York and Scarborough Teaching Hospitals NHS Foundation Trust R&D Unit Standard Operating Procedure R&D/S07



# Implementation of Research Study Amendments by the research delivery teams

# IT IS THE RESPONSIBILITY OF <u>ALL</u> USERS OF THIS SOP TO ENSURE THAT THE CORRECT VERSION IS BEING USED

All staff should regularly check the R&D Unit's website and/or Q-Pulse for information relating to the implementation of new or revised versions. Staff must ensure that they are adequately trained in the new procedure and must make sure that all copies of superseded versions are promptly withdrawn from use unless notified otherwise by the SOP Controller.

The definitive versions of all R&D Unit SOPs appear online. If you are reading this in printed form check that the version number and date below is the most recent one as shown on the R&D Unit website: https://www.research.yorkhospitals.nhs.uk/sops-and-guidance-/ and/or Q-Pulse

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This SOP will normally be reviewed every 3 years unless changes to the legislation require otherwise

### **Version History Log**

This area should detail the version history for this document. It should detail the key elements of the changes to the versions.

1 Versi	ion	Date Implemented	Details of significant changes	
1.0		28th September 2009		
2.0		14 <sup>th</sup> November 2011	Update due to new NIHR CSP amendment guidance and changes to definitions by MHRA. SOP separated into separate SOPs for sponsored and hosted studies. Revised to incorporate amendments for non-CTIMP studies.	
3.0		13 <sup>th</sup> May 2013	Removal of references to the North and East Yorkshire R&D Alliance. Addition of Process Flowchart.	
4.0		26 <sup>th</sup> September 2016	Re-write to incorporate the new HRA process	
5.0		15 <sup>th</sup> August 2017	Sent to research teams for feedback: added classification of amendments, amendment categories and split of responsibilities between R&D and Research Teams. Appendix 1 rewritten to reflect HRA process.	
6.0		21 <sup>st</sup> November 2018	Highlighted the need for research teams to agree implementation dates with support departments before making changes	
7.0		15 <sup>th</sup> August 2022	Changes to include new structure to amendment implementation process	

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## 1. Introduction, Background and Purpose

This SOP describes the procedure for implementation of amendments to the protocol, other essential documents or study arrangements for research studies delivered within the Trust.

#### 2. Who Should Use This SOP

This SOP is aimed at Principal Investigators (PIs), research staff and service department's staff involved in delivery of research projects within the Trust.

In this SOP the Trust means York and Scarborough Teaching Hospitals NHS Foundation Trust and applies to all sites within the Trust.

#### 3. When this SOP Should be Used

This SOP should be used:

- When a notification is received that an amendment has been made to a research study.
- When the RSI (Reference Safety Information) has been updated for an externally sponsored clinical trial of an investigational medicinal product (CTIMP).

For CTIMP studies the RSI should be clearly identified in the protocol and specified in the Clinical Trial Authorisation application. The study sponsor should clearly define the RSI for a trial, for example a clearly defined section of the IB (Investigator Brochure) or SmPC (Summary of Product Characteristics).

**Please note:** The entire IB or SmPC is not the RSI, but a clearly defined section within this document. Investigators should confirm with the study sponsor if there is any uncertainty as to where to locate the RSI or what the current version of the RSI is. Any changes to RSI should be submitted to all Sites as a substantial amendment.

# 4. Procedure(s)

#### 4.1 Amendments and their classification

Amendments are changes made to a research study after review body approval has been received. An amendment can be either:

- Substantial; an amendment to the terms of the application, or to the protocol or any
  other supporting documentation that is likely to affect the safety or mental integrity
  of participants, the scientific value of the study, the conduct or management of the
  study or the quality or safety of any IMP in the trial.
- Non-substantial (minor); changes to the details of a trial that are administrative.

It is the Sponsor's responsibility to decide whether an amendment is substantial or non-substantial.

This SOP applies to all substantial and non-substantial amendments.

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Unless it is an Urgent Safety Measure (see R&D/S68) an amendment should only be implemented in the Trust once all approvals from the relevant review bodies have been received (HRA, REC and MHRA).

#### 4.2 Amendment categories

The HRA will assign a category to each amendment:

- Category A: An amendment to a research study that ALL participating NHS organisations are expected to consider.
- Category B: An amendment to a research study that only those participating NHS
  organisations affected by the amendment are expected to consider.
- Category C: An amendment to a research study that participating NHS organisations are not expected to consider.

NOTE: Some sponsors still request a formal review and response within 35 days for category C amendments – hence, make sure you read all emails fully before acting.

#### 4.3 R&D Unit Responsibilities

Amendments should be received from the Sponsor into the research governance mailbox. Upon receipt, research governance will review the amendment. Any amendments that extend the scope or project timelines of a study need to be sent to the Senior Research Nurses for review. If there are no objections, then research governance can commence the amendment review process. The workflow on EDGE will begin, supporting departments will be identified and finally everything will be sent to the CTA Support mailbox so the implementation process can begin.

NOTE: If any of the supporting teams within the wider R&D department receives an amendment directly from the Sponsor, they should forward it to the research governance mailbox.

Once all relevant regulatory approvals and local approvals (from the study PI/Research Team & relevant support departments) have been received, the R&D will issue Confirmation of Continuing Capacity and Capability. This email simply tells the sponsor everyone involved is happy with the changes. It is NOT an email to initiate implementation of the amendment. The R&D Confirmation of Continuing Capacity and Capability email has been updated to highlight the need to contact support departments to agree an implementation date.

#### 4.4 CTA Support and Team Responsibilities to review the amendment

The CTA Support Team will be responsible for implementing any amendments. Once research governance has conducted their review it will be passed on to the CTA Support mailbox. The CTA Co-ordinator will assign the received amendment to a CTA within one working day. This CTA will usually be that particular Care Groups named CTA but any CTA within the team is able to work on any amendment.

It is the responsibility of the CTA to gather all the internal approvals/objections for the received amendment. At a minimum these will be from the PI and the research nurse team working on that particular study. If any supporting departments are involved then approvals/objections will be needed from them too.

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On receipt of an email from R&D confirming Continuing Capacity and Capability, the research team (or delegated other) should contact the relevant support departments and agree a local implementation date on which the amendment will be implemented in the Trust. This is done because support departments sometimes need to make many changes to their documents and labels before they can implement amendments.

#### 4.4 PI and Research Team Responsibilities to review the amendment

The PI is responsible for either carrying out the tasks outlined below or for ensuring formal delegation to an appropriate member of the Investigator Team.

Upon receipt of an amendment details fromone of the CTAs, the Research team and PI must review the amendment details.

Research teams should ensure that amendments are reviewed carefully. If there is any aspect of an amendment that the team are unsure about, they should liaise directly with the study Sponsor and the PI. If the research team and the PI do not wish to implement the amendment, Research Governance must be informed within **35 days** of the notification of the amendment. If more time is required to review the amendment, please inform Research Governance in order to ensure that the amendment is not automatically implemented after **35 days**.

The PI should confirm that they are happy to proceed with the amendment in order to demonstrate oversight and there should be documented evidence of this in the study Investigator Site File (ISF). Amendments should not be implemented without review and approval by the PI.

If the Research Governance team do not hear anything within **35 Days** of notification of the amendment, approval will be assumed, and an email of Continuing Capacity and Capability will be sent to the Sponsor once all relevant regulatory approvals have been received.

#### 4.5 Implementing Amendments in the Trust

It is the responsibility of the assigned CTA to implement the received amendment.

For substantial amendments, the Amendment Checklist (see R&D/F18) should be used to manage the implementation process.

All amendments should be logged on an Amendment Log (R&D/F118) and on the CTA Workload Spreadsheet.

Teams should print and file the following documents in the Investigator Site File (ISF):

- REC favourable opinion letter
- MHRA approval (for a substantial amendment to a CTIMP)
- HRA Assessment
- HRA Approval
- PI/Research Team's approval/or rejection of the amendment
- R&D Continuing Capacity & Capability email

Teams must also:

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- Print and file the completed Amendment Checklist (R&D/F18)
- Update the study amendment log (R&D/F118)
- Print and file the relevant amended study documents/supersede old versions, and update the study Document Version Control Log.
- Inform wider clinical team that assists with patients' recruitment if eligibility criteria or information about the study is affected.
- Replace any superseded documentation in clinical areas (if applicable) or on computer systems.

If the amendment cannot be implemented on the agreed date for any reason, document the reasons why on the R&D/F18.

#### 5. Related SOPs and Documents

R&D/S75 R&D Processing of Amendments

R&D/F18 Amendment Checklist (Research Team)

R&D/F118 Amendment Log

R&D/F101 Document Version control log

CTA Amendment Quick Guide

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#### Appendix 1

Notification of Amendment received to Research.Governance@York.NHS.

Notification of Amendment received to Research Teams/ CTAs/PIs' inbox

Forward the received AM to Research.Governance@York.NHS.UK

Research.Governance@York.NHS.UK reviews the amendment details – any amendments extending the project timelines or scope (e.g. adding new arm) please send to SeniorResearchNurse@YORK.NHS.UK for no objection review.

<u>SeniorResearchNurse@YORK.NHS.UK</u> review and respond within 1 working day to <u>Research.Governance@York.NHS.UK</u>

If no objection confirmed by SRNs, <a href="mailto:Research.Governance@York.NHS.UK">Research.Governance@York.NHS.UK</a> starts the Amendment review process:

- start EDGE workflow
- specify which support departments are involved
- email it to CTA Support CTASupport@york.nhs.uk for processing

CTASupport@york.nhs.uk assigns the received Amendment to a CTA – within 1 working day

The assigned CTA starts the local review process:

- Add it to the workload spreadsheet
- Request CG/ RNs review and approval
- Request PI review and approval
- Request Support departments review and approval
- Collate all responses and forward to <u>Research.Governance@York.NHS.UK</u>

#### CTA checklist:

- Follow the Amendments Checklist F18
- ✓ Are there any delays?/ can we confirm continuing CaC within 35 days? – please make sure the study sponsor is kept informed
- ✓ Please make sure all parties are kept up to date with the progress

Research.Governance@York.NHS.UK updates the workflow, confirms continuing CaC to the sponsor & triggers local implementation

The assigned CTA starts local implementation:

- Agree implementation date with the CG/ RNs & PI and support departments
- Inform the study sponsor
- Make sure the Amendment changes are implemented by the end of the day on the agreed date

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