EDA-GCP Public Inspection Report (PIR) of Clinical Trial Site

Part 1	General Information
Clinical medical research site details	
CT site information	
Name of CT site	MASRI CRC, Ain shams University
Address of inspected CT site	El-Khalifa El-Mamoun Street, Abbasia, Cairo, Egypt
Inspection details	
Dates of inspection	08 May 2024
Type of inspection	Pre-initiation
Introduction	
General information about the sponsor and CT site	- The inspected site is a Clinical Trial Site (**MASRI CRC, Ain shams University**) that conducts clinical studies for the sponsor (**Global Blood Therapeutics Inc. (GBT) is a wholly owned subsidiary of Pfizer Inc.**) - PI name: **Prof. Dr. Fatma Ebeid** - Activities include participant recruitment, clinical conduct, sample collection, safety monitoring, and data documentation.
Brief report on inspection activities undertaken	
Scope and limitations	
Areas inspected	-Clinical Operations (Screening, dosing, Follow up) -Informed Consent Process -Investigational Medicinal Product (IMP) management -Pharmacy / IMP storage area -Source documents and Case Report Forms (CRFs) -Archiving and documentation system -Quality management system
Out of scope	Not defined
Inspected Clinical medical research	The inspection focused on the following study: - Protocol Title: A randomized, double blind, placebo-controlled, multicenter study to assess the safety and efficacy of Inclacumab in participants with sickle anemia disease experiencing Vaso-occlusive crisis - Protocol Number: GBT2104-131 -Phase: III - EDA Initial approval date: 19\06\2022
Type of IMP	Biological Monoclonal antibody (Inclacumab)
Part 2	

1. Facilities and equipment system	
1.1. Facilities and Trial Conduct	-The site facilities were generally adequate for trial conduct. -Dedicated areas were available for participant reception and waiting, examination, consultation, and clinical procedures to support the conduct of the clinical trial. -Equipment maintenance, calibration, and emergency preparedness arrangements were assessed during the inspection. -The medical equipment used during the trial included an electrocardiogram (ECG) machine, laminar airflow cabinet, centrifuge, refrigerator, carbon dioxide (CO_2) incubator, analytical balance, blood pressure monitor, and an emergency trolley. -Calibration records were available and valid for the inspected equipment. -Procedure room: Emergency trolley available with all medications within expiry dates; trolley-check records available demonstrated that routine checks were performed. Resuscitation equipment, including a defibrillator, intubation equipment, suction apparatus, and oxygen supply devices, was available and maintained in a state of readiness. -Disposal containers labeled and color-coded per international standards. -Pharmacy/IMP storage room: IMP stored in access-controlled room in fire-proof metal cupboard
1.2. Computerized system	Electronic data capture, as eCRF and randomization systems were in use.
2. Pharmaceutical Quality System	
2.1. Quality Management System	-The site established a Quality Management System (QMS) supported by Standard Operating Procedures (SOPs) governing clinical trial conduct, documentation, participant safety, investigational medicinal product management, and quality oversight to ensure compliance with GCP, ethical principles, and applicable regulatory requirements.
2.2.SOPs and Documentation	-The site maintained SOPs governing clinical trial activities. During the inspection, the applicable SOPs and essential trial documents reviewed included the approved protocol and protocol amendments, Investigator's Brochure, informed consent forms, regulatory and ethics approvals, investigator qualifications and training records, delegation logs, investigational medicinal product management records, laboratory documentation, pharmacy manual, monitoring reports, participant records, eCRFs, source documents, contracts and agreements, safety reporting documentation, and other study-specific essential documents.

	-Study related Documents were appropriately controlled, maintained, periodically reviewed, and available.
2.3. Deviation Management	Deviations were handled according to SOPs. Documentation of deviations, investigations, and CAPA was generally adequate. Some deficiencies were noted.
2.4. CAPA System	-A CAPA system was established at the site. -CAPA responses for findings identified during this inspection were submitted by the site and evaluated by EDA inspectors. -The identified findings were appropriately addressed by the site through corrective and preventive actions.
3. Ethics and participant Protection	
3.1.Informed Consent Process	-The informed consent process was verified during the inspection through the review of the approved Informed Consent Forms (ICFs), participant source records, and other relevant essential trial documents. -The inspection confirmed that informed consent was obtained from all participants before the performance of any study-related procedures using the approved Ethics Committee-approved versions of the informed consent forms, including the following: • Adolescent assent (12-17 years old) ICF, Version 0.1 (1-3-2021) • Adult parent ICF, Version 0.3 (10-12-2023) • Partner pregnancy ICF, Version (0.1-3-2021) • Site Specific ICFs, Version 0.2 (12-5-2022) -One observation was identified during the inspection in accordance with ICH E6(R2) and Law No. 214/2020, as the Informed Consent Form (ICF) of one of the participants did not include the participant's fingerprint. In response, the site documented the issue through a Note to File, as the participant had discontinued the study and could not be recalled to complete the missing fingerprint. In addition, the Principal Investigator reviewed the informed consent process for all ongoing participants to ensure full compliance during the re-consenting process and the Clinical Research Associate (CRA) committed to verify and document the implementation of the re-consenting process during the subsequent interim monitoring visit. The submitted CAPA was subsequently reviewed and accepted by the Egyptian Drug Authority (EDA).
3.2. Ethics Committee Approval	Approvals from IRB/IEC were available: **-MOH approval:** 07\07\2021 **-IRB approval:** 13/06/2021

3.3. Participant Safety	-Participant safety was verified during the inspection through the review of participant source records, informed consent documentation, adverse event (AE) and serious adverse event (SAE) documentation, Case Report Forms (eCRFs), medical records, and other study-related essential documents, together with verification of the clinical trial facilities, emergency preparedness arrangements, investigational medicinal product (IMP) management process, pharmacy, and laboratory facilities.
4. Personnel and Training	
4.1. Training and qualifications	-Roles and responsibilities of study personnel were clearly defined. -Current curriculum vitae (CVs), professional qualifications, and training records of the Principal Investigator and delegated study personnel were available and appropriately maintained. -GCP training records for the study team were reviewed and found to be available at the site. Protocol-specific training records had been completed and were retained in the Investigator Site File. As the site had not yet been activated, assessment of staff workload in relation to study conduct was not applicable at the time of the inspection.
5. Investigational Product (IMP) Management	
5.1. IMP handling	-IMP storage conditions, temperature monitoring, shipment, receipt, dispensing, accountability, return, and destruction procedures, as applicable, were reviewed during the inspection. - The pharmacy/IMP storage area was secured with restricted access, and IMPs were stored under the protocol-specified environmental conditions with continuous temperature monitoring and appropriate documentation. -IMP labeling was reviewed and found adequate.
6. Clinical Trial Conduct	
6.1. Protocol Compliance	- The study was generally conducted according to the approved protocol (Version: 5.0, dated: 13/07/2023). -Protocol compliance was verified during the inspection through the review of the approved protocol, participant source records, eCRFs, informed consent documentation, IMP records, laboratory documentation, safety reporting records, monitoring documentation, and other essential trial documents
6.2. Source Data and CRFs	- Source documents and eCRFs were reviewed during the inspection. - The inspection included comparison of participant source records with the corresponding eCRFs and other relevant study documentation which were found to be complete, legible, contemporaneous, and appropriately maintained.

	- The data recorded in the source documents were consistent with the corresponding eCRFs, and documentation practices complied with ALCOA principles.
6.3. Delegation of Duties	- The Delegation of Responsibility Log was confirmed to be available at the site, accurately completed, signed by the Principal Investigator, and reflective of the actual roles and responsibilities assigned to each study team member. - Roles and responsibilities of study personnel were documented through the delegation log. - It was recommended to ensure that the delegation log clearly defines the roles and responsibilities of all study personnel participating in the clinical trial. In addition, confidentiality agreements should be signed by all study personnel before undertaking any trial-related activities and maintained as part of the essential study records. - One observation was identified during the inspection in accordance with ICH E6(R2), as the site training log did not include one of the studies assigned pharmacists, although he had been assigned study-related responsibilities. In response for CAPA implementation, the site updated the training log to document the pharmacist's training with clarification of the actual training date, and the Principal Investigator provided refresher training to the study team on maintaining complete and accurate training documentation. The sponsor verified implementation of the corrective actions during monitoring, and the submitted CAPA was subsequently reviewed and accepted by EDA.
7. Laboratory and Bioanalytical Activities (if applicable)	
- An external local Laboratory was used for analysis. - Laboratory procedures for Sample handling and analysis were generally defined. - External laboratory accreditation and qualifications were confirmed to be appropriate for the study requirements. - Laboratory procedures for sample collection, processing, storage, and transportation were implemented in accordance with the study protocol and laboratory manuals.	
8. Safety Reporting (SAE)	
- Safety reporting procedures were verified during the inspection through the review of adverse event (AE) and serious adverse event (SAE) documentation, safety-related records, applicable SOPs, and other relevant study documentation. - Reporting timelines and documentation procedures were reviewed and confirmed to be in place in preparation for study commencement.	
Part 3	**Inspection outcome**

- Based on the reviewed documentation, inspected facilities, and observations identified during the inspection: The clinical trial site was considered to be operating at an acceptable level of compliance with GCP guidelines and applicable regulatory requirements as All identified deficiencies were communicated to the site and the Corrective and preventive actions (CAPA) were be implemented to address the observations.
-This EDA-GCP-PIR remained valid until the next inspection, provided no critical findings, safety concerns, or regulatory actions arise.

Part 4	**List of national Laws and GCP Guidelines referenced in the inspection report**

1. Law of Regulating Clinical Medical Research no.214/2020.
2. Prime Minister's Decree No. 927 of 2022 On Promulgating the Executive Regulation of Law on Regulating Clinical Medical Research Promulgated by Law No. 214 of 202
3. EDA Chairman Decree No.111 for 2022.
4. Guideline for Good Regulatory Oversight of Clinical Trials by Egyptian Drug Authority "EDREX.GL.Bioinn.006".
5. Guideline for Good Clinical Practice ICH E6r2.
6. Declaration of Helsinki
7. WHO Handbook for Good Clinical Research Practice (GCP) -Guidance for Implementation

Abbreviation	
AE	Adverse Event
CAPA	Corrective and Preventive Action
CO_2	Carbon Dioxide
CRF	Case Report Form
CRC	Clinical Research Center
CT	Clinical Trial
CV	Curriculum Vitae
ECG	Electrocardiogram
EDA	Egyptian Drug Authority
GCP	Good Clinical Practice
IB	Investigator Brochure
ICF	Informed Consent Form
ICH	International Conference of Harmonization
IMP	Investigational Medicinal Product
IRB/IEC	Institutional Review Board / Ethics Committee
MOH	Ministry of Health
PI	Principal Investigator
PIR	Public Inspection Report

SAE	Serious Adverse Event
SOP	Standard Operating Procedure
WHO	World Health Organization

العنـــــــــــوان: ٥١ شارع وزارة الزراعة، العجوزة - الجيزة
البريد الإلكتروني: المكتب الفني / bio.tech@edaegypt.gov.eg، المكتب الإداري /bio.admin@edaegypt.gov.eg
التـــلـيـــفـــون: ٠٢٣٧٤٨٤٩٨٨
موقع الهيئة: www.edaegypt.gov.eg