WHITE PAPER

ICH GCP E6(R3)

Strengthening Sponsor Oversight through Quality by Design and Strategic CRO Partnerships

LINK MEDICAL

Introduction

The revision of ICH GCP emphasizes the risk-based approach with which clinical trials should be designed, conducted and overseen. This new guideline emphasizes building quality into trials from the start and focusing on critical-to-quality factors that directly impact participant safety and data reliability.

For sponsors, this means using a risk-proportionate, quality-focused approach early in the clinical trial and maintaining it throughout the entire trial lifecycle. This confirmation of focus underscores the sponsors responsibility and oversight over outsourced activities and the importance of proper documentation and tools to ensure transparency and accountability – thus making it more important to involve a qualified Contract Research Organization (CROs) at an early stage in the process to ensure compliance, efficiency, and data integrity.

"Oversight is no longer just about compliance—it is about governance, communication, and shared accountability across clinical trial partners."

Quality by Design: **The foundation of ICH E6(R3)**

ICH E6 (R3) emphasizes Quality by Design (QbD) as a fundamental principle where sponsors are expected to proactively identify and address critical to quality factors, which are essential for participant safety and the reliability of a clinical trial outcome. The old "one-size-fits-all" approach to trial design is replaced with a flexible framework that encourages innovation in methodology and technology, as long as oversight measures are scaled appropriately to the trial's complexity and risks.

Sponsors must ensure the quality of clinical trials by systematically managing risk through trial-specific risk assessments, thorough documentation, and proactive mitigation strategies. By involving qualified individuals across disciplines from early stages of study planning and a fit-for purpose design, a scientifically robust and operationally feasible trial can be achieved.

Redefining Sponsor Oversight: **From Delegation to Active Accountability**

While sponsors can delegate clinical trial tasks to vendors or partners, ICH E6(R3) makes it clear that the ultimate responsibility for trial conduct, data quality, and participant safety remains with the sponsor. Oversight should be active, documented, and proportionate to the trial's complexity and risk. Importantly, oversight is no longer just about compliance—it is about governance, communication, and shared accountability across all clinical trial partners.

To meet these expectations, sponsors should define roles and responsibilities clearly in their agreements and oversight plans. It is critical to select service providers (including CROs) that are qualified and capable of supporting the sponsors in enabling their sponsor oversight responsibilities and contributing to quality-driven operations from study start-up through closeout. With the right partners and well-defined governance structures, sponsors can maintain control and insight without micromanaging, striking the balance that ICH E6(R3) calls for.

Transparent Sponsor Oversight

A Contract Research Organization (CRO) such as LINK Medical empowers sponsors to meet their ICH E6(R3) oversight responsibilities by providing structured, transparent, and data-driven support across the clinical trial lifecycle. Through centralized platforms and real-time collaboration, sponsors retain effective oversight without unnecessary operational burden. Key areas of support include:

1. **Project Planning & Documentation:** Joint development of project plans, risk logs, and quality strategies—ensuring shared visibility and governance throughout the study.
2. **Risk Management:** Proactive identification and mitigation of study risks, continuously monitored to protect critical-to-quality factors.
3. **Monitoring Oversight:** Implementation of risk-based monitoring and live dashboards to track site performance and safeguard data quality and patient safety.
4. **Vendor Oversight:** Structured qualification and ongoing oversight of third parties to ensure regulatory and contractual compliance.
5. **Issue Escalation:** Transparent issue-tracking and escalation processes ensure timely resolution of challenges impacting quality, timelines, or compliance.

By integrating these capabilities, the CRO enables sponsors to fulfill their regulatory obligations while focusing on strategic decision-making and trial outcomes.

Project Management and Communication Tools

In line with this active oversight approach, sponsors are increasingly turning to integrated digital platforms to manage clinical trials. Modern Clinical Trial Management Systems (CTMS) and electronic Trial Master File (eTMF) solutions provide real-time visibility and control over trial activities. With these tools, sponsors and CROs can monitor progress, maintain up-to-date document trails, and track tasks and milestones in one centralized system.

Oversight and transparency ensures that any issues or risks are flagged and addressed promptly, enabling truly **risk-based monitoring** by focusing oversight on the most critical aspects of the trial. By leveraging such scientific, data-driven systems, sponsors support compliance with ICH GCP E6(R3) through informed decision-making, efficient communication, and a continuously audit-ready eTMF.

"This level of transparency enables truly risk-based monitoring."

The Strategic Advantage of Early CRO Engagement

- **Collaborative Protocol Development:** Early CRO involvement ensures protocols are scientifically sound, operationally feasible, and aligned with regulatory expectations—accelerating approvals and study start-up.
- **Proactive Risk Management**: Identifying and addressing risks early protects critical-to-quality factors, enhances patient safety, and supports seamless trial execution.
- **Tailored Risk-Based Monitoring (RBM):** Customized RBM plans optimize resource use and maintain compliance by focusing oversight on the most critical study elements.
- **Streamlined Training and Oversight:** Targeted training and governance systems reduce site burden while ensuring high-quality data collection and strong sponsor oversight.

Conclusion

In conclusion, ICH GCP E6(R3) pushes sponsors to elevate their approach to clinical trial quality and oversight through proactive design, rigorous risk management, and strengthened partnerships.

By integrating proactive design, structured governance, and real-time digital oversight, sponsors can transform challenges into opportunities—delivering credible, high-quality evidence that drives both regulatory success and meaningful patient impact in today's rapidly advancing research landscape.

ABOUT LINK MEDICAL

LINK Medical supports sponsors across the full product lifecycle with expert guidance rooted in regulatory expertise, GCP compliance, and operational excellence. With our proven quality systems and experience in implementing risk-based oversight, we are ideally positioned to help sponsors align with ICH E6(R3) and deliver meaningful, high-quality results.