

Joint Research Management Office Standard Operating Procedure for:

Amendments for sponsored studies (including halting studies) - Process for JRMO

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| SOP Number: | 17a | Version Number: | 9.0 |
| Effective Date: | 15 th February 2023 | Review Date: | 15 th February 2026 |

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Purpose:

To outline the Joint Research Management Office (JRMO) procedure for processing amendments for medical research studies sponsored by Barts Health NHS Trust (Barts Health) and Queen Mary University of London (Queen Mary).

To ensure that the JRMO are aware of all Barts Health/Queen Mary sponsored studies amendments and give sponsor authorisation prior to the amendment being submitted to Research Ethics Committee (REC), Medicines and Healthcare products Regulatory Agency (MHRA) and Health Research Authority (HRA).

To ensure that the most up to date version of documents are stored in the sponsor oversight files and sponsor's research database application (EDGE).

To ensure that the JRMO are aware of the relevant requirements for gaining review body approvals when processing amendments to health-related research studies.

Scope:

This Standard Operating Procedure (SOP) applies to all medical research studies sponsored by Barts Health/Queen Mary. It applies to all amendments including temporary halting and early termination of research.

For amendments of externally sponsored studies hosted at Barts Health refer to [SOP 17b: Amendments for hosted studies](#)

For the process of submitting amendments to the JRMO refer to [SOP 17c: Amendments for sponsored studies \(Process for researchers\)](#).

Abbreviations:

| | |
|--------------|---|
| AA | Amendments Administrator |
| AO | Amendments Officer |
| Barts Health | Barts Health NHS Trust |
| CI | Chief Investigator |
| GCP | Good Clinical Practice |
| HRA | Health Research Authority |
| JRMO | Joint Research Management Office |
| MHRA | Medicines and Healthcare products Regulatory Agency |
| Queen Mary | Queen Mary University of London |
| REC | Research Ethics Committee |
| ReDA | Research Database Application |
| SOP | Standard Operating Procedure |

SOP Text:

| | Responsibility | Activity |
|----|--|---|
| 1. | Amendments Administrator (AA) /Governance Officer (GO) | <p>Receive amendments and check whether the submission is valid.</p> <p>1. Review the amendment submission to confirm whether substantial or non-substantial. Check documents as per Appendix A.</p> <p>2. Once the valid document set has been received, record the amendment on the central amendments spreadsheet, and allocate to the GO.</p> <p>3. Respond to the email from the CI/study team within two working days, confirming that the amendment is a valid submission and who the allocated GO will be processing the amendment.</p> <p>If the amendment submission is invalid, save the received documents and request that missing documents and/or further information are sent in one email to the research amendments inbox. Log the amendment on the spreadsheet. Inform the CI that the amendment will not be reviewed until a valid submission is received.</p> |
| 2. | AA & GO | <p>Save the amendment documents and update EDGE. Coordinate the review with the research team and internal JRMO staff.</p> <p>Once a valid submission has been received, save the amendment email and all attachments in the "Indemnity" folder, under the CI's name and study number.</p> |

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| | | <p>Update the EDGE amendment workflow and save all the documents under amendments folder, with the relevant information:</p> <ul style="list-style-type: none"> • Type: Substantial or non-substantial • Reference: Sub Am number i.e. Sub Am 05 • Title: Include version and date of document • Date of amendment approval <p>All amendments for MHRA regulated studies must be notified to the GCP & Governance Managers to review, classify, and approve the amendment.</p> <p>All high risk Interventional and Research studies must be flagged to the Governance and Performance Manager.</p> |
| 3. | GO | <p>Liaise with Support departments, Costing and Contracts Manager, post award team and GCP Manager</p> <p>Review impact on service departments and request approvals as appropriate.</p> <p>If there are any cost implications or extension to study alert the Costing and Contracts team and Post Award teams for review and updating any finance systems as appropriate.</p> <p>Request review from GCP and Governance Manager for all amendments related to MHRA regulated studies or high risk Interventional studies being monitored by the GCP and Compliance team or if the amendment includes the addition of medicines, ingestible products, medical devices or software.</p> |
| 4. | Costing & Contracts Team | <p>Review cost implications of the amendment.</p> <p>Review documentation by assessing any implications on original costing, funding available and need for additional contracts or amendments to contracts.</p> <p>After any cost review, the costing officer should respond to the GO with approval or actions required.</p> |
| 5. | GCP & Governance Manager (For MHRA-Regulated Studies only) and GO | <p>Review amendment</p> <p>For all amendments, these checks will be conducted by the GO but in addition the GCP & Governance manager will review:</p> <ul style="list-style-type: none"> • Statistical impact • Patient safety, burden and risks • Institutional reputational risks • Compliance with applicable regulatory guidelines • Determine the overall risk score for the study, noting the areas of risk(s). Assess the original Risk Assessment according to SOP23 Risk Assessment if the amendment impinges on one or more risk areas. • If required, amend the monitoring plan • If required, request peer review of the amendment <p>If an amendment will add the use of e-consent or new database, ensure</p> |

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| | | <p>that the research team are aware of their requirement to comply with SOP 38b Electronic data management systems for MHRA-regulated studies and SOP 38c Computer System Validation for Interventional and Research studies.</p> <p>Provide feedback to the research team. If any changes are required then request an updated document set is submitted to the research amendments inbox. Review the new document set and provide further feedback when required.</p> |
| 6. | GO | <p>Arrange authorisation of the amendment tool</p> <p>Once the amendment review is complete and all queries have been addressed, arrange authorisation of the amendment form.</p> <p>Issue approval for the amendment to be submitted to the review bodies (See appendix B). Instruct the study team to copy research.amendments@qmul.ac.uk into all review body submissions.</p> |
| 7. | GCP & Governance Manager/GO | <p>Raise any issues in line with the JRMO escalation policy</p> <p>If alerted to a problem with an amendment, follow escalation policy to resolution. Initial escalation will be to the Research Governance and Performance Manager or Senior GCP and Governance Manager. Further escalation may be required to the Research Operations Manager and the Sponsor Oversight Group where necessary.</p> |
| 8. | GO | <p>Check that the JRMO have received all final versions of approved documents</p> <p>Upon receipt of the review body approvals , ensure that the JRMO are in receipt of all documents including:</p> <ul style="list-style-type: none"> • Final Amendment tool • Health Research Authority (HRA), REC and MHRA approval letters (where applicable) and all correspondence. • HRA Confirmation of Amendment Assessment and all correspondence (Note: Where REC Approval is also required, continuing HRA Approval is conditional on Favourable REC Opinion) • All amended documents as listed on approval letters • Written evidence that the CI approves the amendment (if changes were required) • Final protocol signed by the CI (and statistician for MHRA-regulated studies) if changes were required <p>Ensure all documents, including emails and attachments, are saved in the Indemnity shared folder.</p> <p>The documents must also be uploaded to EDGE, under the Amendments section. Workflows on EDGE must also be updated.</p> <p>For all substantial amendments for sponsored MHRA-regulated studies, an amendment acknowledgment email must be sent to the CI copying in the GCP & Governance Manager and allocated monitor.</p> |
| 9. | AA/GO/JRMO Clinical Trial Monitor | <p>Save MHRA-regulated amendment documents and correspondence in the sponsor file</p> |

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| | | <p>Ensure updated versions of study documents are filed in Indemnity and appropriate electronic/physical sponsor oversight file.</p> <p>Mark all documents as superseded and update the version control log. Update the GCP Team and MHRA Dossier EDGE attributes as necessary.</p> |
| Special Amendments | | |
| 10. | GCP & Governance Manager or GO | <p>Manage Urgent Safety Measures</p> <p>Where possible, the CI should discuss the urgent safety measure with the sponsor before implementing the amendment. Upon notification from the CI, request the details of the hazard and the full justification for the urgent safety measure. Ensure that the CI has contacted the MHRA Clinical Trials Unit and, where required, seek advice from the Clinical Director of R&D.</p> <p>Once an urgent safety measure has been implemented, ensure that the CI notifies the REC and MHRA in writing within 3 days. Request the written notification and review it for accuracy and completeness.</p> <p>Ensure that the CI submits a substantial amendment to document the urgent safety measure within two weeks. Review the amendment as a priority and notify the amendments team that the amendment should be treated as a priority.</p> <p>For further details please see JRMO SOP 26a Site level Pharmacovigilance for MHRA regulated studies.</p> |
| 11. | GO or GCP & Governance Manager | <p>Managed halted studies</p> <p>If the sponsor or CI decides to halt the study temporarily, remind the CI of their responsibility to notify the REC (and MHRA for MHRA-regulated studies) immediately and at the latest within 15-days from when the study is temporarily halted. This should take the form of a substantial amendment unless exempt (e.g. during 2020 Pandemic) following instructions from the regulators.</p> <p>The notification must clearly explain what has been halted (for example, stopping recruitment and/or interrupting treatment of subjects already included) and the reasons for the temporary halt.</p> <p>To restart a study that has been temporarily halted, a second substantial amendment must be made.</p> <p>If the study is not restarted, an early termination should be submitted as per JRMO SOP 18a Study Closure Sponsored MHRA-regulated studies.</p> |

Change control

This section outlines changes from version 8.0 to version 9.0

| Section changed | Summary and description of changes |
|-----------------|---|
| All | General administrative changes throughout |
| Section 15 | Addition of required metrics |
| Section 18 | Removed |
| Template | Removal of template |

List of appendices

| Appendix ref. | Appendix name |
|---------------|-----------------------------------|
| Appendix A | Amendment submission document set |
| Appendix B | Template email |

Appendix A

Amendment submission document set

Valid submission of a substantial and non-substantial amendment includes all of the following documents,

- Excel version of the unlocked amendment tool
- All new or amended documents. Both 'clean' and 'tracked changes' versions of amendment documents should be submitted. Revised protocols must be signed by the Chief Investigator (CI) (and statistician for MHRA-regulated studies).
- Signed Confirmation of Costs for Amendments ([SOP 17c Associated Document 1](#))- if the amendment will have any impact on costs.
- Any support department approvals already secured by the CI e.g., pharmacy approval. Written confirmation from the CI (and statistician if applicable) that they approve all amended documents (if the CI and/or statistician are not copied into the submission email).
- Signed conditions of sponsorship (if a new CI is appointed).

If the substantial amendment will be submitted to the MHRA, the following must also be included:

- Updated XML and PDF files of the clinical trials authorisation form, with all changes highlighted.
- Cover letter to MHRA (including a description of the amendment and reasons for the proposed amendment).
- Supporting data as applicable. For example, summaries of data, updated risk benefit assessment, possible consequences for subjects on the study and possible consequences for evaluation of results.

Amendments submitted via the Combined Review:

- Once the Amendment Tool and all supporting departmental approvals have been received, the GO must review and sign the Amendment Tool ensuring that the Sponsor amendment reference number and the sponsor amendment date are clear on the Amendment Tool
- GO to advise the CI and/ research team to create a 'New Amendment' on IRAS for Combined Review and submit the mandatory and supporting documents.
- Once the Amendment has been submitted by the Research Team on IRAS for Combined Review, it will be routed to the sponsor's account.
- GO to review the amendment and documents on IRAS for Combined Review and submit.

Appendix B

Dear xx

The amendment tool has been locked and you should now have sponsor authorisation, please submit to the regulatory bodies as per the submission guidance on the amendment tool, making sure you send the locked amendment tool and all relevant amendment documents.

Please ensure that you copy in the sponsor (research.amendments@qmul.ac.uk) in all correspondence with the regulatory bodies and send the final approved document set to us.