QUALITY ASSURANCE DEPARTMENT

STANDARD OPERATING PROCEDURE		
Department: Quality Assurance	SOP No.:	
Title: Handling of Deviation	Effective Date:	
Supersedes: Nil	Review Date:	
Issue Date:	Page No.:	

1.0 OBJECTIVE:

To lay down a procedure for Handling of Deviation.

2.0 SCOPE:

This SOP is applicable to handling of deviations to approved/established procedures such as Batch Manufacturing Records/Batch Packing Records, SOP's, STP's, calibration procedures and specifications or other established procedures or systems.

3.0 **RESPONSIBILITY:**

Head – Concerned department

Head – Quality Assurance

4.0 **DEFINITION**(S):

NA

5.0 PROCEDURE:

5.1 Preparation procedure :

- 5.1.1 Deviations can be two types and are defined as below.
- 5.1.2 (A)Unplanned deviation: It may arise due to break down or failure of (a) an equipment (b) malfunctioning of an Instrument (c) Utility/Service (d) Human error or (e) any other.
- 5.1.3 (B)Planned deviations: Planned deviation shall take place only for quality improvement, yield improvement, better GMP's, safety reasons and market requirement. For example, Improvement in yield/quality, safety, batch cycle time reduction, cost, improve GMP and compliance to regulatory commitments

5.2 **Unplanned Deviation:**

- 5.2.1 Unplanned deviation shall be brought to notice by operator/supervisor to the head of department.
- 5.2.1 Head of the Department shall inform QA, to get deviation form issued.
- Head of the Department upon primary investigation shall write his comments on unplanned deviation along with the proposed corrective action(s).
- 5.2.3 Head of the Department shall forward the unplanned deviation to Plant Manager for review.



QUALITY ASSURANCE DEPARTMENT

STANDARD OPERATING PROCEDURE		
Department: Quality Assurance	SOP No.:	
Title: Handling of Deviation	Effective Date:	
Supersedes: Nil	Review Date:	
Issue Date:	Page No.:	

- 5.2.4 Plant manager shall review the nature of deviation, the reason for deviation, and the primary investigation and comments given by the HOD. He shall suggest the corrective actions and forward the same to QA.
- 5.2.5 Head Quality Assurance or his designee shall review the impact of deviation on the product quality, process performance, yield, GMP or required regulatory commitments, analytical requirements and any similar deviations in past.
- 5.2.6 QA -Head shall assess the un planned deviations and the corrective actions suggested by the plant Head, and shall recommend the additional testing(s), preventive and corrective steps on product / process if required, based on the validation data and past experience. Based upon the assessment of the corrective actions planned/taken, QA Head shall decide for any change in the facility/ system through the change control procedure.
- 5.2.7 The final decision shall be written by QA -Head on unplanned deviation report with signature and date.
- 5.2.8 Quality Assurance shall assign a number to the unplanned deviation report as per Annexure –I and record the details in deviation register as per Annexure-III.
- 5.2.9 Unplanned deviation report can be numbered as follow;

UDR/2101

Where,

UDR: Denotes "Unplanned Deviation Report"

/ : Slash

21:Year of 2021

01: Serial no. of deviation

- 5.2.10 Released The unplanned deviation shall be closed by head of department in consultation with QA -Head before batch is approved.
- 5.2.11 Quality Assurance department shall file the original closed deviation record and a copy of the same shall be filed in the affected Batch records.

5.3 Planned Deviation:

Planned deviations are identified by head of department, when there is going to be a change in location / area, change in equipment(s) to be used, change in quality of raw material, packaging material, change in processing step, in change in control limit, change in packaging material,

QUALITY ASSURANCE DEPARTMENT

STANDARD OPERATING PROCEDURE		
Department: Quality Assurance	SOP No.:	
Title: Handling of Deviation	Effective Date:	
Supersedes: Nil	Review Date:	
Issue Date:	Page No.:	

change in STP, change in testing condition, change in sampling procedure, change in steps of SOP, or any other established parameter(s) / determined by Quality Assurance.

- 5.3.2 Head of Department shall discuss with Quality Assurance before initiating planned deviation.
- 5.3.3 In case of process changes, planned deviation shall be approved only, when supported by the laboratory data.
- 5.3.4 The planned deviation shall be with prior approval from Quality Assurance
- 5.3.5 The planned deviation shall be initiated by responsible person of the concerned Department as per Annexure–II. This shall include the information related to the planned deviation, standard practice and reason for deviation. The planned deviation shall then be evaluated and commented by HOD.
- 5.3.6 Head of Department shall send back planned deviation to responsible person if not satisfied with reasons for deviation. If found satisfied, with necessity, he shall recommend time frame of deviation and send to Plant Manager for evaluation.
- 5.3.7 After evaluation, Plant head forwards the same to QA for review and evaluation.
- 5.3.8 Quality Assurance shall review the deviation for acceptability and impact on product quality, process performance, yield, analytical, GMP's, or regulatory and decide to allow or not to allow the proposed deviation. During evaluation it is ensured that, unclosed unplanned deviation (eg. related to machine breakdown) shall not be approved.
- 5.3.9 Quality Assurance may consult formulation development depending upon the nature of deviation (if any).
- Quality Assurance may consult regulatory affairs, if any deviation to regulatory commitments / major changes. In case of products for the regulated market, the deviation shall be done only after seeking approval from the respective regulatory authority.
- 5.3.11 Based upon the repetition of the planned deviations and their assessment, QA Head shall decide for applicability of the change in the facility/ system through the change control procedure.
- 5.3.12 If Quality Assurance decides to approve, Head Quality Assurance shall give recommendations, suggest alternatives and propose corrective action. This might lead to additional testing(s) / precaution(s).
- 5.3.13 Number shall be assigned to approve planned deviation report. The rejected planned deviation shall not have any number.



QUALITY ASSURANCE DEPARTMENT

STANDARD OPERATING PROCEDURE		
Department: Quality Assurance	SOP No.:	
Title: Handling of Deviation	Effective Date:	
Supersedes: Nil	Review Date:	
Issue Date:	Page No.:	

5.3.14 Deviation report can be numbered as follow;

PDR/2101

Where,

PDR: Denotes "Planned Deviation Report"

/ : Slash

21: Year of 2021

01:Serial no. of deviation

5.3.15 After approval, Head of the Department shall undertake the activity as per time frame.

5.4 Closure:

- 5.4.1 The outcome on planned deviation shall be reviewed, documented and closed by head of department in consultation with Quality Assurance.
- Ouality Assurance shall decide whether change is to be made permanent. If yes, it shall made through "Change Control Form" as per change control SOP.
- 5.4.3 If review calls for extension in time frame, this shall be further recommended by department and approved by Head Quality Assurance.
- 5.4.4 Quality Assurance shall preserve original copy and the copy of the same shall be filed along with Batch records or related documentation in which deviation is taken.
- 5.4.5 Head-QA will take the batch release decision subject to additional testing required, if any, at the end of the batch completion.
- 5.4.6 QA shall prepare trend report of deviation at the end of the year and report the corrective and preventing actions taken in the respective documents/systems/procedures through change control.



QUALITY ASSURANCE DEPARTMENT

STANDARD OPERATING PROCEDURE

Department: Quality Assurance
SOP No.:

Title: Handling of Deviation
Effective Date:

Supersedes: Nil
Review Date:

Issue Date:
Page No.:

6.0 ABBREVIATION(S):

GMP : Good Manufacturing Practice

R & D : Research and development

SOP : Standard operating procedure

7.0 **REFERANCE(S):**

NA

8.0 ANNEXURE(S):

ANNEXURE – I : Unplanned deviation Form

ANNEXURE – II : Planned deviation Form

ANNEXURE- III : Deviation Register



QUALITY ASSURANCE DEPARTMENT

STANDARD OPERATING PROCEDURE		
Department: Quality Assurance	SOP No.:	
Title: Handling of Deviation	Effective Date:	
Supersedes: Nil	Review Date:	
Issue Date:	Page No.:	

9.0 REVISION CARD:

S.No.	REVISION No.	REVISION DATE	DETAILS OF REVISION	REASON (S) FOR REVISION



	QUALITY ASSURANCE DEPARTMENT	,
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artment: Quality Assurance		SOP No.:
e: Handling of Deviation		Effective Date:
ersedes: Nil e Date:		Review Date:
e Date:		Page No.:
	Annexure I UNPLANNED DEVIATION FOR	M
Initiated By:	Department:	Date:
Deviation No.:	UDR/	
Deviation Related To	Equipment/Instrument	
	Utility/Service	
	Human Error	
	Others	
Nature of deviation		
Reason for Deviation		
Primary Investigation a	nd Comment (HOD)	
Sign:	Date:	
Sign •	Dan.	



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rtment: Quality Assurance Handling of Deviation rsedes: Nil		Effective Date:
		Review Date:
		Page No.:
s suggested by Plant	Head	
	Date:	
tion by Quality Assur		
act	Yes/No	
Impact	Yes/No	
	Yes/No	
	Yes/No	
equired	Yes/No	
n/past experience	Yes/No	
rrective Action by QA	A Head	
	tion by Quality Assuract Impact Equired	Date: tion by Quality Assurance: act Yes/No Impact Yes/No Yes/No Yes/No Yes/No Aequired Yes/No



STANDARD OPERATING PROCEDURE		
Department: Quality Assurance	SOP No.:	
Title: Handling of Deviation	Effective Date:	
Supersedes: Nil	Review Date:	
Issue Date:	Page No.:	
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ate:		Page No.:	
All check points compiled with (Documentary evidence shall be attached or referred to)	Yes/No		
Deviation shall be corrected and closed before batch is approved/released	Yes/No		
Based upon the assessment of the corrective actions planned, whether change control is required.	Yes/No		
Batch release satisfactory	Yes/No		
Other (Specify)			
Closure:		Affected documents closed: Yes/No	

Closure:	Affected documents closed: Yes/No	
Head Of Department		
Sign:	Date:	
Approved by – Head (Quality Assurance)		
Sign:	Date:	



STANDARD OPERATING PROCEDURE		
Department: Quality Assurance	SOP No.:	
Title: Handling of Deviation	Effective Date:	
Supersedes: Nil	Review Date:	
Issue Date:	Page No.:	

Annexure II PLANNED DEVIATION FORM

Initiated By:		Department:	Date:		
Deviation No.:		PDR/			
Deviation Related To		Location/Area			
		Equipment			
		Raw Material			
		Packaging Material			
		Manufacturing			
		Packaging			
		STP/GTP/Specification/SOP			
		Others			
Deviation Planned					
Standard Practice					
Reason for Deviation					



OD): deviation : Date	
deviation : Date	Review Date: Page No.:
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omments) by (Quality Assurance:
	Yes/No
act	Yes/No
	Vac/No
	Yes/No
	Yes/No
	Yes/No
	100/110
experience	Yes/No
ı, whether	Yes/No
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made	
uired	Yes/No
	ed experience



QUALITY ASSURANCE DEPARTMENT

TING STATES						
ST	ΓANDA	ARD OPERA	TING PROCEDURE			
Department: Quality Assurance	SOP No.: Effective Date:					
Title: Handling of Deviation	ersedes: Nil					
ssue Date:				Page No.:		
Evaluation by Head – Regu	latory	Affairs:				
Regulatory Impact			Yes/No			
Notification to Regulatory ag	gency re	equired	Yes/No			
Sign:			Date:			
Recommendation	:					
Alternatives	:					
Corrective Actions	:					
		Deviation : A	Approved/Rejected.			
Head–Quality Assurance	:	Signature:	Date:			
Closure	:					
Planned deviation is to be made permanent	:	Yes/No				
Change control form is filled	:	Yes/No				
Other (Specify)						
Planned deviation closed	:	Yes/No				
Head of the Department	:	Signature:	Date:			
Head - Quality Assurance	:	Signature:	Date:			



QUALITY ASSURANCE DEPARTMENT

STANDARD OPERATING PROCEDURE	
Department: Quality Assurance	SOP No.:
Title: Handling of Deviation	Effective Date:
Supersedes: Nil	Review Date:
Issue Date:	Page No.:

Annexure III

DEVIATION REGISTER

S.No.	Date of Notification	Initiating Department	Deviation details	Stage	Reasons for deviation	Corrective Actions	Approval	Deviation No.	Remarks