1.0 BACKGROUND

This is a University of Hertfordshire standard operating procedure. University of Hertfordshire (UH) acknowledges West Hertfordshire Hospitals NHS Trust (WHHT) Research & Development (R&D) which has allowed UH to use the SOPs developed by WHHT where possible, modified for local implementation.

This document sets out the procedures to be followed by all staff who are involved in the initiation and set-up of projects sponsored/co-sponsored by UH which involve investigational medicinal products (IMPs) or non-CE marked devices which require regulatory approval from the Medicines and Healthcare Regulatory Agency (MHRA). This document also sets out how to go about obtaining Ethical and HRA approval for clinical research studies to be sponsored/co-sponsored by UH. Please refer to the Obtaining Sponsorship for research studies SOP which details how to obtain University of Herts sponsorship/co-sponsorship and the relevant reporting arrangements.

This SOP is specifically for CTIMPs, however in the absence of a documented procedure can be used as guidance for any other clinical study.

It provides guidance on how the necessary regulatory and ethical approvals should be obtained prior to commencement of the study to ensure compliance with the University’s wider research policies and other applicable legislation.

2.0 PURPOSE

The purpose of this SOP is to describe the responsibilities and procedures for applying for and maintaining a CTA and procedures for applying for REC/HRA approval for CTIMPs and other clinical studies sponsored/co-sponsored by UH to ensure compliance with the applicable Regulations. This responsibility is delegated to the Chief Investigator (CI) or delegated individual (DI) for UH sponsored/co-sponsored CTIMPs. This SOP is intended to provide a detailed guidance to ensure that the Sponsor maintains the quality of every aspect of the clinical trial.
A Clinical Trial Authorisation is required only in trials of medicinal products. These are substances, or combinations of substances, which either prevent or treat disease in human beings or are administered to human beings with a view to making a medical diagnosis, or to restore, correct or modify physiological functions in humans.

Any research that fulfils the definition of a clinical trial of an investigational medicinal product will require a CTA from the MHRA. A CTA will only be issued if there are no objections to the research proposal.

The definition of a clinical trial of an investigational medicinal product is:

“…any investigation in human subjects intended to discover or verify the clinical, pharmacological and/or other pharmacodynamic effects of one or more investigational medicinal product(s), and/or to identify any adverse reactions to one or more investigational medicinal product(s) and/or to study absorption, distribution, metabolism and excretion of one or more investigational medicinal product(s) with the object of ascertaining its (their) safety and/or efficacy”.

Clinical studies involving only medical devices, food supplements or other non-medicinal therapies (such as surgical interventions) may require other regulatory approvals.

For all University sponsored CTIMPs UH confirmation to commence will only be given by the Research Office following receipt of a valid CTA, REC and HRA approval.

All University co-sponsored CTIMPs require NHS R&D confirmation to commence. A valid CTA, REC and HRA approval is required.

HRA REC reviews all research projects that are CTIMPS or involve NHS patients or access to data, organs or other bodily material of past or present patients.

3.0 APPLICABLE TO

This applies to all staff involved in clinical research sponsored/co-sponsored by UH, including: Chief Investigators, Principal Investigators, Research Fellows, Consultants, Statisticians, Clinical Trial Pharmacists, Research Managers, Research Nurses, Clinical Trial Practitioners, Allied Health Professionals, Trial Coordinators, Clinical Studies Officers, Data Managers and Research Assistants.

4.0 RESPONSIBILITIES

4.1 The Sponsor/Co-sponsor should risk assess the clinical trial (following gSOP-033 Risk Assessment), review study documentation and ensure that it provides approval to the study Chief Investigator of its authorisation to apply for Regulatory and REC approval. MHRA and REC approval should be sought once full funding has been secured, Sponsorship agreed in Principle and the trial protocol (related trial documents) has been finalised.

4.2 The Chief Investigator (or delegated individual) is responsible for ensuring that the Regulatory and HRA/REC applications are completed and approval obtained as delegated by the study sponsor. The CI (or delegated individual) must ensure that the draft CTA is reviewed by the Trust Clinical Trial Pharmacist before the application is submitted and ensure that pharmacy review subsequent amendments relating to the management of the IMP(s) before they are submitted.
4.3 For co-sponsored studies the **NHS Trust study Co-sponsor** is responsible for ensuring that the applicable research governance checks are completed prior to the provision of the NHS R&D confirmation letter. They are also responsible for ensuring that any subsequent amendments receive review by the applicable staff and regulatory and/or HRA/REC approval prior to implementation.

4.4 For UH sponsored studies the Research office are responsible for provision of confirmation to commence and continuation following any HRA approved subsequent amendments.

4.5 The Trust **Clinical Trial Pharmacist** is responsible for reviewing and providing oversight for CTA applications and subsequent substantial amendments which impact the management of the trial IMP(s) thereafter.

5.0 PROCEDURES

5.1 Classification of Clinical Trials of an Investigational Medicinal Product (CTIMPs)

To find out whether a clinical trial is covered by the Clinical Trials Directive 2001/20/EC, an algorithm ‘Is it a clinical trial of a medicinal product’ available from the MHRA website can be used: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/317952/Algorithm.pdf

After working through the algorithm, please contact the CTSN/R&D department for advice. The MHRA Clinical Trial Helpline can be contacted if required. A copy of the protocol or protocol proposal should be emailed to the MHRA alongside the request.

5.1.1 Clinical Trials involving medical devices and medicines

- Clinical trials involving a medicine and a medical device will be subject to clinical trials regulations and may also be subject to medical device regulations depending on the purpose of the trial
- In such cases, the CTSN/R&D department will advise and assist Investigators in contacting the MHRA to check the regulatory position
- Advice from the MHRA Devices Division should be sought for clinical trials involving non-CE marked devices or CE marked devices used outside the conditions of the CE marking
- If the medical device is to be used in an NHS Trust please contact the Trust medical devices department. Devices cannot be used in NHS Trust without their approval.

5.1.2 Clinical Trials of non-investigational medicinal products (nIMPs)

- Some clinical trials also involve medicinal products which are classified as non-investigational medicinal products (nIMPs). Standard of care medicines that are already being administered to a subject, but are continued during the clinical trial are generally considered to be nIMPs.
- If further clarification is required as to whether a product is an IMP or nIMP, further information is available from the MHRA website/helpline.
5.2 Clinical Trial Authorisation application

Once a Clinical Trial has been classified as a CTIMP, the CTA submission package will be prepared by the CI/Delegated individual for UH Sponsored/Co-sponsored CTIMPs and can be submitted following sponsor approval.

5.3 Registering with EudraCT

In order for a Clinical Trial to be considered for authorisation, it must be registered on the European Clinical Trials Database – EudraCT. This is done by obtaining a unique reference number for each clinical trial.

Guidance is available on the EudraCT website.

5.4 The CTA Application and Submission

Detailed information on what to submit and how to submit the application is available on the MHRA website.

Your submission package must include:

- a covering letter (when applicable, the subject line should state that the submission is for a Phase I trial and is eligible for a shortened assessment time, or if it is submitted as part of the notification scheme)
- a clinical trial application form in PDF and XML versions
- a protocol document
- an investigator’s brochure (IB) or document replacing the IB
- an investigational medical product dossier (IMPD) or a simplified IMPD
- a non-investigational medicinal product dossier (if required)
- a summary of scientific advice from any Member State or the European Medicines Agency (EMA), if available
- manufacturer’s authorisation, including the importer’s authorisation and Qualified Person declaration on good manufacturing practice for each manufacturing site if the product is manufactured outside the EU
- a copy of the EMA’s decision on the paediatric investigation plan and the opinion of the paediatric committee, if applicable
- the content of the labelling of the investigational medicinal product (IMP) (or justification for its absence)

The investigator must ensure consistency between all the submitted documents.

The CI (or delegated individual) must send the draft version of the IRAS form to the Trust CT Pharmacist to allow the CT Pharmacist to review the IMP section of the form. The CT Pharmacist should review and authorise/provide guidance on the following aspects of the CTA submission to the MHRA:

- Review the application for each IMP identified in the trial.

- Sample Label(s) to be used for the trial IMP(s) - The CT Pharmacist must approve any labels submitted or design the label to be used. Notification of this approval should be documented and provided to the CI/delegated individual.
and CTSN. For co-sponsored studies notification of approval should also be sent to the R+D department.

A draft version of the completed Clinical Trial Application should be sent to the CTSNMG for review.

Although the CI will sign the application form as the “Applicant” and the Pro-Vice Chancellor (Research & Enterprise) or DI will be the “contact” for the CI and Sponsor. This is to ensure that all correspondence from the MHRA is sent to the Sponsor.

For co-sponsored CTIMPS, prior to submission to the MHRA, the CI or delegated individual should liaise with the relevant R & D department to authorise and arrange the payment (by bacs transfer) of the required fee to the MHRA as detailed on the MHRA website. The EudraCT number must be included with the payment.

Proof of payment of the fee must be sent with the submission package to the MHRA to ensure the validity of the application.

The Clinical Trial Application should be submitted via the Common European Submission Portal (CESP). The CI should liaise with the CTSN to gain access to the CESP.

An electronic signature of the submitted application form and supporting documents will be filed in the Trial Master File and for co-sponsored studies sent to R&D. A copy of the signed CTA and applicable approvals should be maintained in the trial specific pharmacy file.

Upon receipt of the MHRA approval letter, the CI or delegated individual should communicate any IMP related outstanding actions requested by the MHRA as part of the approval to the Trust CT Pharmacist, who will work with the CI or delegated individual to ensure these actions are completed. For co-sponsored studies the CTSN and R&D department must be informed when these actions are completed and documented.

5.5.1 **What are the possible outcomes?**

There are two possible outcomes:
- Acceptance (with or without conditions)
- Grounds for non-acceptance.

Some acceptance letters state conditions or remarks. The remarks must be responded to prior to the start of the study. If there are grounds for non-acceptance, the CI or delegated individual should reply within 14 days (30 days for gene therapy, somatic cell therapy or products containing genetically modified organisms) to submit an amended request for authorisation. These periods may be extended in certain circumstances.

The amended request is assessed within a total of 60 days from receipt of the initial application (90 days for gene therapy products) and there are two possible outcomes:
- Acceptance (with or without conditions)
- Grounds for non-acceptance.
5.5.2 Terms and conditions of approval

For a multicentre trial, the MHRA must be notified of each additional investigator using the Annex 2: Notification of an Amendment form. Ethics approval for each additional investigator should also be obtained.

In accordance with regulation 27, the Sponsor /CI must notify the MHRA within 90 days of the conclusion of the trial.

The MHRA may suspend or terminate a clinical trial where it feels the conditions for authorisation are not being met.

5.6 MHRA

5.6.1 Type A Clinical Trials

All interventional trials of an IMP conducted in the UK require an approved CTA from the MHRA before they may commence however, the majority of Type A trials conducted in the UK will only require to be notified to the MHRA.

This will involve the sending of the standard EudraCT application form as detailed in section 6.4 and accompanying documents in the usual way. A letter of acknowledgement will be sent to the CI or delegated individual by the MHRA with an accompanying note to say that the trial may go ahead after 14 days from receipt of notification, if the MHRA has not raised any objections.

Therefore the acknowledgement letter will act as the authorisation. Further details are provided on the MHRA website.

(NB - Ethics Committee role: All interventional trials of an IMP conducted in the UK will continue to require a positive opinion from a Research Ethics Committee before they may commence)

5.6.2 Types B & C Clinical Trials

The CTA will be validated on receipt at the MHRA and an acknowledgement letter will be sent to the Sponsor Contact. If the application is valid then the assessment period will begin. This starts from the date of receipt of a valid application.

If the application is not valid the MHRA will inform the CI or delegated individual “Contact”. The full submission package may need to be re-submitted, however the MHRA should advise on the requirements for resubmission. The CI or delegated individual should contact the Sponsor contact for further advice in such circumstances if required.

Each application will be assessed by the MHRA within 30 days from the date of validation of the application. They will provide an initial response to all valid applications within 30 days of receipt.

If the Notice of Acceptance letter from the MHRA places any conditions on the Clinical Trial Authorisation these must be responded to and a confirmation of satisfactory resolution received from the MHRA for the approval to be valid. The Sponsor should verify that the CTA
authorisation letter including any such remarks is responded to prior to Sponsor activation of the trial/ Sponsor approval of amendment.

All correspondence relating to the CTA will be filed within the TMF with copies of relevant applications and approvals in the Sponsor File.

It is a requirement of the CTA that a favourable opinion of a REC is sought and maintained.

The Chief Investigator is responsible for the submission of the initial application to the REC to obtain favourable opinion.

Prior to the activation of the study/ approval of substantial amendments the Research office and CTSN for sponsored studies and the R&D department for co-sponsored studies will verify the governance requirements as part of the initiation visit (see gSOP-18).

N.B- The EudraCT number, CTA number and product name must be quoted in all CTA submissions, amendments, Development Update Safety Reports and End Of Trial notifications.

5.6.3 End Trial Report

Within 12 months from the End of Trial Declaration the Final Trial Report is required to be submitted to the MHRA. Prior to submission to the MHRA, the Chief Investigator will submit the report to the Sponsor/Co-sponsor/CTSN for final review and Sponsor approval. This final report will be sent to the MHRA within one year of the end of the trial and a copy filed within the TMF and for co-sponsored studies will be sent to R&D (see gSOP-22 End of Trial reports).

5.6.4 Other activities

The following also contribute to the maintenance of the CTA but are outside the scope of this SOP:

- Adverse Event Reporting (gSOP-02)
- Development Safety Update Reports (gSOP-16)

6.0 APPLICATIONS TO THE HRA/REC
6.1 HRA/REC Application Process

1. CI/DI to set up an IRAS account if one is not already held

2. CI/DI to complete the IRAS application form ready for submission to the HRA

3. Any sections covering IRMER must be completed and signed by the lead Medical Physics Expert (MPE) and Clinical Radiation Expert (CRE)

4. For UH sponsored/co-sponsored studies a draft copy of the completed IRAS form should be submitted to the CTSNMG for review then to the Sponsor Representative for approval before submission

5. Once approval from the Sponsor Representative has been granted, CI to sign the application form

6. Sponsor’s representative to sign the completed application form

7. CI/DI to collate the submission package using the HRA checklist

8. Once the application is complete CI/DI to book the study for review

9. On the same day the application is booked for HRA approval the application plus all supporting documentation should be submitted electronically via IRAS

10. The application will be validated and an Initial assessment Letter issued
6.2 The HRA Application and Submission

- Application for authorisation of a clinical trial should be completed within IRAS
- The IRAS form should be completed by the CI or delegated individual
- Sections covering the Ionising Radiation (Medical Exposures) Regulations 2000 (IRMER) must be completed by and signed by the lead Medical Physics Expert (MPE) and lead Clinical Radiation Expert (CRE)
- The Application must be signed by the CI and approved by the Sponsor before submission. An electronic signature should be completed for all Sponsored/Co-sponsored CTIMPs
- The Application should also be signed by the Sponsor’s Representative
- Applications should be completed according to the HRA application checklist
- Once the application is complete, the application should be booked for review
- The application should be submitted electronically via IRAS on the same day the it is booked for review
- The HRA will validate the application for REC review and issue an Initial Assessment Letter.

6.2.1 What are the possible outcomes?

If the application submitted is valid, the application will be assessed and discussed at the REC meeting and the applicant will be sent a letter informing them of:

- Favourable opinion
- Provisional opinion
- Rejection

If the letter states a provisional opinion, the CI will need to address all the conditions and remarks and submit their response back to the REC for their final opinion. The CI must provide a copy of this documentation to the Sponsor/Co-Sponsor/R&D and CTSN and maintain a copy in the TMF.

The RECs are required to give an opinion within 60 days of receipt of a valid application. However the clock stops if further information is requested and restarts when this information is received by the REC.

The CI will ensure all documentation submitted to the REC and all correspondence received from the REC is sent to the Sponsor/Co-sponsor/R&D and CTSN and a copy maintained in the TMF.

When NHS sites are to be used, in addition to completing the IRAS forms A “Statement of activities” may be required for each “site type” in place of an agreement. A “Schedule of Events” may also need to be completed as part of the HRA submission. The templates for these are available on the HRA website. These forms should be included in a local information pack and sent to the R+D/CRN.
The HRA Initial Assessment Letter will clarify if any site types do not need to confirm capacity and capability.

6.2.2 Conditions of approval

Favourable ethical opinion letters will also list conditions of that favourable opinion including:

- HRA approval
- NHS R&D confirmation being obtained, where NHS sites are involved
- Obtaining a CTA for CTIMPs
- Other specified conditions

Following favourable ethical opinion the HRA will assess all study documentation prior to HRA approval. Notification of HRA approval must be forwarded to NHS R+D sites for confirmation of green light to commence being granted.

7.0 SUBSTANTIAL AMENDMENTS

The CI or Delegated Individual should prepare, submit and manage the maintenance of the CTA on behalf of the Sponsor. The Investigator and trial team must inform the Sponsor and R&D Department/CTSN if an amendment to the Protocol or the CTA is required and supply supporting information as appropriate as detailed in the amendment SOP for Sponsored CTIMPs (gSOP-09).

An amendment is considered to be substantial when it is likely to have a significant impact on:

- the safety or physical or mental integrity of the subjects
- the scientific value of the trial
- the conduct or management of the trial
- the quality or safety of any IMP used in the trial

Therefore substantial amendments may include, but are not limited to:

Amendments to the trial protocol or investigator’s brochure including: -

- Changes to dose
- Change of IMP supplier
- Eligibility criteria
- Statistical review or analysis (including sample size)
- Amendments to change the sponsor or sponsor name
- Urgent safety measures
- Temporary halt of a trial
- End of Trial (See Section 8.9)

It is the responsibility of the Sponsor to decide whether an amendment is deemed to be Substantial. Where necessary the CTSNMG/R&D department will review the proposed amendment.
7.1 Submission of a Substantial amendment to the MHRA

Amendments to a Clinical Trial Authorisation will be made in accordance with the MHRA guidance. Detailed information on how to amend a CTA is available on the [MHRA website](https://www.mhra.gov.uk).

The CI or designated individual must liaise with the Trust CT Pharmacist regarding all amendments to the protocol of any CTIMPs and ensure the Pharmacy Clinical Trials Team are fully up to date and working to the most recent version of the protocol.

For any pharmacy related amendments, the Trust CT Pharmacist must review and approve the amendment, including any changes to the protocol and if resubmission to the MHRA is required, associated applications and regulatory documents.

The Trust CT Pharmacist will send amendment approvals (if applicable) to the CI/designee and Sponsor/R&D department/CTSN/Research Office (See gSOP-09).

7.2 Submission of a Substantial Amendment to the REC

It is a requirement of the CTA that a favourable opinion of the REC is sought and maintained, if the amendment is considered substantial for ethical review. The Chief Investigator or delegated individual is responsible for the submission of all amendments to the REC (see gSOP-09).

7.3 Submission of a Substantial Amendment to R&D

All amendments and required approvals will be submitted for approval to the sponsor/R&D department electronically. In multicentre trials it may be a requirement of R&D confirmation at the participating sites to submit a copy of the amendment and relevant approvals. This will be co-ordinated by the CI or delegated individual.

For detailed guidance on submission of amendments to the Sponsor/R&D including studies adopted onto the NIHR portfolio please see (gSOP-09).

7.4 Implementation of Substantial amendments

The changes listed in a substantial amendment may NOT be implemented before receipt of the Notice of Acceptance of Amendment from the MHRA if required, approval letter from the REC and local R&D confirmation; with the exception of Urgent Safety Measures where the changes may be implemented immediately. Once all approvals are in place the Sponsor/R&D department will notify the CI (or delegated individual) and ensure that the correct documentation is in place to implement the amendment.

7.5 Non-Substantial amendments

These are defined as a non-substantial administrative amendment that will have no significant implications for participants or for the conduct, management or scientific value of the study. Except for device studies, non-substantial amendments do not require MHRA or Ethics approval. However, they should still be submitted for notification.

For further guidance please also refer to the HRA website.
7.6 Temporary Halt of a Trial

If a Sponsored CTIMP is halted temporarily, the Sponsor must be notified immediately by the CI (or delegated individual) in writing. If a CTIMP is halted due to request from the sponsor/co-sponsor through R&D/CTSN or Trial specific Oversight Committee, the MHRA and REC should be notified no later than 15 days from when the trial is temporarily halted.

The notification must be made as a substantial amendment using the Notification of Amendment form detailing the reasons for the temporary halt.

It is the responsibility of the CI (or delegated individual) to inform the participating Investigator sites of the temporary halt.

If it is decided not to recommence a temporarily halted trial, the MHRA and REC must be notified within 15 days of this decision, using the End of Trial Declaration form.

If an Urgent safety measure is implemented on trial or a serious breach of GCP and/or the trial protocol is identified which requires expedited reporting to the MHRA and REC procedures detailed in the Sponsor’s SOP on serious Breaches should be followed (see gSOP-10)

7.7 Development Safety Update Report

The Sponsor alongside the CI (or delegated individual) and Trust clinical trial pharmacist (where required) will ensure that a DSUR is sent to the MHRA and REC no later than 60 days after the data lock date (gSOP-16). A copy of the completed DSUR report will be retained in the TMF and a study specific QA folder.

7.8 End of a Trial

The end of the trial is defined as the last patient, last visit, unless described differently in the trial protocol and original CTA application. The signed End of Trial form will be submitted within 90 days of the end of the trial to the MHRA and REC as detailed in the HRA guidance (see gSOP-21).

8.0 RELATED DOCUMENTS

- gSOP-02- Adverse Event Reporting (Sponsored/Co-sponsored)
- gSOP-04- Informed Consent
- gSOP-06- TMF/Site File
- gSOP-07- Research Training
- gSOP-09- Amendments
- gSOP-10- Serious Breaches
- gSOP-11- Organisational Oversight
- gSOP-14- Writing Research Protocols
- gSOP-15- CRF Design
- gSOP-16- DSURS
- gSOP-17- Archiving
- gSOP-21- Trial Closure
- gSOP-22- End of Trial Reports
- gSOP-28- Management of Source Data
- ICH GCP
- UK Policy Framework for Health and Social Care Research
● The Medicines for Human Use (Clinical Trials) Regulations 2004 SI 1031/200
1928/2006 (as amended from time to time)

Useful Web links for detailed guidance on procedures described in this SOP;

Detailed guidance for the notification of a type A clinical trial
Detailed guidance for the request for authorisation of a clinical trial
MHRA WebPages for Submitting a CTA Application
MHRA WebPages for Amendments to CTA
MHRA WebPages for End of Trial Notifications

9.0 APPENDICES

Appendix 1.0 - Definitions

10.0 VERSION HISTORY

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11.0 AUTHORSHIP & APPROVAL

Author

Signature Date

Pro-Vice Chancellor (Research & Enterprise) Approval

Signature Date

12.0 AGREEMENT

Please detach and retain within your training files

I have read and understood the contents and requirements of this SOP (ref gSOP-13-01) and accept to follow University policies implementing it.

Recipient

Signature: ........................................Date: ......................

Name & Position: ........................................................................

Please retain copy of the signed form for your reference in your training file

-CONFIDENTIAL-

This document is uncontrolled if printed. Current electronic version of this document should be accessed via the university intranet
Appendix 1: Definitions

**Adverse Event (AE)**
Any untoward medical occurrence in a subject to whom a medicinal product has been administered, including occurrences which are not necessarily caused by or related to that product.

**Adverse Reaction (AR)**
Any untoward and unintended response in a subject to an investigational medicinal product which is related to any dose administered to that subject.

**Chief Investigator (CI)** - A Registered Physician, Dentist, Pharmacist or Registered Nurse who has overall responsibility for the conduct of the study.

**Clinical Trial** – A research study in which one or more human subjects are prospectively assigned to one or more interventions (which may include placebo or control) to evaluate the effects of those interventions on health outcomes.

**Clinical Trial of Investigational Medicinal Product (CTIMP)** - A study that looks at the safety or efficacy of a medicine/food stuff/placebo in humans as defined by the Medicines for Human Use Regulations (2004). Clinical Trials are categorised as Type A, B or C.

**Type A Clinical Trial** - as above but with no higher risk than standard medical care. The medicinal product must be licensed in an EU Member State and the trial relates to the licensed range of indications, dosage and form or, the trial involves off-label use (such as in paediatrics and in oncology), if this off-label use is established practice and supported by sufficient published evidence and/or guidelines.

**Type B Clinical Trial** – as clinical trial above but with somewhat higher risk than standard medical care and involving medicinal products licensed in any EU Member State if such products are used for a new indication (different patient population/disease group), or substantial dosage modifications are made for the licensed indication or if they are used in combinations for which interactions are suspected. Also, trials involving medicinal products not licensed in any EU Member State if the active substance is part of a medicinal product licensed in the EU.

**Type C Clinical Trial** - as clinical trial above but with markedly higher risk than standard medical care and involving a medicinal product not licensed in any EU Member State A grading other than TYPE C may be justified if there is extensive class data or pre-clinical and clinical evidence.

**Clinical Trial Authorisation (CTA)** – Regulatory approval issued by a Competent Authority to conduct a clinical trial within a Member State.

**Development Safety Update Report** – (DSUR)

**Development International Birth Date** - (DIBD) this is the date that the Sponsor received the first CTA for that IMP and this will determine the annual reporting period for the DSUR.

**Data Lock Point** – This should be the last day of the one year reporting period and the DSUR should be submitted to the MHRA and the REC no later than 60 days after the data lock date.

**Delegated Individual (DI)**
An individual delegated by the PI to carry out their task(s).
Good Clinical Practice (GCP) - as defined in the Regulations.

Investigational Medicinal Products (IMP) - means a pharmaceutical form of an active substance or placebo being tested, or used as a reference in a clinical trial.

Principal Investigator (PI)
A Registered Physician, Dentist, Pharmacist or Registered Nurse who has responsibility for the conduct of the trial at a host site.

Sponsor’s Representative
The Pro-Vice Chancellor (Research & Enterprise) will act as the Sponsor’s Representative.

The Medicines & Healthcare products Regulatory Agency (MHRA)
UK Competent Authority responsible for regulation of clinical trials.

The Regulations

Trial Master File
The Trial Master File (TMF) will be held at the principal site by the sponsor, Chief Investigator or at the co-ordinating Centre. The TMF should contain all essential documents defined as documents which individually and collectively permit evaluation of the conduct of a trial and the quality of the data produced. A Trial Master File should be set up at the beginning of a trial and maintained up-to-date throughout the trial until trial conclusion.

For trials currently running, it is recommended that Section 8 of the ICH-GCP Guideline is followed as guidance in order to meet statutory requirements. However, some of the documents listed may not be available or applicable in many non-commercial trials. The appropriate documentation will vary according to the trial and sponsor requirements.