
- What do we need to validate and what to check?
- Suspected data integrity violation What do we need to do?

#### Workshop 3: Reviewing Audit Trail Entries

Attendees will be provided with the output of an audit trail to review and see if any potential issues are identified for further investigation.

#### **Controls to Aid Second Person Review of Audit Trails**

- Procedural controls for data review
- Technical considerations for audit trail review e.g.
- Identifying data that has been changed or modified how the system can help
- Documenting the audit trail review has occurred
- Review by exception how technical controls can help
- Have you specified and validated these functions?

#### **Speakers**



Dr Christopher Burgess

*Burgess Analytical Consultancy Ltd., UK Chairman of the ECA Analytical Quality Control Working Group* 

He is a Chartered Chemist and has more than 40 years' experience in the pharmaceutical industry initially with Glaxo in Quality Assurance and Analytical R&D and then in international consultancy. He is a "Qualified Person" in the European Union and a member of the European QP Association advisory board. He was appointed to the United States Pharmacopoeia's Council of Experts 2010 to 2015 and re-elected 2015 to 2020 for and is a visiting professor of the University of Strathclyde's School of Pharmacy and Biomedical Sciences (SIPBS). In addition, he is the chairman of the ECA Analytical Quality Control Group and a member of the Executive committee of European Compliance Academy. He is also a member of the USP Expert Panel on Validation and Verification entrusted to revise General Chapters <1224>, <1225> and <1226>.

#### **Dr Markus Dathe**



*F. Hoffmann-La Roche AG, Basel, Switzerland* Analytical and Process Chemist with more than 20 years of practical experience in laboratory, quality and informatics functions.

Markus held several positions in life sciences and pharma operations of Novartis since 1997, joined Siegfried in 2006 and is GMP Coordinator in the Small Molecules Technical Development of Roche since 2011. He had been successfully leading global projects in the area of CDS, LIMS and QMS.



#### **Dr Bob McDowall**

*R D McDowall Ltd., Bromley, Kent, UK* Analytical chemist with over 40 years' experience including 15 years working in the pharmaceutical industry; Bob has been a consult-

ant for over 20 years. He has been involved with the validation of computerised systems for over 30 years and has recently published the second edition of Validation of Chromatography Data Systems. Bob is the writer of the Questions of Quality (LC-GC Europe) and Focus on Quality (Spectroscopy) columns and is a member of the Editorial Advisory Boards of several Journals. He was a contributor to the GAMP Good Practice Guide for Validation of Laboratory Systems, second edition and is a core industry member of the GAMP Data Integrity SIG. He is an SME for input and review of the new GAMP Guide on Records and Data Integrity.

Reservation Form: CONCEPT HEIDELBERG P.O. Box 10 17 64 69007 Heidelberg Germany Reservation Form: + 49 6221 84 44 34



Internet: www.gmp-compliance.org

#### Registration

Via the attached reservation form, by e-mail or by fax message. Or you register online at www.gmp-compliance.org.

#### **Conference language**

The official conference language will be English.

#### **Organisation and Contact**

CONCEPT HEIDELBERG P.O. Box 10 17 64 69007 Heidelberg, Germany Phone +49 (0) 62 21/84 44-0 Fax +49 (0) 62 21/84 44 34 info@concept-heidelberg.de www.concept-heidelberg.de

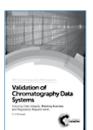
#### For questions regarding content:

Dr Günter Brendelberger (Operations Director) at +49 (0)62 21 84 44 40, or per e-mail at brendelberger@concept-heidelberg.de.

# For questions regarding reservation, hotel, organisation etc.:

Mr Rouwen Schopka (Organisation Manager) at +49 (0)62 21/84 44 13, or per e-mail at schopka@concept-heidelberg.de..

#### Literature



Participants of this Course can purchase the 2nd Edition of Dr Bob McDowall's book "Validation of Chromatography Data Systems" (Royal Society of Chemistry ) with a discount of 20%!

You will receive the order form for this book at the course.

#### Social Event

In the evening of the first course day you are cordially invited to a social event. This is an excellent opportunity to share your experiences with colleagues from other companies in a relaxed atmosphere.



#### Date

#### Data Integrity Quality Oversight in the QC Laboratory Monday, 18 June 2018, 09.00 – 18.30 h

(Registration and coffee 08.30 h - 09.00 h) Tuesday, 19 June 2018, 08.30 h - 16.00 h

#### Audit Trail Review for Laboratory System Post Conference Workshop

Wednesday, 20 June 2018, 09.00 h - 16.00 h (Registration and coffee 08.30 h - 09.00 h)

#### Venue

Steigenberger Hotel Berlin Los-Angeles-Platz 1 10789 Berlin, Germany Phone +49 / (0) 030 2127 - 0 Fax +49 / (0) 030 2127 - 117 berlin@steigenberger.de

#### Fees (per delegate plus VAT)

#### Data Integrity Quality Oversight in the QC Laboratory

ECA Members  $\in$  1,590 APIC Members  $\in$  1,690 Non-ECA Members  $\in$  1,790 EU GMP Inspectorates  $\in$  895 The conference fee is payable in advance after receipt of invoice and includes conference documentation, dinner on the first day, lunch on both days and all refreshments. VAT is reclaimable.

#### Audit Trail Review Post Conference Workshop

ECA Members  $\in$  790 APIC Members  $\in$  840 Non-ECA Members  $\in$  890 EU GMP Inspectorates  $\in$  445 The conference fee is payable in advance after receipt of invoice and includes conference documentation, lunch and all refreshments. VAT is reclaimable.

# Data Integrity Quality Oversight in the QC Laboratory +

Audit Trail Review Post Conference Workshop ECA Members  $\in 2,190$ APIC Members  $\in 2,290$ Non-ECA Members  $\in 2,390$ EU GMP Inspectorates  $\in 1,340$ The conference fee is payable in advance after receipt of invoice and includes conference documentation, dinner on the first day, lunch on three days and all refreshments. VAT is reclaimable.

#### Accommodation

CONCEPT HEIDELBERG has reserved a limited number of rooms in the conference hotel. You will receive a room reservation form/POG when you have registered for the event. Reservation should be made directly with the hotel. Early reservation is recommended.

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Reservation Form (Please complete in full)			Department	ber PO Number if applicable		Zip Code Country	E-Mail (please fill in)	<b>Important:</b> This is a binding registration and above fees are due in case of cancellation or non-appearance. If you cannot take part, you have to inform us in writing. The cancellation fee will then be calculated according to the point of time at which we receive your message. In case you do not appear at the even without having informed us you will have to pay the full registration fees will you are entitled to participate in the conference (received your payment, you are entitled to participate in the conference (received your payment, you are entitled to participate in the conference (receipt of payment will not be confirmed)! (As of January 2012)
Reservation Form (Please complete in full) <ul> <li>Data Integrity Quality Oversight in the Quality Post Conference Workshop Audit Trail Regime</li> </ul>	Mr Ms.	Title, first name, surname	Company	Important: Please indicate your company's VAT ID Number	Street/P.O. Box	City	Phone/Fax	CONCEPT HEIDELBERG reserves the right to change the materials, instruc- tors, or speakers without notice or to cancel an event. If the event must be cancelled, registrants will be notified as soon as possible and WI receive a full refund of fees paid. CONCEPT HEIDELBERG will not be responsible for discount airfare penalties or other costs incurred due to a cancellation. <b>Terms of payment</b> : Payable without deductions within 10 days after receipt of invoirce. German law shall apply. Court of jurisdiction is Heidelberg.
If the bill-to-address deviates from the specifications on the right, please fill out here:					CONCEPT HEIDELBERG P.O. Box 101764 Fax +49 (0) 62 21/84 44 34	D-69007 Heidelberg	<b>DENVISION</b>	<b>General terms and conditions</b> If you cannot attend the conference you have two options: I. We are happy to welcome a substitute colleague at any time. 2. If you have to cancel entirely we must charge the following processing fees: Cancellation - until weeks prior to the conference 10 %. - within 1 week prior to the conference 100 %.