TEMPLATE FOR COMMENTS

**COMMENTS ON WHO WORKING DOCUMENT:** QAS/19.819/Rev.1
**TITLE OF THE DOCUMENT:** GUIDELINE ON DATA INTEGRITY

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*Kindly complete the table **without modifying the format** of the document - thank you.*

| **General comment(s) if any :** | **Originator of the comments** |
|---|---|
| The intent to replace TRS 996 Annex 05 Guidance on good data and record management practices with this shorter, less-detailed Guideline on Data Integrity raises concerns that valuable guidance will be lost, for example on good documentation practices for electronic records and on the important distinctions between static and dynamic data. We suggest that these aspects from TRS 996 be retained in this version. | **ISPE** |

| **Section** | **Line** | **Comment/rationale** | **Proposed change/suggested text** | **Classification** L= low, M= medium, H= high | **Originator of the comments** (for WHO use) |
|---|---|---|---|---|---|
| TOC | 63 | The Table of Contents shows the title of this section to be "Data", but the title in the main body is shown as "Data and data transfer". | We suggest changing this line to read "Data and data transfer". | L | |
| TOC | 64 | Section 10 is listed as data integrity in the Table of Contents but is not present in the main body of the document. The main body shows Section 10 as "Good Documentation Practices". | We suggest that a guideline on Data Integrity needs both a definition for Data Integrity and a dedicated section on Data Integrity (from the previous draft or TRS 996, perhaps?). | H | |
| TOC | 65 | In the absence of a section on data integrity, the section number for Good documentation practices needs changing. | We suggest changing this line to read: "10. Good documentation practices." | L | |

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| TOC | 66 | In the absence of a section on data integrity, the section number for computerized systems needs changing. | We suggest changing this line to read: "11. Computerized systems." | L | |
| TOC | 67 | In the absence of a section on data integrity, the section number for Corrective and preventative actions needs changing. | We suggest changing this line to read: "12. Corrective and preventative actions." | L | |
| 1.2 | 86 | We acknowledge the inclusion of "computerized systems that are not capable to meet regulatory requirements" as an important addition to this version of the guideline. However, line 87 would read better if changed to read: "… systems that are not capable of meeting regulatory requirements or are inappropriately managed …". | Suggest make editorial change to line 87 to read: "… systems that are not capable of meeting regulatory requirements or are inappropriately managed …". | L | |
| 1.3 | 103 | We suggest including reference to DI as an inherent part of the Pharmaceutical Quality System; the time for DI as a separate initiative is long past. | … include and implement a DI program within the Pharmaceutical Quality System, and to monitor… | M | |
| 2 | 117 | We suggest rephrasing this section to protect patient safety and product quality through DI - align with FDA patient-centric focus and move away from compliance for compliance sake. | … guidance and recommendations to strengthen data integrity in support of patient safety and product quality, and to ensure regulatory requirements related to DI documentation and record management are met. | M | |
| 3 | 142 | The definition of archivist has been removed compared to the Oct 2019 draft and to TRS 996. Combined with the avoidance of the term Archive in 11.20, it creates a gap in the data lifecycle. | Please consider restoring the definition for archivist. | M | |
| 3 | 155 | We acknowledge the addition of a true copy by generation of a validated process i.e. not requiring individual certification that it is a true copy, as a benefit and move towards efficiency. | None | N/A | |
| 3 | 158 | Scope in 2.2 was designated as GxP for | We suggest updating data definition to GxP. | M | |

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| | | Pharmaceutical Products. Definition of data in Glossary (lines 158 – 161) exclusively refers to GMP. | | | |
| 3 | 168 | Data governance definition now includes assurances of data quality. Data quality is not defined in this document and is not well understood in the industry. | Please consider if this should be data integrity rather than data quality. If it should be data quality, it is suggested that a clear definition and discussion of expectations for data quality be provided. | H | |
| 3 | 199 | Typographical error at the end of sentence, i.e. no need for end bracket. | Delete ")" at end of last sentence. | L | |
| 4.7 | 230 | Intentional changes can be authorized or fraudulent (deliberate manipulation). | Suggest replacing intentional and unintentional with authorized or unauthorized for clarity. | M | |
| 4.9 | 244 | Is this computerized systems validation only or would you include e.g. process validation, cleaning validation, here also? | Please can you clarify? | M | |
| 4.9 | 246 | We acknowledge and approve the addition of security and cybersecurity – external threats are just as serious as internal vulnerabilities. | None | N/A | |
| 4.9 | 247 | Please consider if data classification, confidentiality and privacy should be added to this list. | Please consider if data classification, confidentiality and privacy should be added to this list. | M | |
| 4.13 | 268 | The clarification of DI lapses that may impact patient safety, product quality or efficacy aligns well with a patient-centric focus. | None | N/A | |
| 4.16 | 289 | Designing processes to reduce transcription and conversion fits well with GAMP's Data Integrity by Design focus in its latest Good Practice Guide. | None | N/A | |
| 5 | 300 | There is an excellent statement in TRS1019 Annex 3 Appendix 5 (Computerized Systems Validation) about data flows and process maps which are important precursors to a risk assessment, irrespective of whether the records. | We suggest adding TRS 1019 statement (please see below) to the start of the QRM section, as the basis for the risk assessment.<br>*"Documentation of data flows and data process maps is recommended, to facilitate the assessment* | M | |

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| | | are paper or electronics (and can help to highlight manual transcription etc. which could be targeted for replacement with automated, validated interfaces). | *and mitigation and control of data integrity risks across the actual, intended data process(es);"* | | |
| 5 | 302 | Although the acronym "DIRA" is explained at line 100, it would be useful to explain the term again at this point as this is the start of an important section on quality risk management. | We suggest amending the first sentence to read: "The DIRA (Data Integrity Risk Assessment) should be documented". | L | |
| 7 | 350 | This section on outsourcing makes no statement on data ownership or that responsibility for DI remains with the contract givers. | We suggest adding a statement on data ownership and that responsibility for DI remains with the (regulated) contract givers. | H | |
| 9.5 | 409 | Why track the acquisition method when discussing processing? | We suggest either clarifying that it is the processing method (name and version) that needs to be tracked when results are processed using different methods / parameters, or simply replace this item with a reference to WHO Good Chromatography Practices instead. | M | |
| 10.1 | 423 | Even though 4.16 on line 277 lists out electronic and paper requirements, having section 10 as Good Documentation Practices for paper only could infer GDocPs are unnecessary for electronic records. | The previous version (Oct 2019) applied to both paper and electronic records, as did TRS 996; Please consider reinstating electronic records guidance in Section 10. | H | |
| 11.4 | 464 | Many of these devices (pH meters, balances) do now store electronic records yet lack sophisticated access and electronic record controls – this is a much bigger issue. Such devices are mentioned in §6.2 of the MHRA GXP Data Integrity Guidance and Definitions (March 2018). | We suggest offering the following guidance: "Where the basic electronic equipment does store electronic data permanently and only holds a certain volume before overwriting…" | M | |
| 11.12, 11.14 | 509 | For audit trails capturing changes to GxP data then yes absolutely they should be ON at all times. While not recommended as an example | We suggest clarifying in 11.12 that an **audit trail capturing creation, modification or deletion of GxP data should always be ON**, and in 11.14 | M | |

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| | | of good practice, there is a QC laboratory software that boasts 11 (yes, eleven!) audit trails. Often, the term audit trail is misused to mean any technical or system log. There are "audit trails" that capture so much detail that the audit trail storage requirements way exceeded the data generated. | that this audit trail should be reviewed as part of routine data review. We suggest additional guidance that other audit trails (or logs) e.g. capturing changes to system configuration, user accounts etc. be activated when needed as part of the data integrity controls as identified in the risk assessment, and reviewed on a periodic basis. | | |
| 1.17 | 536 | This clause requires procedures for documented and periodic review, but there is no explanation of what these are. | We suggest adding an explanation of the different review approaches, including:<br>Routine data review, forensic data review, periodic review, review by exception. | H | |
| 11.20 | 548 | This section seems to carefully avoid the use of the word "archive" and makes no mention of the need for records to be under control of independent data management personnel – despite Section 3 Glossary providing a definition of archiving, including the need for data management personnel. | We suggest updating this section to leverage the word Archive and its associated definition. | M | |
| EX. 9 | 789 | This section deals with Original Data; the glossary does not define original data but does define Raw Data. | Please consider unifying the terminology and clarifying the importance of original data (especially including dynamic data). | H | |