

STANDARD OPERATING PROCEDURE

HUMAN RESEARCH ETHICS & GOVERNANCE OFFICE (HREG) SOP006: SAFETY REPORTING

TARGET AUDIENCE

The target audience is Sponsors, Contract Research Organisations, Investigators, participating Institutions and their delegates, of clinical research projects that were approved by the Peter Mac HREC.

RELATED PETER MAC POLICIES, PROCEDURES OR GUIDELINES

POLICY Responsible Conduct of Research

SOP002 Peter Mac Governance Review Requirements for Human Research

SOP004 Monitoring of Ongoing Research

PURPOSE

The purpose of this SOP is to describe the Peter MacCallum Cancer Centre (Peter Mac) Ethics Committee process for submission and handling of safety reports arising out of research reviewed by the Peter Mac Ethics Committee as the reviewing Human Research Ethics Committee (HREC).

For safety reporting requirements for research conducted at Peter Mac that was reviewed by an Ethics Committee other than Peter Mac, refer to *SOP002: Peter Mac Governance Review Requirements for Human Research*.

This SOP is consistent with the NHMRC National Statement on Ethical Conduct in Human Research (2023 and updates) and the NHMRC Safety monitoring and reporting in clinical trials involving therapeutic goods (November 2016 and updates).

PROCEDURE

When communicating safety information to the Peter Mac HREC, the Sponsor or their delegate must clarify the impact of each report on patient safety, trial conduct and trial documentation. The items below required to be submitted to the Peter HREC by the Sponsor or delegate will be acknowledged by the Peter Mac HREC.

NOTE: For reporting of Serious Breaches of Good Clinical Practice or the protocol, refer to SOP004 Monitoring of Ongoing Research, Section 6.4 (Serious Breach reporting replaces Protocol Deviation/Violation reporting).

The procedure to be followed is provided in the following table.

Reporting party	Report required and timeline	Supporting information required
SPONSOR or delegate	Provide the HREC with annual update of the Investigator's Brochure or where applicable, Product Information.	Impact of the update/addenda on patient safety, trial conduct and trial documentation
	Provide the HREC with any Addenda to the Investigator's Brochure or where applicable, Product Information.	
SPONSOR or delegate	Provide the HREC with an Annual Safety Report including a clear summary of the evolving safety profile of a trial.	A brief description and analysis of new and relevant findings;

	NOTE: The HREC has the discretion to request more frequent reporting for specific trials, such as early phase trials. Such a request may be stated on the initial Ethical Approval for a trial or may be instituted during the conduct of the trial.	For IMPs not on the Australian Register of Therapeutic Goods, a brief analysis of the safety profile of the IMP and implications for participants taking into account all available safety data and results of relevant clinical or non-clinical studies A brief discussion of the implications of the safety data to the trials risk-benefit ratio A description of any measures taken or proposed to minimise risks
SPONSOR or delegate	Notify the HREC of all Significant Safety Issues that adversely affect the safety of participants or materially impact on the continued ethical acceptability or conduct of the trial. I. Significant Safety Issues that meet the definition of an Urgent Safety Measure should be notified within 72 hours of the measure being taken. II. All other Significant Safety Issues should be notified within 15 calendar days of the sponsor becoming aware of the issue. III. Significant Safety Issues often result in safety-related changes to trial documentation. Any resulting amendment should be submitted to the HREC without undue delay. IV. Temporary halt of trial for safety reasons should be notified within 15 calendar days of the sponsor's decision to halt the trial. V. Early termination of a trial for safety reasons should be notified without undue delay and within 15 calendar days of the sponsor's decision to terminate the trial.	I. Reason for the urgent safety measure; measures taken; further actions planned II. Details of the significant safety issue; further actions planned III. Submit amendment per Ethics Committee SOP004 IV. Reasons for the halt; the scope of the halt (e.g. suspension of recruitment or cessation/interruption of trial treatment); measures taken; further actions planned. V. Reasons for the early termination; measures taken; further actions planned
HREC	Advise the TGA, investigators and their institutions of any decision to withdraw approval.	Reasons for the withdrawal of approval and date of withdrawal of approval

DEFINITIONS

Definitions stated in the NHMRC document *Safety monitoring and reporting in clinical trials involving therapeutic goods November 2016* are the governing definitions for Investigational Medicinal Product (IMP) Trials and Investigational Medical Device (IMD) Trials.

The Definitions provided below are broader in scope to allow inclusion of clinical research outside the scope of an IMP or IMD trial in this SOP.

For further explanation of any of the definitions consult the NHMRC document *Safety monitoring and reporting in clinical trials involving therapeutic goods November 2016.*

Investigator's Brochure (IB)	The document containing a summary of the clinical and non-clinical data relating to an investigational medicinal product or device that are relevant to the study of the product or device in humans.	
Product Information (PI)	The approved Australian summary of the scientific information relevant to the safe and effective use of a prescription medicine.	
	If the conditions of use differ from those authorised, the PI should be supplemented with a summary of relevant clinical and non-clinical data that supports the use of the product in the trial.	
Annual Safety Report	Summary of all new available safety information relevant to a trial that is received over a 12 month period (the Executive Summary of safety information produced for international regulators, such as the Development Safety Update Report (DSUR) may serve as the Annual Safety Report).	
Significant Safety Issue (SSI)	A safety issue that could adversely affect the safety of participants or materially impact on the continued ethical acceptability or conduct of the trial.	
Urgent Safety Measure (USM)	A measure required to be taken in order to eliminate an immediate hazard to a participant's health or safety.	
	Note: This type of significant safety issue can be instigated by either the investigator or sponsor and can be implemented before seeking approval from HRECs or institutions.	
Reviewing HREC	The Human Research Ethics Committee (HREC) that issued the Ethical Approval for the project.	
	Under the multisite review system a NHMRC certified HREC can review and issue ethical approval for a project at multiple sites. These multiple sites will be named in the initial Ethical Approval or be added as an amendment to the initial Ethical Approval. The "reviewing HREC" is responsible for the ongoing monitoring of the project at those sites.	
Institution	An institution named as a Participating Site on an Ethical Approval issued by the Peter Mac HREC.	

RESPONSIBILITIES

The NHMRC National Statement on Ethical Conduct in Human Research (2023 and updates) permits monitoring arrangements to be commensurate to the risk, size and complexity of the <u>research</u>. The nature and extent of participant safety monitoring should be based on the assessment of the risks of the <u>research</u> intervention(s) relative to standard care and the extent of knowledge about the investigational medicinal product or device being tested. The sponsor's plans for safety monitoring should be documented and continually reviewed and adapted during the <u>research</u>, as real time assessments of safety data are performed.

The sponsor, through their independent safety monitoring arrangements, has the primary responsibility for monitoring the ongoing safety of the investigational medicinal product or device. The HREC should be satisfied that the sponsor's arrangements are sufficiently independent and commensurate with the risk, size and complexity of the <u>research</u>.

It is the responsibility of Sponsors, Contract Research Organisations, Investigators, Institutions and their delegates, conducting **clinical research projects** that were approved by the Peter Mac HREC and all Human Research Ethics and Governance office staff members to follow and adhere to the procedures set out in this SOP.

It is the responsibility of Sponsors, Contract Research Organisations, Investigators, Institutions and their delegates, of **clinical trials** involving therapeutic goods that were approved by the Peter Mac HREC to also comply with the reporting requirements in NHMRC document *Safety monitoring and reporting in clinical trials involving therapeutic goods November 2016* (Appendix 1 and Appendix 2 from this document are included in this SOP for reference).

KEY PERFORMANCE INDICATOR/S OR MONITORING

At least 90% of all notifications required by this SOP to be received within the specified timeframe.

If a notification is not received within the notified time frame the submitting project and/or sponsor will be notified that the correct timeframe was not met, what the correct timeframe for the item is and will be provided with a copy or link to this SOP.

LEGISLATION/REFERENCES/SUPPORTING DOCUMENTS

NHMRC National Statement on Ethical Conduct in Human Research (2023, and updates)
NHMRC Safety monitoring and reporting in clinical trials involving therapeutic goods (November 2016 and updates)

NHMRC Reporting of Serious Breaches of Good Clinical Practice (GCP) or the Protocol for Trials Involving Therapeutic Goods (2018)

FURTHER INFORMATION

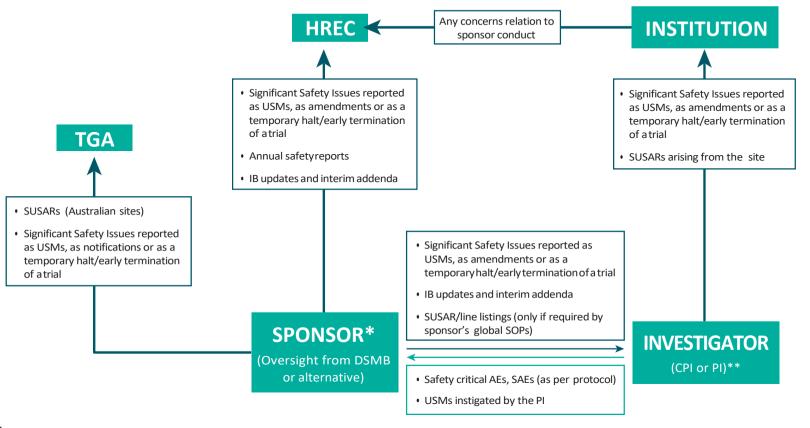
For enquiries related to this Procedure please email ethics@petermac.org
Consult the Peter MacCallum Cancer Centre website: Safety reporting - Peter MacCallum Cancer Centre

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KEY

USM – Urgent Safety Measure

AE – Adverse Event SAE – Serious Adverse Event SUSAR – Suspected Unexpected Serious Adverse Reaction PI – Product Information

SOP – Standard Operating Procedure

IB – Investigator's Brochure

CPI – Co-ordinating Principal Investigator PI – Principal Investigator

DSMB - Data Safety Monitoring Board

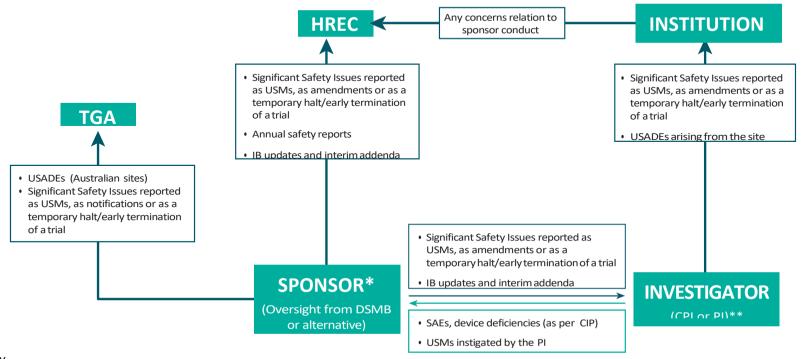
^{*} The sponsor (or their delegate) should report to all parties in accordance with the timelines indicated within this document.

^{**}The CPI should be provided with all correspondence sent by the sponsor to PIs and/or the HREC.



Appendix 2: Reporting Flowchart for Investigational Medical Device

Trials



KEY

AE – Adverse Event
SAE – Serious Adverse Event
USADE – Unanticipated Serious Adverse Device Effect
USM – Urgent Safety Measure

SOP – Standard Operating Procedure

CIP – Clinical Investigation Plan

IB – Investigator's Brochure

IFU – Instructions for Use

DSMB – Data Safety Monitoring Board CPI – Co-ordinating Principal Investigator

PI – Principal Investigator

^{*} The sponsor (or their delegate) should report to all parties in accordance with the timelines indicated within this document.

^{**}The CPI should be provided with all correspondence sent by the sponsor to PIs and/or the HREC.