

Medicines & Healthcare products Regulatory Agency All Wales Medicines Strategy Group Grŵp Strategaeth Meddyginiaethau Cymru Gyfan

### Making medicines safer Nicola Wheatley Memorial Lecture



June M Raine

17<sup>th</sup> November 2022



#### Nicola Wheatley 20 September 1981 – 30 October 2021

### Making medicines safer

- 1. Why is making medicines safer so important and what is the vital contribution from Wales?
- 2. What were the learnings from safety monitoring for vaccines and therapeutics during pandemic?
- **3. Where next**? Better data and new scientific methodologies for safer medicines





MHRA's mission is to enhance and safeguard the health of the public by ensuring medicines and medical devices work and are acceptably safe





UK data driving real-world evidence

### Changing regulatory environment





Growing patient expectations for rapid access to breakthroughs

Changing demographics and disease patterns

**Digital transformation** 

Unlocking the potential of transformative medicines

### Challenges and opportunities...













### MHRA - challenges and opportunities

Following EU Exit, safe transition to new role as independent sovereign regulator

Regulatory reform to support new safer systems and greater patient involvement

Opportunity for new ways of working and safe speedy access to innovation for patients

### A new era in regulation

Today's **public and patients** have rightful expectations of safety and involvement in decisions about healthcare products

Today's **health service** deserves safe, speedy access to the most transformative products – medicines and medical devices

Today's **life sciences industry** demands an agile and supportive regulator

# • Putting patients first • World-leading Innovative • Scientific excellence

### One Agency delivering for patients

#### **Patient Involvement**

## Putting patients first, creating a dialogue with patients at every step of regulatory process to maintain public and stakeholder trust



Enable Scientific Innovation

- Clinical trials & clinical investigations
- · Global biological standards
- · Regulatory science



Accelerate healthcare access

- 17,000 medicines & 2M devices in UK
- · Innovative access & reliance procedures
- New medical device regulations in 2022



#### **Strengthen Patient Safety**

- 368,000 safety reports on COVID vaccines
- · Real world data critical to risk management
- · Pro-active surveillance and enforcement

### MHRA transformation means four key culture shifts

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<pre>'Controller' to 'Enabler'</pre>	<pre>'Black box' to 'System partner'</pre>	<b>'Population health'</b> to <b>'Patient Champion</b> <sup>,</sup>	Global voice
Without losing high standards of safety and efficacy or independence in decision-making, with effective tools to control industry when needed	Joint working with health technology assessment, leading to 'end-to-end' approach with real pull- through to healthcare system and patients	Influencing clinical practice and helping patient decision-making Moving to life cycle approach, using real world data, responsive to patient views and safety	Leading in development of innovative regulatory approaches to new technologies, UK the best environment for clinical trials, global standards followed: ICH and IMDRF

#### Moving to a product 'life cycle' regulatory approach

### Working in partnership



### Partnership pathway for innovative medicines



Making medicines safer and the vital contribution from Wales

### Medicines safety monitoring cycle



### Identifying safety signals

Yellow Card Scheme cornerstone of UK public health protection since 1964

Widely acknowledged as an exemplar among surveillance schemes

Yellow Card continues to evolve to be relevant to work of healthcare professionals and daily lives of patients and public

MHRA and Yellow Card Centres are working together to make medicines safer



### Why is making medicines safer so important?



6.5% hospital admissions in UK relate to adverse drug reactions

ADRs were responsible for death in 0.15%

72% were classified as avoidable

Adverse drug reactions as cause of admission to hospital: prospective analysis of 18 820 patients

Munir Pirmohamed, Sally James, Shaun Meakin, Chris Green, Andrew K Scott, Thomas J Walley, Keith Farrar, B Kevin Park, Alasdair M Breckenridge Pirmohamed et al 2004 BMJ 329; 15-19

#### **Open Access**

Research

**BMJ Open** An investigation into drug products withdrawn from the EU market between 2002 and 2011 for safety reasons and the evidence used to support the decisionmaking

derived from EMA reports, PubMed	lite ature sea	arch and website	s of competent	authorities	alatoa u	omoon 2002 and	2011
Drug name	Case reports	Animal studies	Case- control	Cohort	RCTs	Meta-analysis	*Other
Rofecaxib	Х		х	х	х	Х	
Thioridazine	Х	x	x		x	Х	
Valdecoxib	Х				x	Х	
Rosiglitazone	Х		x	х	x	Х	
Sibutramine	Х				x		x
Orciprenaline	Х				x		
Benfluorex	Х		x	x	x		
Clobutinol	Х	х			x		
Buffomedil	Х	x					
Veralipride	Х						
Rimonabant	Х				x	Х	
Carisoprodol	Х	x		x	x		x
Aceprometazine+Acepromazine	Х						x
+Clorazepate							
Dextropropoxyphene	Х						x
Nefazodone	Х						x
Ximelagatran/melagatran					x		
Lumiracoxib	Х				x		
Sitaxentan	Х	х					
Bufexamac	X	х					x

\*Other studies include non-randomised and or not ontrolled clinical trials and incidence studies. EMA, European Medicines Agency; EU, European Union. Case reports remain the most significant method of medicines safety monitoring

McNaughton et al 2015 BMJ Open Jan 15



Sir William Asscher Chair Committee on Safety of Medicines 1987-1992

#### Professor Philip Routledge Chair Herbal Medicines advisory Committee



#### ATROPINE AS POSSIBLE CONTAMINANT OF COMFREY TEA

SIR,—A 30-year-old man visited a health-food store complaining of flatulence. Comfrey tea was recommended. He put 28 g into boiling water. He had several cups of the infusion, after which he felt light-headed, agitated, and confused, and had difficulty in micturition. He also complained of dry mouth and he had sinus tachycardia of 120/min, dilated pupils, and a warn dry skin. He was admined and his symptoms resolved over the next 24 h An infusate of the comfrey tea competitively blocked the contractile response of guineapig ileum to acetylcholine and the tea contained a minimum of 4 mg atropine per 28 g of leaf. This is likely to have been due to contamination with *Atropa belladona* (deadly nightshade), which was noted in a previous batch of comfrey tea from a different supplier.<sup>1</sup>

Use of comfrey tea has been associated with veno-occlusive disease of the liver, as Dr Ridker and Professor McDermott discuss (March 25, p 657), probably due to the presence of pyrrozilidine alkaloids.<sup>2,3</sup> These alkaloids, however, do not seem to have anticholinergic properties, and belladona toxicity should be considered in patients with atropine-like symptoms after ingestion of comfrey tea.

Welsh National Poisons Unit, Department of Pharmacology and Therapeutics, University of Wales College of Medicine, Heath Park, Cardiff CF4 4XN

P. A. ROUTLEDGE T. L. B. SPRIGGS







**YCC Wales** Yellow Card Centre Wales Canolfan Cerdyn Melyn Cymru

#### Annual Report 2021-2022





YCC Wales / CCM Cymru @YCCWales · Nov 7

Dewch i'n weld ni i siarad am diogelwch meddyginiaethau a pwysigrwydd adrodd am sgil-effeithiau.

...

Come and see us to talk about medicines safety and the importance of reporting side effects.

#### Concourse, UHW @CV\_UHB #MedSafetyWeek



### Yellow Card Centre Wales initiatives

- Yellow Card Champions initiative
- E-learning modules for pharmacy in Wales
- Inviting public & healthcare professionals to make pledge to report adverse reactions
- Publishing papers
- Herbal campaigns



Direct Yellow Card reports per 100,000 population by Yellow Card Centre regions and entire UK received between 2019 - 2021





Received: 19 October 2021 Revised: 9 February 2022 Accepted: 14 March 2022

DOI: 10.1111/bcp.15326

#### ORIGINAL ARTICLE

Changes in suspected adverse drug reaction reporting via the yellow card scheme in Wales following the introduction of a National Reporting Indicator

Paul N. Deslandes<sup>1,2</sup> | Robert Bracchi<sup>1</sup> | Karen Jones<sup>1</sup> | Kath E. Haines<sup>1</sup> | Emma Carey<sup>3</sup> | Alana Adams<sup>3</sup> | Jenna Walker<sup>3</sup> | Alison Thomas<sup>3,4</sup> | Philip A. Routledge<sup>4</sup> <sup>3</sup>

<sup>1</sup> All Wales Therapeutics and Toxicology Centre, University Hospital Llandough, United Kingdom <sup>2</sup> University of South Wales, Lower Glyntaf Campus, Treforest, UK <sup>3</sup> Yellow Card Centre Wales, UK <sup>4</sup> School of Medicine, Cardiff University, UK

Correspondence Paul N Deslandes, All Wales Therapeutics and Toxicology Centre, University Hospital Landough. Email: paul.deslandes@wales.nhs.uk Aims: This study aimed to assess the impact of a National Reporting Indicator (NRI) on rates of reporting of suspected adverse drug reactions using the Yellow Card scheme following the introduction of the NRI in Wales (UK) in April 2014. Methods: Yellow Card reporting data for general practitioners and other reporting groups in Wales and England for the financial years 2014-15 (study period 1) and 2015-16 (study period 2) were obtained from the Medicines and Healthcare Products Regulatory Agency and compared with those for 2013-14 (pre-NRI control period).

**Results:** The numbers of Yellow Cards submitted by general practitioners in Wales were 271, 665 and 870 in the control period, study period 1 and study period 2, respectively. This is equivalent to an increase of 145% in study period 1 and 221% in study period 2 compared with the 12-month control period (2013-14). Corresponding increases in England were 17% and 37%, respectively (P < .001 chi-squared test). The numbers of Yellow Cards submitted by other groups in Wales were 906, 795 and 947 in each of the study periods.

Conclusions: Introduction of the NRI corresponded with a significant increase in the number of Yellow Cards submitted by general practitioners in Wales. General practitioner reporting rates continued to increase year on year through to 2018-19 with the NRI still in place. No concomitant change was found in reporting rates by other groups in the health boards in Wales.

KEYWORDS

adverse drug reaction reports, incentives, National Reporting Indicator

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Br J Clin Pharmacol. 2022;88:3829-3836.

wileyonlinelibrary.com/journal/bcp 3829



**FIGURE 2** Number of Yellow Cards submitted by general practitioners and other reporters in Wales (2013–14 to 2019–20)

#### Get ready for



YCC Wales / CCM Cymru @YCCWales · Nov 9 Ydych chi erioed wedi profi sgil-effaith o feddyginiaeth? Rhowch wybod am unrhyw sgil-effeithiau a amheuir **C** cttog.gig.cymru/optimeiddio-a-... Helpwch ni i wneud meddyginiaethau'n fwy diogel i bawb. #WythnosDiogelwchMeddyginiaethau #DiogelwchCleifion #CynllunCerdynMelyn

#### Diolch am roi gwybod i ni



### #MedSafetyWeek 7-13 November 2022

13 YCC Wales / CCM Cymru Retweeted



Jessica Jenkins @jessjenkins01 · Nov 11

...

Swansea Bay University Health Board trainee pharmacists have been busy engaging with staff and public to promote Medication Safety Week #MedSafetyWeek #yellowcard #patientsafety @UhbBay @Jat\_man



### Bringing together poisons data and adverse reaction data





#### ALL WALES THERAPEUTICS AND TOXICOLOGY CENTRE

Canolfan Therapiwteg a Thocsicoleg Cymru Gyfan

promoting the safe, clinically- and cost-effective use of medicines in Wales



National Poisons Information Service



All Wales Therapeutics and Toxicology Centre Academic Building, University Hospital Llandough Penlan Road, Penarth CF64 2XX

Email: awttc@wales.nhs.uk

### Making medicines safer – asking the important questions

90. Trends in enquiries to the UK National Poisons Information Service (NPIS) involving "preschool" (0–4 years) children in 2015. Might knowledge of circumstances help plan prevention strategies?

Nicola Wheatley<sup>a</sup>, Gillian A. Cooper<sup>a</sup>, John P. Thompson<sup>a</sup>, Sally M. Bradberry<sup>b</sup>, Euan A. Sandilands<sup>c</sup> and Simon H. L. Thomas<sup>d</sup> <sup>a</sup>UK National Poisons Information Service, Cardiff, UK; <sup>b</sup>UK National Poisons Information Service, Birmingham, UK; <sup>c</sup>UK National Poisons Information Service, Edinburgh, UK; <sup>d</sup>UK National Poisons Information Service, Newcastle, UK

**Objective:** To investigate trends in the ingestions of the "preschool" population to see if knowledge of circumstances of exposures might help in planning prevention strategies to prevent suspected poisonings. The UK National Poisons Information









### Making medicines safer – asking the important questions

#### 282. A poisoning prevention program aimed at adolescents in Wales: Is it needed?

Nicola Wheatley<sup>1</sup>, Gillian Cooper<sup>1</sup>, Gloria A Alldridge<sup>1</sup>, John P Thompson<sup>1</sup>, Michael Eddleston<sup>2</sup>, J Allister Vale<sup>3</sup>, Simon HL Thomas<sup>4</sup>

<sup>1</sup>National Poisons Information Service (Cardiff Unit), Cardiff and Vale University Health Board, Cardiff, UK; <sup>2</sup>National Poisons Information Service (Edinburgh Unit), Royal Infirmary of Edinburgh, Edinburgh, UK; <sup>3</sup>National Poisons Information Service (Birmingham Unit), City Hospital, Birmingham, UK; <sup>4</sup>National Poisons Information Service (Newcastle Unit), Newcastle upon Tyne Hospitals NHS Foundation Trust, Newcastle upon Tyne, UK



What were learnings of pandemic for safety monitoring?

### Pandemic challenges and opportunities

#### Guidance

# MHRA regulatory flexibilities resulting from coronavirus (COVID-19)

Guidance for industry on flexible approaches to regulation we are taking during the COVID-19 outbreak.





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### COVID-19 vaccine safety strategy

Yellow Card Coronavirus (COVID-19)	Yellow Card Vaccine Monitor	Rapid Cycle Analysis	Formal Epidemiological Studies
Spontaneous reporting system for ADRs post vaccination	Active surveillance for specific identified cohorts	Proactive, weekly monitoring of AESIs: vaccinated vs unvaccinated	On demand using EHR data for hypothesis testing
Structured data coded t	o regulatory standards	Vaccinations records transferred from Point of Care Systems to NHS Digital / System Suppliers	Vaccinations records transferred from Point of Care Systems to NHS Digital / System Suppliers
Artificial Intelligence processing		Ļ	Ļ
to assist in identification of supplemental terms from narrative elements of the file		Data ingested into Clinical Practice Research Datalink and extracted for analysis	Data ingested into Clinical Practice Research Datalink and extracted for analysis
Quality Assured workflow from de	dicated team of trained assessors	Implementation of software developed by researchers	Data cleaning and analysis by team of MHRA epidemiologists
Signal Detection – by va	ccine assessment team		Bespoke epidemiological studies.
Sequential observed vs expected analysis to identify issues or provide reassurance for adverse reactions of interest and ad hoc analyses in event of other signals	Comparison of frequency of events in clinical trial vs real world use	Sequential observed vs expected analysis to identify issues or provide reassurance for adverse reactions of interest and ad hoc analyses in event of other signals	using data on vaccinations, outcomes, and confounders , with methods determined based upon hypothesis to be tested

PHARMACOEPIDEMIOLOGY AND DRUG SAFETY 2001; **10**: 483–486 **DOI**: 10.1002/pds.677

#### ORIGINAL REPORT

# Use of proportional reporting ratios (PRRs) for signal generation from spontaneous adverse drug reaction reports

S. J. W. Evans, P. C. Waller\* and S. Davis

Post-Licensing Division, Medicines Control Agency, Market Towers, 1, Nine Elms Lane, London SW8 5NQ

#### SUMMARY

**Background** The process of generating 'signals' of possible unrecognized hazards from spontaneous adverse drug reaction reporting data has been likened to looking for a needle in a haystack. However, statistical approaches to the data have been underutilised.



#### Professor Stephen Evans

Table 1. Calculation of PRRs		
	Drug of interest	All other drugs in database
Reaction(s) of interest	а	b
All other reactions	с	d

 Table 2.
 Example of a PRR calculation-rifabutin and uveitis

	Rifabutin	All other drugs
Uveitis	41	754
All other ADRs	14	591 958
TOTAL	55	592 712

PRR = 41/55 divided by 754/592, 712 = 586. Chi-squared (1 df) = 22 740.

### Signal strengthening through rapid cycle analysis

Proactive use of large healthcare record databases to monitor Adverse Events of Special Interest

Implemented from start of vaccine deployment with expertise from London School of Hygiene and Tropical Medicine and UKHSA

Supported initial decision making on risk of Bell's Palsy and Guillain Barre Syndrome and provided reassuring data on safety from 2.4 million doses in 2 months



### Signal – reports of thrombosis with thrombocytopenia

Very rare events of thromboembolic events with concurrent thrombocytopenia associated with COVID-19 vaccines

Initially identified as safety concern with AZ vaccine Feb / March 2021

Several EU countries halted use of AZ vaccine in March while the issue was investigated by regulators

#### FINANCIAL TIMES

#### Blood clots and the AstraZeneca Covid vaccine: is there a link?

Regulators say shot is safe but UK records new clotting cases and growing number of countries restrict its use



Donato Paolo Mancini in Rome and Anna Gross in London APRIL 2 2021

589 🖶

https://www.gov.uk/government/publications/covid-19-vaccinationblood-clotting-information-for-healthcare-professionals/information-forhealthcare-professionals-on-blood-clotting-following-covid-19-

vaccinatio



DOI: 10.1056/NEJMoa2109908. https://www.nejm.org/doi/full/10.1056/NEJMoa2109908

#### The NEW ENGLAND JOURNAL of MEDICINE

#### ORIGINAL ARTICLE

#### Clinical Features of Vaccine-Induced Immune Thrombocytopenia and Thrombosis

Sue Pavord, F.R.C.Path., Marie Scully, M.D., Beverley J. Hunt, M.D., William Lester, M.D., Catherine Bagot, M.D., Brian Craven, M.B., B.Ch., Alex Rampotas, M.R.C.P., Gareth Ambler, Ph.D., and Mike Makris, M.D.

#### Investigation of Vaccine Associated Thrombosis and Thrombocytopenia





### Further research into VITT mechanism

#### **Cross-disciplinary research consortium**

- ✓ Epidemiological evidence supporting COVID-19 benefit risk assessment
- ✓ Genetic risk factors for TTS
- Biomarker for platelet activation
- ✓ A diagnostic test for TTS
- Development of modified vaccine without the propensity to cause TTS

The aetiopathogenesis of vaccine-induced immune thrombotic thrombocytopenia

Authors: Cheng-Hock Toh,  $^{\rm A}$  Guozheng Wang  $^{\rm B}$  and Alan L Parker  $^{\rm C}$ 

Clinical Medicine March 20, 2022



#### Weighing up the potential benefits and harms of the Astra-Zeneca COVID-19 vaccine



#### David Spieglhalter, Keble1971

\* Based on coronavirus incidence of 6 per 10,000: roughly UK in February

### New approach to transparency about regulatory decisions

**Prof Sir Munir Pirmohamed presents at Downing Street COVID-19 vaccine briefing** 



Chair Commission on Human Medicines

#### Anti-vaccine protesters try to storm London offices of medical regulator

Police stop attempt to invade MHRA headquarters as hundreds gather in Canary Wharf

- Coronavirus latest updates
- See all our coronavirus coverage





#### Taking Paxlovid with other medicines and herbal supplements

If you are taking ritonavir as part of your treatment for <u>HIV</u> or <u>hepatitis C infection</u>, you can continue taking your treatment as usual

#### **Cautions with other medicines**

Some medicines do not mix well with Paxlovid. Tell your doctor if you're taking:



VIH COVID-19 Treatm	ent Guidelines			Search
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ome/Therapies / Antiviral Therapy. / I	Ritonavir-Boosted Nirma	<u>trelvir (Paxlovid)</u> / Drug-Drug	g Interactions	
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Where next? New data, tools and scientific methodologies to strengthen safety surveillance

### The SafetyConnect programme











Engaging & transparent

Fully integrated into the healthcare system

With latest tools and innovation

Using multiple data sources to generate better evidence for safety

### Use of Real World Data to support safety and innovation



#### Clinical Practice Research Datalink

Over 3 billion consultations coded from primary care records and linked to other data sources years of electronic health record data collection



of UK healthcare consultations are in primary care



60M patient lives Over 16M

currently registered patients



Representative age, sex and ethnicity







### Impact of pharmacogenomics on drug safety

#### Why is Pgx research needed?

**£530M cost** of ADRs on NHS due to hospital admissions

An estimated **20-30%** of ADRs could be prevented by pharmacogenetic testing

**Virtually everyone** has at least one genetic variation (pharmacogene) which affects their response to drugs

**89% of people over 70** will have been prescribed at least one drug linked with a pharmacogene<sup>3</sup>

- Improved understanding of safety profile of medicinal products
- Discovery of genomic markers to identify patients most at risk of ADRs
- Generating evidence to support development of screening tests
- ✓ Maintaining access of life saving medicine to those at least risk of harm
- Supporting implementation of pharmacogenomics in the clinical care: pre-emptive PGX approach
- ✓ Reducing clinical burden of ADRs

What are the benefits?

✓ Supporting future drug development

### Using genomic data to prevent adverse drug reactions

Yellow Card data is unique data pool for research into adverse drug reactions

Opportunity to link with phenotypic data via Clinical Practice Research Datalink



Pharmacogenetics: an opportunity for a safer and more efficient pharmacotherapy

#### M. INGELMAN-SUNDBERG

From the Division of Molecular Toxicology, IMM, Karolinska Institutet, Stockholm, Sweden

News	Using the new PJ	Learning	Research	
Home / News				
Adverse drug reactions	, Medi costs	cation-resting the NHS	elated harr 5 £400m e	n in older adults ach year, study
25 May 2018	finds			

### Yellow Card Biobank





The Biobank would collect and sequence **DNA samples** for a 'watchlist' of research topics to establish if specific **genetic variants** can **predispose** individuals to a certain side effect to a drug or vaccine



Participants' **Electronic Health Records** and other **relevant phenotypic data** would be collected to support the research



External researchers could apply to access anonymised data or add their own topic to the watchlist



Ultimate aim is to support development of **genetic screening tests** to be used prior to prescription and reduce burden of ADRs

### Improving representativeness of our clinical practice data



Describing our Data

### Frequency of PGX gene variants in whole genome sequences

Distribution of number of PGx genes with dose recommendation per sample



#### **Genomics England Cohort**

Participants n = 76,805

Ethnicity breakdown:

- African = 1,916
- American = 173
- East Asian = 450
- European = 60,388
- South Asian = 7,019
- Mixed ancestry = 6,859

~99.5% of participants have haplotypes in at least 1 PGX gene 25.4% participants have haplotypes in 4 PGX genes



BRITISH PHARMACOLOGICAL SOCIETY

### Personalised prescribing

#### Using pharmacogenomics to improve patient outcomes

A report from the Royal College of Physicians and British Pharmacological Society joint working party





Fig 8. Comparing pharmacogenomic and standard approaches to prescribing

### **Regulatory Science**

#### MHRA priority research areas

#### 1. Regulatory science in key licensing areas

The role of the patient in decision-making; women's health; drug repurposing; orphan medicines; biosimilars, among others

#### 2. Genomics and diagnostics

Precision medicine; companion diagnostics; infectious disease diagnostics; exploring a Yellow Card Biobank

#### 3. Data science

Synthetic data for artificial intelligence algorithms; data-enabled clinical trials; realworld evidence in clinical trials; near real-time pharmacovigilance

#### 4. Advanced therapies

Stem cell supply (UK Stem Cell Bank); 'What's in the tube'; innovative regulation; point of care manufacture

5. A prioritised laboratory science portfolio for biological standardisation and control

Biological standardisation; smart control testing of biologicals

6. Supporting emergency response to disease

Pandemic preparedness (current and next); emerging pathogens





UK Digital Strategy



#### **NHS**<sup>×</sup>

#### **Data saves lives**

Our strategy to reshape health and care with data

### Making medicines safer – in summary

Opportunities from EU Exit and learnings from pandemic have catalysed the new proactive collaborative regulatory approach

Aim is to enable innovation and bring new medicines to patients and the healthcare service safely based on best science

Safety systems bringing together all relevant data more important than ever with accelerated access to innovative products

Together we can maximise the opportunities of new tools, data and methodologies for strengthened surveillance



### Nicola Wheatley



#### A gifted and dedicated scientist, who made significant contributions to the field of toxicology



Together with NPIS we celebrate the life and lasting legacy of Nicola Wheatley