

Reporting Requirements During Research Studies

**IT IS THE RESPONSIBILITY OF ALL USERS OF THIS SOP TO ENSURE THAT
THE CORRECT VERSION IS BEING USED**

All staff should regularly check the R&I Department'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 Staff must ensure that they are adequately trained in the new procedure and must make sure that all copies of superseded versions are promptly withdrawn from use unless notified otherwise by the SOP Controller.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&I Department 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&I Department website:

www.research.yorkhospitals.nhs.uk/sops-and-guidance-/ and/or Q-Pulse

SOP Reference:	R&D/S06
Version Number:	7.0
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Implementation date of current version:	13 th May 2026

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	Date:	15 th April 2026

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.

Version	Date Implemented	Details of significant changes
1.0	12 th November 2009	
2.0	21 st November 2011	Scheduled review. Inclusion of DSUR. Amended to be applicable to non-CTIMP studies.
3.0	15 th July 2013	Removal of references to the North and East Yorkshire Alliance. Change of fax number.
4.0	15 th August 2017	Change of title and removal of safety aspects to alternative SOPs as existing title confusing
5.0	20 th March 2019	Change in procedure for quarterly reporting of Trust Sponsored Studies. Update to link for R&D website
6.0	21 st November 2022	Updates to all external review process submission guidelines and processes following Brexit and implementation of combined review/MHRA submissions.
7.0	13 th May 2026	Updated to remove annual REC reports. Updates to DSUR process, quarterly QA reviews. Added section for funder reporting

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1 Introduction, Background and Purpose

For all research studies there is a requirement to complete reporting. The type of reporting required is dependant on the type of study and the approvals received.

Clinical Trials of Investigational Medicinal Products (CTIMPs) are legally regulated by the Medicines for Human Use Act 2004 and regulations made by statutory instrument under that Act. This legal framework imposes a number of reporting requirements in addition to those relating to specific adverse events. These reports must be made to the Medicines and Healthcare Products Regulatory Agency (MHRA) and the Research Ethics Committee that gave the favourable ethical opinion for the study (REC).

For non-CTIMPs there are requirements to report various matters to RECs and/or HRA.

For studies where external funding has been received there may be a requirement to provide funder reports at time points specified by the funder

In addition to this external reporting investigators are required to inform R&I Department responsible for care organisations in which research is conducted of any significant matters relating to the research of which these organisations should be aware. This SOP details how these responsibilities should be discharged.

2 Who Should Use This SOP

This SOP should be used by all staff involved in research studies sponsored or co-sponsored by the Trust and by personnel in the R&I Department.

3 When this SOP Should be Used

This SOP should be used when the Trust is the sponsor or co-sponsor of a research study where reporting requirements will exist throughout and at the end of that study. This SOP details those requirements and whilst this document is reviewed and updated regularly all users are strongly advised to refer to the relevant sections of the HRA and MHRA websites to ensure that the correct procedures are being followed.

4 Procedure(s)

4.1 Development Safety Update Report (DSUR) for CTIMPs only

For all CTIMP studies, sponsors are required to submit a safety report to the MHRA and REC, once a year or on request. Preparation of the DSUR is delegated to the CI but the Sponsor must review and approve the report prior to the submission being made. Enough time must be allowed for this when considering the timescales of the submission.

4.1.1 Background to the DSUR

Required from 1st September 2011, this is intended to be a common standard for periodic reporting on drugs under development (including marketed drugs that are under further study) among the International Conference on Harmonisation (ICH) regions.

The DSUR is intended to present a comprehensive annual review and evaluation of pertinent safety information collected during the reporting period by: (1) examining whether the information obtained by the sponsor during the reporting period is in accord with previous knowledge of the investigational drug's safety; (2) describing new safety issues that could have an impact on the protection of clinical trial subjects; (3) summarising the current understanding and management of identified and potential risks; and (4) providing an update on the status of the clinical investigation/development programme and study results.

A DSUR should be concise and provide information to assure regulators that sponsors are adequately monitoring and evaluating the evolving safety profile of the investigational drug. All safety issues discovered during the reporting period should be discussed in the text of the DSUR; however, it should not be used to provide the initial notification of significant new safety information or provide the means by which new safety issues are detected.

4.1.2 Responsibility and timelines for submission of DSUR

Responsibility for preparation and submission of the DSUR within the specified timescales is delegated to the CI. Reports must be provided at yearly intervals for the duration of the trial, from trial authorisation until termination.

The 'Development International Birth Date' (DIBD) determines the start of the annual reporting period for the DSUR. This date is the Sponsor's first authorisation to conduct a clinical trial in any country worldwide. The data lock point of the DSUR should therefore be the last day of the one-year reporting period.

The DSUR must be submitted to all concerned regulatory authorities **no later than 60 calendar days** after the DSUR data lock point.

The due date of the DSUR must be clearly documented in the ISF/TMF.

4.1.3 DSURs for Combination Therapies

In general, a single DSUR should be prepared for clinical trials involving a fixed combination product (i.e. a product consisting of at least two active ingredients in a fixed dose that is administered in a single dosage form). If the sponsor is also conducting clinical trials with individual component(s) of the fixed combination product, separate DSUR(s) should be submitted for each component.

4.1.4 Reference Safety Information

The Investigator's Brochure (IB) in effect at the start of the reporting period is the reference document to determine whether the information received during the reporting period remains consistent with previous knowledge of the investigational drug's safety profile. The IB version number and date must be stated in the DSUR. When an IB is not required for a study, the Summary of

Product Characteristics (SmPC) should serve as the reference safety information and version information given similarly.

The IB or SmPC should contain a discrete section, which is the Reference Safety Information (RSI), allowing the IB or SmPC to be updated independently of the RSI.

The IB in place at the beginning of the reporting period should be appended to the DSUR, regardless of whether the IB or SmPC was altered during the period of the DSUR. The RSI in place at the beginning of the reporting period should be the reference for the expectedness assessments in the DSUR line listings, regardless of whether the RSI was updated during that reporting period. If the IB or SmPC was updated during the reporting period the current version should also be submitted.

The DSUR should include the date and version number of the IB or SmPC and the section used as the RSI.

4.1.5 Completing the DSUR

The DSUR has a standard format the MHRA website should be checked for the latest instructions for completion and submission.

<https://www.gov.uk/guidance/clinical-trials-for-medicines-manage-your-authorisation-report-safety-issues#development-safety-update-reports-dsurs>

Unless a trial has gone through the combined review process this should be submitted to the MHRA using MHRA Submissions via the Human Medicines option. Select 'Development Safety Update Report' as the Regulatory Activity and 'Original Submission' from the Regulatory sub activity dropdown list.

If at least one of the trials covered by the DSUR has gone through the Combined Review process, then the report should be submitted via the Integrated Research Application System (IRAS). It is important to allow sufficient time to check the latest instructions for completion and submission of the DSUR on the MHRA website before the due date in the event of any changes to this process.

The DSUR should include:

- a cover letter which includes:
 - a listing all the IRAS IDs and/or EudraCT numbers of trials covered by the DSUR.
 - an email address for correspondence
 - the payment reference number in the format: 'DSUR-[5 digit MHRA company number]-[IMP name]-[Payment date DD/MM/YYYY]'
- an analysis of the patients' safety in the concerned clinical trial(s) with an appraisal of its ongoing risk/benefit
- a line listing of all suspected serious adverse reactions (including all SUSARs) that occurred in the trial(s), including all SUSARs from third countries
- an aggregate summary tabulation of SUSARs that occurred in the concerned trial(s)

- region-specific information in accordance with guidelines on how to increase transparency (see below)

Full details of what to include in a DSUR can be found in the ICH E2F guidance. https://database.ich.org/sites/default/files/E2F_Guideline.pdf.

In case of a first-in-man trial and subsequent short-term metabolism or pharmacokinetic studies the DSUR should be notified within 90 days of the end of trial together with the notification of the end of the trial.

4.1.6 Submitting the DSUR

The CI should ensure that the DSUR is reviewed and approved by the Sponsor Representative in the R&I Department prior to submission. The CI is responsible for submitting the DSUR.

For submissions through the MHRA's Medicines Portal, acknowledgements of receipt for DSUR submissions are generated by MHRA Submissions where a confirmation of submission is emailed to the reporter.

For DSURs submitted via IRAS after submission you will find a record of the DSUR under 'Project History' on the project details page. You can check here to confirm the status of your submission (pending / invalidated / completed etc) and you can also see details of any requests for further information (INRFI) – these will also flag up as clarification requests under 'My Tasks'.

DSURs do not need to be reported separately to the REC.

At the end of the DSUR reporting period the sponsor should assess the new safety information that has been generated and submit any proposed safety changes to the investigator's brochure as a substantial amendment. This amendment must be supported by the DSUR and approved before the reference safety information (RSI) is changed.

4.2 Quarterly Study Review Report (QSR) (all studies)

To ensure adequate sponsor oversight a quarterly report must be submitted for all Trust Sponsored studies for consideration at the Research Quality Assurance Group (RQAG) meetings. Reports are required quarterly, in January, April, July and October, unless specified otherwise by the R&I Unit and should be submitted on the template referenced in Section 5 R&D/F22 Quarterly Study Review (QSR) Form for Trust Sponsored Studies or R&D/F03 Quarterly Study Review (QSR) Form for Trust Sponsored Studies (anonymised data collection studies only). The report should be submitted to the R&I Department via yhs-tr.research.enquiries@nhs.net. The research Programme Manager will review these and send to yhs-tr.research.ga@nhs.net no later than 7 working days before the due date of the designated review meeting.

4.3 Notification of End of Study (all studies)

The CI must notify the R&I Department of the end date as soon as a study has ended.

The CI must then complete the correct Form (available to download from the HRA website) and submit within 90 days of the global end of trial and within 15

days of the global premature end of the trial. Investigators must ensure that the correct form is used for CTIMP, non-CTIMP or device studies.

Final analysis of the data (following 'lock' of the study database) and report writing is normally considered to occur after formal declaration of the end of the study.

It is not possible to submit amendments to the trial or the DSUR once the declaration of the global end of the trial form has been received by the MHRA. If the end of trial declaration has been received within a reporting period, or within 60 days following the data lock point, the corresponding DSUR will not be required.

Before the declaration of the end of the study is completed, the plans that have been approved by the REC for use of tissue and data collected in the course of the study, providing information to participants, and dissemination of results must be reviewed. If any changes need to be made to these approved arrangements consideration must be given as to whether a substantial amendment is required before submitting the end of study notification.

Where a project has HRA Approval and has been reviewed by a REC you need only inform the REC when your study has ended. Where a project has HRA Approval and was not reviewed by an NHS REC, you will need to tell HRA when the project has ended. You should send this notification by email to hra.approval@nhs.net including your IRAS ID and your contact information (phone and email).

Submission must be made to the MHRA, REC and/or HRA as appropriate. Refer to the HRA website for information or seek advice from the R&I Department.

A copy of the signed completed notification must be retained in the ISF/TMF together with evidence of submission.

If a CTIMP is terminated before the date specified in the protocol for its conclusion the CI must notify the R&I Unit immediately and is responsible for notifying the MHRA and the REC as soon as possible and within 15 days of the date of termination by submitting the declaration as described above. This must be undertaken in an expedited fashion.

4.4 Final report on the research (all studies)

All project-based research (not research tissue banks or research databases) that has been reviewed by a REC, needs to submit a final report. This is listed in the Standard Conditions issued with the decision letter.

The time frame for publishing the summary of results is within 12 months of the end of the study. Where applicable, you should publish your summary results within this timeframe in the public register (or registers) where you have registered your study.

Where the study may be multi-national this is the end of study in all participating countries and not just in the UK.

If the study was approved via combined review, the final report form can be completed and submitted in IRAS.

All other project-based research reviewed by a REC, should use the form on the HRA website.

There is no need to submit a CSR (Clinical Study Report) to the REC for any CTIMP. The information relevant for the REC is captured in the final report form.

You do not need to submit a clinical trial summary report to the MHRA as well however, for CTIMPs the CI must send a short confirmatory email to CT.Submission@mhra.gov.uk. The subject line of the email notification must state 'End of trial: result-related information: EudraCT XXXX-XXXXXX-XX' and/or IRAS ID XXXXXXX' once the result-related information has been uploaded to the public register. If your clinical trial is not on a public register or the results will not be published in the register (for example an adult phase I study), summary results should be submitted via MHRA Submissions. An acknowledgement letter will not be sent for this submission.

For clinical investigations of a medical device, you should send a copy of the final report to the MHRA when it is available.

If your trial has gone through the Combined Review process, then the final report form should be submitted via IRAS. More information on how to submit an end of trial via IRAS can be found on HRA's website.

Copies of all final reports should be submitted to the R&I Department also. These will be shared with the Trust's R&I Group.

4.5 Funder reports

Where the study has received funding there may be a requirement to complete progress and/ or finance reports.

The CI and/ or award holder is responsible for ensuring that any reports to the funder are completed and submitted within the required timeframe.

This may be delegated to a member of the study team however the CI and/ or award holder must review this before submission.

5 Related SOPs and Documents

R&D/S05 Research Related Adverse Event Reporting Procedure for CTIMP studies (Including reporting a Pregnancy)

R&D/S07 Implementing Amendments for Research Studies NOT Sponsored by the Trust

R&D S74 Making Amendments to Trust Sponsored Research Studies

R&D/F21 Developmental Safety Update Report (DSUR) Form

R&D/F22 Quarterly Study Review Form for Trust Sponsored Studies

R&D/F03 Quarterly Study Review Form – Trust Sponsored Studies (Anonymised data collection studies only)