



**Specialist  
Pharmacy  
Service**



# Gene Therapies and Aseptics - a practical guide

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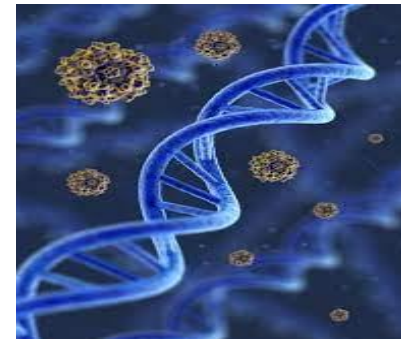
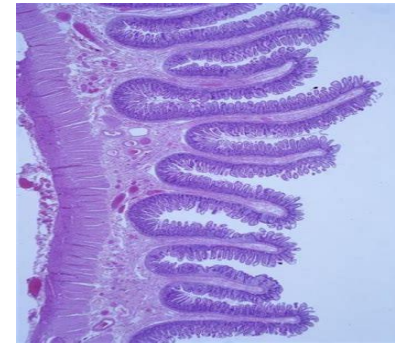
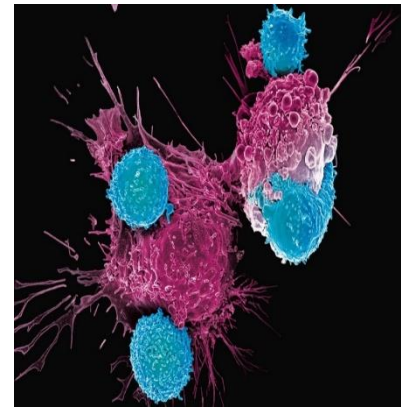
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# Advanced Therapy Medicinal Products - ATMPs

- An ATMP is a biological medicine.
- Regulation (EC) No 1394/2007 **classified** ATMPs as:
  - Somatic Cell Therapy Medicinal Product
  - Tissue Engineered Products
  - Gene Therapy Medicinal Product (GTMP)

Combined ATMPs are any of the above + a device.



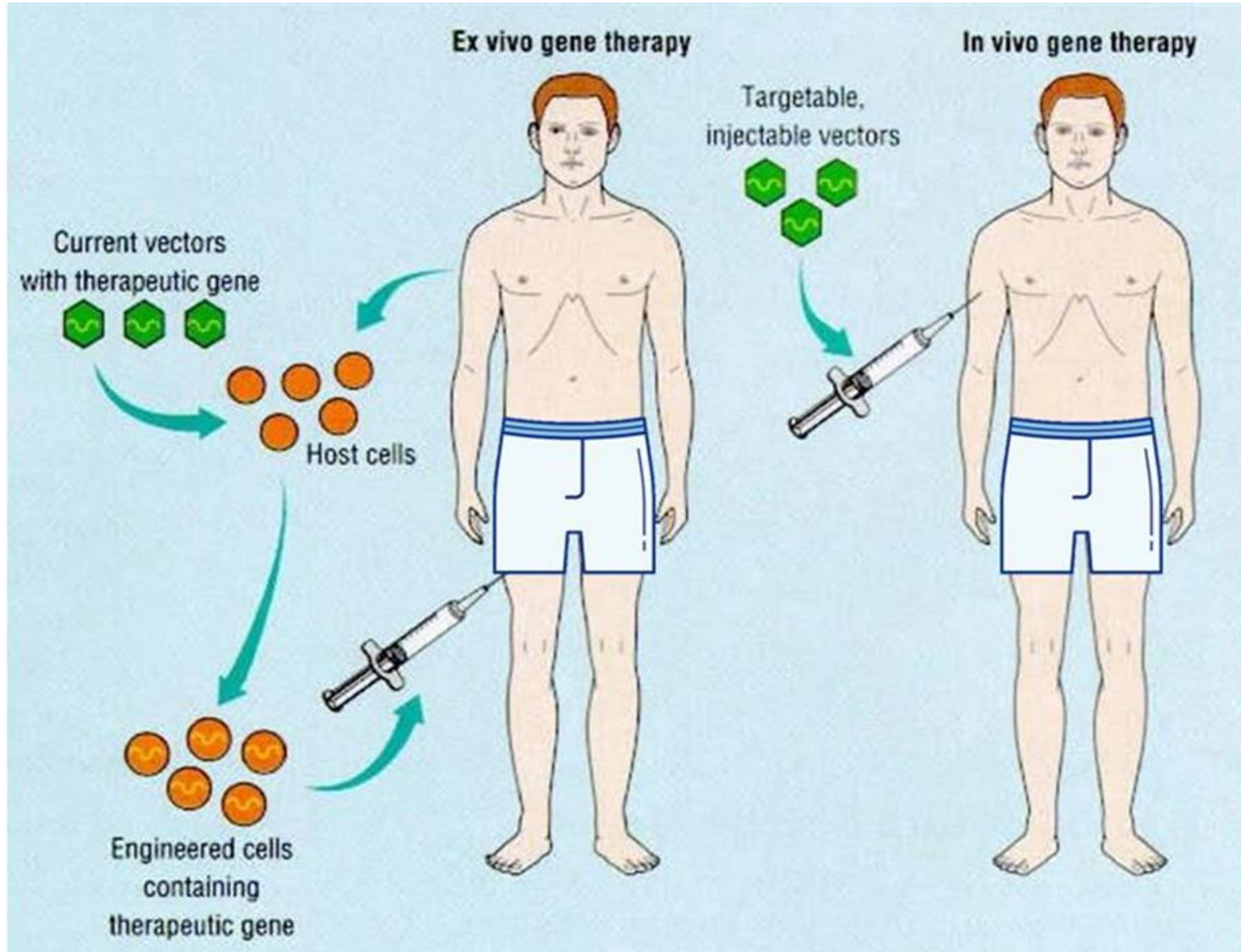
## *Under UK legislation (HMRs 2012 Regulation 2A):*

*A “gene therapy medicinal product” is a biological medicinal product which has the following characteristics—*

- it contains an active substance which contains or consists of a recombinant nucleic acid used in or administered to human beings with a view to regulating, repairing, replacing, adding or deleting a genetic sequence; and*
- its therapeutic, prophylactic or diagnostic effect relates directly to the recombinant nucleic acid sequence it contains, or to the product of genetic expression of this sequence.*

*A vaccine against infectious diseases is not to be treated as a gene therapy medicinal product.*





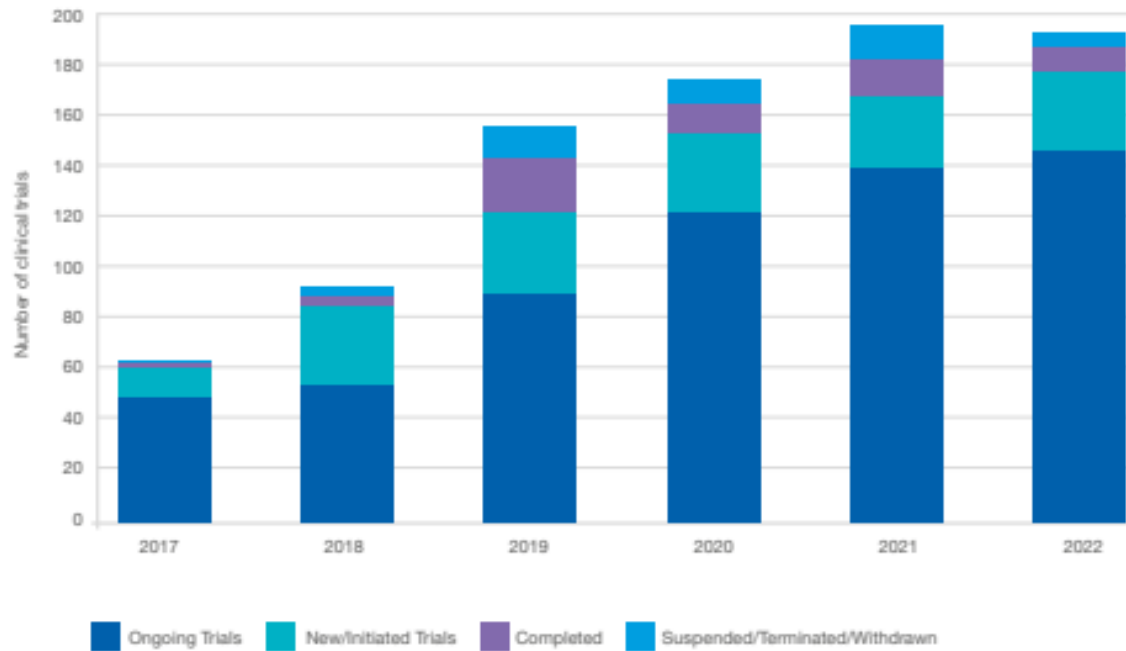


Generic name	Brand name	Indication	Type of ATMP
atidarsagene autotemcel	<i>Libmeldy</i>	Pre-symptomatic early onset (late infantile and early juvenile) metachromatic leukodystrophy	Ex vivo GTMP
autologous anti CD19 transduced CD3+ cells (brexucabtagene autoleucel)	<i>Tecartus</i>	Mantle cell lymphoma in adults <b>ALL in adults</b>	Ex vivo GTMP
autologous CD34+ enriched cell fraction that contains CD34+ cells transduced with retroviral vector that encodes for the human ADA cDNA sequence	<i>Strimvelis</i>	Severe combined immunodeficiency due to adenosine deaminase deficiency	Ex vivo GTMP
axicabtagene ciloleucel	<i>Yescarta</i>	Diffuse large B-cell lymphoma in adults – third-line and <b>second line</b>	Ex vivo GTMP
ex vivo expanded autologous human corneal epithelial cells containing stem cells	<i>Holoclar</i>	Limbal stem-cell deficiency due to ocular burns in adults	TEP
onasemnogene abeparvovec	<i>Zolgensma</i>	Spinal muscular atrophy	In vivo GTMP
spheroids of human autologous matrix-associated chondrocytes	<i>Spherox</i>	Articular cartilage disorders	TEP
talimogene laherparepvec	<i>Imlygic</i>	Malignant melanoma	In vivo GTMP
tisagenlecleucel	<i>Kymriah</i>	Diffuse large B-cell lymphoma in adults – third-line	Ex vivo GTMP
tisagenlecleucel	<i>Kymriah</i>	Acute lymphoblastic leukaemia in children and young adults	Ex vivo GTMP
voretigene neparvovec	<i>Luxturna</i>	Leber congenital amaurosis or retinitis pigmentosa caused by confirmed biallelic RPE65 mutations	In vivo GTMP
eladocagene exuparvovec	<i>Upstaza</i>	Aromatic L-amino acid decarboxylase deficiency >18months old	In vivo GTMP



# Clinical Trials

Figure 1. Number of ATMP clinical trials in the UK per year



## What does this mean for Aseptics.....?



- More work, more complexity:  
Preparation capacity will be required
- Recognised by ISMB / Aseptic Transformation process and the O'Shaunessey review.

Date published: 17 March, 2023

Date last updated: 1 June, 2023

## Assurance of aseptic preparation of medicines

[Publication \(/publication\)](#)

### Content

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- [Appendix 4: iQAAPS quality indicators](#)
- [Appendix 5: EL\(97\)52 Review Working Group](#)

**NHS Infusions and Special Medicines Programme: Guidance to replace EL(97)52 in England**

Aseptic preparation is defined as: reconstitution of an injectable medicine or any other aseptic manipulation when undertaken within NHS aseptic facilities to produce a labelled ready-to-administer presentation of a medicine, in accordance with a prescription provided by a practitioner, for a specific patient.

Aseptic reconstitution of any medicinal products or IMPs, where this is performed in a pharmacy aseptic facility.

Aseptic reconstitution of innovative therapies such as ATMPs where this is performed in any NHS aseptic facility with pharmacy oversight





GOV.UK

Home > Health and social care > Medicines, medical devices > Clinical trials and investigations  
> Commercial clinical trials in the UK: the Lord O'Shaughnessy review

Department for Science, Innovation & Technology | Department of Health & Social Care | Office for Life Sciences

## Independent report

# Commercial clinical trials in the UK: the Lord O'Shaughnessy review - final report

Updated 26 May 2023

Contents

- Foreword
- Executive summary
- Part 1: context, operating environment and existing commitments
- Part 2: problem statements and significant actions
- Part 3: transforming how the UK does clinical trials

### Foreword

The UK is blessed with a rich, diverse and creative academic sector with [4 of the world's 10 leading universities in the field of international research](#). Matched with an entrepreneurial culture that is second only to the United States, this makes our science sector the envy of the world. But in the fields of medicine and life sciences, inventions and discoveries alone do not change lives. For a therapy, device, diagnostic or digital tool to reach patients, a long, often laborious process of translating insights into products and then testing their safety and efficacy through clinical trials is required.

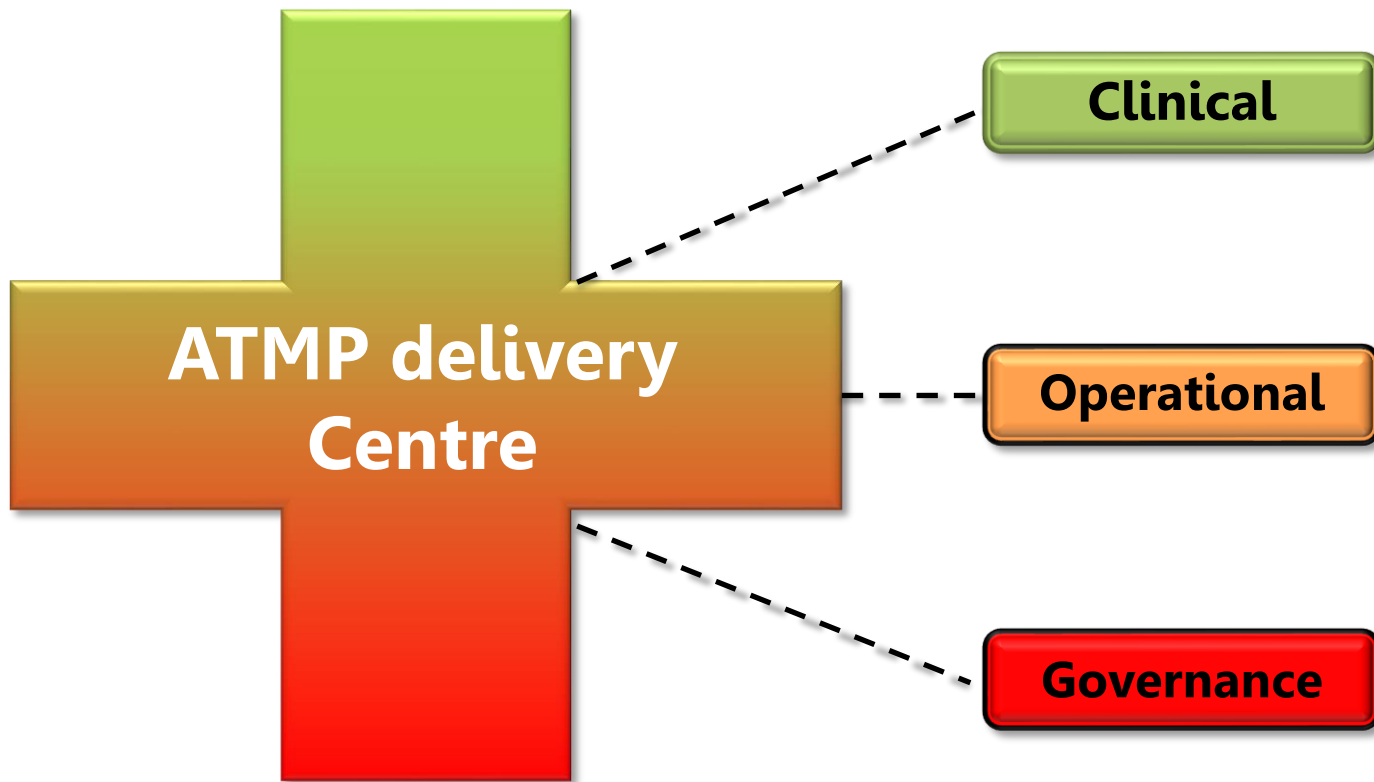
**Problem statement 4:  
research is not systematically prioritised  
by or within the NHS**

Stakeholders to this review have cited a shortfall of research nurses, pharmacy and imaging resources, **and aseptic teams** as constraints to delivery of clinical trials

We also need to make sure that the infrastructure is in place to conduct research;

**Recommendation 12: income generated by commercial sponsors should be explicitly directed to units and departments leading trials in NHS sites to provide direct financial incentives to take part in commercial trials**

Hospital consultants who take part in research studies are more likely to promote the uptake of innovative therapies or devices once they have been licensed, improving access for all patients.



# Local Governance

## Feasibility

- Facility for preparation / capacity
- Technical Assessment



# Organisational Governance

- Additional to local R & D processes for ATIMP trials

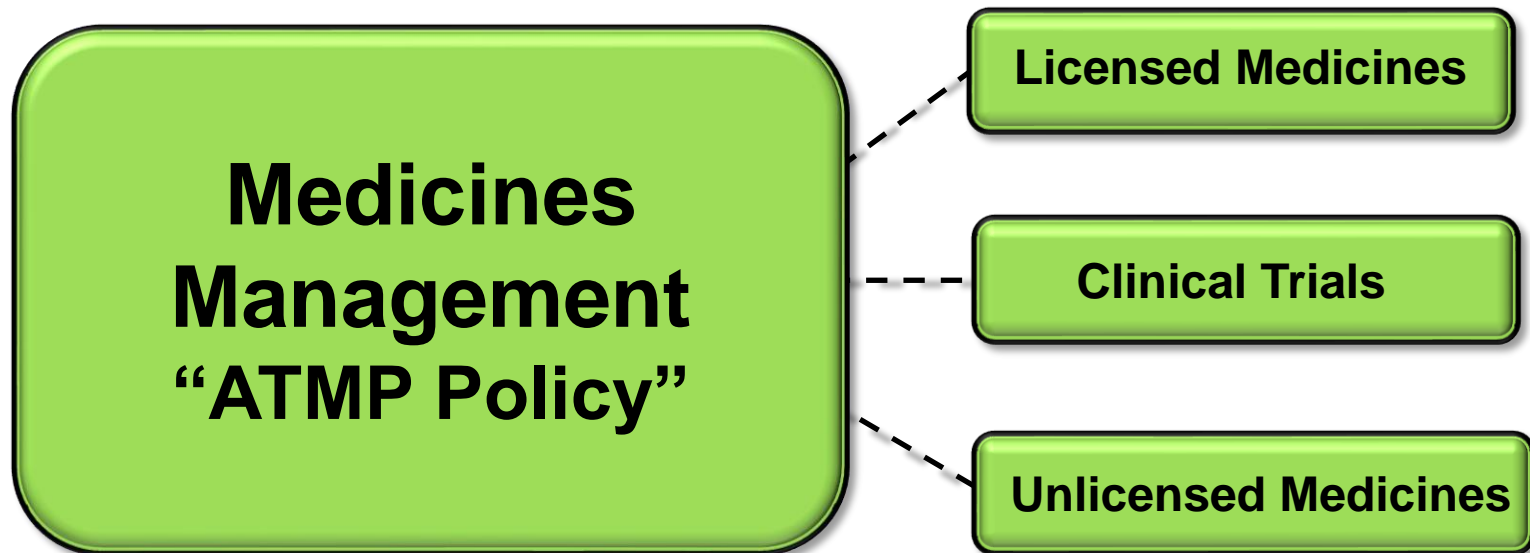
- Why?

- Innovative medicines
- Innovative administration techniques
- Committees e.g. ATMP
- Regulatory Change e.g. GMSC (HSE)
- Media Interest

## How?

ATMP Policy






Pan UK Pharmacy Working  
Group for ATMPs

Gene Therapy Medicinal  
Products

Governance and  
Preparation Requirements

Version 1  
September 2019

With special thanks to  
Scottish Pharmacy Quality Assurance Group  
And  
Northern Alliance Advanced Therapy Treatment Centre 

- Gene Therapies require additional scrutiny.
- Establish Classification of the gene therapy and any containment required.

How to set up a GMSC



# Risk assessment - GMSC

- Review safety of products and risk to health
- Ensure all parts of pathway including receipt, preparation and infusion are risk assessed and control measures in place.
- Mandatory requirements apply only to clinical trials
- Technically only required for any GTMP that is also a GMO
- **But the Pan UK PWG for ATMPs recommend all products have full safety overview**
- Notification to HSE where applicable



Appendix 2

## Example of a GMSC Risk Assessment

### RISK ASSESSMENT FOR HANDLING OF GENETICALLY MODIFIED MICRO-ORGANISMS FOR GENETIC MODIFICATION SAFETY COMMITTEE (GMSC)

#### SECTION 1 Basic Information

<b>Project Title</b>	
<b>Trial Organisers/Sponsor</b>	
<b>Principle Investigator (PI)</b>	
<b>PI Address</b>	
<b>PI Telephone</b>	

# How to Assure Governance is Appropriate

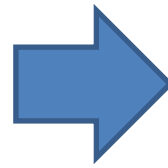
**Organisational Policies**

**Local Procedures**

**Quality Systems**

**Collaboration &  
Communication**

# Site Selection



# Site Initiation

## Pharmacy Institutional Readiness Guidance



<https://www.sps.nhs.uk/networks/pan-uk-pharmacy-working-group-for-atmps/>

# Operational Implementation

Map processes from  
placing order through to  
administration and  
monitoring of ATMPs

Key principles for each  
stage to facilitate  
consistency of  
implementation

# Pharmacy Institutional Readiness for In vivo Gene Therapy

## Product Receipt

- In-vivo (virus based) GTMPs are suitable for handling in Pharmacy. See [Gene Therapy and Preparation](#) for more information. On occasion they may require handling of dry ice and Pharmacy receiving areas require competency to undertake this activity.
- An SOP for receipt of GTMPs covering those holding marketing authorisation as well as investigational medicinal products (IMPs) is required. Checks on receipt should include integrity of the product, labelling, temperature compliance during transit, and Certificate of Analysis / QP certificates detailing the dose, if applicable. These should be reviewed by an appropriately trained clinical pharmacist or Clinical Trials pharmacist. Handling precautions should also be considered, including spillage kit when required.

An exemplar Product Receipt checklist is available in Appendix 5

## Storage

- Storage requirement is likely to be in -20°C to -90°C for GTMPs. Room temperature stability is often short.
- Continuous temperature monitoring and alarms are required from receipt through to administration. Actions in the event of an alarm should be specified (and in line with anything detailed in the supply agreement with the company/sponsor).
- Deviation processes should be clarified e.g. if short period temperature out-of-specification occurs, the SOP should state that risk assessment and actions to be taken are documented. Pharmacy should be made aware of any on-site storage deviations.

The exemplar Product Receipt checklist is available in Appendix 5 which covers aspects of storage

## Preparation Location Decision

- Some in-vivo GTMPs will require a thaw/preparation/reconstitution step. Optimal location for in-vivo gene therapy will be as per SmPC or clinical trial protocol. Where the location is not specified guidance can be found in [Gene Therapy and Preparation](#). Preparation location should have been defined in the GMSC risk assessment. Where stability data allows aseptic preparation should occur within a pharmacy aseptic unit.

Appendix 5

### In-vivo GTMP Receipt Checklist

Product Name	
Supplier	
Manufacturer (if different to above)	
Courier Job Number (& other ref no)	
Date & time received	
Received by	
<b>Checking step</b>	
Tamper-evident ties intact?	
Outer	
Inner	
Dry ice competency	
Transit Logger temp on receipt as per r	
Data Logger W (no alarms)	
All require Shippin Return Cert/	

Appendix 6a

### In-vivo GTMP Pharmacy Aseptic Preparation Checklist

Process Set Up/Governance		Yes / No / NA	Checker Initials	Date & time
Roles and responsibilities documented or campaign use agreed	Yes / No / NA			
Dedicated Isolator or BSC (II) available	Yes / No / NA			
Preparation Location Complies with the requirements in Chart 8.2 in <a href="#">Gene Therapy and Preparation</a>	Yes / No / NA			
Worksheet written in line with SmPC, or Protocol / Pharmacy Manual (for Clinical Trials)	Yes / No / NA			
Appropriate label designed	Yes / No / NA			
Worksheet approved	Yes / No			
Waste pathway clear	Yes / No			
Required PPE is available	Yes / No			
Cleaning agent appropriate	Yes / No			
Spill kit available at all times	Yes / No			
<b>Process</b>				
The process is covered by a suitable validation	Yes / No			
Operators are trained in the process	Yes / No			
SOP requires confirmation of patient readiness prior to beginning preparation	Yes / No			
Retrieval from storage (SOP available)	Yes / No / NA			
Thaw SOP in place	Yes / No / NA			
Check and release processes in place	Yes / No / NA			
Transportation arranged	Yes / No			
Print Name				
Signature				
Date				



# ATIMP Considerations at FEASIBILITY

- Storage

- Ambient
- Fridge
- Freezer
- Ultralow
- Cryostorage
- Transportation

- Preparation / Reconstitution Step

Needed?

**NO**

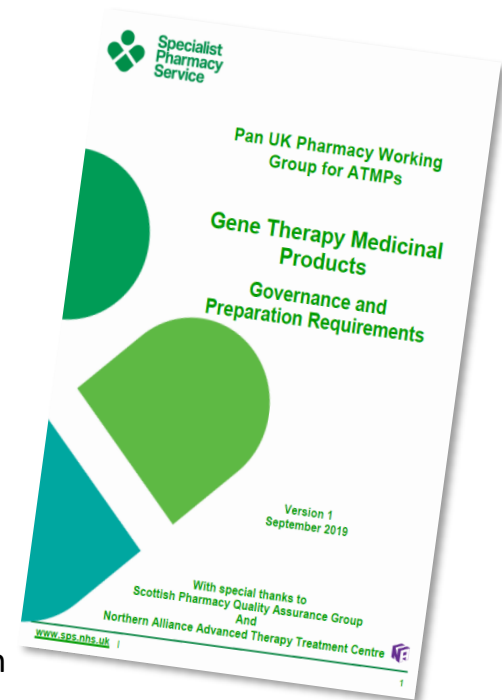
Stability of IMP

**YES**

In-use stability post preparation  
Optimal preparation location  
Suitable facilities  
Suitable Capacity  
Post Recon labelling – annex 13

compliant

Pharmacist supervision



# SOPs and training

- SOPs for all tasks and only to be carried out by trained staff:
  - Receipt, handling, storage
  - Preparation
  - Transport
  - Administration
  - Waste management / shedding / spills
  - Containment / potential exposure to patients,
  - Clinical Toxicity Management
  - Supportive medicines
  - Washout periods

# Site Initiation

- Distribution arrangements
  - Import: QP oversight
- Receipt
  - Documentation e.g. QP certificate
  - Cold chain deviations
  - Storage
  - Preparation
    - Components
    - UKCA/ CE marked
  - Administration

**TOP TIP:** undertake a dry run of the whole process




Pan UK Pharmacy Working  
Group for ATMPs

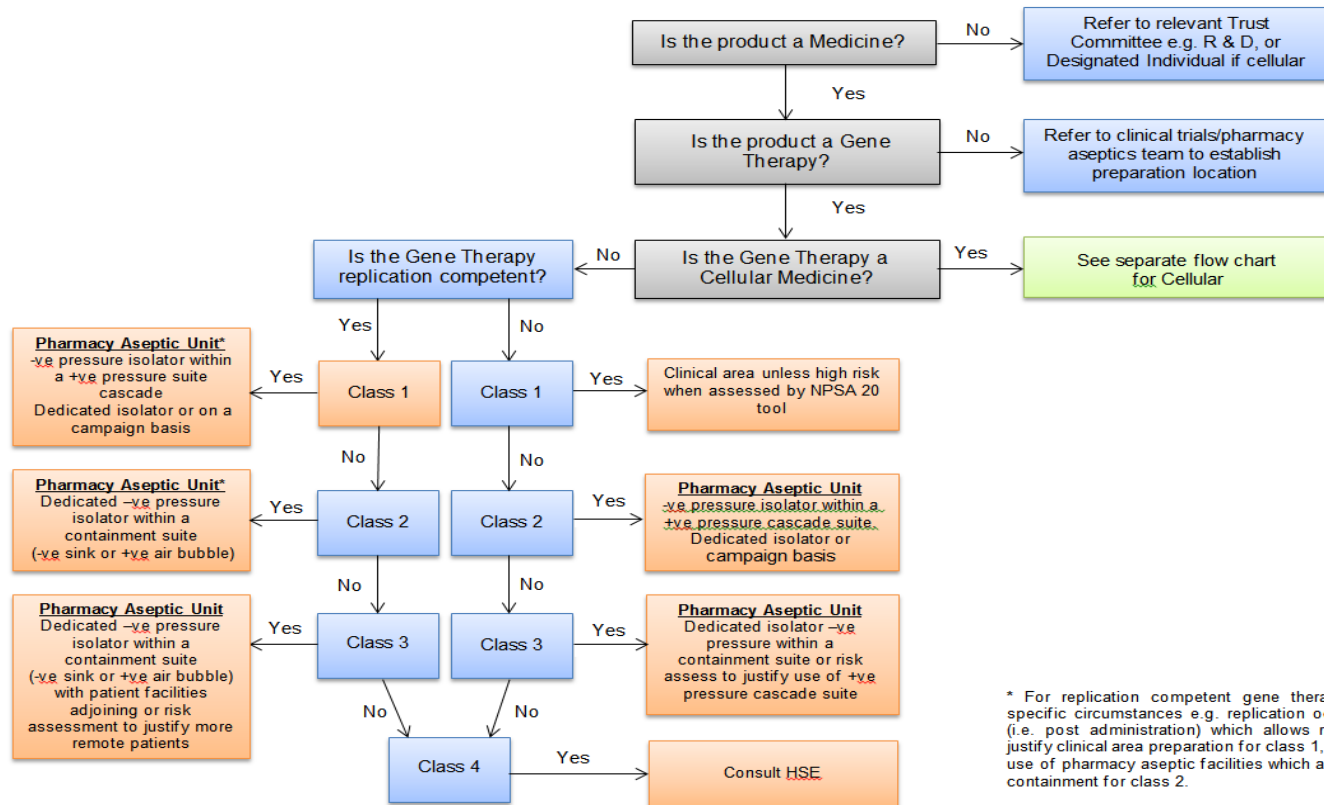
# Gene Therapy Medicinal Products

## Governance and Preparation Requirements

Version 1  
September 2019

With special thanks to  
Scottish Pharmacy Quality Assurance Group  
And  
Northern Alliance Advanced Therapy Treatment Centre 

# In-Vivo Gene Therapy Preparation Location Guidance



**TOP TIP:** Specify required environment rather than device

# Top Tips for Sponsors

- Understand site requirements
- Pre-empt questions
- Design a deliverable process
- Understand the role of the
- Sponsor Pharmacy



The first stop  
for professional  
medicines advice

[Guidance](#) [Events](#) [Podcasts](#) [Planning](#) [Training](#) [Publications](#) [Tools](#) [Q Search](#)

[COVID-19](#) [PGDs](#) [Administering](#) [Cautions and contraindications](#) [Dosing](#) [Switching](#) [Interactions](#) [Medication Safety](#) [Safety in breastfeeding](#)

## The role of the sponsor pharmacy in clinical trials of investigational medicinal products (CTIMPs)

Published 12 December 2022

Topics: [Clinical trials](#) · [Regulatory](#)

Identifying key areas where pharmaceutical expertise is required by sponsors for conducting non-commercial clinical trials



National Pharmacy Clinical Trials Advisory Group

### Pharmacy Manual Checklist for Clinical Trials of Advanced Therapy Investigational Medicinal Products

Pan UK Pharmacy Working Group for ATMPs

March 2023

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About · L



# Pharmacy Learning and Resources

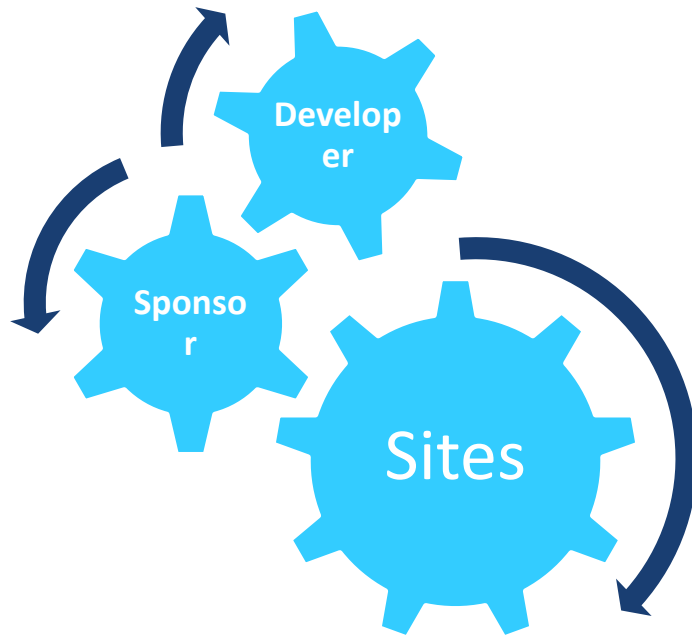
## Support at all levels

Pan UK PWG resources support each sector to optimise implementation

[Advanced therapy medicinal products – SPS - Specialist Pharmacy Service – The first stop for professional medicines advice](#)

ATTC Network Clinical Trials Section on NHS Readiness Toolkit

<https://www.theattnetwork.co.uk/clinical-trials/>



# Experience from an Aseptic Unit



# Background

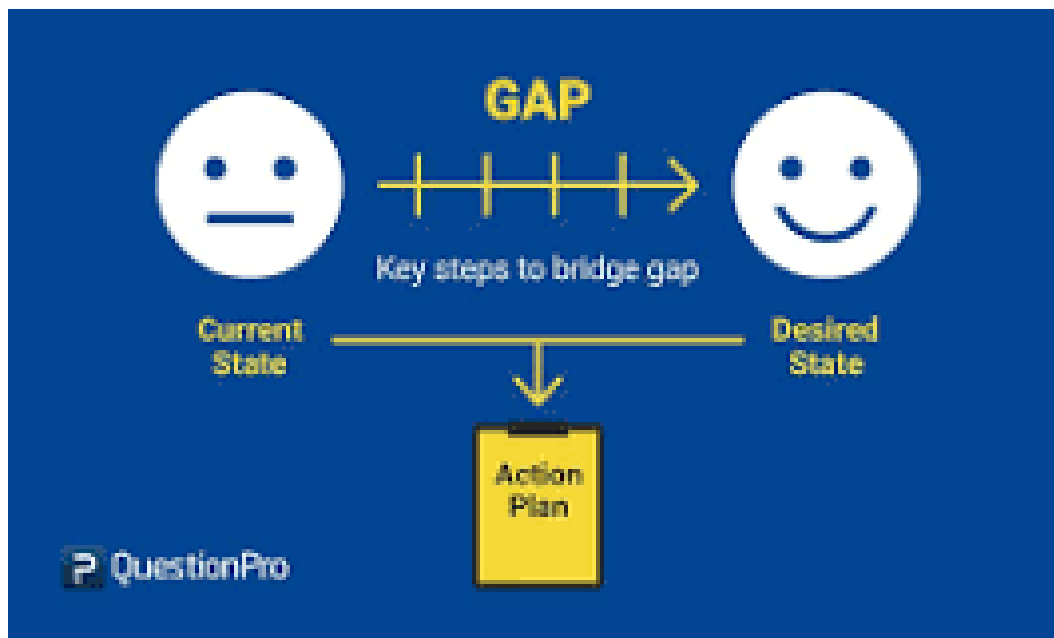
- Salford Royal Hospital
- Dedicated Gene Therapy in aseptic unit since 2011
- As a trust we have been working on gene therapy (in-vivo ATMP) implementation since 2021
- All ATMP are currently trials – metabolic medicine
- Several trails pulled during set up
- Patient screening/eligibility
- Due to dose first patient 11<sup>th</sup> October 2023

# Governance arrangements

- Driven by pharmacy
- Importance of GMSC and appropriate membership (joint ATMPC and GMSC)
- In vivo vs ex-vivo
- Robust risk assessment process



# GAP ANALYSIS



# Aseptic Processing

- Pharmacy Manual with all relevant information
- Optimal presentation of IMP
  - Size
  - Number of manipulations
  - Disinfection time
  - Preparation time
- **Consider**
  - Validation of processes
  - Gowning
  - Monitoring



# Facilities

Do you need a dedicated gene therapy suite?

## Risks

- Complex production methods
- Containment level required
- Is vector replication competent?



# Storage and waste handling

## *Our concerns:*

- Storage -20°C to -90°C for GTMPs within aseptics
- Prevention of cross contamination

## *Solutions:*

- ATMPs are not stored in aseptics
- Vials kept in Pharmacy Clinical Trials
- Products collected/delivered immediately
- Waste collected immediately
  - Trained porters to collect
  - GMO waste transfer logs



***Dummy run to test all procedures  
and processes***





# Spillage / Needlestick

- Procedures can't cover the intricacies of every individual product.
- The place of the GMSC Risk Assessment is to determine if any additional precautions required.
- Spill kits
  - Specific to Trial/product
  - Transported with the product
- Training for all staff



# Aseptic Capacity

- Complex treatments to prepare, store, distribute

*However,*

- Most are one off treatments
- If effective may prevent need for longer term treatment – potentially releasing aseptic capacity
- Small patient cohorts
- Eligibility and screening

Don't get bogged down with  
planning what you should/would  
do for Class 3 and 4 .....  
it's unlikely to happen



Don't forget why!



# In vivo Gene Therapy: Adeno Associated Virus



**NHS England strikes deal on life-saving gene-therapy drug that can help babies with rare genetic disease move and walk**

8 March 2021

Children and young people Genomics Long term conditions Medicine  
Specialised commissioning

## Spinal Muscular Atrophy

- Rare Genetic Progressive Neuromuscular Disorder
- SMN1 gene is missing or not working
- Onasemnogene abeparvovec replaces the function with a working copy of a human SMN
- Life changing
- Needs early treatment

['Gene therapy is a game changer for our son'](#)  
[- BBC News](#)

# Conclusion

- GTMPs are game changing for patients
- GTIMP trials are challenging
- GTMP delivery can be disruptive
- Planning and collaboration are key to consistent quality implementation for patient safety and robust data.
- Getting it Right First Time requires Organisational Governance and System Leadership

For more information about the Pan UK PWG for atmps contact [anne.black7@nhs.net](mailto:anne.black7@nhs.net)

