

# Conducting a clinical trial or research study in Australia

## A rough guide through ethics (ethics approvals), governance (site approvals) and regulatory approvals

The main requirements for commencement of a clinical trial are:

1. Human Research Ethics Committee (HREC) approval including approval of a written participant information sheet & consent form (a master copy).
2. Site specific assessment authorisation (research governance) from your institution, this may include review of the indemnity arrangements, establishment of a contract with the trial organiser (if applicable) and approval of any site specific documents.
3. Completion of the Therapeutic Goods Administration (TGA) Notification Scheme (CTN Scheme) or the Clinical Trial Exemption Scheme (CTX Scheme) if your trial involves a new therapeutic good or medical device or a new use of an existing therapeutic good or medical device.

Please note that you require your full protocol, patient information sheet and consent form, your data collection forms and any follow up questionnaires going to out to families. If you are linking with any data registries, this may involve additional approvals.

If you are have a website that is open to the public, then you will need ethics approval for the content.

Please consult with a statistician, your pharmacy, if relevant, medical records data manager and any other expert/personnel who you will require to complete the protocol and implement your study.

# Ethical review

## What is ethics?

In Australia, the ethics of human research is governed by the *National Statement on Ethical Conduct in Human Research (2007 updated May 2015)* issued by the National Health and Medical Research Council (NHMRC). Under these guidelines all research involving humans requires ethical approval. The national statement can be found here:

<https://www.nhmrc.gov.au/guidelines-publications/e72>

## Will my research require ethics review?

Health and disability research involving human participants, human tissue or the use of health information requires ethics review. The national statement indicates that each institution must monitor any processes of ethical review of low risk research to ensure those processes continue to provide sufficient protection for participants.

Please speak with your HREC even if you think your research involves no more than low risk.

## 1. How do I apply for ethics approval from a HREC

If you are preparing an ethics and governance application for the first time, you will need to take the time to read the following resources. Don't forget to talk with your ethics committee administrative team as they will be able to guide you through the process. You will first need to see if you are in a state that accepts the National Mutual Acceptance Scheme. If you are in Western Australia and conducting a multi-state multi-centre trials, you may still need to operate under a system that is a hybrid of multiple ethics committees.

This is the NHMRC Human Ethics portal. It has tools, explanations and resources.

<http://hrep.nhmrc.gov.au/>

This website has some great resources including summaries of the ethics process and downloadable graphics, explanations, tools and checklists:

<https://www2.health.vic.gov.au/about/clinical-trials-and-research>

It is the responsibility of the principal coordinating investigator (Australian study lead/chair) to submit the ethics application.

### Single site vs multi-centre vs multiple ethics review

1. Sometimes you will be conducting a study at a single centre/hospital. Single ethics review is illustrated here:

[http://hrep.nhmrc.gov.au/uploads/files/concept\\_diagram\\_single\\_ethical\\_review\\_o.pdf](http://hrep.nhmrc.gov.au/uploads/files/concept_diagram_single_ethical_review_o.pdf)

2. At other times you will be conducting a project across multiple centres and multiple states. There is a Single Ethical Review of Multi-centre Research.

### The National Mutual Acceptance Scheme – single review system

The Victorian, South Australian and Queensland Departments of Health, and the New South Wales Ministry of Health have signed a Memorandum of Understanding (MOU) for

the National Mutual Acceptance (NMA) of ethical and scientific review of clinical trials conducted in each of the participating jurisdiction's public health organisations.

Please note, there are state by state variations in requirements e.g. the Victoria Module for Victorian submissions.

3. In Australia, not all centres are signed up yet to the National Mutual Acceptance Scheme. Therefore you will sometimes need to apply for Multiple ethics review: [http://hrep.nhmrc.gov.au/uploads/files/concept\\_diagram\\_multiple\\_ethical\\_review\\_o.pdf](http://hrep.nhmrc.gov.au/uploads/files/concept_diagram_multiple_ethical_review_o.pdf)

### **Online forms website:**

The majority of HRECs utilise the Online Forms website for completion of the HREC application (NEAF: National Ethics Application Form). We recommend working closely with your HREC when you are preparing a submission to confirm the process to be followed for either multiple or single-site review as there are variations between HRECs and states.

If you are required to use the Online Forms website to prepare your ethics submission you will need to create an account (once only). Participating site investigators must also have an existing account or register for Online Forms.

<https://au.ethicsform.org/SignIn.aspx>

IT Help Desk - Contact the IT Help Desk regarding technical questions on Online Forms and AU RED. Telephone: (61 2) 9037 8404 Monday to Friday 10am to 4pm EST

Email: [helpdesk@infonetica.net](mailto:helpdesk@infonetica.net)

**Submitting to ethics:** after completing your application, review the submission process for the HREC you are applying to and complete their submission checklist. Most HRECs have set meeting dates for review of new applications. In a multi-site submission each site investigator will be required to sign the application (either electronic or hard copy), contact your HREC for their specific requirements.

## **2. What is research governance?**

Alongside ethics approval, you will also need the project to be reviewed by each centre by their research governance officer. Research governance considers legal compliance, financial management, resource implications, medical records access, accountability and risk management associated with research at a participating site.

## **How do I apply for governance authorisation?**

For multi-centre review the Coordinating Investigator completes the NEAF and generates the Site Specific Assessment (SSA) Form for each individual site via the online forms website. The SSA is then transferred to the participating principal investigators, or their nominee, to complete site specific governance. You can commence the process for ethics

approval and SSA authorisation (governance) at the same time. However, it should be noted that SSA authorisation cannot be completed until HREC approval has been given.

### **3. Regulatory Approval: Therapeutic Goods Administration**

#### **Does my study require regulatory approval?**

**Regulatory approvals for investigational drugs or devices by the TGA:** if your study involves a new drug or device or a new use for an approved drug or device a submission of a CTN or CTX to the TGA is required.

#### **How do I apply for regulatory approval?**

The submission process is electronic and maintained by each institution and may be carried out by the trial organiser/sponsor or an individual institution. This is a new process implemented in late 2015 and you will need guidance from your institution.

<https://www.tga.gov.au/form/ctn-scheme-forms>

Generally a CTN may be submitted to the TGA when the following have been completed:

1. HREC Approval
2. Research Governance Approval (for public hospitals only and a few private Hospitals.
3. Fully executed Clinical Trial Research Agreement (CTRA)

The sponsor or institution makes a final declaration (electronic signature). Payment will be required per application but multiple sites can be included on one CTN submission.

### **Ongoing obligations**

#### **Ethics**

after HREC approval is granted it is the responsibility of the principal investigator (for single site ethical approval) or the coordinating investigator (in the case of a trial with multi-centre approval) to submit updates and amendments to the HREC, this may include:

- progress reports, at least annually;
- amendments to the approved study documentation, such as the participant information sheet or protocol;
- addition of new trial sites in the case of a multi-centre site approval;
- safety information;
- study termination.

Review or acknowledgement by governance (more on this below) may be required for study amendments before they can be implemented.

**Safety reporting:** the principal investigator at each site is responsible for ensuring that any adverse or serious adverse events are reported to the trial organiser, governance and the HREC or CPI as applicable.

#### **Governance**

All ethics updates and approval should be noted by each governance office. Sometimes, if this involves a protocol amendment, the protocol amendment may need to be noted prior to being implemented at a given site.

### **TGA and Regulatory**

Changes to the following need to be updated with the TGA:

1. change of principal investigator
2. changes to drug or devices
3. Study completion
4. Serious, unexpected and drug related adverse events