STANDARD OPERATING PROCEDURE FOR THE LOCAL MANAGEMENT REVIEW OF AMENDMENTS TO STUDIES

SOP NUMBER:	**Fife R&D SOP40**
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1. PURPOSE

This SOP describes the procedure for the Local Management review and approval of amendments to clinical research studies sponsored or hosted by NHS Fife.

It is the responsibility of all staff using this SOP to ensure they are using the latest version of it. The latest version is available via StaffLink, the R&D section of the NHS Fife website (www.nhsfife.org/research) and EDGE (https://www.edge.nhs.uk). For guidance, contact the R&D Department via fife.randd@nhs.scot

2. APPLICABILITY

This SOP applies to all staff involved in the conduct of clinical research studies and members of the NHS Fife R&D Department involved in the process for Local Management review and approval of amendments to clinical research studies.

3. POLICY

Researchers wishing to make amendments to research conducted by the NHS must obtain NHS Local Management Approval (also referred to as R&D Approval) for each NHS research site. This approval must be in place before any amendments can be implemented. The only exception to this is if the amendment is an Urgent Safety Measure (See 4.12.2).

4. PROCEDURE

4.1 The R&D Approvals Team will normally be informed of an amendment either by the Chief Investigator (CI), NHS Research Scotland Permissions Coordinating Centre (NRSPCC), by a study contact or by the local Principal Investigator (PI)/R&D Research Nurse. For multicentre studies the review process can only commence once the appropriate documentation has been made available to the NHS Fife R&D Approvals Team by NRSPCC via the Scottish Research Database Application (SReDA).

4.2 The NHS Fife R&D Approvals Team must ensure that the Sponsor organisation is aware of the Health Research Authority (HRA) amendment system and must request that all amendment documentation is submitted via the lead coordinating centre (see: http://www.hra.nhs.uk/nhshsc-rd-uk-process-management-amendments/.

4.3 The HRA has divided amendments into three categories:

- *Category A*: Has implications for, or affects, all participating NHS/Health and Social Care organisations hosting the research project therefore needs to be considered and may need change control actions.

- *Category B*: Has implications for, or affects, specific participating NHS/HSC organisations hosting the research project. Only at these organisations does it need to be considered and any change control actions required.

- *Category C*: Has no implications that require management or oversight by the participating NHS/HSC organisations hosting the research project. However the amendment should still be submitted for information.

For multi-centre studies, the lead coordinating centre (NRSPCC for Scottish led studies) will confirm the category of the amendment. For single centre studies, this is not required.

4.4 The R&D Approvals Team must review, collate and check all the documents required for Local Management Approval and request information from NHS Fife staff and Supporting Departments as necessary. It is important to ensure that all Support Departments involved in the study are aware of the amendment, even if there are no changes envisaged for their area. Although a complete document set does not have to be provided immediately, approval cannot be granted until all appropriate documents are in place.

4.5 For Category A and B (where affected) Amendments, the R&D Approvals Team must carry out the following checks on the supplied documents:

- Have all appropriate documents been supplied, when compared with the relevant document list? Not all documents on the list are required for all studies.

- Has the HRA/REC form been signed by the Sponsor/CI/Academic Supervisor/PI (as required) and been supplied?

- Have the REC, MHRA and any other necessary approvals been supplied where appropriate?

- Do the version numbers of documents supplied match those on the latest HRA/ethics favourable opinion letter(s)?

- If the ethics opinion was given pending any changes, have the revised documents and proof that they were acceptable been supplied?

- If the amendment involves changes to a contract and/or indemnity document, all clauses must be checked by the Assistant R&D Director/Central Legal Office (CLO), if contentious, to ensure that NHS Fife is able to agree to the provisions.

- If the amendment involves changes to the way data is accessed/handled /stored or any new data linkage is proposed, then advice may need to be sought from Information Governance.

- The need for Honorary Research Contracts or Letters of Access should be determined and appropriate documents supplied (see R&D SOP24 - Research Passports, Honorary Research Contracts, Letters of Access and Other Processes for External Researchers).

4.6 The details of the amendments must be scrutinised if any of them involve changes from the study as originally approved. If there are changes to or additional activities or financial implications, these must be reviewed and approved in the same way as a new study (see R&D SOP11 - Process of Local Management Review and Approval of all Research Undertaken in NHS Fife).

4.7 The R&D Approvals Team must be satisfied that all paperwork is in place, up to date and satisfactory; that all questions concerning the conduct, cost and other implications of the study have been answered; that any contracts contain appropriate provisions and that overall, there are sufficient safeguards to protect NHS Fife, its patients and staff. Any questions must be referred to the Medical Director, appropriate Support Department or the Central Legal Office (CLO).

4.8 Confirmation of Local Management Approval/Acknowledgement

4.8.1 For Category A or B amendments, once all the study documentation is in place, all queries have been resolved satisfactorily, and the 'Approvals – Amendments' Workflow has been completed and authorised by the Assistant R&D Director on EDGE, an amendment approval letter (with associated documents/contracts if required) must then be provided for Medical Director sign off (or Assistant R&D Director sign off for Non-CTIMPs and Non-Device studies).

4.8.2 For Category C amendments, once all the study documentation is in place, all queries have been resolved satisfactorily, the 'Approvals – Amendments' Workflow must be completed by the R&D Approvals Team. Category C amendments do not require authorisation by the Assistant R&D Director or sign off by the Assistant R&D Director or Medical Director.

4.8.3 For Category A or B amendments, a Local Management Approval letter is issued to the Principal Investigator, local Research, Sponsor, and any other named person involved in the study, by email.

4.8.4 For Category C amendments, an acknowledgement email is sent to the Principal Investigator, local Research, Sponsor, and any other named person involved in the study, by email.

4.8.5 The Local Management Approval letter or acknowledgement email and associated documentation are then stored in S:\Research\PROJECTS\2 PROJECT DOCUMENTATION\SReDA STUDY FOLDERS and uploaded to SReDA and EDGE.

The local research team are responsible for uploading amendment documentation to their respective electronic site files on the research drive and on EDGE.

4.9 Honorary Contracts and Letters of Access can be issued by HR and the R&D Approvals Team, if required, once Local Management Approval is granted.

4.10 Local Management Approval for substantial amendments cannot be given until the amendment has a favourable ethical opinion from an appropriate REC (where relevant), and, where appropriate, from the MHRA or other regulatory authorities.

4.11 Local Management Approval for an amendment must be issued and where necessary, the appropriate contracts signed, before any changes to data collection/research activity can be implemented within NHS Fife.

4.12 Timelines

4.12.1 Once the lead nation coordinating centre has confirmed that a Category A or B amendment is complete and valid, they will provide the Sponsor with a 35-day implementation date. Once all appropriate REC and regulatory approvals are in place, the Sponsor can then implement the amendment:

- As soon as a site provides Local Management Approval, providing that the PI/study team/Support Departments are happy with the amendment and sufficient capacity and resources are available to support it or

- After the 35 days implementation date, unless the site has indicated that it has questions or needs to carry out further review. In this case, the amendment can only be implemented at that site once Local Management Approval has been confirmed. In these circumstances, Local Management review and approval of the amendment must be completed as quickly and efficiently as possible after providing notification to the Sponsor or NRS-PCC.

Note: even if the site has questions/needs further review, if it has not notified the Sponsor of this, the Sponsor can implement the amendment after the 35 days.

- At an alternative date if the study coordinator or CI informs the local team.

4.12.2 Amendments that are considered Urgent Safety Measures can be implemented immediately by all relevant sites but must then go through the usual amendment review and approval process.

5. REFERENCES

NHS/HSC R&D – UK PROCESS FOR MANAGEMENT OF AMENDMENTS (http://www.hra.nhs.uk/nhshsc-rd-uk-process-management-amendments/)

6. DEFINITIONS / ABBREVIATIONS

CLO	Central Legal Office
CTIMP	Clinical Trial of Investigational Medicinal Product
HRA	Health Research Authority
MHRA	Medicines and healthcare Products Regulatory Agency
NRSPCC	NHS Research Scotland Permissions Coordinating Centre
PI	Principal Investigator
REC	Research Ethics Committee
SOP	Standard Operating Procedure
SReDA	Scottish Research Database Application (https://www.reda.org.uk/)

7. DOCUMENT HISTORY

Version Number:	Edited by (job title):	Effective Date:	Details of Revisions Made:
1	Allyson Bailey R&D Commercial Manager Julie Aitken R&D Trials Facilitator	16 Sept 2017	N/A – new SOP
2	Aileen Yell R&D Research Coordinator	27 Sept 2019	Format updated in line with current SOP template and minor changes to text for clarity. Clarification added that advice may be required from Information Governance if the amendment involves changes to the way data is accessed/handled/stored or if there will be any new data linkage. Clarification added that Support Departments must be made aware of all amendments. Associated Documents Doc Ref 40-01 and Doc Ref 40-02 added.
3	Aileen Yell R&D Research Coordinator	07 Dec 2021	Doc Ref 40-01 and Doc ref 40-02 deleted and reference to EDGE Workflows added. Process clarified regarding issue of LMA for Category A and B amendments and acknowledgment of Category C amendments. Text relating to timings updated for clarity.

8. APPROVAL

APPROVED BY	Date
Professor Alex Baldacchino, Research & Development Director NHS Fife Signature: 	07 Dec 2021