RD SOP 33 R & I Committee Safety Oversight

Greater Manchester Mental Health NHS Foundation Trust

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<table>
<thead>
<tr>
<th><strong>Title of Standard Operating Procedure:</strong></th>
<th>RD SOP 33 R &amp; I Committee Safety Oversight</th>
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<tbody>
<tr>
<td><strong>Document Summary:</strong></td>
<td>This standard operating procedure describes the steps to ensure that oversight of the safety standards are met for the clinical trials conducted under the sponsorship of GMMH</td>
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<td><strong>Document Author:</strong></td>
<td>Sarah Leo – Head of R &amp; I</td>
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<tr>
<td><strong>Target Audience:</strong></td>
<td>Trust-wide, Research Community, Internal and External Researchers</td>
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<tr>
<td><strong>Consultation:</strong></td>
<td>R &amp; I Committee</td>
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<td><strong>Approval Committee:</strong></td>
<td>R &amp; I Committee</td>
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<tr>
<td><strong>Cross Reference Document(s):</strong></td>
<td>All Trust R &amp; I SOPs</td>
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| **Minimum Monitoring Requirement**      | **Frequency** | **Process for monitoring** | **Evidence** | **Responsible Individual(s)** | **Response Committee(s)** |
| Review of SOP content                   | Annually | Review by Author, redraft, submission to R & I Operational Group | Minutes of R & I Operational Group | Head of R & I Office | Research & Innovation Committee |
Contents

1. Introduction ........................................................................................................... 3
2. Purpose .................................................................................................................. 3
3. Roles and Responsibilities .................................................................................... 3
   3.1 Duties within the organisation ...................................................................... 3
   3.2 Specific to this SOP ...................................................................................... 3
4. Procedure .............................................................................................................. 4
   4.1 R & I Committee meeting dates and agenda ................................................. 4
   4.2 Signal Management ...................................................................................... 4
   4.3 Safety reporting to the R & I Committee ....................................................... 5
   4.4 Scope of review ............................................................................................ 5
   4.5 Documentation and Communication of the R & I Committee safety review... 5
   4.6 Information management for the safety oversight process ......................... 5
5. References and Bibliography ................................................................................. 6
6. Associated Trust Documents .................................................................................. 6
1. Introduction

Safety of the participants in a Clinical Trial of an Investigational Medicinal Product (CTIMP) is paramount. The Medicines for Human Use (Clinical Trials) Regulations 2004 and UK Policy Framework for Health and Social Care Research set out specific requirements for the safety management of clinical trials. Safety procedures must be designed and applied to ensure safety is monitored, reviewed, documented and when appropriate, reported to the authorities. In GMMH, the R & I Committee will review monthly Safety Reports submitted for ongoing GMMH sponsored CTIMP’s. The R & I Committee will also receive and review Annual Safety Reports (Development Safety Update Report) at the appropriate time.

This SOP should be read in conjunction with RD SOP8a Pharmacovigilance for Trust-Sponsored MHRA-regulated Clinical Trials, RD SOP9 Notification of a Serious Breach of GCP or the Clinical Trial Protocol, RD SOP34 Development Safety Update Reporting and the Clinical Trial protocol.

Please note that safety reporting for non-CTIMP’s is covered in RD SOP41.

2. Purpose

This standard operating procedure describes the steps to ensure that oversight of the safety standards are met for the clinical trials conducted under the sponsorship of GMMH. Safety Listing Reports will be completed and submitted monthly to the R & I Committee. This Committee will determine whether, based on the literature information or other data sources, there are new risks associated with an IMP or whether known risks have changed; and that the appropriate actions are taken.

3. Roles and Responsibilities

3.1 Duties within the organisation

It is the responsibility of the Research Office to make Trust R & I SOPs available to all research active staff working on Trust premises.

It is the responsibility of the study Chief Investigator (CI) or local Principal Investigator (PI) to ensure that up-to-date copies of Trust R & I SOPs are available to research staff.

It is the responsibility of the study Chief Investigator (CI) or local Principal Investigator (PI) to distribute study-specific SOPs to appropriate members of the research team.
and to ensure that up-to-date copies are filed in the Investigator Site file and are available to research staff.

It is the personal responsibility of all staff to follow Trust procedural documents.

### 3.2 Specific to this SOP – Responsible personnel

This SOP applies to all clinical research teams conducting a GMMH sponsored IMP trial, the R & I Office staff and GMMH R & I Committee.

### 4. Procedure

#### 4.1 R & I Committee meeting dates and agenda

R & I Committee meetings will take place quarterly. Safety Monitoring of on-going IMP trials will be a standing item on the agenda. Safety monitoring will include a review of routine signal management. When appropriate, ad hoc meetings will take place depending on the severity of a detected SAE, or any follow-up actions that might be required.

#### 4.2 Signal management

In the Report of the Council for International Organisations of Medical Sciences Working group VIII Practical Aspects of Signal Detection in Pharmacovigilance (CIOMS, Geneva 2010), a signal is defined as information that arises from one or multiple sources (including observations and experiments), which suggests a new potentially causal association, or a new aspect of a known association, between an intervention and an event or set of related events, either adverse or beneficial, that is judged to be of sufficient likelihood to justify verificatory action. For the purpose of monitoring data in EudraVigilance, only signals related to an adverse reaction shall be considered.

Participant safety will be monitored and evaluated by the Chief Investigator and/or Principal Investigator and the clinical trial team during the scheduled and unscheduled visits of the clinical trial. New risks might also be identified by the team from other sources.

Regardless of the source of a potential safety signal the Investigator and the clinical trial team will analyse and prioritise the potential safety signal and determine the timeline by which further activities should be undertaken including treatments of signs and symptoms and communication with the R & I department etc, as per RD SOP8a Pharmacovigilance for Trust-Sponsored MHRA-regulated Clinical Trials, RD SOP34 Development Safety Update Reporting and the trial protocol.
4.3 Safety reporting to the R & I Committee

The Clinical Trial team will notify the R & I Office as and when SAE’s and SAR’s occur. Reports will be submitted using an Adverse Events (AE) form. This could be an Adverse Events (AE) and Causality Assignment Form (template available from the R & I office), or an AE form developed by the CI and trial team, as agreed by the Trust as sponsor. The R & I Office will submit reports of SAE’s and SAR’s to the R & I Committee. The R & I Office will also complete SAE and SUSAR Line Listing Reports and submit them to the R & I Committee. The R & I Committee will receive and review reports of SAE’s and SAR’s, SAE and SUSAR Line Listing Reports, DSUR and Annual Safety reports.

See the following for further information: RD SOP8a Pharmacovigilance for Trust-Sponsored MHRA-regulated Clinical Trials, RD SOP9 Notification of a Serious Breach of GCP or the Clinical Trial Protocol, and RD SOP34 Development Safety Update Reporting.

4.4 Scope of review

The R & I Committee meeting can be used to perform signal validation, analysis, prioritisation and evaluation. As appropriate, discussions will include the following:

➢ Strength of evidence for a causal effect: i.e. number of reports, exposure, temporal association, plausible mechanism, de/re-challenge, alternative explanation / confounders
➢ Seriousness and severity of the reaction and its outcome
➢ Novelty of the reaction
➢ Drug-drug interactions
➢ Reactions occurring in special populations
➢ Follow-up of unresolved issues

4.5 Documentation and communication of R & I Committee Safety review

Discussions, recommendations, and required follow-up actions will be recorded in the Committee meeting minutes. Recommendations will be communicated via email by the R & I Office to the Chief Investigator and Principal Investigators as appropriate after the meeting.

4.6 Information management for the safety oversight process

Each Trust-sponsored CTIMP will have a ‘Safety Signal Tracking’ storage location within Q-Pulse’s document module which upon termination of the study will be archived with the main CTIMP folder. The Safety Signal Tracking storage location will contain:

- Bi-monthly Safety Listing Reports
5. References and Bibliography


UK Policy Framework for Health and Social Care Research v3.3 07/11/17

CTIMP Algorithm

HRA guidance on amendments
https://www.hra.nhs.uk/approvals-amendments/what-approvals-do-i-need/

6. Associated Trust Documents

RD SOP8a Pharmacovigilance for Trust-Sponsored MHRA-regulated Clinical Trials
RD SOP9 Notification of a Serious Breach of GCP or the Clinical Trial Protocol
RD SOP34 Development Safety Update Reporting and the Clinical Trial protocol

Terms of Reference for the GMMH R & I Committee