



IRISH MEDICINES BOARD
**GUIDE TO REPORTING SERIOUS ADVERSE REACTIONS
AND SERIOUS ADVERSE EVENTS ASSOCIATED WITH
HUMAN TISSUES AND CELLS**

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This guide does not purport to be an interpretation of the law and/or regulations and is for guidance purposes only.

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1. INTRODUCTION

The following document is intended to provide guidance for tissue establishments and/or other relevant organisations on the procedure to follow for submitting a suspected serious adverse reaction (SAR) or serious adverse event (SAE) report to the Irish Medicines Board (IMB).

The IMB has been designated as the competent authority for the purpose of implementing EU and national legislation related to human tissues and cells, including the following:

- Directive 2004/23/EC of the European Parliament and of the Council of 31st March 2004 on setting the standards of quality and safety for the donation, procurement, testing, processing, preservation, storage and distribution of human tissues and cells.
- Directive 2006/17/EC of the 8 February 2006 implementing Directive 2004/23/EC of the European Parliament and the Council as regards certain technical requirements for the donation, procurement and testing of human tissues and cells.
- Directive 2006/86/EC of the 24 October 2006 implementing Directive 2004/23/EC of the European Parliament and of the Council as regards traceability requirements, notification of serious adverse reactions and events and certain technical requirements for the coding, processing, preservation, storage and distribution of human tissues and cells.
- Statutory Instrument 158 of 2006, European Communities (Quality and Safety of Human Tissues and Cells) Regulations 2006.
- SI No. 598 of 2007, European Communities (Human Tissues And Cells Traceability Requirements, Notification of Serious Adverse Reactions and Events and Certain Technical Requirements) Regulations 2007

In accordance with this legislation, the IMB is obliged to:

- Establish a reporting system for the notification of SARs and SAEs as outlined below.

2. DEFINITIONS (DIRECTIVE 2004/23/EC)

Serious adverse reaction (SAR)

An unintended response, including a communicable disease, in the donor or in the recipient associated with the procurement or human application of tissues and cells that is fatal, life-threatening, disabling, incapacitating or which results in, or prolongs hospitalisation or morbidity.

Serious adverse event (SAE)

Any untoward occurrence associated with the procurement, testing, processing, storage or distribution of tissue and cells that might lead to the transmission of a communicable disease, to death or life-threatening, disabling or incapacitating conditions for patients or which might result in, or prolong, hospitalisation or morbidity.

All serious adverse events and reactions (which meet the above definitions) and their subsequent management should be captured and recorded by the quality management system in operation at the tissue establishment, procurement organisation or organisation responsible for human application.

Responsible person

Every tissue establishment shall designate a responsible person who shall be responsible for ensuring that human tissues and cells intended for human application in their establishment comply with the terms of the legislation.

3 REPORTING SERIOUS ADVERSE REACTIONS AND EVENTS TO THE IMB

Tissue establishments, through the responsible person, shall notify the IMB of, and provide the IMB with, a report analysing the cause of, and ensuing outcome of;

- Any SAR and events which may influence the quality and safety of tissues and cells and which may be attributed to the procurement, testing, processing, preservation, storage and distribution of tissues and cells.
- Any SARs observed during or after clinical application which may be linked to the quality and safety of tissues and cells.

All reports of SAEs (as defined above and in the legislation) which may influence the quality and safety of tissues and cells should be notified to the IMB. This includes 'near miss' reports where the event was detected prior to transplantation.

In the case of assisted reproduction, any type of gamete or embryo misidentification or mix-up shall be considered to be a SAE and should be notified to the IMB.

IMB Adverse Reaction / Event Report Form - Human Tissues and Cells

Notification and details of the above reactions and events should be provided to the responsible person (or designee) at the tissue establishment who should then submit a report(s) to the IMB using the IMB Adverse Reaction / Event Report Form - Human Tissues and Cells.

Contact details

The IMB Adverse Reaction / Event Report Forms may be completed and notified through the online reporting system or by downloading the forms available on the Blood, Tissues and Cells / Publications section of the IMB website at www.imb.ie.

Copies of the form and guide are also available on request by phone/fax/post/e-mail from the IMB at:

Tissue and Cells,
Pharmacovigilance Section,
Freepost
Irish Medicines Board,
Kevin O'Malley House,
Earlsfort Centre,
Earlsfort Terrace,
Dublin 2.

Fax No: +353-1-6762517

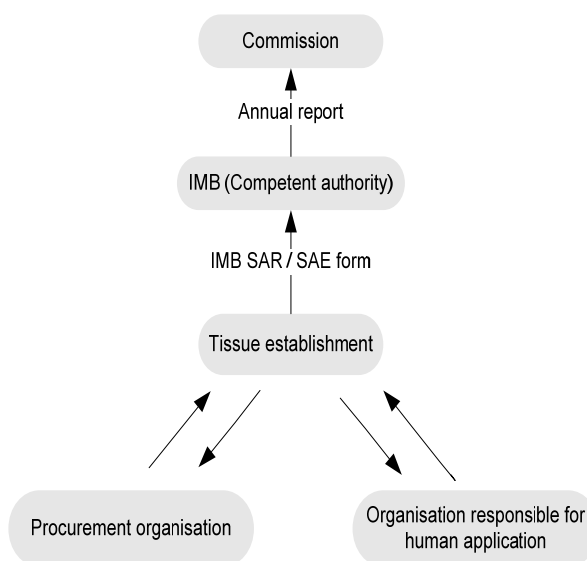
Phone No: +353-1-6764971 (ask for the Pharmacovigilance Section)

Email: imbpharmacovigilance@imb.ie

Alternatively, when submitting a completed report form please tick the box 'supply of report forms required' at the end of the form, and they will be forwarded by post.

Tissue establishment reporting

As far as possible, all reports should be submitted by a tissue establishment to avoid double reporting. Other organisations, for example, a procurement organisation or an organisation responsible for human application, should report events/reactions that have occurred at their facility to the associated establishment who will report on to the IMB. The actual location of the SAE/SAR will be captured on the form. However, a report received by the IMB directly from a procurement organisation or an organisation responsible for human application will be accepted in accordance with the legislative requirements. In this case it remains the responsibility of the organisation to inform the relevant establishment of the incident.



4. INSTRUCTIONS FOR COMPLETION AND SUBMISSION OF FORMS

All available information should be included on the form.

- If information requested is not available, the term N/A or the words 'not available' should be included, where appropriate.
- Supplementary information may be appended with the initial report form for clarification if considered relevant/deemed necessary by the reporter.
- A contact name, telephone number and e-mail address should be provided to facilitate the IMB to follow up cases, as appropriate.
- All reports should be signed and dated.

Report identification number

The person submitting the SAR/SAE report form should assign a unique report identification number, which may be used to link information back to this case. This will ensure that the SAR/SAE may be fully traceable in the future. The responsibility for assigning a system of numbering rests with the individual establishment or organisation, as long as it allows for traceability. Alternatively, a hospital or patient record number may be used. This number will be kept on file at the IMB for future reference.

Please note that individual case record numbers will also be allocated by the IMB for reference purposes and the reporting organisation will be informed of this number in any relevant correspondence.

Event/reaction

Only one box should be ticked, indicating the SAR or SAE. Please note that if a reaction occurs as a result of an event, it should be considered as a reaction and reported as such, with relevant background information provided.

Dates

All dates should be included, in accordance with legislative requirements. If not relevant insert N/A.

Notification of relevant establishments/site manufacturers

Procurement organisations or organisations responsible for human application should have procedures in place to notify the associated establishment or other relevant parties. Establishments should notify other associated establishments or organisations as appropriate. Information on parties notified should be included in the report.

Unique donation identification number

A single identifying code should be allocated to all donated material by the tissue establishment. This code should incorporate at least the information set out in Annex VII Directive 2006/86/EC.

Donor/procurement information

This information should be provided if known. If unknown, please state this. If not applicable, please state N/A. Donor, recipient or staff names are not required and may be anonymised.

Submission of completed reports

Adverse Reaction / Event Report Forms may be completed and submitted through the online reporting system or by downloading the forms available on the Blood, Tissues and Cells / Publications section of the IMB website at www.imb.ie. All hard copy completed forms should be submitted to the IMB by post or fax, see contact details Section 3 (also included at the bottom of the forms).

5. PROCESSING INITIAL AND FOLLOW-UP REPORTS

On receipt of completed report forms the IMB will:

- Enter anonymised information provided onto the IMB database and assign a unique IMB number to the case. Both this number and the reference number assigned by the tissue establishment or organisation will be referenced in all correspondence
- Generate an IMB Adverse Reaction/Event Report Confirmation Form. This form will include the relevant case reference numbers (i.e. the IMB's number and the number assigned by the reporting tissue establishment/organisation) and will be forwarded to the contact person in the reporting organisation. The completed confirmation report should be returned to the IMB by fax or post as soon as possible.

6. ANNUAL NOTIFICATION TO THE EUROPEAN COMMISSION

On an annual basis the IMB will submit a report, collating national information relating to adverse reactions and events to the European Commission.

7. SUMMARY

What needs to be reported?

- Any SAR/SAE which may influence the quality and safety of tissues and cells, and
- Any SAR observed during or after clinical application which may be linked to the quality and safety of tissues and cells.

Who needs to report?

- Responsible person (or designee) at tissue establishments should submit reports.
- Other organisations (e.g. procurement organisation or organisation responsible for human application) should report SARs/SAEs that have occurred at their facility to the associated tissue establishment who will report on to the IMB.
- A report submitted directly to the IMB from a procurement organisation or organisation responsible for human application will also be accepted.

When did the requirements for reporting come into force?

- The requirement to submit SAR / SAE reports to the IMB became effective from 7 April 2006.
- Reports should be submitted without delay following the discovery of the reaction / event.

How should reports be submitted?

- Submit a report on the IMB Adverse Reaction / Event Form available from the IMB website online or by phone/e-mail/fax/request (see contact details)
- The person submitting the report should assign a unique ID report number to the report which allows for traceability. Records should be kept.
- The IMB will assign a unique IMB number to the case.
- The IMB will send to the reporter
 - IMB Adverse Reaction Confirmation Form or
 - IMB Adverse Event Confirmation Form.

This form will contain the reporting establishment ID number and the IMB case reference number.

The form should be returned to the IMB upon completion by fax or post or online reporting.

Potential causes for concern

- A lack of SAE and SAR reports from a particular site
- Reports where the implications are potentially serious and/or have implications for other sites.
- Clusters of reports either nationally, or within a particular site.

Points to note

If in doubt, please report. The IMB will provide feedback if the case is considered to fall outside the remit for reporting outlining the rationale. The IMB may also be contacted by e-mail/phone for queries in relation to the reporting of SARs and SAEs, see contact details Section 3.