Medicines & Healthcare products Regulatory Agency

MHRA and its role in clinical investigation applications

Mark Grumbridge
Head of Clinical Investigations

MedConnect North Event:
Re-discovering the MedTech Journey

Science research and innovation

Our objective is to deliver public health impact, world-leading research innovation, and a unique proposition via an ambitious science strategy which will balance innovation against sustainability and affordability.

Healthcare quality and access

Application process

Notify MHRA when

It's a non-CE marked device

A CE-marked device being used outside of its intended use

First steps

E-portal hosted by Integrated Research Application System (IRAS)

Validation - a checklist is available on the MHRA website.

Up to 5 working days

Are the outcomes looking at safety and performance? Do we have all the relevant documentation? (checklist on our website)

NHS Health Research Authority

IRAS INTEGRATED RESEARCH APPLICATION SYSTEM

Application Data

2020 - 44

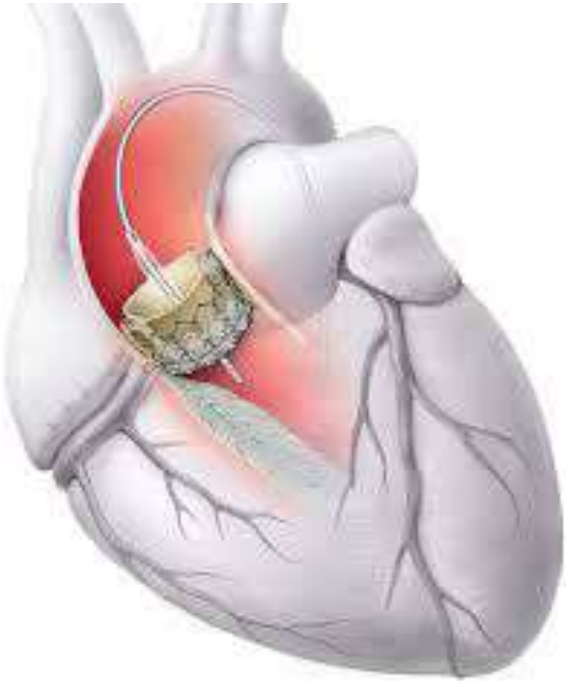
2021 - 81

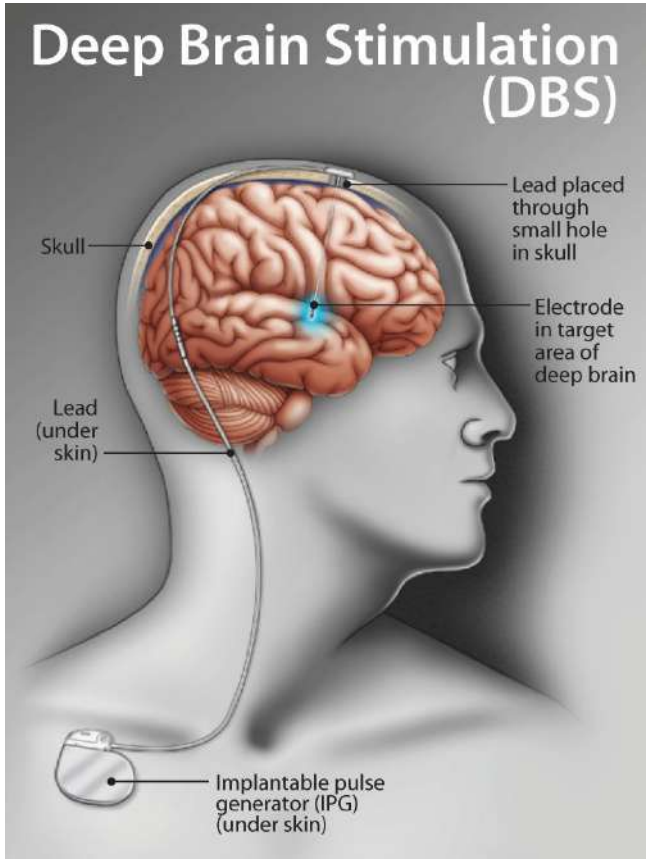
2022 – 83

2023 - 70

*** To date**

Types of device





Internal and external review

Internal clinical staff

Technical staff

External experts (around 130)

Sterilisation

Biocompatibility & Toxicology

Statisticians

Electrical safety

The review – what are we expecting?

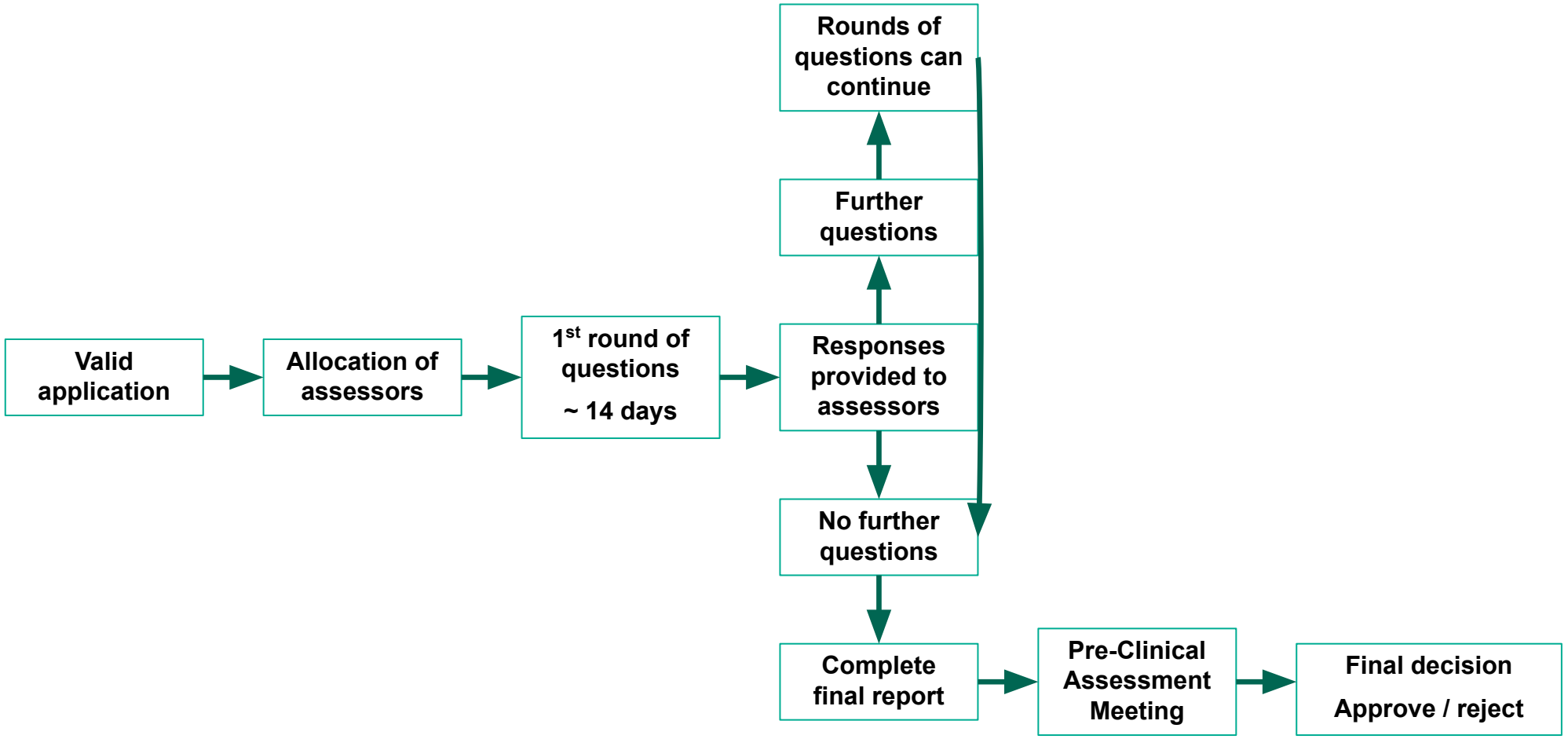
- Demonstration of Safety and Performance

- The objectives of clinical investigation are:

To verify that, under normal conditions of use, the performance of the devices conform to those referred to in Section 3 of Annex I

To determine any undesirable side-effects, under normal conditions of use, and assess whether they constitute risks when weighed against the intended performance of the device

Validation and review Process



Assessment process

When the MHRA has received application documents and validated them, we will contact the applicant to confirm that the 60-day (45 days in NI) assessment has started or we will advise if there are any issues identified in the validation process.If there are any issues raised, the 60-day assessment will start when we receive a valid response.

Day 1 of the 60 days is taken as being the first day that follows the date of acceptance of a valid Notification. For example, If an application is received on 24th August and the assessor validates the submission on 28th August, the clock starts on 29th August.

Assessors report – PCA 5 (pre clinical assessment)

- The assessor will indicate if they approve or object to the application
- The assessor will provide a justification for their decision
- The assessor will include any comments for the approval letter

PCA5 ASSESSMENT REVIEW FORM TO BE COMPLETED BY ALL ASSESSORS

PRE-CLINICAL ASSESSMENT: OBJECTION/NO OBJECTION

Please complete and sign this form and attach it to any additional assessment report you may wish to provide. May I also remind you that all assessors (internal and external) should not contact the manufacturer directly, but that all correspondence needs to come through to MHRA, except in the case of clinical issues when the clinical team should be contacted.

REFERENCE: CI/2023/0040/GB

Company Name : Ingenion Medical Limited
Model Name : cymactive™
Model No : 01-0022□ part number: CYM-2R-12
Description : cymactive™ 2.0R Bladder Management System (BMS) is a temporary urinary catheter that includes an integral valve which is controlled using an external magnet and a delivery device

AREA OF ASSESSMENT: - CLINICAL ASSESSMENT

With reference to the clinical investigation of the above device, I, Mr Mark Grumbridge

(* delete whichever is not appropriate)

* (a) have no grounds for MHRA to object to the commencement of this clinical investigation.

* (b) have grounds for MHRA to object to the commencement of this clinical investigation.

It is important that you provide the justification for your decision to object or not object to this submission below:

My justification for the decision reached:
(please include a reference to the information supplied by the applicant, which you have reviewed e.g. "Based on the initial application and the applicant's responses dated ……. I have reviewed this information and confirm that they are/are not acceptable for the following reasons ……")

Possible outcomes

No objection
Conditional No objection
Objection - common reasons are,
Lack relevant clinical end points
Clinical parameters insufficient/ inappropriate
Inadequate pre-clinical testing/ assessment
Inadequate toxicological testing/ analysis
No sterilisation validation
Inadequate electrical testing
Risks outweigh benefits

Final letter (within 60 days)

- Will detail our decision
- Will detail reporting requirements

Medicines & Healthcare products Regulatory Agency

MHRA

Ms Rebecca Hamilton-Cook
Coloplast Ltd
Nene Hall
PE2 6FX
United Kingdom

MHRA
10 South Colonnade
Canary Wharf
London
E14 4PU
United Kingdom

www.gov.uk/mhra

24/05/2023

Our ref: CI/2023/0027/GB

Dear Ms Hamilton-Cook,

CLINICAL INVESTIGATION: NO OBJECTION

Manufacturer	: **Coloplast A/S**
Device Name	: **TEST PRODUCT CH12/CH14**
Study Name	: **CP348 - A randomized, open-labelled, crossover study confirming performance of a new single-use compact intermittent catheter in a population of adult female intermittent catheter users**
Description	: **The investigational device is a ready-to-use, sterile, hydrophilic-coated compact female catheter for intermittent catheterisation. 'Name of device is commercially sensitive'.**
Your notification dated	: **31/03/2023.**
Protocol version number	: **2.0**

I hereby notify you that MHRA has no grounds for objection to the making available of the above medical device for the purposes of a clinical investigation as declared in the above notification.

MHRA Comments

Next steps

Objection

MHRA detail the grounds for objection

Applicant to address the grounds for objection

Resubmission if the applicant chooses to do so

No objection

Interim reports – case by case (approval subject to….)

SAE reports – as and when (subject to internal review)

Final report – assessment

** Ethics and local approvals also required**

Amendments

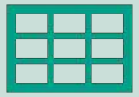
Once you've received a letter of no objection from us, you must notify the MHRA of all proposed amendments to the investigation. You must wait until we send you another letter of no objection before you implement the changes.

You must tell us about any changes made to:

- the device under investigation
- study documentation, including the clinical investigation plan
- investigators or investigating institutions
- changes requested by an ethics committee

Deviations

Manufacturers must notify the MHRA of all deviations relating to UK study sites only as soon as they have been made aware of them. Details about the nature of the deviation, when it occurred, where it occurred, and any proposed corrective and preventative actions should be provided.



Please use the following Excel template when reporting deviations and keep this as a ‘live’ document so that new deviations can be added. This enables both the sponsor and MHRA to have a complete overview each time it is submitted.

Coordinated assessment pathway process

MHRA is collaborating with the Health Research Authority (HRA) on the coordinated assessment pathway which involves our two organisations sharing information during our assessment of medical device clinical investigations.

For this process we require the MHRA Devices application to be submitted first and then the REC application to be submitted as soon as MHRA has confirmed the devices application to be valid

Combined review process

Combined review is the way research teams seek approval for new Clinical Trials of Investigational Medicinal Products (CTIMPs) and combined medicine and device trials.

Research teams make a single application using a new part of IRAS, which goes to both the Medicines and Healthcare products Regulatory Agency (MHRA) and a research ethics committee (REC) at the same time. The application also goes for study wide review, such as HRA and HCRW approval, if the study is to take place in the NHS or Northern Ireland HSC.

The regulatory and ethics reviews are done in parallel and any requests for further information (RFIs) are raised jointly. A single response to these requests leads to a single decision from both reviews. Study wide review is usually issued at the same time as MHRA and REC, but may come later if there are still issues to discuss with the applicant.

Innovative Devices Access Pathway - IDAP

The Innovative Devices Access Pathway (IDAP), launched later in 2023, will be operated by the Medicines and Healthcare products Regulatory Agency (MHRA), the National Institute for Health and Care Excellence (NICE), Health Technology Wales (HTW) and Scottish Health Technology Group (SHTG).

The ambition of this new programme is to bring innovative technologies and solutions to the forefront of the National Health Service (NHS), through a new, integrated support service for developers that will include enhanced opportunities for engagement.

Guidance and support

MHRA Innovation Office

The MHRA Innovation Office is open to ideas for innovative medicines, medical devices and manufacturing processes. It provides free and confidential expert regulatory information, advice and guidance to organisations of all backgrounds and sizes based nationally or internationally.

Guidance and support

Guidance

Notify the MHRA about a clinical investigation for a medical device

How to notify the MHRA of your intention to carry out a clinical investigation for medical devices.

Future regulation

Medicines & Healthcare products Regulatory Agency

Government response to consultation on the future regulation of medical devices in the United Kingdom

Successes

INDEPENDENT PREMIUM

First patient in UK fitted with sensor to give early heart failure alert

Device is implanted during a simple 45-minute procedure using a small catheter

NEWS

Wednesday 08 February 2023

Hospital trust first in UK to implant novel heart failure device

NEWS › HEALTH

Liver dialysis device 'safe and effective for treating liver failure'

The DIALIVE device could be approved for clinical use within the next three years

Resources

https://www.gov.uk/guidance/notify-mhra-about-a-clinical-investigation-for-a-medical-device

https://www.gov.uk/government/groups/mhra-innovation-office

https://www.gov.uk/guidance/regulating-medical-devices-in-the-uk

Medicines & Healthcare products Regulatory Agency

Mark Grumbridge

Mark.grumbridge@mhra.gov.uk

Copyright information