

Lääkealan turvallisuus- ja kehittämiskeskus | Säkerhets- och utvecklingscentret för läkemedelsområdet | Finnish Medicines Agency

Commercial/Outsourced Archiving

FIMEA Annual GLP Seminar 11.12.2019



Outsourcing in GLP

- Introduction
- Outsourced/Commercial Archiving in GLP:
 - A) Printed material, wet material, tissue blocks, slides etc
 - B) Electronic archiving: electronically produced records







Outsourcing of archives in GLP

Introduction

Outsourcing or commercial services =

Not produced nor provided by the test facility/test site
Usually commercial services; may serve many different clients!
Apply especially to small test facilities/test sites: lack of suitable space and/or resources

- → Archiving outsourced
- → General requirement: outsourced archive should comply with GLP-Principles!

Outsourcing of archives in GLP

Outsourcing of Archiving – Contract Archives

Advisory Document: Establishment and control of archives that operate in compliance with the principles of GLP, No 15 Chapter 10.: Contract Archive Services: ... "the use of contract archive facilities is not precluded."

- → Confirmation of compliance with GLP:
- → Responsibility of test facility/site management
- → are subject to audits by QA!

Outsourcing of archives in GLP

Outsourced/commercial archiving services – what to expect?

- documents describing the commercial archive and services
- Possible references; other GLP-facilities using it?
 - Existing quality systems, e.g accreditation
 - ISO standard 11799
 - ISO/TC 46/SC 11
 - ISO 16175 (digital archiving)
 - Compliance to national legislation requirements
 - Finland: National Archives orders and administrative regulations

Outsourcing of archives in GLP

General requirements for outsourced/commercial archives

- Contracts/agreements: what is archived, duration, removal etc
- **Rights and responsibilities**: appointed archivist, who is allowed to make a loan, who has right to dispose material and how etc. → documentation must be found; contract, SOP
- **Access** to contract archive: who, when and how? Must be controlled and traceable: log book for entries
- General **facilities and environment**; environmental control, structure, conditions of storage, separation of archive spaces (if serves many clients); log books, indexes of archived materials
- Training of personnel, resources, contact persons, SOP's
- Distance; **transportation** issues, **responsibilities**, chain of custody, data integrity during transportation, transportation conditions

Outsourcing of archives in GLP

Electronic archiving:

- Management responsibility of IT-systems? Responsibility of test facility/site management
- →Co-operation between IT and archivist
- SOP's, contract, archivist, controlling of environment defined area!
- transferring of electronic data: in which formats and how, what kind of data is archived
 - CD vs. electronical transfer
- how transfer is controlled? Confirmation of data integrity → validation of archiving
 - protection of data from any changes
- access to transferred data, data retrieval, long-term retention
- Transferring of data to another form; validation, data integrity, documentation



Outsourcing of archives in GLP

General management issues

- Subject for internal QA audits
- Communication between contract archive and test facility/test site
- Plans for transfer/move/closing of operation of the archive
- →Documentation (SOP, risk assessment, contract..)
- Plans for crisis and disaster recovery (fire, flood..): documentation; contract, SOP, risk assessment/evaluation
- How sponsor is informed and by whom in case of emergency etc?
 Contract, SOP?
- Disposal of archived material? Rights and responsibilities?
- → contract, SOP



Thank you for your attention! Any questions?

