

2021 INTERNATIONAL QA CONFERENCE

3RD-5TH NOVEMBER 2021

LONG TERM DATA READABILITY AND GXP COMPLIANCE SESSION

4TH NOVEMBER 2021

Implementation of the OECD/MHRA guidance on legacy software management in virtual environments

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Software use for data readability



Long-term access to archived data and reliable reconstruction of research studies from raw data



Organisation for Economic Co-operation and Development 6.16 Archive.

When legacy systems can no longer be supported, consideration should be given to the importance of the data, and if required, to maintaining the software for data accessibility purposes. This may be achieved by maintaining software in a virtual environment.

OECD SERIES ON PRINCIPLES OF GOOD LABORATORY PRACTICE AND COMPLIANCE MONITORING, <u>Number 22</u>. Advisory Document of the Working Party on Good Laboratory Practice on GLP Data.



Regulations on data integrity



ALCOA+ Data integrity requirements

Attributable

Document must clearly identify who has created and contributed to them, and be protected against falsification or forgery of those details

Legible

Stored documentation must be legible and easy to read

Contemporaneous

Documentation should demonstrate and support contemporaneous record-keeping

Original

Storing original copies of documentation guarantees accuracy and confidentiality

Accurate

The processes and procedures by which companies record and keep their documentation up to date must ensure accuracy and reliability

+Complete

All documentation must have an audit trail to show no data has been deleted or lost

+Consistent

Documentation must be date and time stamped and stored in such a way to prove it has been assembled in the expected sequence

+Enduring

Data must be available for as long as the regulation requires

+Available

- Archived study data in electronic form must remain immutable, readable and 'dynamic', i.e., interactive
- Reproducibility of study results requires software to remain functional and usable.

<u>Challenges</u>

- Software is subject to rapid obsolescence if not regularly updated
- Updated software cannot guarantee the same functionality and output as the original software version.



Digital preservation perspective





- Entire archived study is a 'digital object' to be preserved
 - Raw digital data and derived information
 - Study reports and documentation.
- Significant properties of the digital object are intrinsically tied to the data types and representation that results from the software use.

Preservation principles considered sufficient to preserve significant properties of archived studies:

Data integrity – verified through checksum of electronic data files

Software integrity – verified functionality of the legacy software.



vality by agility Compliance considerations



DATA INTEGRITY

Y Extent to which
data is complete,
consistent and accurate
throughout the data lifecycle
from data collection to
analysis and archiving

Complete

All the required data needs to be collected and stored

Unaltered

Data must not be changed

Secure

Data must not be destroyed

√ Confidential

Data must not be disclosed to unauthorised individuals

✓ Usable

Study metadata needs to provide context for experts reproducing study results

SOFTWARE Usable life Usable life

Extent to which a software installation is functional, reliable, and usable throughout its lifecycle from operational use to archived study reproducibility.

Functional

Software installation must stay operational

Software must not be changed

√ Secure

Software installation must not present risks from cyber attacks and confidentiality breaches

Accessible

Software installation needs to be easily accessed for repeated use



Requirements: Human factors



- **ARCHIVIST**
- Study records and raw data are stored and preserved by archivists, following the instructions of scientists.
- RESEARCHER •
- Studies are reconstructed by scientists. Use of the specialty software is outside the scope of archivists' competences.
- IT SPECIALIST •
- Software installation and management is a matter for IT specialists, particularly use of legacy operating systems that present security risks.

How to achieve preservation and reliable use of archived research study, considering

- Long-term retention of knowledge and skill-sets
- Separation of concerns and competencies among three types of specialists.



y by agility About software virtualization



- Why is software important for digital content use?
- Why do we need legacy software?
- Why does the software become obsolete?

- What is virtualization and virtual machines?
- How can virtualization help with long term data access?
- What do we need to consider in order to use virtualization for GXP compliance?

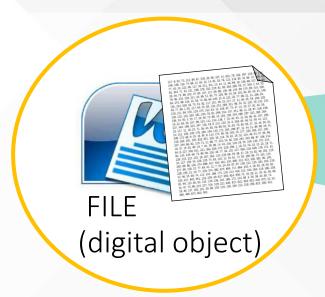


Digital depends on software



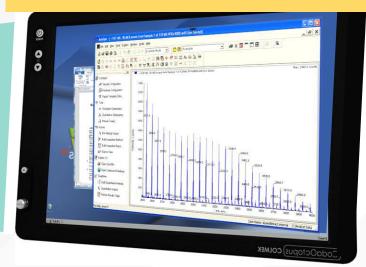
Digital content cannot be used without software that can 'play' it.

- are persisted as computer files
- Digital data and content
 Software is needed to process the files and represent digital encoding in a human readable form
- For consistent presentation of data, integrity of both data files and software must be ensured.



SOFTWARE (file decoder)

DIGITAL 'ARTEFACT'



Persisted part of the digital artefact

Hardware to process and display



Digital Ecosystem





EXPERIENCES

DIGITAL ASSETS

Operating systems

Content servers

Data processing tools

Individual experiences

Data streams

Ontologies

Simulation software

Communication protocols

Content readers

Documents, databases,

Controlled vocabularies

Virtualization software

Security

User applications

Social

experiences

Software source code

Knowledge bases

Software development tools

Discovery tools

Communication platform

Metadata, indexes, registries



Impact of OS obsolescence

















End of Extented Support

2014-04-08

2017-04-11

2020-01-14

2023-01-10

2026-01-16

End of Extented Support

2015-07-14

2020-01-14

2023-10-10

2027-01-11

Microsoft Windows



Released for sale:

2001

End of extended support: 2014

SARS Epidemic 2002-2004

Started 16 Nov 2002

Severe Acute Respiratory Syndrome Coronavirus

SARS-CoV or SARS-CoV-1



Released for sale:

2009

End of extended support: 2020

Access and validation of all studies since 2001 are now affected.



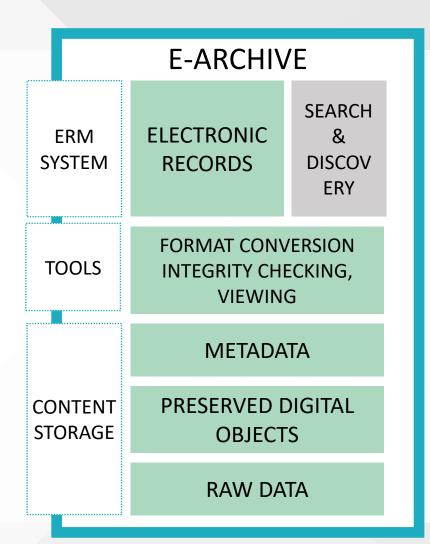


Legacy software in a Lab environment



Current practice: Keep the operational system DICITAL



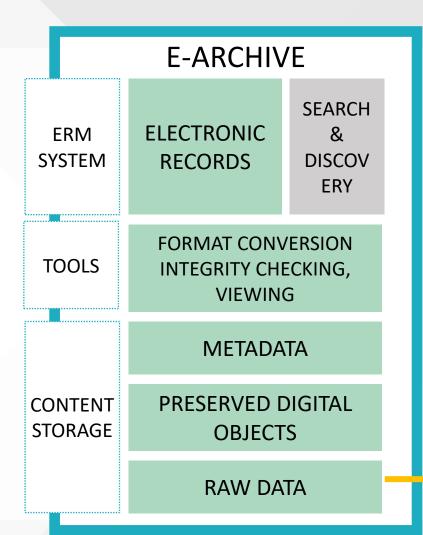


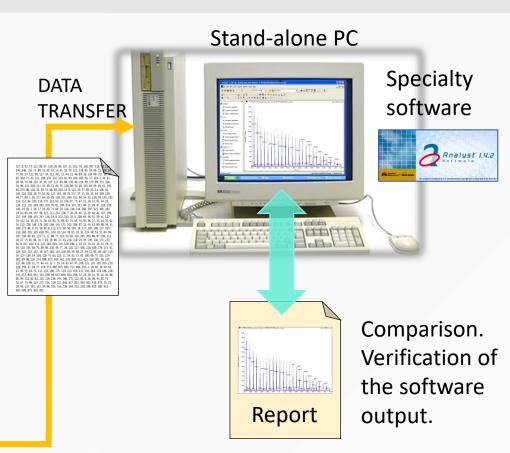




vality by agility Current practice: Transfer data to a local PC



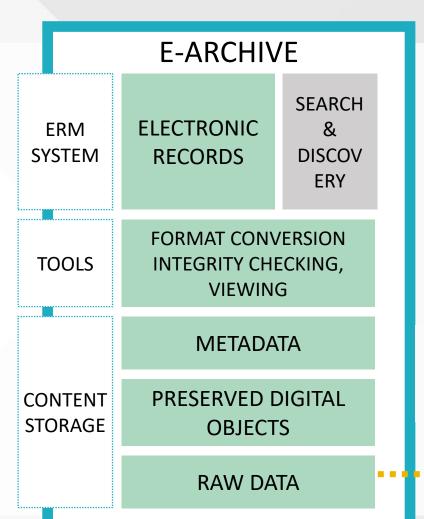






vality by agility Technology obsolescence impact







System isolation, to mediate security risks

If hardware fails, reinstall software.

PHYSICAL TO DATA TRANSFER

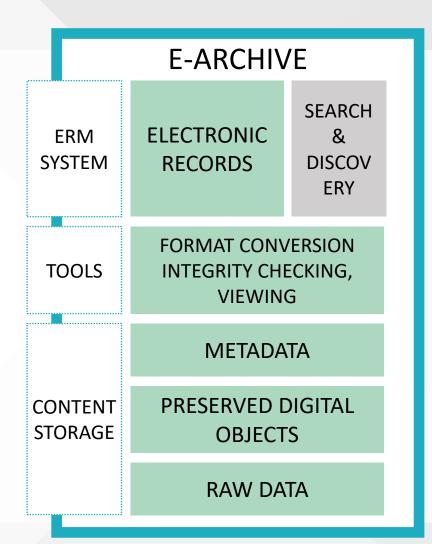
Technology obsolescence

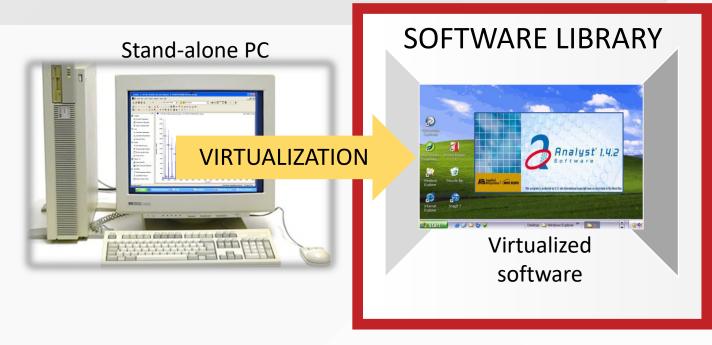
- Unsupported PC hardware
- Unsupported operating system (Windows XP, Windows 7)
- Unsupported application
- Compatible software may not be available.



vality by agility Re-install software in virtual machines





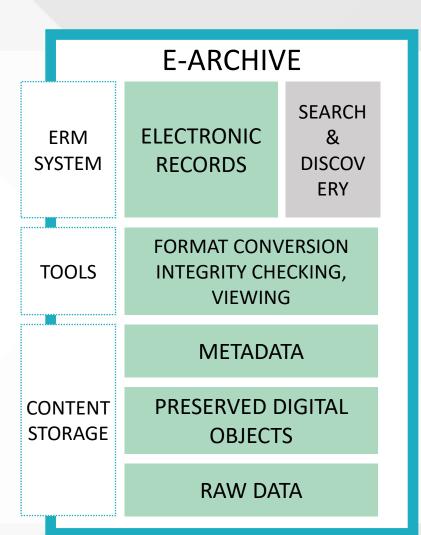


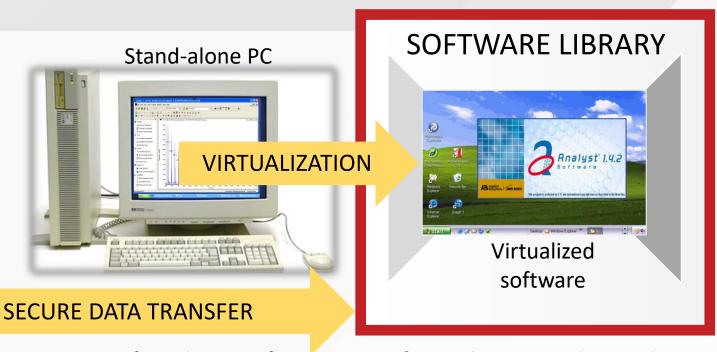
- Software hosting with no risk from hardware obsolescence
- Validated software installations
- Remote access through Virtual Desktops (in standard browsers).



pality by agility Re-install software in virtual machines





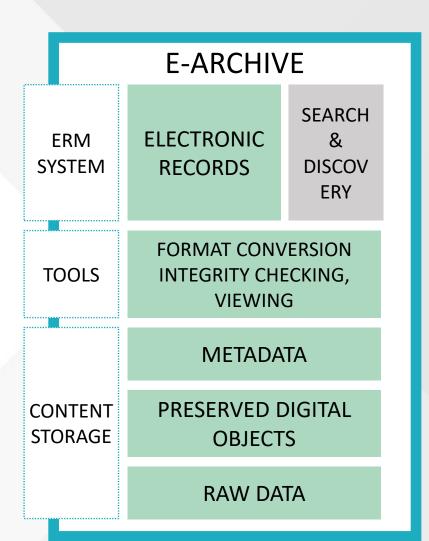


- Data is transferred secure for study reconstruction
- Data is removed from the Software Library once the task is completed.
- Software hosting with no risk from hardware obsolescence
- Validated software installations
- Remote access through Virtual Desktops (in standard browsers).



Juality by agility Study reconstruction





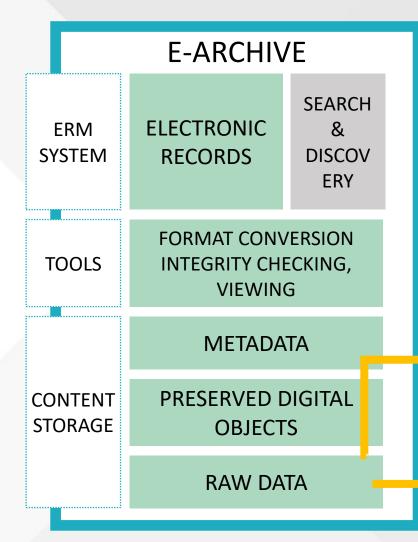


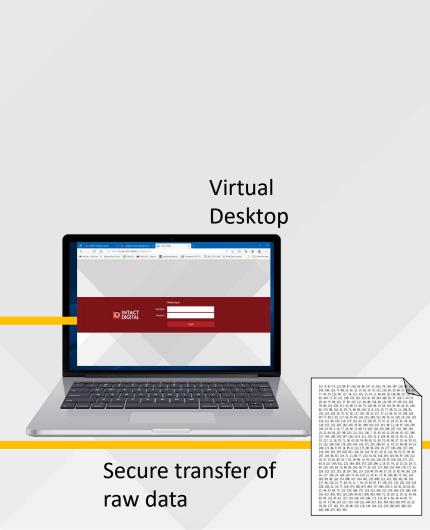




Juality by agility Study reconstruction





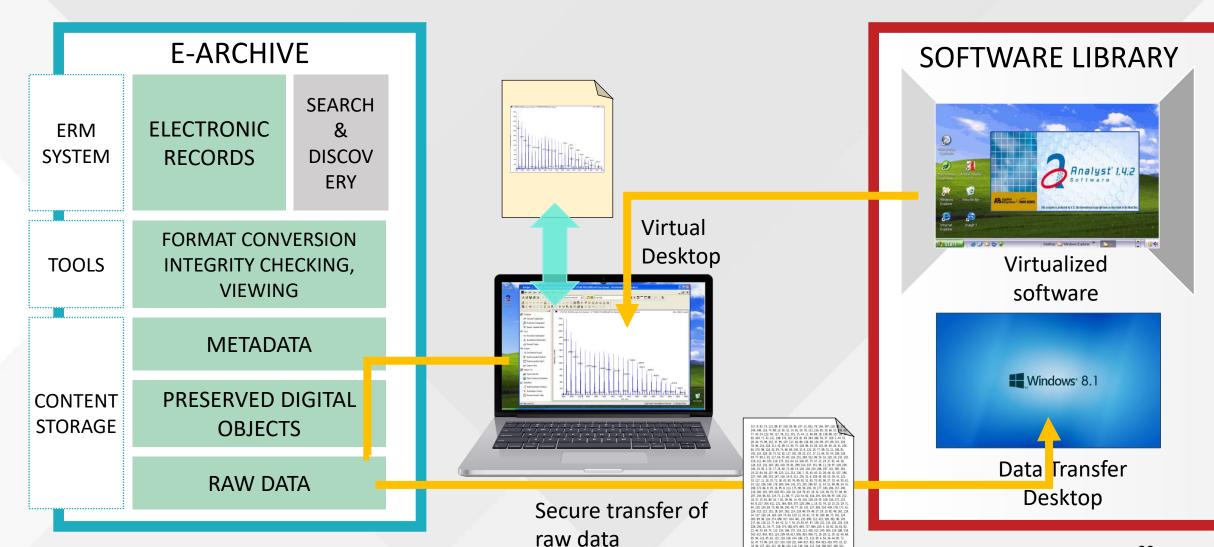






Juality by agility Study reconstruction









What is virtualization? How does it work?



vality by agility Physical computer





A physical computer has

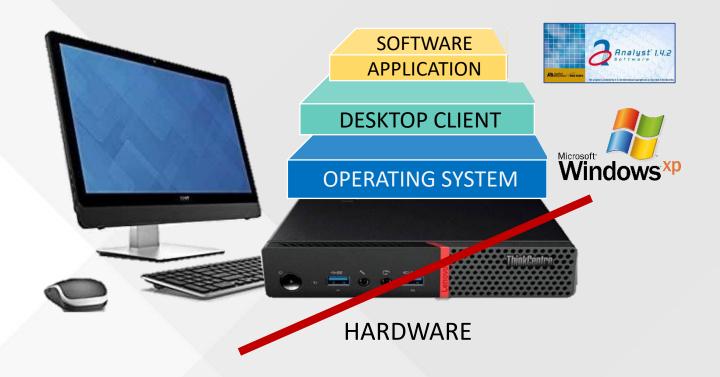
- Hardware
- Operating system
- Desktop
- Software applications

Operating system is a collection of programs that manage hardware, user interaction with he desktop and execution of the applications.



Vuality by agility Physical computer: Obsolescence → REFLECT | CHALLENGE | INNOVATE





- Hardware needs to be changed
- Operating system has to be shielded.



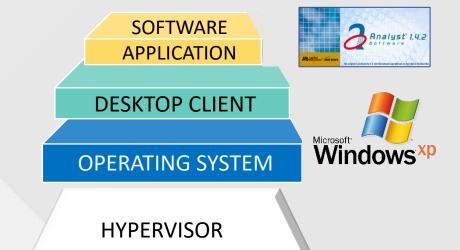
vality by agility Virtualized computing environment



'VIRTUAL COMPUTER'

GUEST

HOST



Legacy operating system runs as a 'GUEST' on a modern 'HOST' computing system.

Hypervisor 'translates' the GUEST operations so that they can be executed on the HOST.

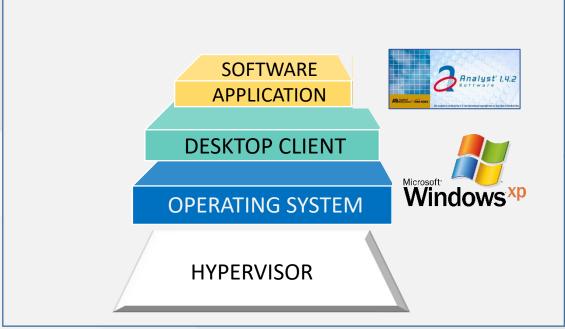


Windows Server 2019



uality by agility Virtualized computing environment







HARDWARE



Remote access enables

- Secure access to the virtual machines
- Passing the mouse and typing instructions to the VMs
- Display of the outcomes on the user screen.

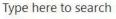


Example



- Virtual environment with installed software in virtual machines
- Remote access from a secure personal laptop

































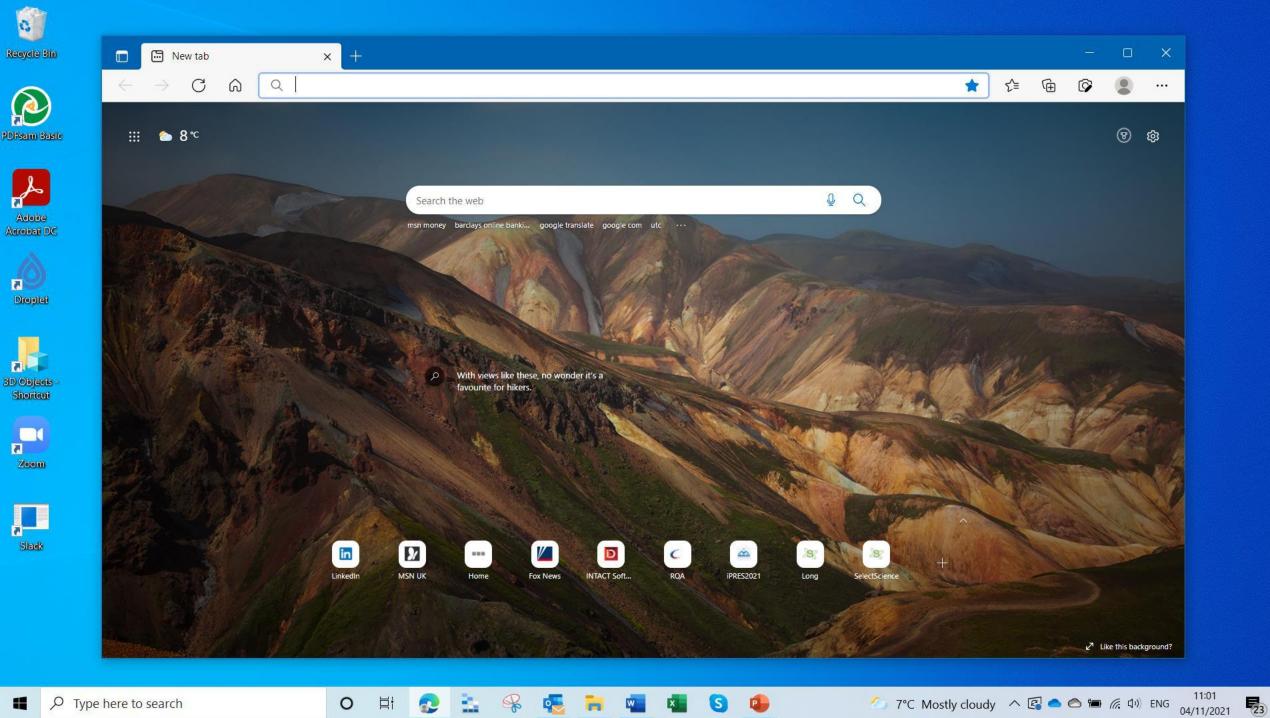










































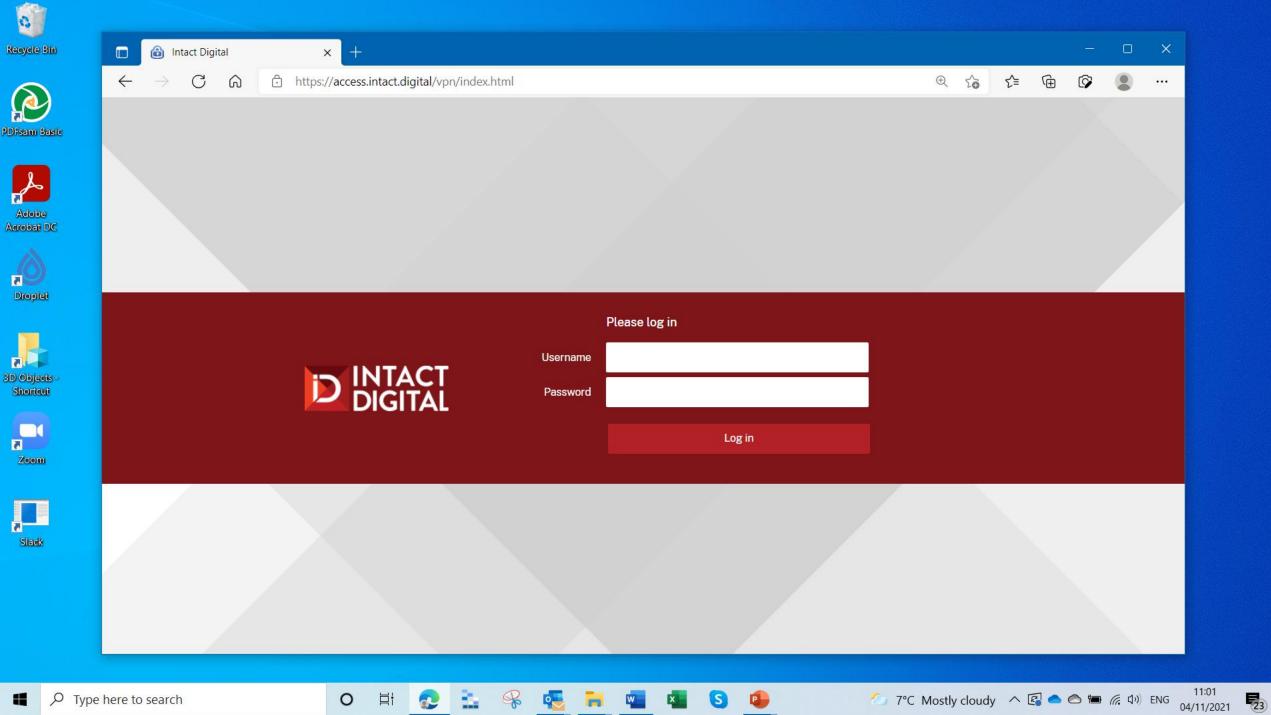






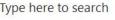




































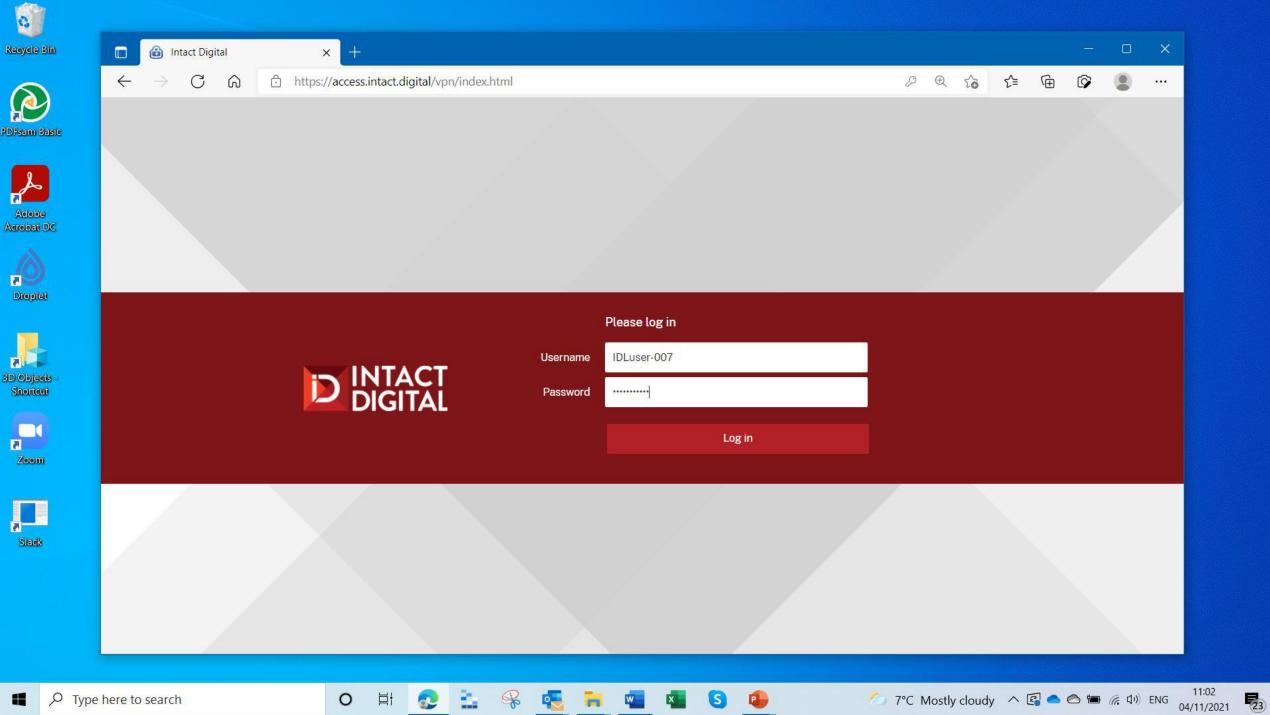






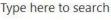






































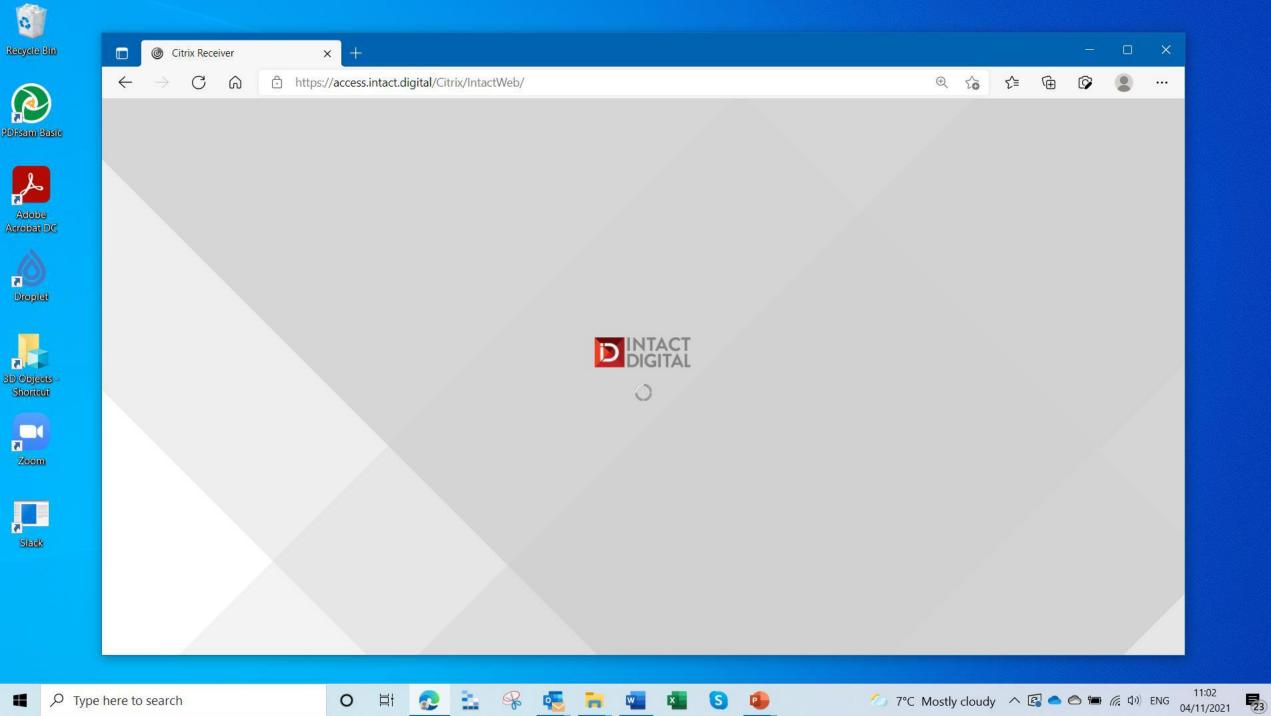






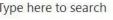




































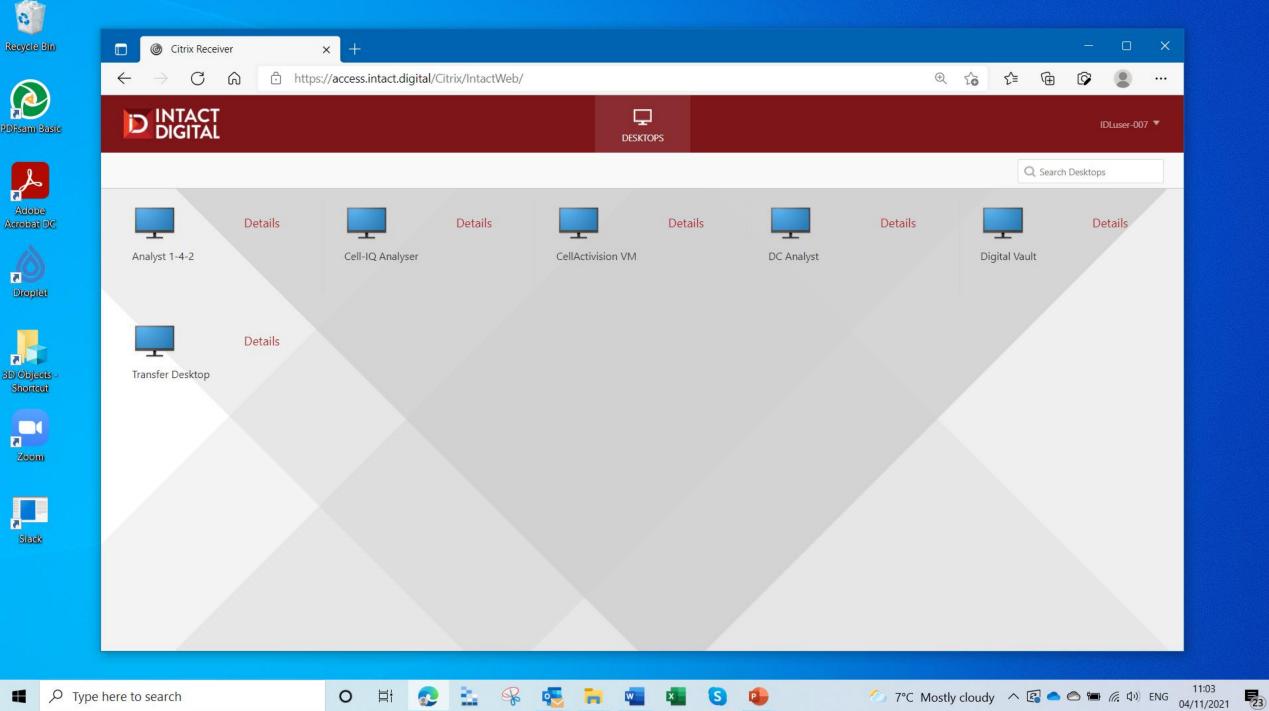






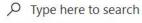












































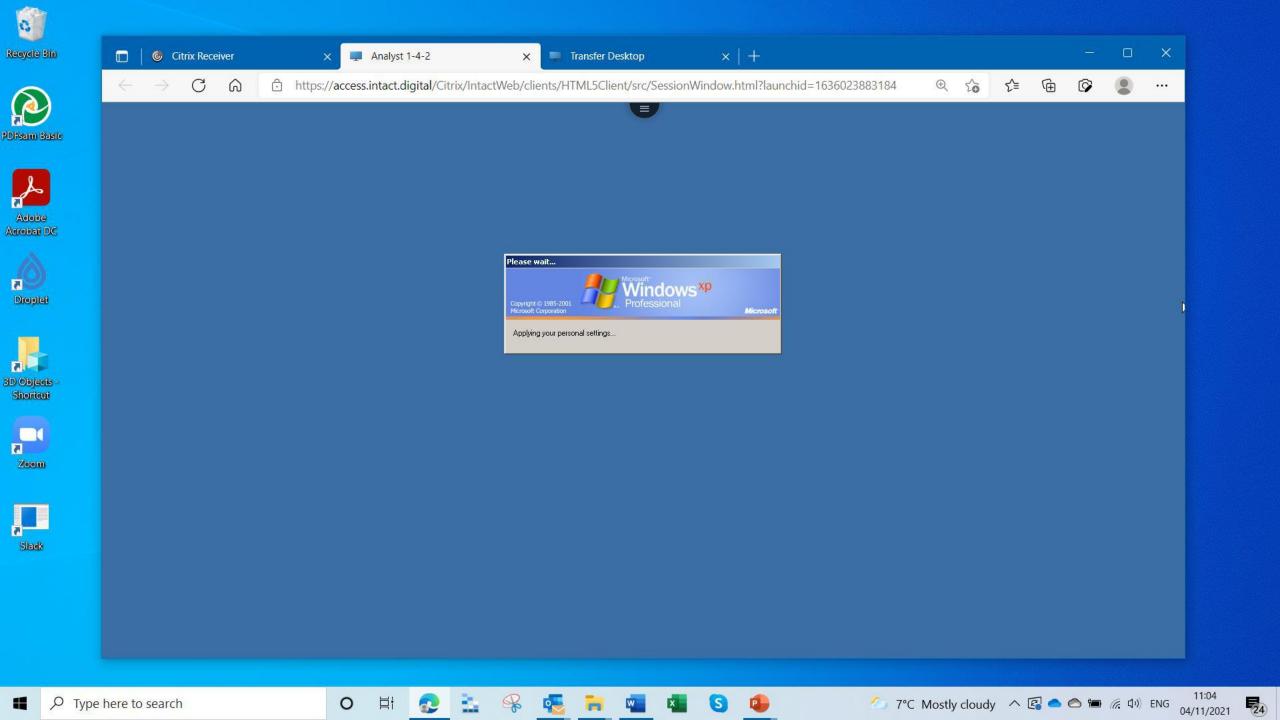


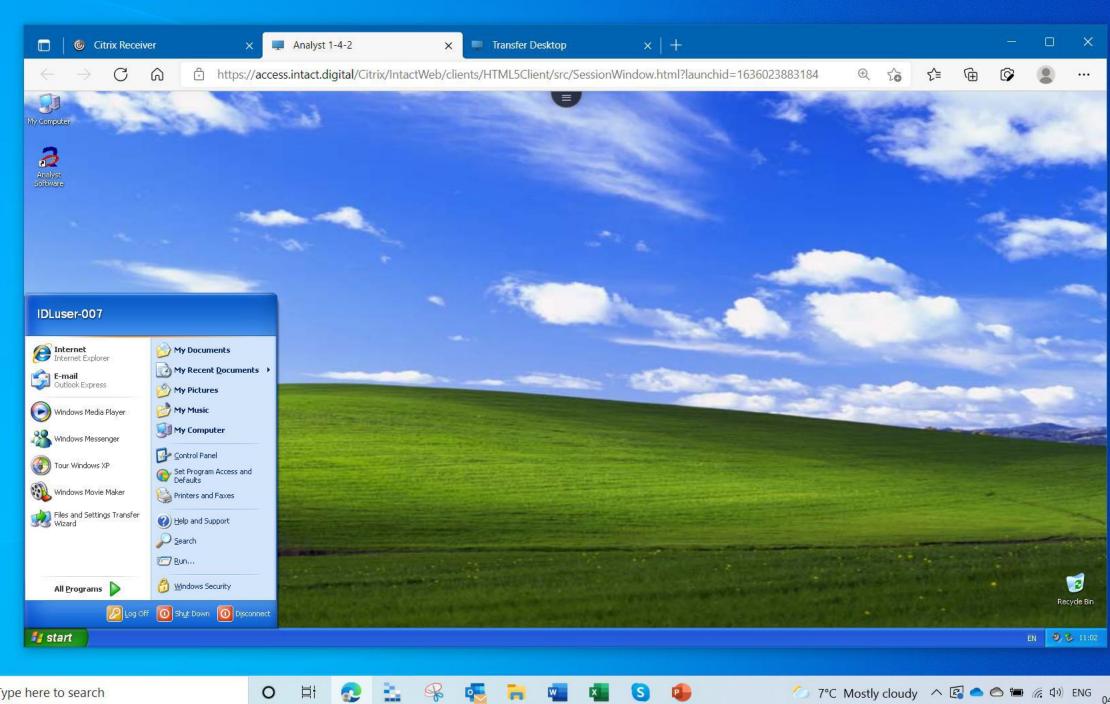














Recycle Bin

Acrobat DC

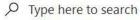
7 Droplet

3D Objects

Shortcut

Zoom

Slack

































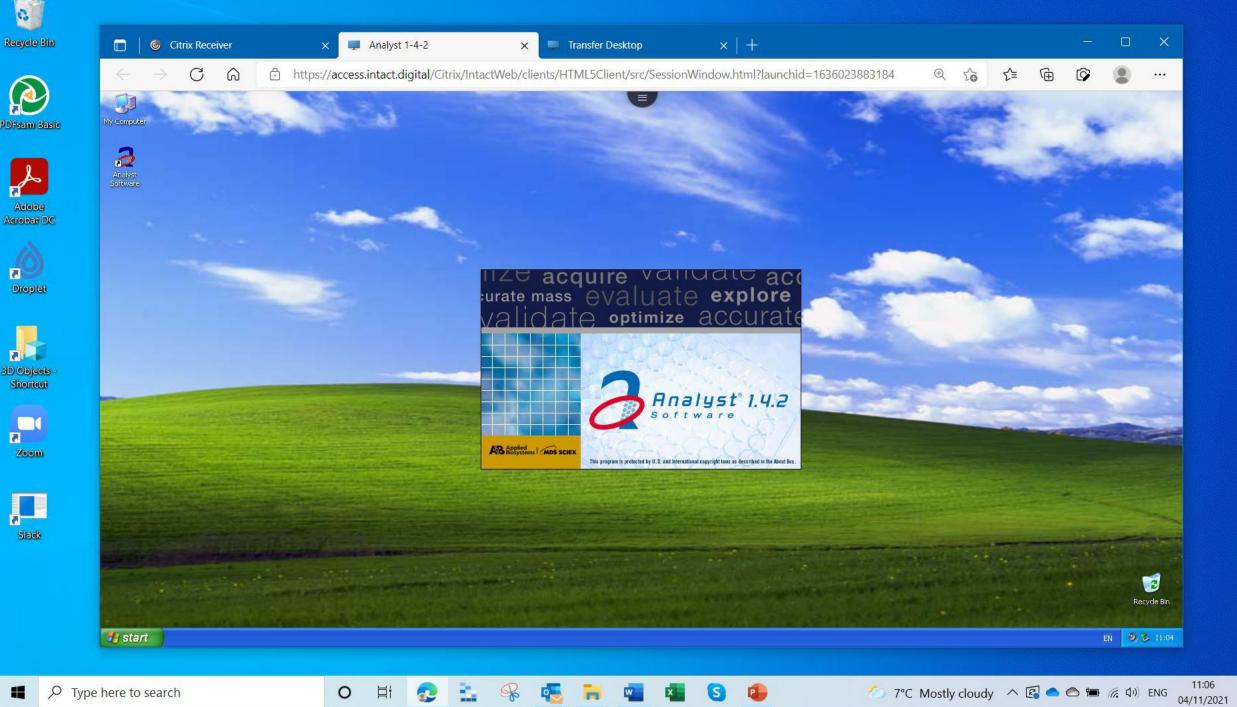






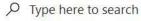






Zoom

Slack



























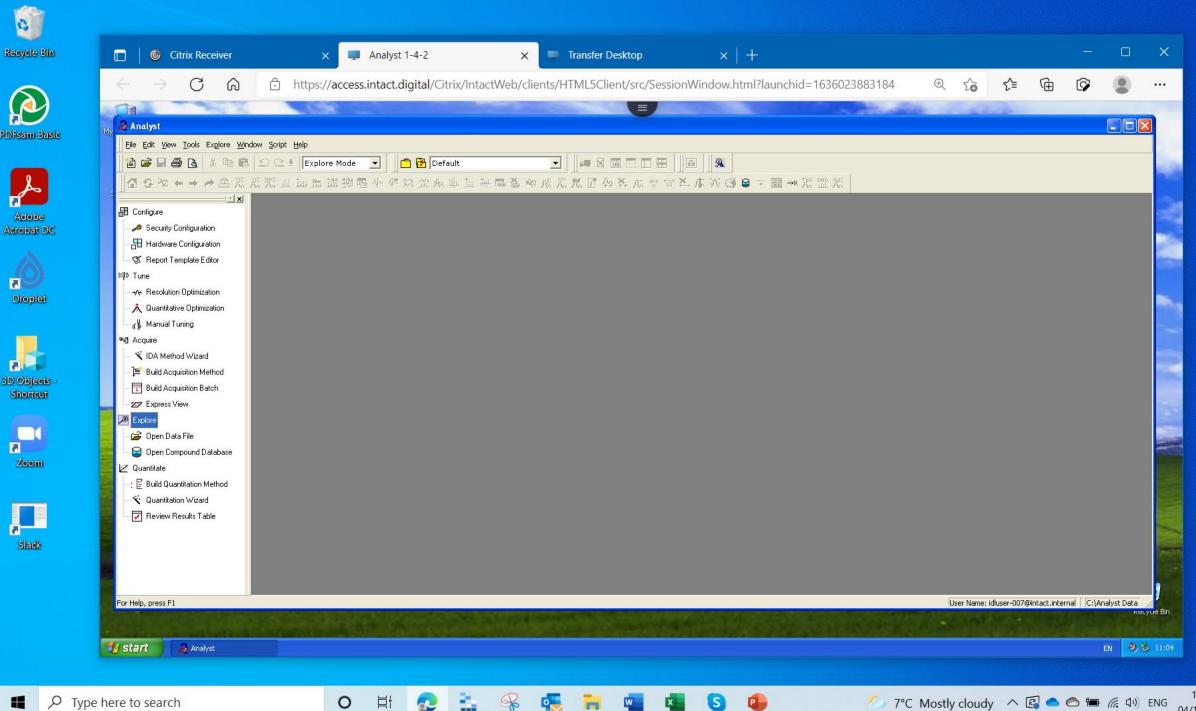




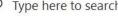








































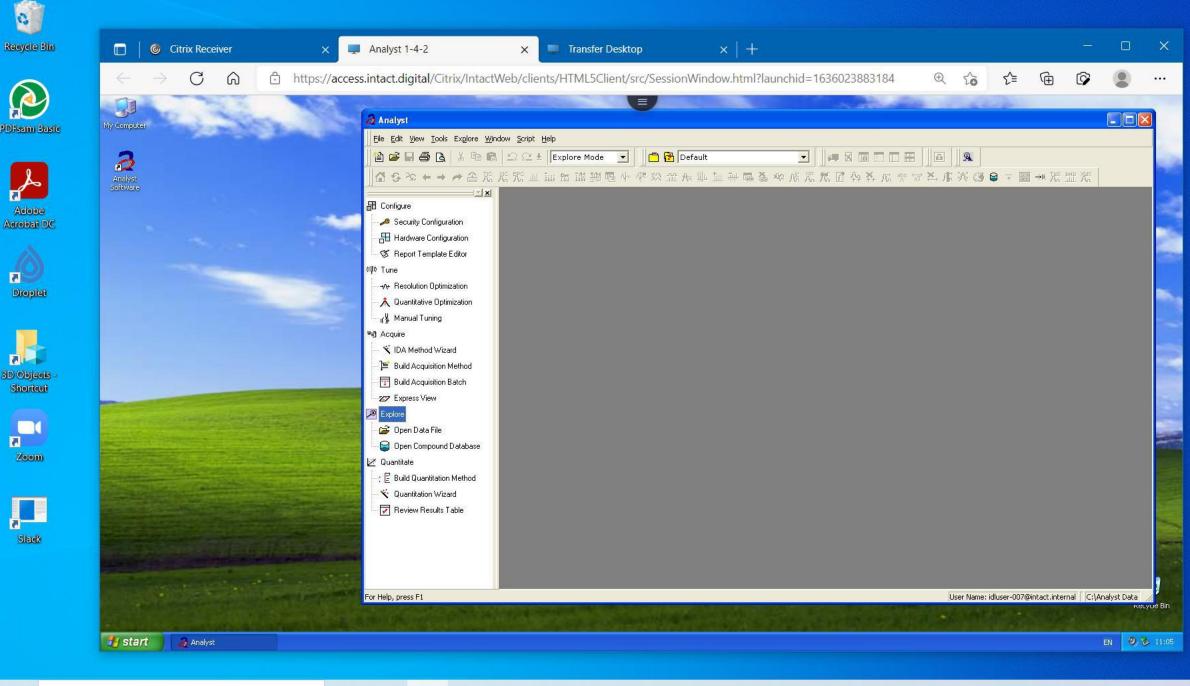




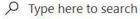




































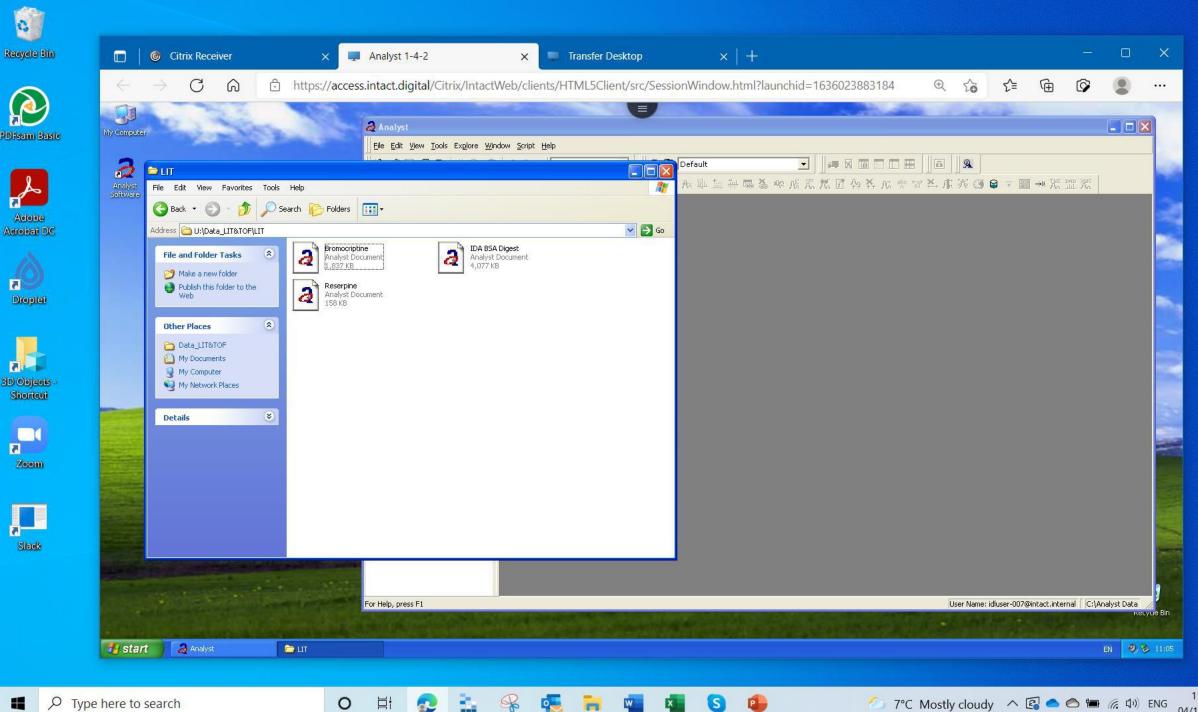




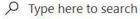




































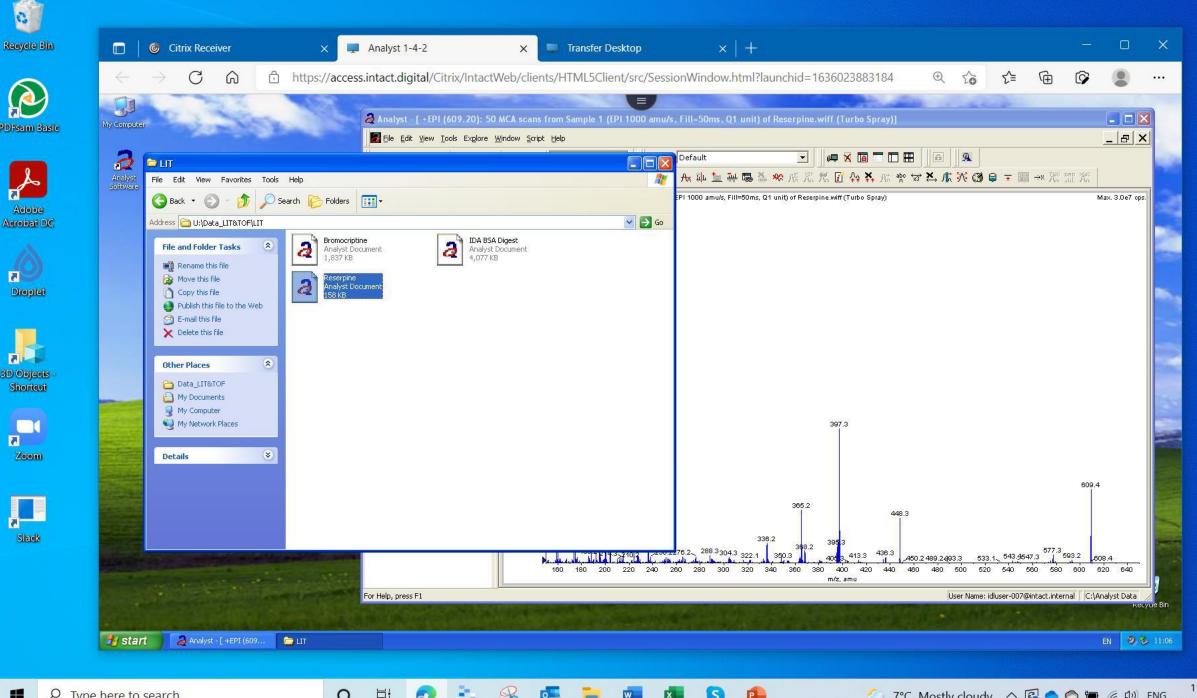




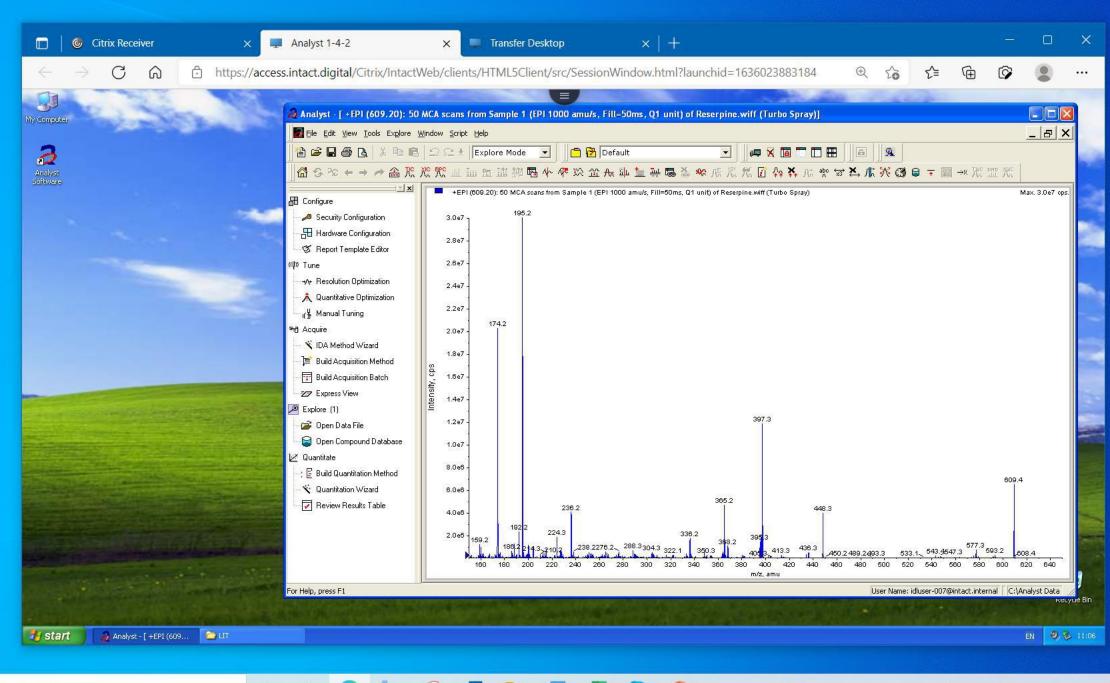








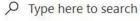






Droplet

Shortcut

























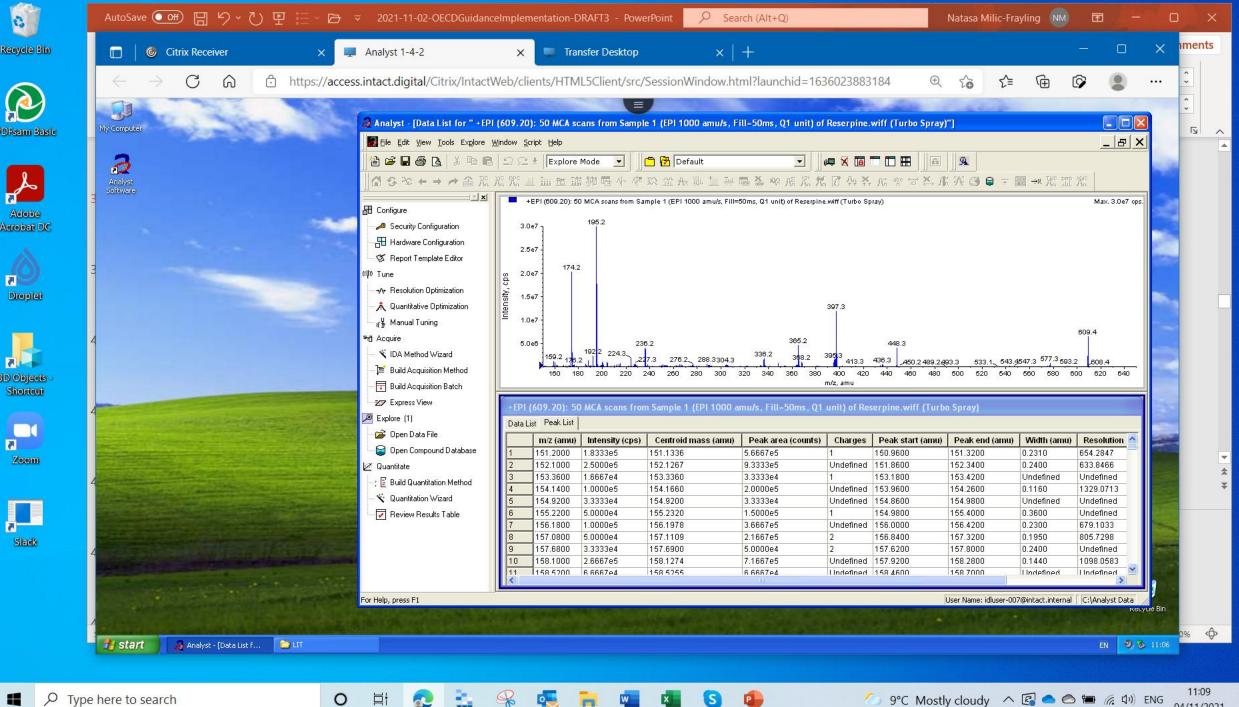














Droplet

3D Objects

Shortcut

























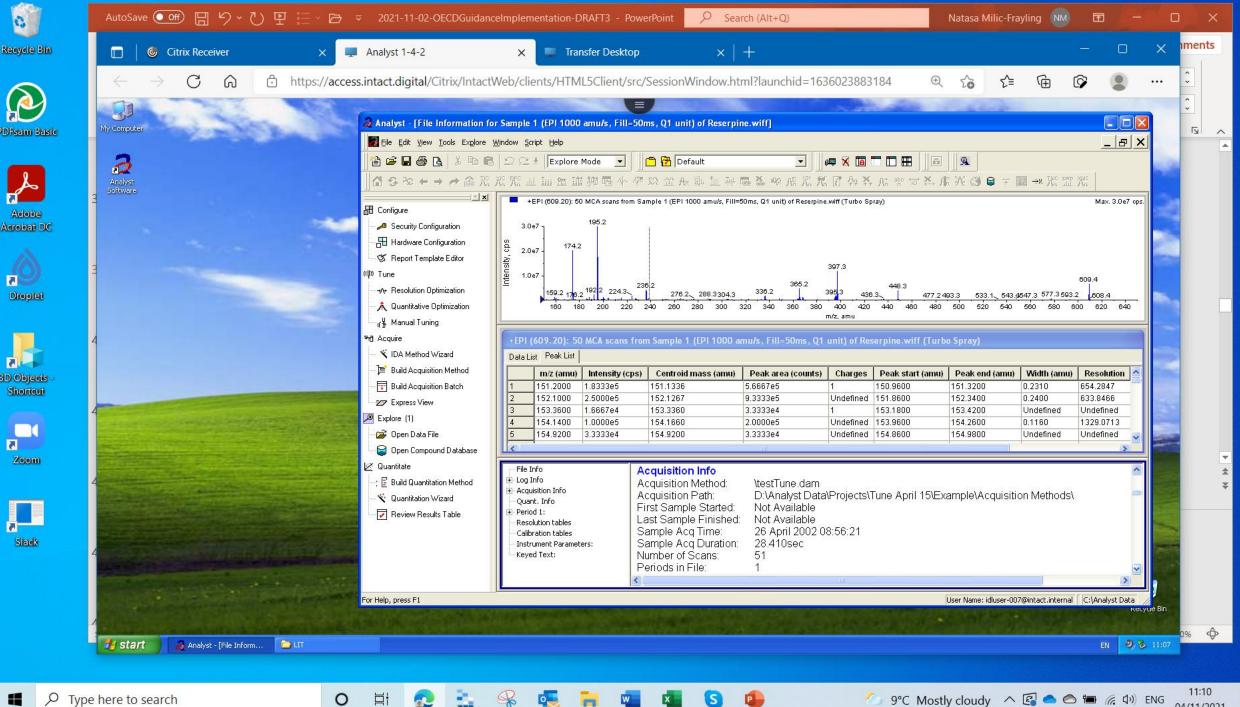














Droplet

3D Objects

Shortcut



























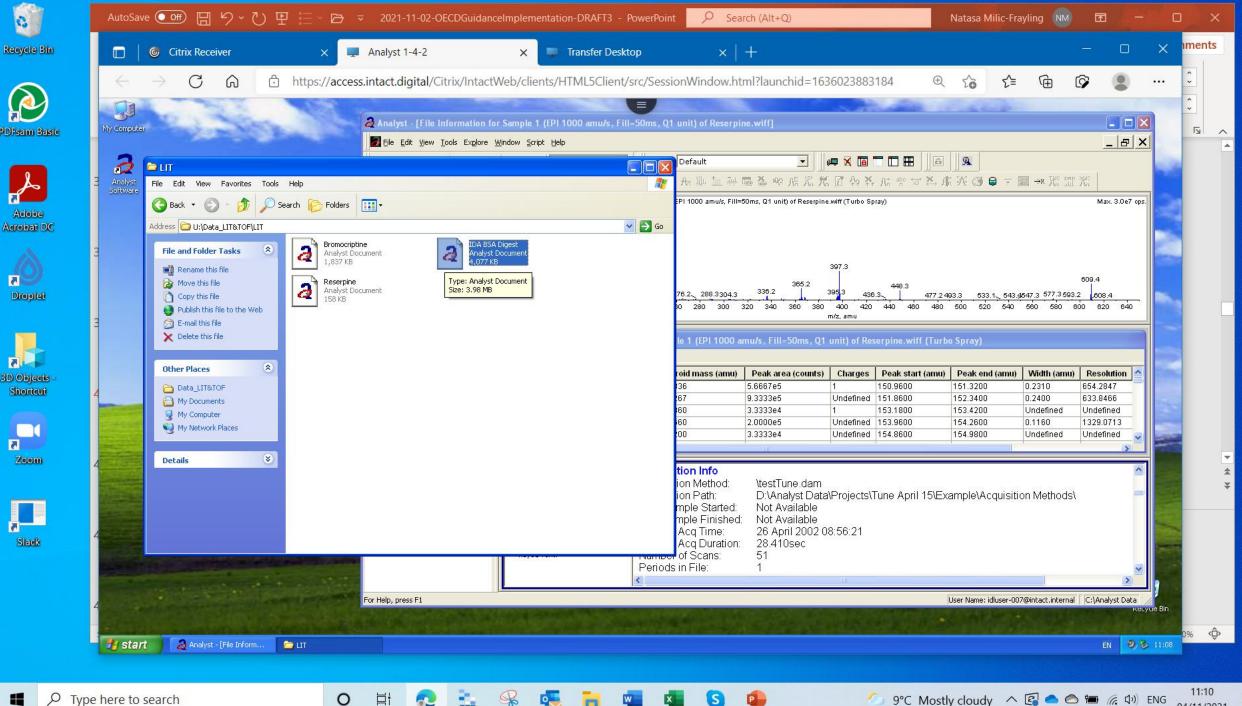












Droplet

3D Objects

Shortcut

















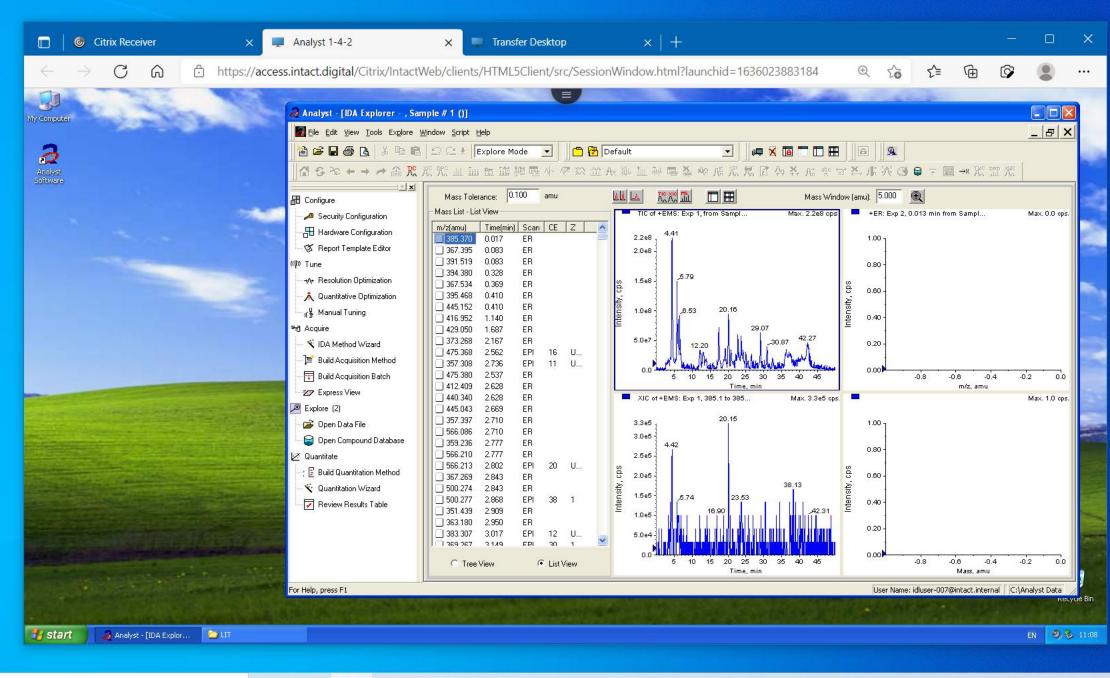










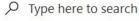




Droplet

3D Objects

Shortcut































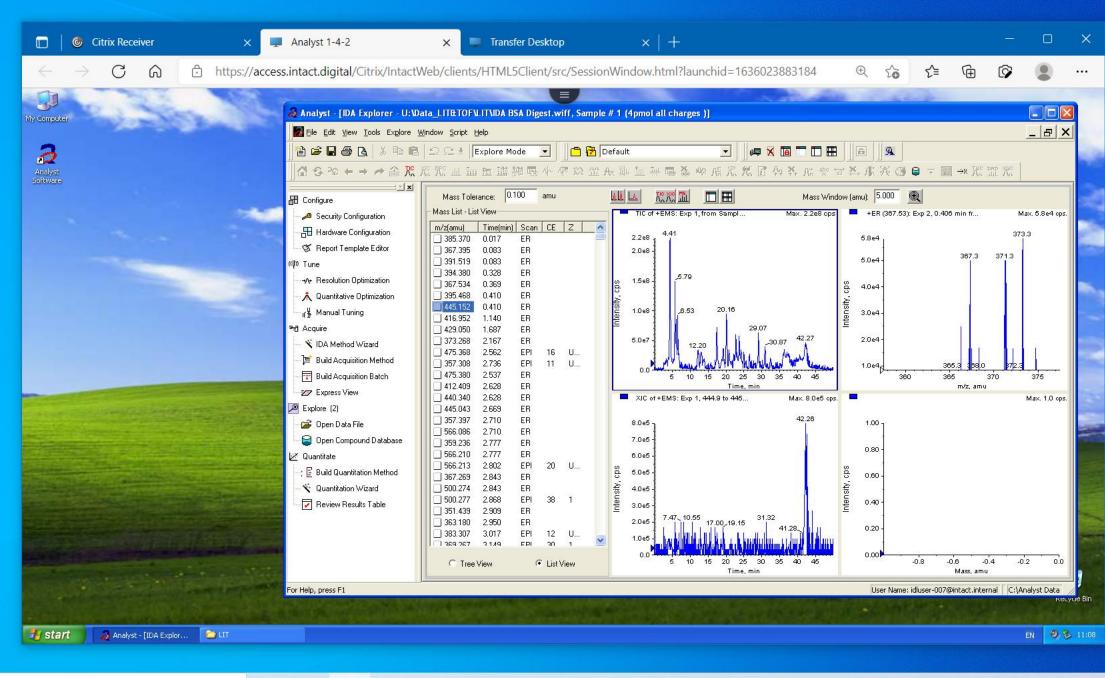










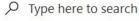




Droplet

3D Objects

Shortcut





























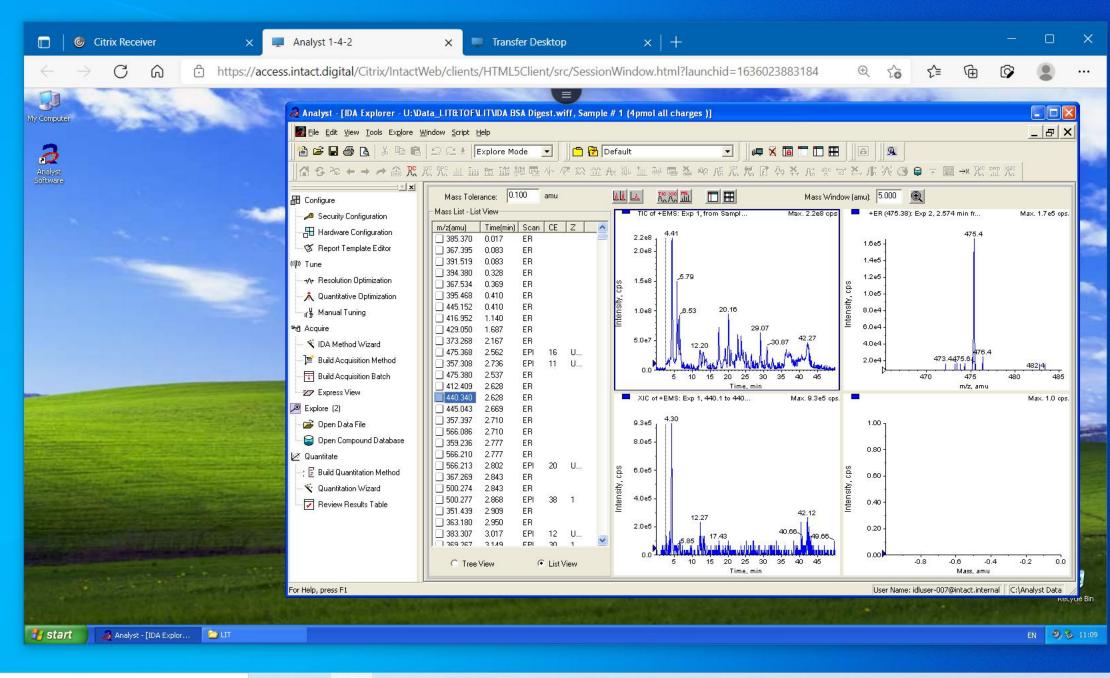










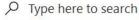




Droplet

3D Objects

Shortcut













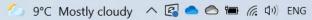














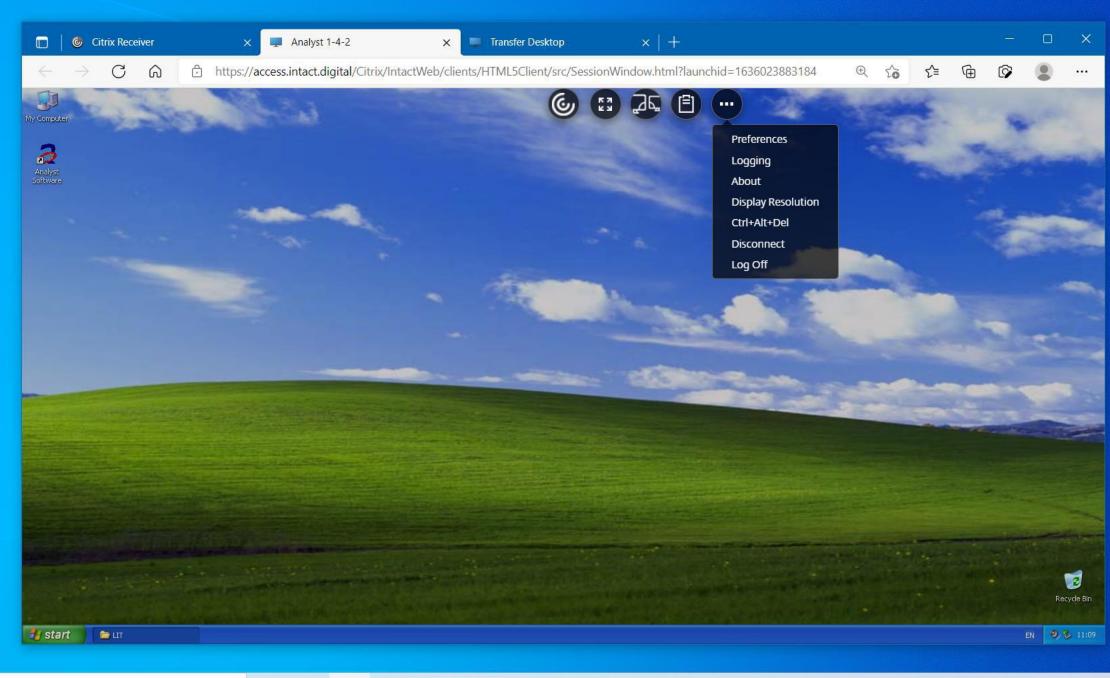














Recycle Bin

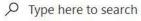
Adobe Acrobat DC

Droplet

3D Objects Shortcut

Zoom

Slack





















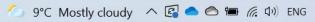


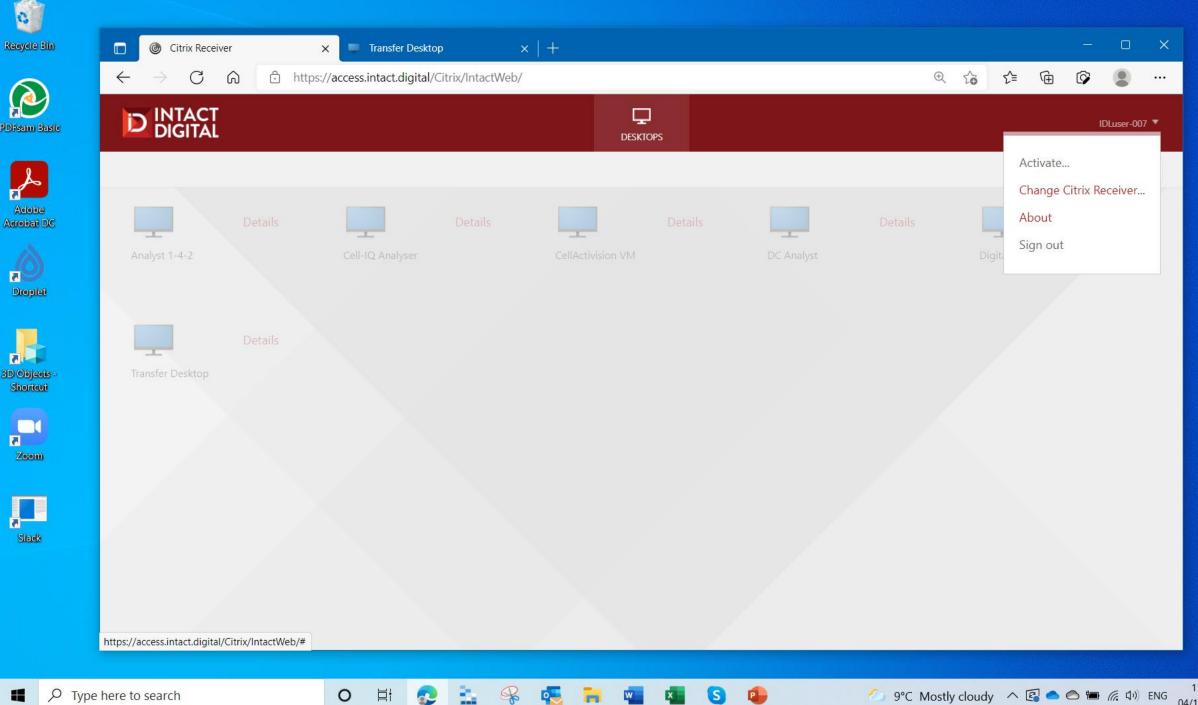






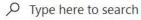
























































Compliance considerations



vality by agility Long-term software management

Maintenance







reflect | CHALLENGE | INNOVATE | Procedures: Installation management



INSTALLATION QUALIFICATION (IQ \rightarrow SL-IQ)

- Create a sandboxed VM environment for software installation
- Upload of software and software installation documentation
- Document the process of installing the software in the VM
 - Follow the original Installation Qualification (IQ) used to create installations in the Lab.
 - Create **Software Library IQ** (SL-IQ) for the specific software.

OPERATIONAL QUALIFICATION (OQ \rightarrow SL-OQ)

- Configure Virtual Desktops (VD) to support data transfer and software use.
- Review the Operational Qualification (OQ) of the original software installed in the Lab
 - Document the testing of the virtualized software installation
 - Select and test software features that support the study reconstruction task
 - Document the operational qualification process SL-OQ for virtualized software installations.

Roles

- IT | IT Specialist
- **RS** Researcher
- AR Archivist



ality by agility Procedures: Software integrity checks Digitality checks



PERFORMANCE QUALIFICATION (PQ \rightarrow SL-PQ)

- Create a **Performance Qualification (PQ)**test and select representative test data
 - Select a minimal set of steps to establish the **software integrity**
 - Perform the test with the original software (in the Lab) and virtualized software
 - Document the PQ procedure for the virtualized installation to create SL-PQ
 - Apply SL-PQ test before importing the study data.

STUDY RECONSTRUCTION

Use Transfer Desktop to transfer data into the Software Library environment

Data is accessible to all the VMs available to the user

Activate the desktop with specific software and gain access to data

Move the data to the VM if it needs to be used locally by the software

Access the study documentation and reconstruction process.

Reproduce the results and document the study reconstruction process.

Roles

IT | IT Specialist

RS Researcher

AR Archivist



y by agility Vision: Software assurance



Work with vendors on safe deposit of released software for archival use

- At the time of software deployment
 - Service agreement for operational software
 - Assurance agreement to access virtualized software installations in the VMs
 - Identical copy of software is validated and running in the isolated/archival environment.

BENEFITS

- Data archive is always in sync with installed software
- The community has a common standard for managing data integrity
- Regulators can confirm and approve specific software installation practice
- The ecosystem is stable and innovation is not affected by software obsolescence.



Thank you!

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