Standard Operating Procedure CCTU/SOP007

CCTU Escalation Cascade

1. Scope

This procedure covers escalation of all issues arising from activities undertaken by the CCTU

2. Purpose

To ensure that arising issues are dealt with in a timely and appropriate manner by all members of CCTU.

3. Definitions and Abbreviations

The headings below contain the definitions of terms and meaning of abbreviations used within the document.

3.1. Definitions

Term	Definition
Cambridge Sponsored	Sponsored by Cambridge University Hospitals NHS Foundation Trust (CUH); or the University of Cambridge (UoC); or jointly by CUH and UoC
	or Cambridgeshire & Peterborough NHS Foundation Trust (CPFT) or CPFT jointly with the University of Cambridge

3.2. Abbreviations

Abbreviation	Meaning
CCTU	Cambridge Clinical Trials Unit
CTIMPs	Clinical Trials of Investigational Medicinal Products

4. Undertaken by

Any member of the CCTU

5. Items Required

CCTU/SOP018 Handling of Protocol and Regulatory Non-Compliance in Clinical Trials

CCTU/SOP019 Urgent Safety Measures and Temporary Halt for CTIMPs

R&D/SOP003 Serious Breach of Protocol or GCP in CTIMPs

Trust Procedure: Raising concerns (whistle-blowing) procedure

http://merlin/Lists/DMSRecords/DispRecordTabsDoc.aspx?ID=20663&IsDlg=1&Source=/&IsDlg=1#

R&D Policy and procedure: Scientific misconduct

http://merlin/Pages/Results.aspx?k=ALL(scientific%20misconduct)

Trust Policy and Procedure: Data Protection

http://merlin/Pages/Results.aspx?k=data%20protection

6. Summary of Significant Changes

Updates to hyperlinks under items required.

7. Method

The following sections provide a description of the processes to be followed when implementing this document's procedures.

7.1. GCP Non Compliances

- Reporting of protocol or regulatory non compliances will be according to CCTU/SOP018 Handling of Protocol and Regulatory Non-Compliance in Clinical Trials
- Reporting of serious breach will be according to R&D/SOP003 Serious Breach of Protocol or GCP in CTIMPs
- Reporting of urgent safety measures will be according to CCTU/SOP019 Urgent Safety Measures and Temporary Halt for CTIMPs

7.2. Misconduct and Fraud

- Reporting of misconduct and fraud will be according to Trust R&D Policy and Procedure: Scientific misconduct

7.3. Breach of Data Protection Act

- Reporting of breach of data protection will be according to Trust Policy and Procedure: Data Protection

7.4. EPIC Use and Functionality Issues

- All EPIC specific issues will be collated by Clinical Trial Monitors and reported quarterly to the Health Information Management Team Leader and Sponsor.
- In the event of significant issues which affect patient safety or data integrity, these will be escalated immediately as appropriate

7.5. All other issues

- For escalation of all other issues/concerns that do not fit into the above categories, including but not limited to: complaints, staff issues, confidentiality concerns, resourcing issues.
- Establish all information where possible relating to the issue to be reported
- Email or send written letter/notes, should the reporter prefer to do so anonymously, to CCTU Operations Director or delegate (Note: all issues raised will be dealt with in confidence; reports made anonymously may be more difficult to investigate depending on information made available)
- CCTU Operations Director or delegate will assess and escalate the issues/concerns as appropriate

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- Refer to Trust Procedure: Raising concerns (whistleblowing)

8. Monitoring Compliance with and the Effectiveness of this Document

a. Process for Monitoring Compliance and Effectiveness

As part of routine monitoring visits, audit and inspection

b. Standards/Key Performance Indicators

This process forms part of a quality management system and is reviewed according to CCTU procedures. Standard Operating Procedures are reviewed every two years.

9. References

The Institute of Clinical Research, Abbreviations used in Clinical Trials.

MHRA, Good Clinical Practice "Grey Guide"

10. Associated Documents

- CCTU/SOP018 Handling of Protocol or Regulatory Non-Compliance
- CCTU/SOP019 Urgent Safety Measures for CTIMPs
- R&D/SOP003 Serious Breach of Protocol or GCP in CTIMPs

11. Equality and Diversity Statement

This document complies with the Cambridge University Hospitals NHS Foundation Trust service equality and diversity statement.

12. Disclaimer

It is the user's responsibility to check against the electronic library that this printed out copy is the most recent issue of this document.

Review date	2 years (or earlier in light of new evidence) from approval date
Owning department:	CCTU QA
Supersedes:	CCTU/SOP007 V3
Local reference:	CCTU/SOP007 V4

Escalation pathway

Associated with the following SOPs: CCTU/SOP007, CCTU/SOP018, CCTU/SOP019 and R&D/SOP003

Sponsor organisation's internal escalation and review processes for dealing with fraud, misconduct, disciplinary issues etc.

MHRA – Serious Breach	Sponsor R&D Director R&D Manager	EPIC HIM Team Leader

CCTU Operations Director or Delegate → CCTU staff

Data Monitoring Committee and Ethics Committee	Chief Investigator	Trial/Study Team Staff

REC – Participating Sites

MHRA – Urgent Safety Measures

Anybody with knowledge of any issue in need of escalation, at any study site should inform the trial team and /or Chief Investigator

Issues to be escalated up from all participating centres in a trial:
Consistent non-compliance
Potential Serious Breaches
Urgent Safety Measures
Suspected Fraud, Misconduct
Data protection & Confidentiality Concerns
Staff & Resources issues
Complaints and other important issues relating to legal responsibilities of the Sponsor