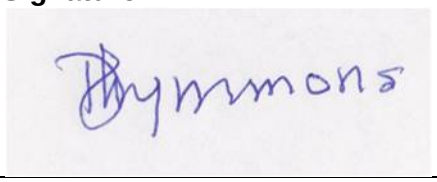
The University of Manchester

Standard Operating Procedure

Number:	UM/UoM Urgent Safety Measures/SOP11/5.0		
Title:	**Urgent Safety Measures**		
Version:	5.0 (March 2018)	**Effective Date**	March 2018
Author:	Mrs April Lockyer/Victoria Sheard	**Review Date**	March 2020
Reviewed by: Dr Mohammed Zubair		**Approved By:** Prof Deborah Symmons	
Position: Research Governance, Ethics and Integrity Manager		**Position:** Chair of Clinical Trials Management Group	
Signature: 		**Signature:** 	

Version	Date	Reason for change
2.0	**January 2013**	**Update of weblinks and office details**
2.1	**May 2014**	**Addition of version control statement for SOP**
3.0	**October 2015**	**Update of weblinks and office details**
4.0	**August 2016**	**Update of weblinks and office details**
5.0	**March 2018**	**Update to reflect current processes**

When using this document please ensure that the version you are using is the most up to date either by checking on the Research Governance, Ethics and Integrity Team website (http://www.staffnet.manchester.ac.uk/services/rbess/governance/) for any new versions or contacting the author to confirm the current version.

1.0 Background

The EU Good Clinical Practice (GCP) Directive 2001/20/EC was introduced to establish standardisation of research activity in Clinical Trials throughout the European Community. It was transposed into UK law as the Medicines for Human Use (Clinical Trials) Regulations 2004 (SI 2004/1031) which came into force on 1st May 2004. The Medicines for Human Use (Clinical Trials) Regulations together with subsequent amendments will be referred to as the Regulations in the rest of this document.

During the course of a Clinical Trial involving an investigational medicinal product (IMP), new safety information in the form of a Serious Adverse Event or information received from an external source may necessitate an immediate change in the study procedures or a temporary halt to the study in order to protect clinical trial subjects from any immediate hazard to their health and safety.

If time does not allow for an amendment to be authorised by the Medicines and Healthcare Regulatory Authority (MHRA) and main Research Ethics Committee (REC), this change in procedure can be implemented as an **Urgent Safety Measure**, by the Chief Investigator, in accordance with the process put in place by the MHRA, and as detailed in this standardised operating procedure (SOP). When the CI is not available it is the responsibility of the PI to introduce and report any urgent safety measures. The Sponsor can also implement this change.

This SOP is applicable to Clinical Trials involving an Investigational Medicinal Product and Medical Device trials.

An urgent safety measure is a procedure not defined by the protocol that is put in place prior to authorisation by the MHRA, main REC and Sponsor(s) in order to protect clinical trial subjects from any immediate hazard to their health and safety.

2.0 Purpose

This SOP outlines the procedures for implementing Urgent Safety Measures during the course of a Clinical Trial involving an IMP or medical device ***for a study sponsored by The University of Manchester.*** Where The University of Manchester has delegated responsibility for Urgent Safety Measures to another organisation, such as one of its partner NHS Trusts or a Clinical Trial Unit (CTU), the Investigator should follow the SOP of that organisation. ***However, The University of Manchester must still be notified (as set out in 3.2 below) where any Urgent Safety Measures have been implemented.***

3.0 Procedure

3.1 When to implement an Urgent Safety Measure

If the Principal/Chief Investigator becomes aware of information that trial subjects may be at risk of harm, he/she must take immediate action to make the required changes in study procedure or temporarily halt the study in order to protect clinical trial subjects from any immediate hazard to their health and safety.

3.2 Notifying the University of Manchester

The Principal Investigator must inform The University Research Governance, Ethics and Integrity Team (by telephone 0161 275 2725 or via email to clinicaltrials@manchester.ac.uk (marking the email Urgent and including the subject "Urgent Safety Measure Implemented - CTIMP") immediately of the change in study procedure providing full details of the information they have received and the decision making process leading to the implementation of the urgent safety measure.

If there is a co-sponsor for the study, the co-sponsor should also be notified. Where the University of Manchester has delegated responsibility for Urgent Safety Measures to another organisation, the Investigator should follow the SOP of that organisation. That organisation will be responsible for notifying the MHRA.

All correspondence with the Sponsor, MHRA and REC must be filed in the TMF including copies of substantial amendment form submissions.

3.3 Notifying the MHRA/REC

If the University of Manchester has Sponsor responsibility for Urgent Safety Measures, the Research Governance, Ethics and Integrity Office, or the organisation/individual delegated to report the incident **will immediately (ideally within 24 hours)** contact the Clinical Trial Unit at the MHRA (on 020 3080 6456) to discuss the issue with a medical assessor.

If the MHRA need more information a medical assessor will be in touch.
The MHRA will tell the person notifying them how the written report should be submitted (usually by email). A written notification in the form of a substantial amendment must also be submitted to the MHRA no later than 3 days from the date the measures were implemented. The substantial amendment should detail the measures taken, the reasons for implementing such measures as well as detailing the medical assessor contacted.

The REC which issued the favourable ethical opinion must also be notified in line with the MHRA reporting schedule.

If the Research Governance, Ethics and Integrity Office is closed for a period of time greater than 3 days (for example at Christmas and Easter), the Chief Investigator will be responsible for contacting the MHRA immediately to discuss the Urgent Safety Measure with a medical assessor, completing the substantial amendment form and forwarding this to the main REC and MHRA within 3 days as per outlined above, copying the University Research Governance, Ethicsand Integrity Team into all correspondence (clinicaltrials@Manchester.ac.uk). During periods where the MHRA phone is not accessible an email should be sent to clintrialhelpline@mhra.gov.uk providing an email overview. This should then be followed up with a phone call to the MHRA the next day the phone lines are open (Monday – Friday 08.30-16.30).

If a study is temporarily halted for any reason, (e.g. stops recruitment of new subjects and/or interrupts the treatment of subjects already included in the trial), the sponsor must notify the MHRA and the main REC as soon as possible and not later than 15 days as a substantial amendment A further substantial amendment will be required to re-start the study. The Chief Investigator may not recommence the study until the main REC has given a favourable opinion and the MHRA has not raised grounds for non-acceptance of the recommencement.

4.0 Related Procedures

SOP09: Substantial and non-substantial amendments to Clinical Trials (http://www.staffnet.manchester.ac.uk/services/rbess/governance/clinicaltrials/policiesandprocedures/)

5.0 Appendices

https://ec.europa.eu/health/sites/health/files/files/eudralex/vol-10/substantial_amendment_notification_form_.pdf

6.0 References

- Standard Operating Procedure Urgent Safety Measures University Hospital of South Manchester NHS Foundation Trust
- Standard Operating Procedure Urgent Safety Measures, Sheffield Teaching Hospitals NHS Foundation Trust.