Policy

Trust sponsored international studies

Key messages

This document seeks to ensure that:

- there is a clear process for assessing whether sponsorship of a proposed International study is within the Trust's capabilities;
- there is a clear process for assessing whether a non-UK site can be added after study set up for a Trust-sponsored study;
- there is a clear process of identifying all necessary and relevant expertise, knowledge and resources to enable the Trust to maintain appropriate Sponsor oversight of any proposed International study; and
- International studies sponsored by the Trust are designed, managed and conducted in accordance with Trust requirements and all applicable regulatory, research governance and GCP requirements.

1 Scope

This policy applies to the R&D department, the Cambridge Clinical Trials Unit and to investigators and study teams:

- Intending to conduct a new International study
- Conducting an existing Trust-sponsored study (whether international or not) where an additional participating site outside the United Kingdom is intended to be added after set up (after which time the study will be known as an International study, if it is not already)

Unless the context otherwise clearly indicates, words used in the singular include the plural.

2 Purpose

The purpose of this document is to inform fully all relevant parties of the processes to be followed for sponsoring an International study and/ or when an additional participating site outside of the United Kingdom is added to an existing Trust-sponsored study after set up.

3 Definitions and abbreviations

3.1 Definitions

Chief investigator (CI): The person who takes overall responsibility for the design, conduct and reporting of the entire multi-site study.

Clinical trials agreement (CTA): A contract which is required before any research can commence at an international participating site and which shall cover funding (or other support), governance, management, conduct and apportionment of liability for the study.

International site: A location where an activity which is the subject of the International study takes place.

International study: Any Trust-sponsored study (including CTIMPs and non CTIMPs) with a site/ s in any country outside the United Kingdom.

Interventional study: A study which falls within the definition of either:

- a clinical trial of an investigational medicinal product
- a clinical investigation or other study of a medical device
- a combined trial of an investigational medicinal produce and an investigational medical device
- any other clinical trial to study a novel intervention or randomised clinical trial to compare interventions in clinical practice

Any other category of study in IRAS is not an Interventional study including studies limited to working with human tissue samples (defined as relevant material under the Human Tissue Act 2004) or studies limited to working with data (project specific only).

IRAS: The Integrated Research Application System.

Principal investigator (PI): The leader responsible for a team of individuals conducting the study at an international site.

R&D legal team: The solicitor consultants and any R&D contract manager.

R&D officers: Any R&D governance assistants and/ or co-ordinators.

Sponsor: The party responsible for the finance, conduct and management of the study in accordance with EU/ local law.

Trust-sponsored: Sponsored by Cambridge University Hospitals NHS Foundation Trust (CUH) or sponsored by CUH jointly with the University of Cambridge.

3.2 Abbreviations

Abbreviation	Meaning
CCTU	Cambridge Clinical Trials Unit
CI	Chief Investigator
CTIMPs	Clinical Trials of Investigational Medicinal Product
ICF	Informed Consent Form
PI	Principal Investigator
PIS	Participant Information Sheet

4 Introduction

The Trust can sponsor an International study provided study is not an Interventional study. The Trust does not sponsor International studies which are also Interventional studies.
The Trust may not add a new International site to an existing Trust-sponsored Interventional Study.

An exception to this rule could be made in cases of a national health emergency such as pandemic but will require a risk assessment and Research Board approval, to be instigated through the R&D legal team.

If a CI wishes to conduct an International study, which is also an Interventional study, and/or add a new International site to an existing Trust-sponsored Interventional study, the CI must contact the R&D legal team as early as possible to discuss potential alternative contractual arrangements other than Trust sponsorship.

Where the Trust sponsors an International study, which is:

- Not an Interventional study and
- Includes an International site

The Trust may under local law, be responsible for ensuring compliance with regulatory procedures in participating countries and may delegate certain of its legal responsibilities as Sponsor to national lead sites or local Sponsors as may be agreed in each country.

Although a Sponsor can formally delegate one or more of these functions of sponsorship, ultimately the Sponsor remains responsible. Therefore the Sponsor is required to implement sufficient processes to maintain appropriate oversight of the International study so that it can ensure that the legislation is complied with and the Sponsor's legal responsibilities are met.

This policy has been drafted to cover all International studies including both CTIMPs and non-CTIMPs because an International study which may not fall under the Medicines for Human Use (Clinical Trials) Regulations 2004 in the United Kingdom may be regulated as a CTIMP under the legislation of other countries.

5 Responsibilities

R&D officers and/ or clinical trial coordinators: will notify the relevant person from R&D legal team[1] as soon as they become aware of:

- A proposed International study
- The proposed addition of a new International site in an existing Trust-sponsored study or
- Any activity in connection with a location outside of the United Kingdom which raises the question of the nature of the relationship between the Sponsor and that location

R&D legal team: will consider whether the proposed International study is an Interventional study. If so, and also in the case of the proposed additional of a new International site in an existing Trust-sponsored Interventional study, it will liaise with the R&D officers and/or trial co-ordinators to discuss potential alternative contractual arrangements other than Trust sponsorship. For jointly sponsored studies, the R&D legal team will liaise additionally with the University Research Operations Office.

6 Governance measures for International studies

Subject to the over-riding principle in section 4 (that the Trust may not sponsor an International study, which is also an Interventional study, and/or open an International site in an existing Trust-sponsored Interventional study) where the Trust assumes legal responsibility as sole or joint sponsor of an International study and/or opens an International site in a Trust-sponsored study, the following risk management measures may be put in place if applicable and where appropriate:

a. A lead international site may be identified by the CI for each country, and the Trust shall delegate the responsibility for applying for and maintaining local regulatory and ethical approvals to the lead international site

b. International sites may be required to arrange their own insurance cover for their conduct of the study and to indemnify, through the CTA, the Sponsor against any liability which is the fault of the International site

c. Where the Trust is sole Sponsor, the CI will liaise with lead international sites to arrange local insurance cover for participants if required (this may include cover for non-negligent harm in some countries). Where the CI is a substantive employee of the University, the CI will liaise with the University insurance office to arrange applicable insurance cover for the relevant aspects of the international study

d. The CI shall be responsible for ensuring that all ethical, regulatory and site approvals required to conduct the study at each international site are in

[1] This is the R&D legal team member who has responsibility for the division under which the proposed International study and/or addition of a new International site has arisen.

place before any research activity commences at that international site and shall keep copies on the trial master file

e. The R&D legal team will take steps to limit the Trust's liability as far as possible in the CTA. Where possible English law will govern the CTA or the R&D legal team may (on a case by case basis) agree to accept the international site's local law or a split jurisdiction clause so that each party can only be sued in its local courts under local law

f. The R&D legal team will review each international site's PIS and ICF to ensure appropriate information is given to participants about indemnity/ insurance arrangements for the study. This will require back translation of the PIS and ICF for non-English speaking countries.

g. The R&D legal team will review the insurance cover requirements for each country to ensure all Sponsor liabilities under national laws are covered.

h. The CCTU shall set up a risk-based monitoring plan for CCTU supported studies

i. The Trust shall delegate the responsibility for ensuring that any study drug is labelled in accordance with local laws to the lead international site in each country

j. The Trust shall delegate the responsibility for arranging the translation of all study documents in accordance with local requirements to the lead international site in each country

7 Green light procedure for initiation of international sites

No research activity shall commence at any International site until copies of the following documents have been received by the CI (to be kept on the trial master file) if the R&D officers confirm that it is required for that International site:

- Ethical and regulatory approvals and any local site approvals required
- Ethically approved PIS and ICF
- Copy of local site insurance policy
- Fully signed CTA
- Any additional documentation required by pharmacy

8 Monitoring international studies

The Trust needs to ensure that it has sufficient Sponsor oversight for non-United Kingdom sites.

The Sponsor and/or delegate shall carry out audit and monitoring activities as deemed appropriate for each International study and/or International site to detect and rectify poor compliance.

This shall include reviews of the following if applicable:

a. The TMF to ensure the requirements of green light procedure in section 8 above have been met

b. Remote monitoring and monitoring visit reports

c. The study team's processes to ensure fast and effective communication with PI's at all International Sites in the event of safety issues arising

d. SAE reporting to non-United Kingdom regulatory authorities

9 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. Documents are reviewed every two years.

10 References

1. MHRA Good Clinical Practice Guide

Equality and diversity statement

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

Disclaimer

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

Document management

Approval:			
Owning department:	Research and development		
Author(s):	Tracey Hensman		
File name:	International studies policy version4		
Supersedes:	Version 23, December 2019		
Version number:	Version 4	Review date:	December 2027
Local reference:	R&D POL003	Media ID:	30112