MELBOURNE HEALTH	OFFICE FOR RESEARCH		
	STANDARD OPERATING PROCEDURE: SOP011		
	Sponsor Responsibilities In Investigator Initiated Studies		
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1. AIM

To define Sponsor Responsibilities in the conduct of Investigator driven studies.

2. SCOPE

All phases of clinical investigational for medical products, medical devices and diagnostics.

3. APPLICABILITY

Where the Investigator/organisation is acting in the capacity the sponsor of a clinical trial.

4. PROCEDURE

4.1 Background

The sponsor for an investigator initiated study may be an individual (eg the investigator or department head), a company (e.g. a not-for-profit) an organisation (e.g. a charity) or an institution (e.g. a public hospital)**.** Each institutional will have its own policy regarding the sponsorship role.

4.2 Sponsor Responsibilities

The sponsor is responsible for:

- Ensuring that any clinical trial involving a drug or device not approved for marketing in Australia (or approved for an indication other than that proposed in the clinical trial) and for which there is no commercial sponsorship, obtains approval from the VMIA.

- Ensuring that Quality Assurance and Quality Control systems are in place to ensure trials are conducted, data is gathered, and subsequently reported, in compliance with GCP, the trial protocol, and any TGA requirements.

- Securing agreement from all involved parties to ensure direct access to all trial related sites, source data/documents, and reports for the purpose of monitoring and auditing by the sponsor, and inspection by domestic and foreign regulatory authorities.

- Ensuring that no omissions occur which might disentitle themselves, the Hospital or HREC, to such indemnity as could otherwise be available under the Medical Indemnity and Public Liability Policies.

- Selection of the appropriate investigator(s) and institution(s) to conduct and complete the trial according to GCP standards.

- Implement a system to manage quality throughout all stages of the trial process using a use a risk-based approach including *Critical Process and Data Identification, Risk Identification, Risk Evaluation, Risk Control, Risk Communication, Risk Review, Risk Reporting*

- Ensure oversight of any trial-related duties and functions carried out on its behalf, including trial-related duties and functions that are subcontracted to another party by the sponsor's contracted CRO(s).

- Develop a systematic, prioritized, risk-based approach to monitoring clinical trials

- Definitive, unambiguous allocation of trial-related duties and responsibilities to trial-related staff.

- The provision of appropriate insurance and indemnity for the trial and trial-related staff, as well as measures for subject compensation for trial-related injury.

- Ensuring the confirmation of endorsement from the relevant HREC(s) and notification of the approval etc. to the TGA.

- Ensuring that funding arrangements are declared in the protocol submissions to warrant that the clinical trial retains its "investigator initiated" status under the VMIA policy.

- Ensuring medical expertise is on hand for trial-related medical queries or patient care.

- Trial design and appropriate analysis.

- Data handling, record keeping, and overall trial management.

- Must maintain all records relating to the study for a period of at least 15 years from the end of the Trial (i.e. completion of data analysis) in the case of adults and at least 25 years from the end of the Trial (i.e. completion of data analysis) in the case of children.

- Ensuring that agreements made with the investigator/institution and any other parties involved with the clinical trial, are in writing, as part of the protocol or in a separate agreement.

- Ensuring that Investigational Products available to subjects free of charge.
- Taking appropriate urgent safety measures (with investigator) where necessary.
- Keeping records of all adverse events reported by investigators.
- Ensuring appropriate manufacture, packaging, labelling/coding and distribution to trial sites of all investigational medicinal products.
- Ongoing safety evaluation and AE/ADR reporting as described earlier in this document.
- Compliance with Monitoring/Audit/Inspection requirements.
- Notification of any premature termination of the trial in question.
- Completion of the Clinical Study Report.

5. GLOSSARY

Adverse drug reaction (ADR)

Adverse drug reactions concern noxious and unintended responses to a medicinal product.

Adverse event (AE)

Any untoward medical occurrence in a patient administered a medicinal product and which does not necessarily have to have a causal relationship with this treatment. An adverse event can therefore be any unfavourable and unintended sign (for example, an abnormal laboratory finding), symptom, or disease temporally associated with the use of a medicinal product, whether or not considered related to this medicinal product.

Clinical Trials Agreement (CTA)

An agreement governing the safety and efficacy of outside collaborators, proprietary biologics or pharmaceutical compounds in clinical studies.

European Union (EU)

An organization of European countries.

Good Clinical Practice (GCP)

A standard for the design, conduct, performance, monitoring, auditing, recording, analyses, and reporting of clinical trials that provides assurance that the data and

reported results are credible and accurate, and that the rights, integrity, and confidentiality of trial subjects are protected.

Human Research Ethics Committee (HREC)

A body which reviews research proposals involving human participants to ensure that they are ethically acceptable and in accordance with relevant standards and guidelines.

The National Statement requires that all research proposals involving human participants be reviewed and approved by an HREC and sets out the requirements for the composition of an HREC.

International Conference on Harmonisation (ICH)

International Conference on Harmonisation of Technical Requirements for Registration of Pharmaceuticals for Human Use is a joint initiative involving both regulators and research-based industry focusing on the technical requirements for medicinal products containing new drugs.

Investigator

An individual responsible for the conduct of a clinical trial at a trial site ensuring that it complies with GCP guidelines. If a trial is conducted by a team of individuals at a trial site, the investigator is the responsible leader of the team and may be called the Principal Investigator. In this instance they may delegate tasks to other team members.

Investigator initiated trial

A clinical trial that has the following characteristics:

- A pharmaceutical/device company is not acting as the sponsor for the purposes of the CTN application.
- A pharmaceutical/device company is not fully funding the conduct of the study, that is, making payment to the relevant hospital or investigator.
- The clinical trial addresses relevant clinical questions and not industry needs.
- The principal investigator or the Hospital/Institution is the primary author and custodian of the clinical trial protocol.

Serious adverse event (SAE)

Any untoward medical occurrence that at any dose:

- Results in death.
- Is life-threatening.

(NOTE: The term "life-threatening" in the definition of "serious" refers to an event/reaction in which the patient was at risk of death at the time of the event/reaction; it does not refer to an event/ reaction which hypothetically might have caused death if it were more severe).

- Requires inpatient hospitalisation or results in prolongation of existing hospitalisation.
- Results in persistent or significant disability/incapacity.
- Is a congenital anomaly/birth defect.
- Is a medically important event or reaction.

Sponsor

An individual, company, institution, or organization which takes responsibility for the initiation, management, and/or financing of a clinical trial.

Sub Investigator

Any individual member of the clinical trial team designated and supervised by the investigator at a trial site to perform critical trial-related procedures and/or to make important trial-related decisions (e.g., associates, residents, research fellows).

Therapeutic Goods Administration (TGA)

Australia's regulatory agency for medical drugs and devices.

6. REFERENCES

1. Note for guidance on Good Clinical Practice (CPMP/ICH/135/96) annotated with TGA comments DSEB, July 2000, section 5.
2. Standard Operating Procedures for Clinical Investigators, World Health Organisation, version 1.1.
3. EU Clinical Trials Directive, Sponsorship responsibilities in publicly funded trials, Medicines for Human Use (Clinical Trials) Regulations 2004, section 5.
4. The Australian Clinical Trial Handbook, the Therapeutic Goods Administration, March 2006.
5. Victorian Managed Insurance Authority Guidelines for Clinical Trials for Victorian Public Hospitals, 2006.

7. APPENDICES

Appendix 1: SOP Change Log

DOCUMENT END

APPENDIX 1 : SOP CHANGE LOG

Version No.	***Reason for Issue***
1	First issue
2	Review content
3	Update template, review content, add the following text: • Implement a system to manage quality throughout all stages of the trial process using a use a risk-based approach including *Critical Process and Data Identification, Risk Identification, Risk Evaluation, Risk Control, Risk Communication, Risk Review, Risk Reporting* • Ensure oversight of any trial-related duties and functions carried out on its behalf, including trial-related duties and functions that are subcontracted to another party by the sponsor's contracted CRO(s). • Develop a systematic, prioritized, risk-based approach to monitoring clinical trials