

## Verfahrensabläufe Pharmakovigilanz

Für die Darstellung der Pharmakovigilanz-Prozesse im Annex des Pharmacovigilance System Master File (PSMF; Überprüfung z.B. im Rahmen von Pharmakovigilanz-Inspektionen) empfiehlt das BfArM eine synoptische Gegenüberstellung der nach Durchführungsverordnung 520/2012 (DVO) und Good Pharmacovigilance Practices (GVP) geforderten Prozesse und den entsprechend zugehörigen firmeninternen vorhandenen schriftlichen Verfahrensabläufen (Standard Operating Procedures, SOPs).

Die folgende Aufstellung wurde mit dem BfArM abgestimmt und soll dabei behilflich sein, die vorliegenden SOPs den jeweiligen Themenkomplexen zuzuordnen. Das BfArM weist darauf hin, dass diese Prozesse aber nicht die einzigen in Verfahrensabläufen abzubildenden Prozesse sind, sondern alle im Unternehmen durchgeführten Prozesse auch in entsprechenden Prozessbeschreibungen abzubilden sind.

Prozess		DVO Nr. 520/2012	GVP	SOP
QPPV	<ul style="list-style-type: none"> <li>roles and responsibilities of the QPPV</li> </ul>		II.B.4.5	
Monitoring, Case processing and Databases	<ul style="list-style-type: none"> <li>Continuous monitoring of Pharmacovigilance data</li> <li>risk minimization</li> <li>benefit-risk evaluation</li> </ul>	Article 2 + 11	I.B.11.3 I.B.9.1 XVI, IX, XII	
	<ul style="list-style-type: none"> <li>update of product information</li> <li>Implementing (safety) variations</li> <li>continuous monitoring of information published on the European medicines and competent authority web-portal</li> </ul>	Article 11	I.B.11.3 I.B.9.1 II.B.4.5. XII	
	<ul style="list-style-type: none"> <li>Signal detection</li> <li>Signal management</li> </ul>	Article 2 + 11 + 19 - 21	I.B.11.3 I.B.9.1 II.B.4.5 VI, VII, VIII, IX	
	<ul style="list-style-type: none"> <li>individual case safety reports (ICSRs) incl. collection, processing, quality control, follow-up, coding, classification, duplicate detection, evaluation</li> <li>data quality, integrity, completeness incl. avoiding duplicate submission</li> <li>Case management</li> <li>submission of adverse reactions to the EudraVigilance</li> <li>reporting</li> </ul>	Article 11 + 28	I.B.11.3 I.B.9.1 VI	
	<ul style="list-style-type: none"> <li>literature searching</li> </ul>		II.B.4.5	
	<ul style="list-style-type: none"> <li>safety database change control</li> </ul>		II.B.4.5	
PSMF	<ul style="list-style-type: none"> <li>pharmacovigilance system master file (PSMF)</li> <li>instructions on critical processes in PSMF</li> <li>record management system in PSMF</li> </ul>	Article 1 – 3, 5, 7	I.C.1 I.B.11.1 II.B.4.5 II	
PSUR	<ul style="list-style-type: none"> <li>periodic safety update reports (PSURs) incl. scheduling, preparation, QC, submission and assessment</li> </ul>	Article 2 + 34 + 35	I.B.11.3 II.B.4.5 VII	
RM	<ul style="list-style-type: none"> <li>Risk management (RM) incl. establishing, assessing, implementing and evaluating effectiveness of risk minimisation measures</li> </ul>	Article 2 + 30 - 33	I.B.9.1 I.B.11.3 II.B.4.5 V	
Communication	<ul style="list-style-type: none"> <li>Communication with national competent authorities and the Agency incl. new or changed risks, PSMF, RMSs, PSURs, CAPAs, PAS</li> </ul>	Article 11	I.B.11.3 I.B.9.1 II.B.4.5 XV, XII	
	<ul style="list-style-type: none"> <li>Communication of relevant safety information to healthcare professionals and patients</li> </ul>	Article 2 + 11	I.B.11.3 I.B.9.1 II.B.4.5. XV, XII	
	<ul style="list-style-type: none"> <li>Meeting commitments to competent authorities</li> </ul>		I.B.11.3	
	<ul style="list-style-type: none"> <li>responding to requests from competent authorities, including provision of correct and complete information</li> </ul>		I.B.11.3, II.B.4.5	

Prozess		DVO Nr. 520/2012	GVP	SOP
Quality, Compliance and Audit	• quality system	Article 8	I.A	
	• quality control		II.B.4.5	
	• Audits incl. CAPAs	Article 2 + 13 + 17	I.B.6, II.B.4.5 II, III, IV	
	• Compliance management	Article 11 + 15	I.B.9.1 I.B.11.3	
	• Management of human resources • competent and appropriately qualified and trained personnel • job descriptions • organizational chart defining the hierarchical relationships of managerial and supervisory staff • Business continuity plans	Article 10 + 14	I.B.6 I.B.11.1	
	• training		II.B.4.5	
	• interaction between the pharmacovigilance and product quality defect systems		I.B.11.3	
	• subcontracting,	Article 6 + 7	I.C.1.5, II.B.4.5	
	• safety data exchange agreements	Article 6 + 7	I.C.1.5, II.B.4.5	
	• recording and storing of pharmacovigilance information	Article 12	I.B.10, II.B.4.5	
	• safety data archiving	Article 12	I.B.10, II.B.4.5	