

Salford Royal NHS Foundation Trust	
Standard Operating Procedure: Adverse Events Reporting	
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1.0 Background

This SOP applies to Clinical Trials of Investigational Medicinal Products (CTIMP's) where Salford Royal NHS Foundation Trust is acting as research sponsor.

Research-related adverse events are not uncommon and range from mild expected drug reactions to fatal or life threatening suspected unexpected serious adverse reactions (SUSARs). All adverse events need to be reported correctly and within strict timeframes, in accordance with the Medicines for Human Use (Clinical trials) Regulations 2004. These state that a sponsor shall ensure that all relevant information about a SUSAR is recorded, and reported to the Medicine and Healthcare Regulatory Agency (MHRA) and the National Research Ethics Committee (NRES).

2.0 Procedure

1. All adverse events/SUSARs occurring in the course of any CTIMP where Salford Royal NHS Foundation Trust is acting as research sponsor should be reported in the following manner, as soon as possible after their occurrence. This includes any Medicinal product used in a Trial, not just the product being investigated (please see SOP 21 on Non Investigational Medicinal Products)
 - 1.1 Upon enrolment into a clinical trial, the subject should be given a trial participant card. This will instruct the subject to inform a member of the trial team of any hospitalisation or illness occurring whilst in the trial. It is important that each subject is given a completed card (i.e. card with subjects name, trial name and contact details for the research team) when enrolling in a trial. Please see appendix 6 for a suggested format of this document.
 - 1.2 A member of the research team will thus be informed about each episode of illness/hospitalisation and will inform the PI.
 - 1.3 The severity and causality of a serious adverse event, adverse event or SUSAR (Suspected Unexpected Serious Adverse Reaction) should be assessed by a qualified medical practitioner, usually (but not always) the Principal Investigator. This could be via the Trial Data Monitoring Committee
 - 1.4 If the case appears to be a SUSAR then it should be unblinded (by the R&D department if necessary) and the following considered:
 - 1.4.1 If the administered product is the tested IMP, the case would be reported as a SUSAR.
 - 1.4.2 If the administered product is a comparator with a marketing authorisation, the adverse reaction should be reassessed for expectedness according to the study protocol. If the adverse reaction is unexpected then the SUSAR should be reported; otherwise it is an expected serious adverse reaction and not reportable on an expedited basis.
 - 1.5 The PI will complete and sign a Trust *Clinical Trial Adverse Event* or *SUSAR* form, and return it to the R&D Directorate. An electronic copy should be sent to srftadverseevents@manchester.ac.uk.
 - 1.6 For multi-centre trials the other Principal Investigators involved in the trial must report all SUSARs and adverse events to the Chief Investigator as soon as possible. The Chief Investigator is then responsible for reporting events to the R&D Directorate.
 - 1.7 For Multi Centre CTIMPs Sponsored by Salford Royal NHS Foundation Trust the R&D Lead will make all other Principal Investigators aware of this information within 7 days of it being reported.

- 1.8 The R&D Lead and the Research Governance Manager will also check regularly for events reported via the Trust Risk system which are flagged as research related.
2. When details of an event are received in the R&D Directorate they must be date stamped and passed immediately to the R&D Lead or the Research Governance Manager for action.
3. A sequential number will be assigned to each event, and based on the information provided by the researcher regarding causality and severity of the incident, one of the following codes will also be assigned (see figure 1):

AE	Adverse Event
SAE	Serious Adverse Event
ADR	Adverse Drug Reaction
SSAR	Suspected Serious Adverse Reaction
SUSAR	Suspected Unexpected Serious Adverse Reaction
HIRS	HIRS reports not classified as any of the above
4. The incident will be recorded on the Adverse Event Log specific to that trial. Each CTIMP has a specific file on the shared drive which contains this log.
5. For events coded as AE, SAE or HIRS no further action may be required. These are logged and filed in the project file.
6. For events assessed as being related to the study drug, information regarding action taken must be recorded in the adverse event log. For adverse reactions not classed as serious, the researcher may be advised to use the MHRA Yellow Card system to report the reaction. Where the reaction is already a recognised side effect of the IMP, no further action is required, but this must still be noted.
7. When notification of a SUSAR is received in the R&D Directorate, expedited reporting is required.
 - 7.1 The event will be recorded on the Adverse Event Log as above.
 - 7.2 Where the SUSAR is assessed as fatal or life-threatening the R&D Lead or the Research Governance Manager must report the event to the MHRA and REC within 7 days of being notified. SUSARs which are not fatal or life-threatening must be reported within 15 days.
 - 7.3 SUSARs must be reported to the main REC, and must be accompanied by the NRES Safety Report form. (See Appendix 5) The form should be signed by the person submitting the report and submitted on paper. All enclosures should be listed and referenced on the form.
 - 7.4 SUSARs must also be reported to the Pharmacovigilance Unit of the MHRA, using the CIOMS or SUSAR form, within the timelines stated above. When available, the electronic reporting system must be used.

8. The R&D Directorate will write to the Principal Investigator on an annual basis to request an update on adverse events occurring throughout the trial.
9. The R&D Directorate is responsible for ensuring that annual safety reports are provided to the main REC and the MHRA by the investigator. The investigator may be provided with a copy of the Adverse Event Log in order to assist them with the report. This is separate from the REC annual progress report.
 - 9.1 The REC requires Annual safety reports on the safety of subjects in all clinical trials of the IMP for which the sponsor is responsible, with an aggregated global line listing of all suspected serious adverse reactions (SSARs) occurring in these trials to date. There is no prescribed format for the report, however it must be accompanied by the COREC Safety Report form.
 - 9.2 The annual safety report provided to the MHRA should have three parts: a report on the subjects' safety in the concerned clinical trial, a line listing of all SSARs (including all SUSARs) occurred in the concerned trial, and an aggregate summary tabulation of SSARs that occurred in the concerned trial. One copy of the report should be sent to the Clinical Trials Unit of the MHRA, preferably on CD-ROM.

Related Procedures

SOP4 Delegation of Duties

SOP7 Incident Reporting

Appendices

Figure 1 - Assessment of event type

1. Adverse Event Reporting in Salford Royal NHS Foundation Trust – a guide for researchers
2. CIOMS form (Council for International Organisation of Medical Science)
3. Trust Adverse Event form
4. Trust SUSAR form
5. NRES Safety Report form
6. Suggested Trial Participation Card Format
7. Adverse Event Log Proforma