1 PURPOSE & SCOPE
The purpose of this SOP is to describe the Peter MacCallum Cancer Centre (Peter Mac) Ethics Committee process for submission and handling of safety reports arising out of research reviewed by the Peter Mac Ethics Committee as the reviewing Human Research Ethics Committee (HREC).

For safety reporting requirements for research conducted at Peter Mac that was reviewed by an Ethics Committee other than Peter Mac, refer to Guideline 001 Peter Mac Governance Review Requirements for Human Research.

This SOP is consistent with the NHMRC National Statement on Ethical Conduct in Human Research (2007 and updates) and the NHMRC Safety monitoring and reporting in clinical trials involving therapeutic goods (November 2016 and updates).

2 TARGET AUDIENCE
The target audience is Sponsors, Contract Research Organisations, Investigators, participating Institutions and their delegates, of clinical research projects that were approved by the Peter Mac HREC.

3 RELATED POLICY
POLICY 21.1.1: Responsible Conduct of Research
Ethics Committee SOP 004: Monitoring of Ongoing Research
Ethics Committee Secretariat Guideline 001: Peter Mac Governance Review Requirements for Human Research

4 DEFINITIONS
Definitions stated in the NHMRC document Safety monitoring and reporting in clinical trials involving therapeutic goods November 2016 are the governing definitions for Investigational Medicinal Product (IMP) Trials and Investigational Medical Device (IMD) Trials.

The Definitions provided below are broader in scope to allow inclusion of clinical research outside the scope of an IMP or IMD trial in this SOP.

For further explanation of any of the definitions consult the NHMRC document Safety monitoring and reporting in clinical trials involving therapeutic goods November 2016.

<table>
<thead>
<tr>
<th>Investigator’s Brochure (IB)</th>
<th>The document containing a summary of the clinical and non-clinical data relating to an investigational medicinal product or device that are relevant to the study of the product or device in humans.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Product Information (PI)</td>
<td>The approved Australian summary of the scientific information relevant to the safe and effective use of a prescription medicine. If the conditions of use differ from those authorised, the PI should be</td>
</tr>
</tbody>
</table>

Prepared by Manager, Human Research Ethics & Governance
Approved by Associate Director, Clinical Research

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supplemented with a summary of relevant clinical and non-clinical data that supports the use of the product in the trial.

<table>
<thead>
<tr>
<th>Annual Safety Report</th>
<th>Summary of all new available safety information relevant to a trial that is received over a 12 month period (the Executive Summary of safety information produced for international regulators, such as the Development Safety Update Report (DSUR) may serve as the Annual Safety Report).</th>
</tr>
</thead>
<tbody>
<tr>
<td>Significant Safety Issue (SSI)</td>
<td>A safety issue that could adversely affect the safety of participants or materially impact on the continued ethical acceptability or conduct of the trial.</td>
</tr>
</tbody>
</table>
| Urgent Safety Measure (USM) | A measure required to be taken in order to eliminate an immediate hazard to a participant’s health or safety.  
Note: This type of significant safety issue can be instigated by either the investigator or sponsor and can be implemented before seeking approval from HRECs or institutions. |
| Reviewing HREC | The Human Research Ethics Committee (HREC) that issued the Ethical Approval for the project.  
Under the multisite review system a NHMRC certified HREC can review and issue ethical approval for a project at multiple sites. These multiple sites will be named in the initial Ethical Approval or be added as an amendment to the initial Ethical Approval. The “reviewing HREC” is responsible for the ongoing monitoring of the project at those sites. |
| Institution | An institution named as a Participating Site on an Ethical Approval issued by the Peter Mac HREC. |

5 RESPONSIBILITIES

The NHMRC National Statement on Ethical Conduct in Human Research (2007 and updates) permits monitoring arrangements to be commensurate to the risk, size and complexity of the trial. The nature and extent of participant safety monitoring should be based on the assessment of the risks of the trial intervention(s) relative to standard care and the extent of knowledge about the investigational medicinal product or device being tested. The sponsor’s plans for safety monitoring should be documented and continually reviewed and adapted during the trial, as real time assessments of safety data are performed.

The sponsor, through their independent safety monitoring arrangements, has the primary responsibility for monitoring the ongoing safety of the investigational medicinal product or device. The HREC should be satisfied that the sponsor’s arrangements are sufficiently independent and commensurate with the risk, size and complexity of the trial.
It is the responsibility of Sponsors, Contract Research Organisations, Investigators, Institutions and their delegates, conducting clinical research projects that were approved by the Peter Mac HREC and all Ethics Committee Secretariat staff members to follow and adhere to the procedures set out in this SOP.

It is the responsibility of Sponsors, Contract Research Organisations, Investigators, Institutions and their delegates, of clinical trials involving therapeutic goods that were approved by the Peter Mac HREC to also comply with the reporting requirements in NHMRC document *Safety monitoring and reporting in clinical trials involving therapeutic goods November 2016* (Appendix 1 and Appendix 2 from this document are included in this SOP for reference).

### 6 PROCEDURE

When communicating safety information to the Peter Mac HREC the Sponsor or their delegate must clarify the impact of each report on patient safety, trial conduct and trial documentation. The items below required to be submitted to the Peter HREC by the Sponsor or delegate will be acknowledged by the Peter Mac HREC. 

**NOTE:** For reporting of Serious Breaches of Good Clinical Practice or the protocol, refer to SOP004 Monitoring of Ongoing Research, Section 6.4 (Serious Breach reporting replaces Protocol Deviation/Violation reporting).

The procedure to be followed is provided in the following table.

<table>
<thead>
<tr>
<th>Reporting party</th>
<th>Report required and timeline</th>
<th>Supporting information required</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>SPONSOR or delegate</strong></td>
<td>Provide the HREC with <em>annual</em> update of the <em>Investigator’s Brochure</em> or where applicable, <em>Product Information</em>. Provide the HREC with any Addenda to the <em>Investigator’s Brochure</em> or where applicable, <em>Product Information</em>.</td>
<td><em>Impact of the update/addenda on patient safety, trial conduct and trial documentation</em></td>
</tr>
<tr>
<td><strong>SPONSOR or delegate</strong></td>
<td>Provide the HREC with an <em>Annual Safety Report</em> including a clear summary of the evolving safety profile of a trial. <strong>NOTE:</strong> The HREC has the discretion to request more frequent reporting for specific trials, such as early phase trials. Such a request may be stated on the initial Ethical Approval for a trial or may be instituted during the conduct of the trial.</td>
<td><em>A brief description and analysis of new and relevant findings;</em> <em>For IMPs not on the Australian Register of Therapeutic Goods, a brief analysis of the safety profile of the IMP and implications for participants taking into account all available safety data and results of relevant clinical or non-clinical studies</em> <em>A brief discussion of the implications of the safety data to the trials risk-benefit ratio</em> <em>A description of any measures taken or proposed to minimise risks</em></td>
</tr>
</tbody>
</table>
Notify the HREC of all Significant Safety Issues that adversely affect the safety of participants or materially impact on the continued ethical acceptability or conduct of the trial.

I. Significant Safety Issues that meet the definition of an Urgent Safety Measure should be notified within 72 hours.

II. All other Significant Safety Issues should be notified within 15 calendar days of the sponsor instigating or being made aware of the issue.

III. Significant Safety Issues often result in safety-related changes to trial documentation. Any resulting amendment should be submitted to the HREC without undue delay.

IV. Temporary halt of trial for safety reasons should be notified within 15 calendar days of the sponsor’s decision to halt the trial.

V. Early termination of a trial for safety reasons should be notified without undue delay and within 15 calendar days of the sponsor’s decision to terminate the trial.

Advise the TGA, investigators and their institutions of any decision to withdraw approval.

7 KEY PERFORMANCE INDICATORS
At least 90% of all notifications required by this SOP to be received within the specified timeframe.
If a notification is not received within the notified time frame the submitting project and/or sponsor will be notified that the correct timeframe was not met, what the correct timeframe for the item is and will be provided with a copy or link to this SOP.

8 RELATED MATERIALS
Consult the Peter MacCallum Cancer Centre website for any forms required for submission: https://www.petermac.org/research/doing-research-us/ethics-governance
9 REFERENCES

INTERNAL DOCUMENTS
- POLICY 21.1.1: Responsible Conduct of Research
- Ethics Committee SOP 004: Monitoring of Ongoing Research
- Ethics Committee Secretariat Guideline 001: Peter Mac Governance Review Requirements for Human Research

EXTERNAL DOCUMENTS
- National Statement on Ethical Conduct in Human Research (2007, and updates)
- NHMRC Safety monitoring and reporting in clinical trials involving therapeutic goods (November 2016 and updates)
- NHMRC Reporting of Serious Breaches of Good Clinical Practice (GCP) or the Protocol for Trials Involving Therapeutic Goods (2018)

10 FURTHER INFORMATION
For enquiries related to this Procedure please email ethics@petermac.org

11 VERSION AND APPROVAL HISTORY

<table>
<thead>
<tr>
<th>Date</th>
<th>Version #</th>
<th>Author; Owner and Authoriser</th>
<th>Changes</th>
</tr>
</thead>
<tbody>
<tr>
<td>August 2011</td>
<td>1.0</td>
<td>Author: Dianne Snowden, Ethics Coordinator; Owner: Ethics Committee; Authorised by: Chair, Clinical Research Governance</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Summary of Changes: Additional reporting requirements removed and SOP streamlined to be consistent with the NHMRC Australian Health Ethics Committee (AHEC) Position Statement on Monitoring and Reporting of Safety for Clinical Trials Involving Therapeutic Products (May 2009)</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Stakeholders involved in the review process: Clinical Research Committee; Ethics Committee Clinical Research Governance Committee.</td>
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<tr>
<td>August 2014</td>
<td>2.0</td>
<td>Author: Dianne Snowden, Ethics Coordinator; Owner: Ethics Committee; Authorised by: Chair, Research Governance Committee</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Summary of Changes: SOP updated to reflect the multisite ethical review process</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Stakeholders involved in the review process: Clinical Research Committee; Ethics Committee; Research Governance Committee</td>
<td></td>
</tr>
<tr>
<td>January 2017</td>
<td>3.0</td>
<td>Author: Dianne Snowden, Manager Human Research Ethics; Owner: Ethics Committee; Authorised by: Associate Director, Clinical Research</td>
<td></td>
</tr>
</tbody>
</table>

Prepared by Manager, Human Research Ethics & Governance

Approved by Associate Director, Clinical Research
Summary of Changes: SOP reporting requirements updated based on NHMRC Safety monitoring and reporting in clinical trials involving therapeutic goods (November 2016).

Stakeholders involved in the review process: Clinical Research Committee; Ethics Committee; Parkville Cancer Clinical Trials Unit.

June 2018

Author: Dianne Snowden, Manager Human Research Ethics; Owner: Ethics Committee; Authorised by: Associate Director, Clinical Research

Summary of Changes: Refer to SOP004 regarding Serious Breach reporting based on revised NHMRC Reporting of Serious Breaches of Good Clinical Practice (GCP) or the Protocol for Trials Involving Therapeutic Goods 2018.
**ETHICS COMMITTEE**

**TITLE: Safety Reporting**

**STANDARD OPERATING PROCEDURE: SOP006**

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**HREC**

- Significant Safety Issues reported as USMs, as amendments or as a temporary halt/early termination of a trial
- Annual safety reports
- IB updates and interim addenda

**INSTITUTION**

- Significant Safety Issues reported as USMs, as amendments or as a temporary halt/early termination of a trial
- SUSARs arising from the site

**TGA**

- SUSARs (Australian sites)
- Significant Safety Issues reported as USMs, as notifications or as a temporary halt/early termination of a trial

**SPONSOR**

(Oversight from DSMB or alternative)

- Significant Safety Issues reported as USMs, as amendments or as a temporary halt/early termination of a trial
- IB updates and interim addenda
- SUSAR/line listings (only if required by sponsor’s global SOPs)

**INVESTIGATOR**

(CPI or PI)**

- Safety critical AEs, SAEs (as per protocol)
- USMs instigated by the PI

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**KEY**

AE – Adverse Event

SAE – Serious Adverse Event

SUSAR – Suspected Unexpected Serious Adverse Reaction

USM – Urgent Safety Measure

**SOP – Standard Operating Procedure**

**DSMB – Data Safety Monitoring Board**

**IB – Investigator’s Brochure**

**CPI – Co-ordinating Principal Investigator**

**PI – Principal Investigator**

**PI – Product Information**

**DSMB – Data Safety Monitoring Board**

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* The sponsor (or their delegate) should report to all parties in accordance with the timelines indicated within this document.

** The CPI should be provided with all correspondence sent by the sponsor to PIs and/or the HREC.

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Prepared by Manager, Human Research Ethics & Governance

Approved by Associate Director, Clinical Research

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Approved: June 2018

Review: June 2020

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**KEY**

- **AE** – Adverse Event
- **SAE** – Serious Adverse Event
- **USADE** – Unanticipated Serious Adverse Device Effect
- **USM** – Urgent Safety Measure
- **SOP** – Standard Operating Procedure
- **DSMB** – Data Safety Monitoring Board
- **CIP** – Clinical Investigation Plan
- **PI** – Principal Investigator
- **PPI** – Co-ordinating Principal Investigator
- **IB** – Investigator’s Brochure
- **IFU** – Instructions for Use

* The sponsor (or their delegate) should report to all parties in accordance with the timelines indicated within this document.

**The CPI should be provided with all correspondence sent by the sponsor to PIs and/or the HREC.**