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ClinicaltrialsNSW

Overview and Quality Improvement Initiatives

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Agenda

- clinicaltrialsNSW overview
- Quality Management System:
  - ✓ standard operating procedures (SOPs)
  - ✓ Good Clinical Practice
- NSW Health SOPs for sites
- Quality Improvement Initiatives
- National Teletrials Compendium

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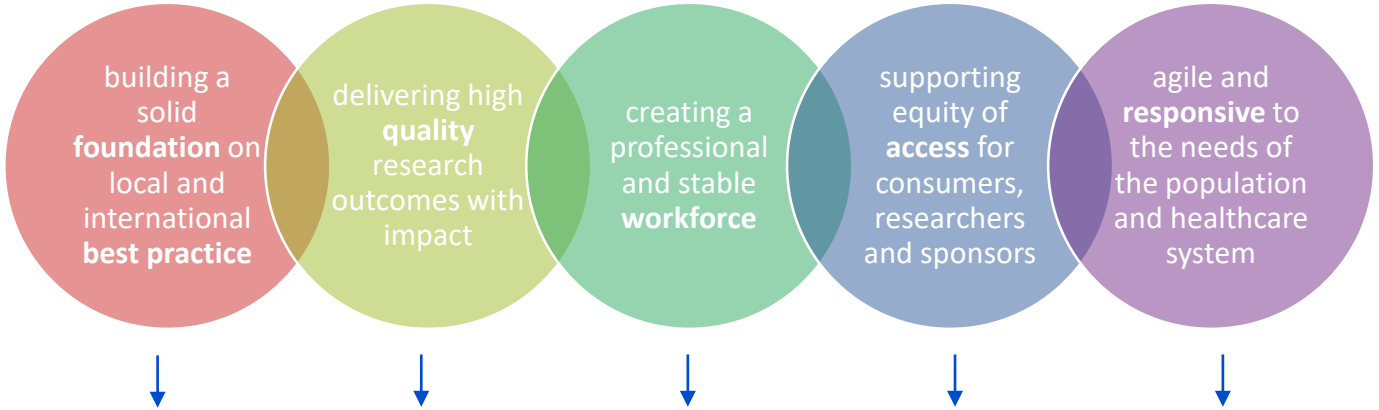
clinicaltrialsNSW

Established 2018 to enable clinical trial capacity, capability and collaboration across NSW

transforming clinical trials in NSW



mature, interconnected clinical trials sector
embedding research into health service delivery
providing equity of access to innovative healthcare

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Initiatives

COVID-19 Responsive

- NSW Health COVID-19 Clinical Trials Guidance
- Waratah Vaccine Trial Alliance
- Adaptive Platform Trials

Quality

- Early Phase Clinical Trials Framework
- ACSQHC The National Clinical Trials Governance Framework

Best Practice

- Clinical Trials Management System
- Trial Funding and Site Financing

Workforce

- Workforce analysis
- Education & Training: GCP & ISO14155 Training

Access

- Rural Regional & Remote Clinical Trials Program

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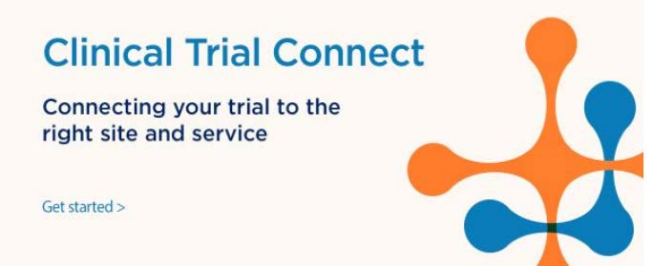
clinicaltrialsNSW Concierge

Core programs – supporting clinical trials across NSW LHDs and MRIs



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Quality Management System

Standard Operating Procedures for clinical trials

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Quality Management System

- Formalised system that documents processes, procedures, and responsibilities for achieving quality policies and objectives
- Helps coordinate and direct an organization’s activities to meet regulatory requirements and improve its effectiveness and efficiency on a continuous basis.

• Multiple levels of the clinical trial process:

- Sponsor level
- External clinical monitoring level
- Study level and
- Individual site level

Components of Quality Management

A set of operational activities intended to ensure the quality requirements are actually being met. It is the ongoing review of data collection forms and other records for completeness and logic

A set of activities intended to
a) establish quality requirements and procedures
b) ensure that those requirements are being met and procedures followed
c) Verify that quality is being maintained
This includes the generation of procedural documents to guide quality activities and the review of documentation to assess adherence to written procedures, policies and regulations

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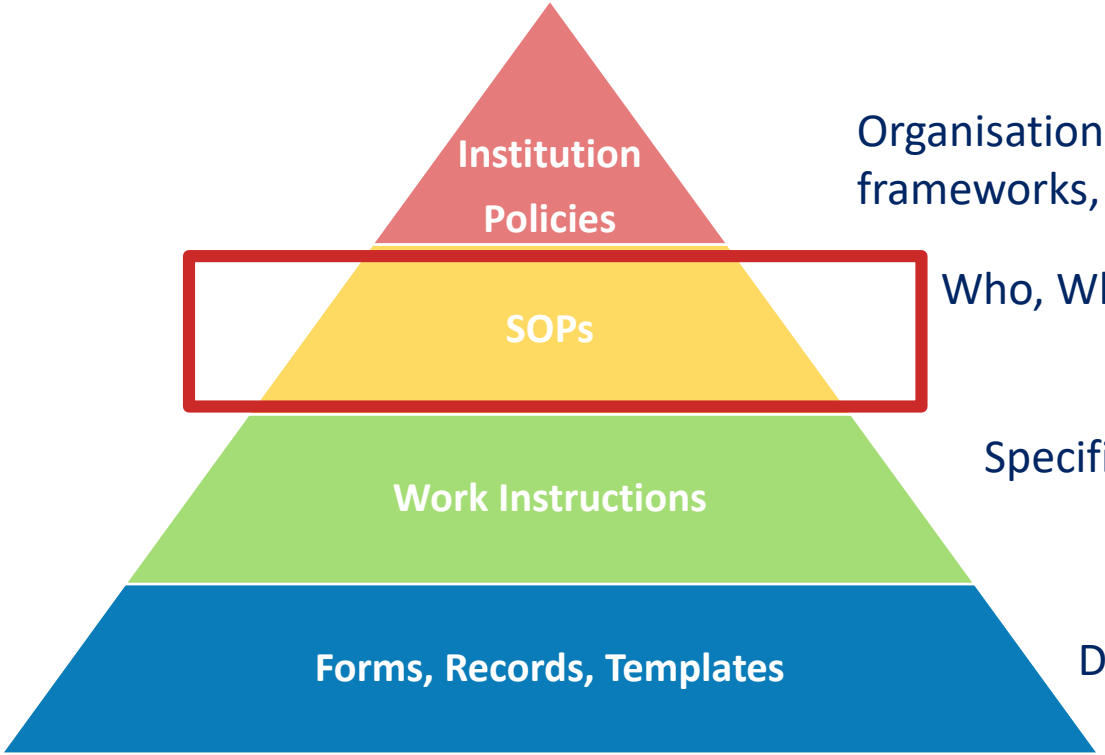
Quality Management System- Documentation



Organisation's strategic policies and frameworks, corporate manuals

Who, What, When, Where

Specific tasks and how to do them

Documents to record compliance

Definition- SOP

- detailed written instructions to achieve uniformity of the performance of a specific function
- systems with procedures that assure the quality of every aspect of the trial should be implemented
- an effective catalyst to drive performance improvement and improve organizational results
- create the level of quality and accepted practice for a specific procedure
- Foundation of every good **quality system**

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Good Clinical Practices

- A set of internationally recognized ethical and scientific quality requirements which must be observed for designing, conducting, recording and reporting clinical trials that involve the participation of human subjects
- Compliance with this good practice provides assurance that the rights, safety and well-being of trial participants are protected, and that the results of the clinical trials are credible
- Consistent with the Declaration of Helsinki

Medical device

- Clinical investigation of medical devices is not strictly governed by ICH-GCP
- Device trials must be conducted in accordance with ISO standard 14155 on the *Clinical Investigation of Medical Device on human subjects*
- However many of the principles of ICH-GCP are also found in the devices regulations and standards

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NSW Health SOPs for the conduct of clinical trials

Initiative by clinicaltrialsNSW

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NSW Health SOPs for clinical trial sites

These generic SOPs:

- provide a basic framework for NSW PHOs to comply with the principles of GCP
- provide the necessary tools to ensure that clinical trial sites are able to operate to ICH-GCP standards by efficiently providing operating documentation
- assist the NSW PHOs to operate to ***at least minimum GCP requirements when conducting clinical trials***

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https://www.medicalresearch.nsw.gov.au/clinical-trial-toolkit/

Areas covered

Associated with these SOPs are a number of work instructions and templates.

- SOP-QA-01 clinical trial training and qualification
- SOP-QA-02 hosting an audit or regulatory inspection
- SOP-QA-03 sub-contracting external vendors
- SOP-TC-01 trial feasibility and start up
- SOP-TC-02 PI delegation of duties
- SOP-TC-03 informed consent
- SOP-TC-04 managing and reporting safety events
- SOP-TC-05 non-compliance and suspected breaches gcp protocol
- SOP-TC-06 IMP management and emergency unblinding
- SOP-TC-07 source data and CRF completion
- SOP-TC-08 handling and transporting biological specimens
- SOP-TC-09 investigator site file and essential documents
- SOP-TC-10 close out at trial site
- SOP-TC-11 clinical trial archiving

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Scope

- Set of generic SOPs has been developed to assist the NSW PHOs to operate to ***at least minimum GCP requirements when conducting clinical trials***
- Intended to complement and augment rather than replace, current SOPs that your institution may have
- Where local requirements need to be added the SOPs should be updated to reflect actual practice at your institution
- Used as a guide only and be adapted, adopted and version controlled to ensure, where possible, standard application across your entire organization
- Site specific implementation of GCP is required to comply with regulations but the actual processes can vary from site to site

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Out of Scope- NSW Health SOPs for clinical trial sites

- DO NOT cover the areas of Ethics Committees and broader issues of research ethics and governance as these are more specifically addressed in the National Statement and/or Institutional policies and procedures
- NOT intended to replace legislation or published guidance
- The resources should NOT be relied upon as a complete summary of obligations on public health organisations in relation to clinical trials and are not intended to circumvent clinical judgement or replace locally developed clinical trials policies

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Implementation approach

- In many institutions, there are a number of SOPs already in place
- Collate your institution's SOPs that cover aspects of safety and patient care
- Collate your existing site/ departmental SOPs
- Perform a gap analysis of what GCP aspects are not covered
- Institutions may choose to adopt the NSW Health generic SOPs unchanged or incorporate them into their existing documents
- As mentioned before, NSW Health SOPs represent the ***minimum requirement to meet GCP obligations***

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Implementation approach (cont.)

- In general it would be expected that where the SOPs are modified, the modification would tighten or expand on requirements rather than reduce the requirements
- NSW PHOs can download the files from our website so that they can further develop and implement their own procedures from the generic document provided
- Once implemented the SOPs will provide a basic operational documentation system that should be version controlled and reviewed at regular intervals for current applicability

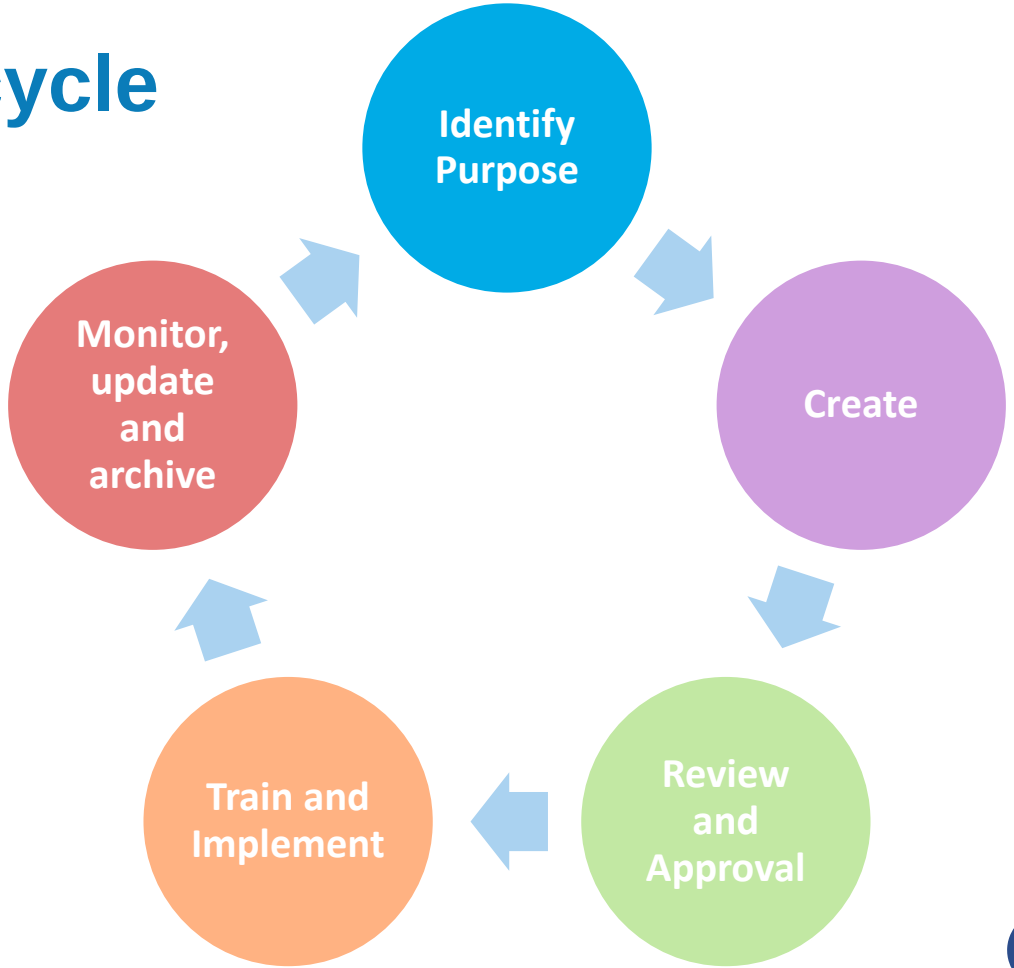
Staff training

- Relevant staff should be made aware of the SOPs and the institutional policy regarding adherence to them
- SOP should be accessible to staff
- All staff should have SOP training including GCP training
- Training should be documented

Monitor and Review SOP

- Should be reviewed on a regular basis (usually annually or every 2 years) to ensure its up to date, current and active
- A delegated senior staff
- Independent audit reviews to ensure compliance with national and international standards
- Managed through the document control system of the institution adopting them

SOP Lifecycle



Benefits

- **protect the rights and welfare of human study participants.**
- provides autonomy within the clinical site
- improves the quality of the data collected
- utilized as a reference and guideline as to how research will be conducted within the clinical site
- excellent training source for new employees and/ or fellows
- Sponsor confidence boosters
- assist to meet accreditation and inspection requirements

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Quality Improvement Initiatives

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National Clinical Trials Governance Framework (CTGF)

Initiative by the Australian Commission on Safety and Quality in Health Care

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National Clinical Trials Governance Framework

Australian Commission on Safety and Quality in Healthcare has introduced a clinical trials component to the National Safety and Quality Health Service (NSQHS) Standards accreditation for institutions

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National Clinical Trials Governance Framework

Clinical Governance Standard

Intention

- To implement governance for clinical trial services that ensure patients and consumers receive safe and high-quality clinical trial services.

Partnering with Consumers Standard

Intention

- To create an organisation in which there are mutually beneficial outcomes by having:

✓ Consumers as partners in planning, design, delivery, measurement and evaluation of systems to deliver clinical trial services

✓ Trial participants and patients as partners in their own care, to the extent that they choose

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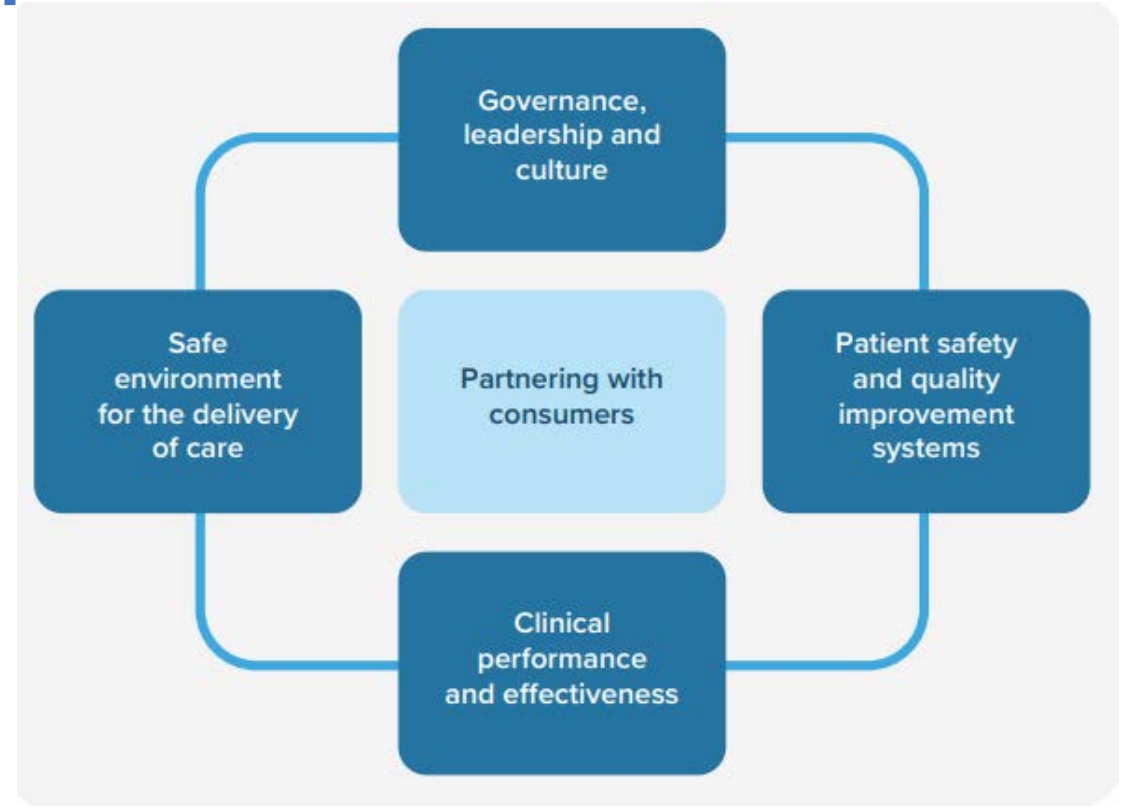
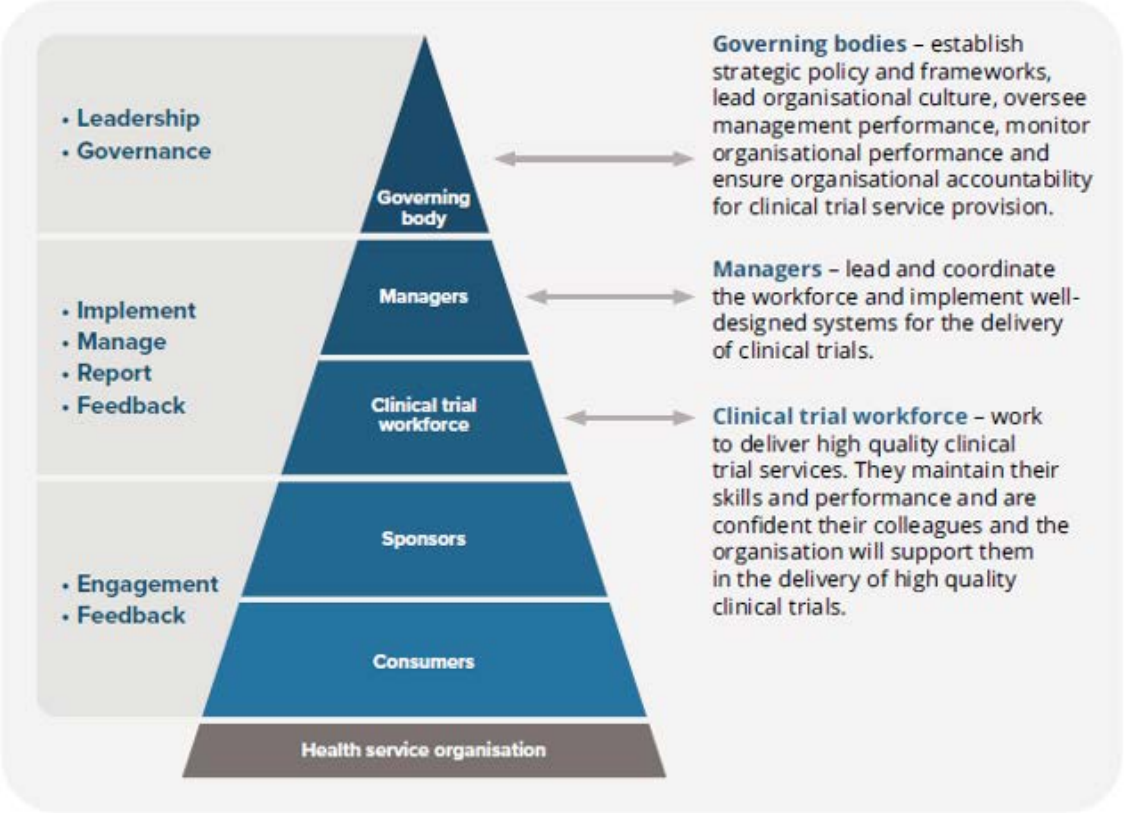
Components of the National CTGF



https://www.safetyandquality.gov.au/sites/default/files/2020-02/national_clinical_trials_governance_framework_and_user_guide_-draft_for_pilot_2020.pdf

Roles and functions of identified positions



https://www.safetyandquality.gov.au/sites/default/files/2020-02/national_clinical_trials_governance_framework_and_user_guide_-draft_for_pilot_2020.pdf

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Early Phase Clinical Trials Quality Recognition Scheme (EPCT QRS)

Initiative by the Office for Health and Medical Research

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Background

- Part of the Early Phase Clinical Trials Framework
- Ensures operational conduct is aligned with best practice nationally and internationally
- Recognises sites that have the capability to conduct high quality early phase trials
- Value to the health sector:
  - ✓ Support decision making for Public Health Organisations: Confidence that a trial site meets a high standard of conduct
  - ✓ Increase attractiveness of the site to sponsors

Five Standards

1. Adequate Medical and Clinical Governance Oversight at site level
2. Efficient and effective systems and processes to ensure quality
3. Risk Assessment and Management Procedures in place demonstrating that the site continuously verifies and assesses all aspects of the early phase clinical trials
4. Appropriate research team experience and qualification for early phase clinical trials
5. Adequate infrastructure and resources to conduct clinical trials and appropriately respond to medical emergencies

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https://www.medicalresearch.nsw.gov.au/early-phase-clinical-trials-2/

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Good Clinical Practice Inspection Program

Initiative by the Therapeutic Goods Administration (TGA)

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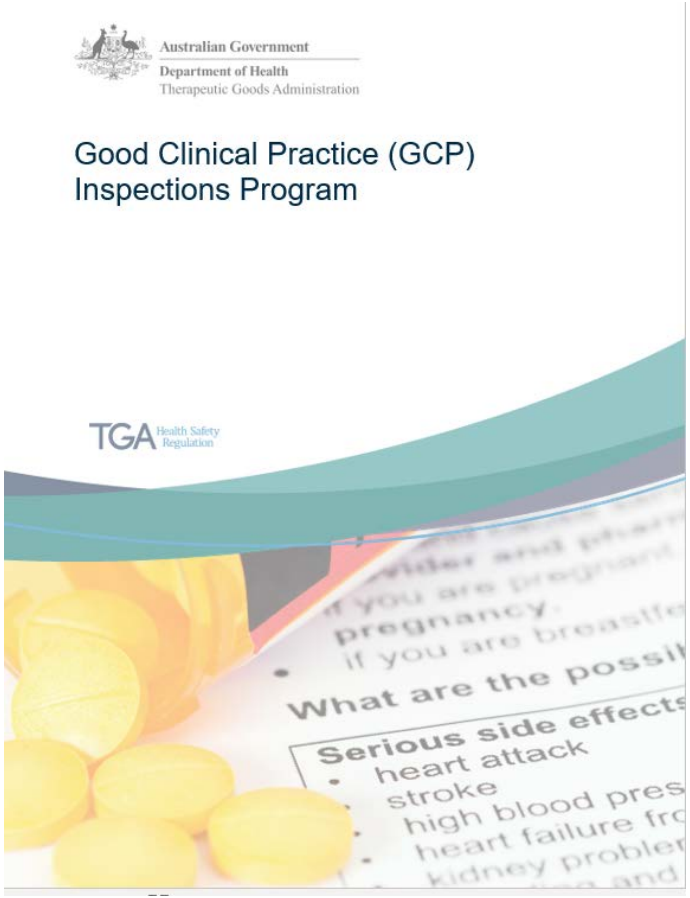
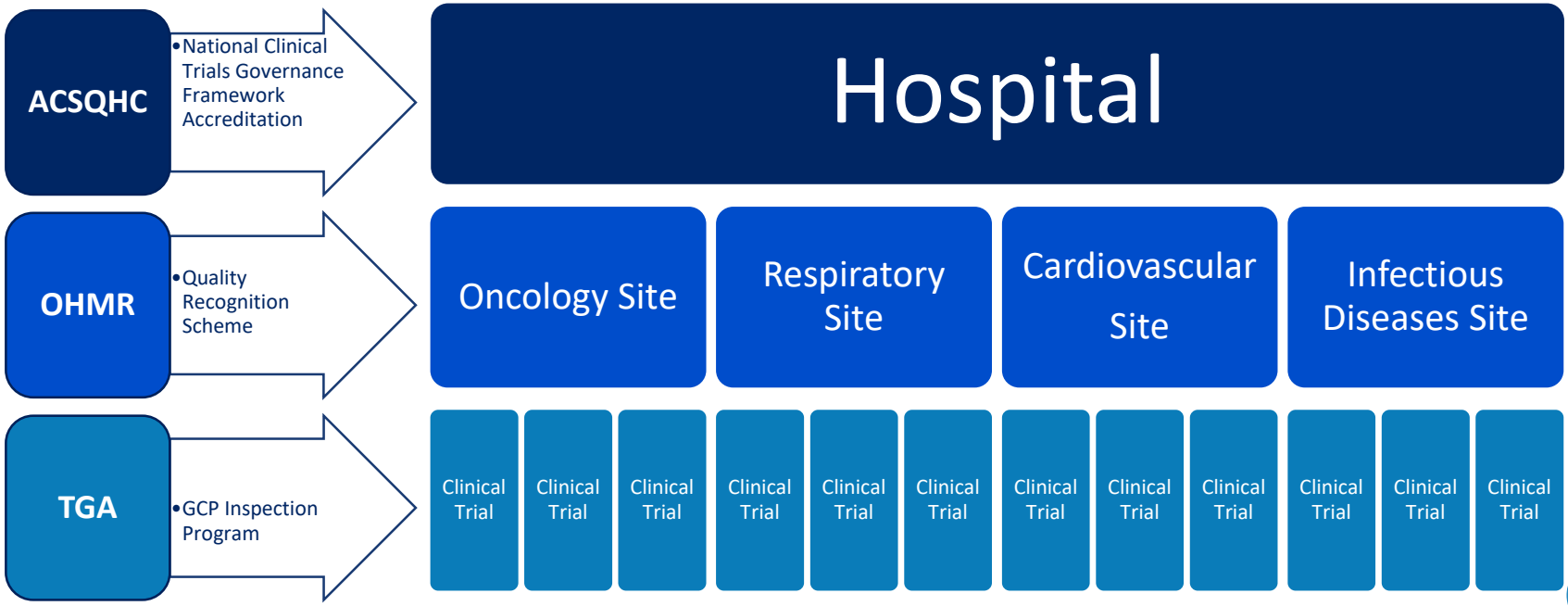
Overview

- A domestic regulatory GCP inspections program
- To strengthen Australia as an attractive clinical trial research destination for both the local medical technologies, biotechnology and pharmaceuticals sector
- Encourage compliance and provide the TGA with a capability to investigate non-compliance should it be reported (e.g., triggered inspections).



https://www.tga.gov.au/seeking-volunteers-good-clinical-practice-inspection-program

How all fit together



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National Teletrials Compendium

Australian Government Initiative

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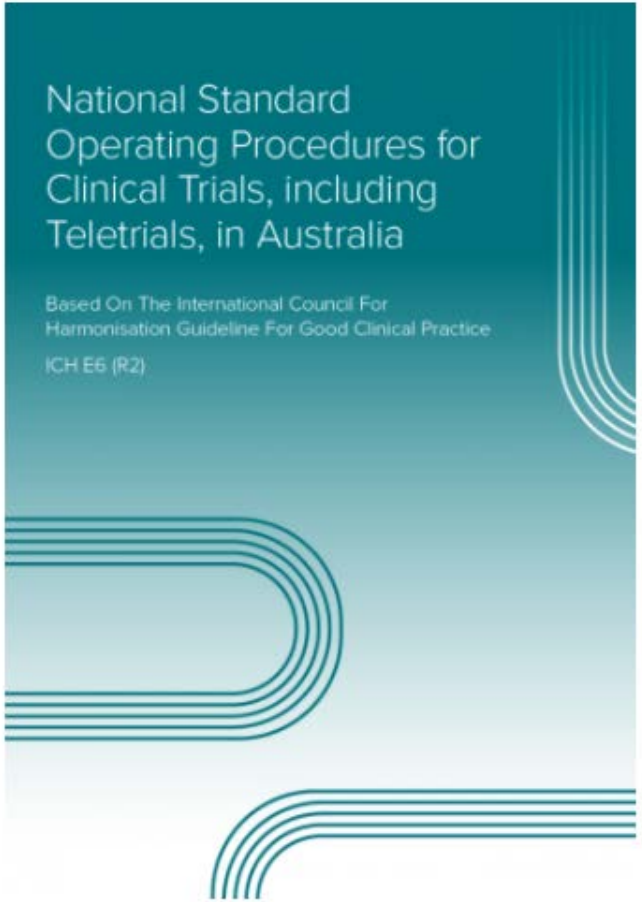
Scope

Two Publications:

1. Principles and
2. Standard operating procedures (SOPs) for clinical trials and teletrials

- agreed to by all states and territories and will help organisations and people who conduct clinical trials
- Endorsed by NSW Health



https://www.health.gov.au/resources/collections/the-national-teletrials-compendium

ICH- E6 (R3)- on the Horizon

E6(R2) is not fully designed to address emerging technologies, innovations in trial design, the diversity of data sources, testing facilities, and service providers, or to address other emerging complexities of the current clinical trial climate in light of COVID-19

The action proposed is a full rewrite and reorganization of the ICH E6 (R2) Guideline….and will include addressing the application of GCP principles to the ***increasingly diverse trial types*** *and the* ***data sources*** *being employed to support regulatory and healthcare-related decision-making on drugs, and* ***provide flexibility*** *whenever appropriate* ***to facilitate the use of technological innovations*** *in clinical trials.*

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Remember

If it isn’t written down, it didn’t happen

If it isn’t written down properly, it didn’t happen either.

- Don’t stop at being a GOOD clinical trial site
- Become a GREAT clinical trial site

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Regulatory Frameworks: Resources

Regulatory Framework	Description
Integrated Addendum to ICH E6(R1): Guideline for Good Clinical Practice E6(R2), annotated with TGA comments	Internationally accepted standard for the designing, conducting, recording and reporting of clinical trials. If requirements specified in the National Statement appear to differ from those specified in the Guideline for Good Clinical Practice, the TGA recommends compliance with the National Statement.
ISO 14155 Clinical Investigation of medical devices for human subjects- Good Clinical Practice	Addresses good clinical practice for the design, conduct, recording and reporting of clinical investigations carried out in human subjects to assess the safety or performance of medical devices for regulatory purposes.
Australia's National Statement on Ethical Conduct in Human Research (2007) (Updated 2018) issued by NHMRC	Designed to clarify the responsibilities of: Institutions and researchers for the ethical design, conduct and dissemination of results of human research and Review bodies in the ethical review of research
NHMRC: Australian Code for the Responsible Conduct of Research 2007	Guides institutions and researchers in responsible research practices and promotes research integrity. It assists institutions in developing their own employee codes of conduct and procedures for the investigation of allegations of research misconduct by providing a comprehensive framework of acceptable academic standards.
The NHMRC Guidance: Safety monitoring and reporting in clinical trials involving therapeutic goods November 2016	Addresses the monitoring, collection and reporting of adverse events and adverse reactions that occur in clinical trials involving investigational medicinal products and investigational medical devices for trials conducted the Clinical Trial Approval (CTA) or Clinical Trial Notification (CTN) schemes.
Australian Clinical Trial Handbook: Guidance on conducting clinical trials in Australia using "unapproved" therapeutic goods, version 2.3, Nov 2020	Provides guidance on the legislative, regulatory and good clinical practice requirements when conducting clinical trials in Australia using 'unapproved' therapeutic goods. It assists trial sponsors, HRECs, investigators and approving authorities (institutions) to understand their roles and responsibilities under the therapeutic goods legislation.
Note for guidance on clinical safety data management: Definitions and standards for Expedited reporting (CPMP/ICH/377/95) Annotated with TGA comments	Is an internationally accepted standard for the reporting of important clinical safety information principally arising during clinical development of medicines.
Therapeutic Goods (Medical Devices) Regulations 2002	Medical device regulations
Privacy: NSW Health Records and Information Privacy Act 2002 and Privacy Act 1988	This Act applies to every organisation that is a health service provider or that collects, holds or uses health information.

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