Investigator Initiated Clinical Trials Submission Guidelines

(NALHN SPONSORED)

Government of South Australia
Health
Northern Adelaide Local Health Network

CONTENTSINTRODUCTION 4

SITE SPECIFIC ASSESSEMENT - SSA 5

TECHNICAL SUPPORT 5

HELPFUL HINTS 5

DUAL SUBMISSION 5

ARTIFICIAL INTELLIGENCE (AI) AND LARGE LANGUAGE MODEL (LLM) TOOLS 5

CLINICAL TRIAL NOTIFICATION – CTN 6

CLINICAL TRIAL RESEARCH AGREEMENT - (CTRA) 7

SCHEDULE 2: 8

GOVERNANCE FEE 8

PHARMACY FEE 8

PAYEE 8

INDEMNITY 8

INSURANCE 8

SA HEALTH EMPLOYEES 9

DUAL EMPLOYMENT 9

NON-SA HEALTH EMPLOYEES 9

THIRD PARTY SPONSORS 9

NALHN CREDENTIALLING 9

SSA FEE FORM 10

STUDY PROTOCOL 10

INVESTIGATORS CVs 10

Declaration by Principal Investigator, Associate Investigators and other research personnel 11

GOOD CLINICAL PRACTICE CERTIFICATE 11

POLICE CLEARANCES 11

CONFIDENTIALDY AGREEMENTS FOR NON- SA HEALTH STAFF 11

TRIAL COORDINATOR FORM 11

RADIATION SAFETY REPORT / STANDARD OF CARE DECLARATION BY PI 12

ADVERTISING 12

OTHER LEGAL CONTRACTS AND AGREEMENTS 13

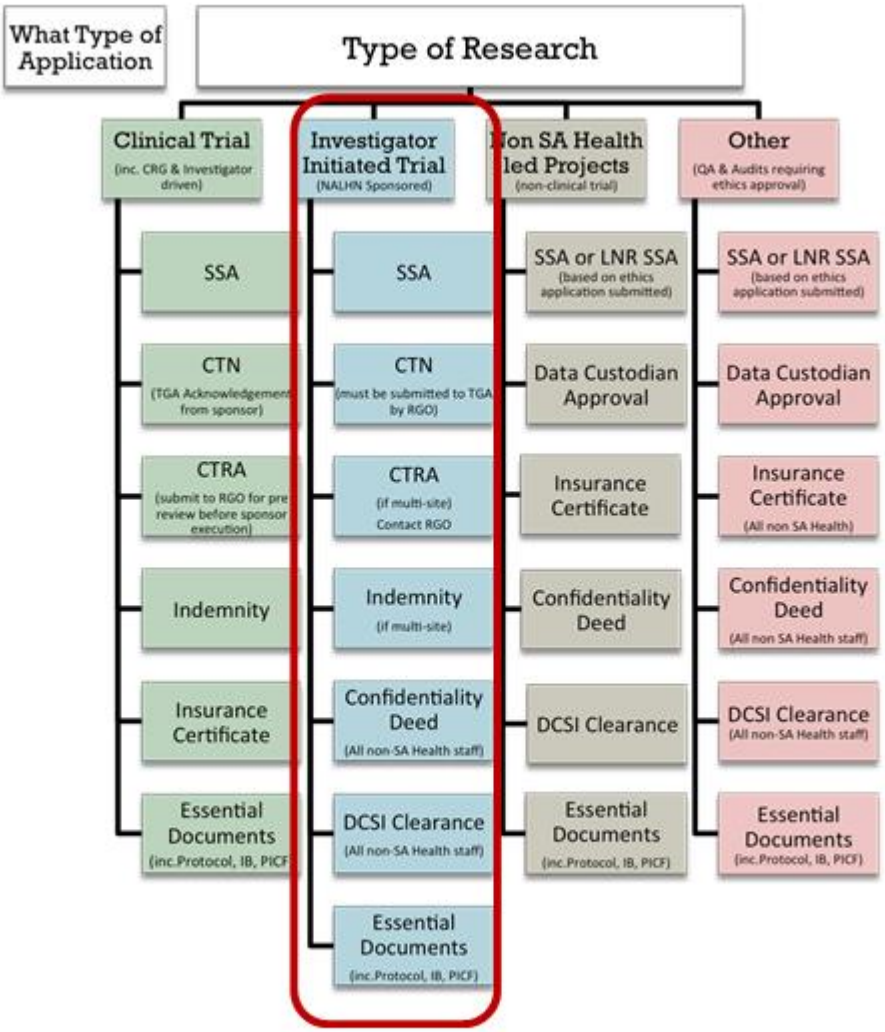
NEXT STEPS 14
SIGNING 14
LODGING YOUR APPLICATION 14

INTRODUCTION

In accordance with the SA Health Research Ethics and Governance Policy , all research within the Northern Adelaide Local Health Network (NALHN) requires authorisation of the delegated officer (Executive Director of Medical Services) before commencing. The Research Governance Office is keen to discuss your project proposals with you at an early stage wherever possible and is here to help navigate the necessary paperwork needed to lodge a research application.

At a minimum, this will include a Site-Specific Assessment (either a full SSA or Low/Negligible Risk form), research protocol, Ethics approvals, and other supporting documents, depending on the type of study.

This guide relates to NALHN Sponsored Investigator Initiated Clinical Trials. In cases where NALHN is not the trial sponsor, please refer to the Clinical Trials (including Clinical Research Group and Investigator Driven Trials) Submission Guideline.



SITE SPECIFIC ASSESSEMENT - SSA

Research that involves a risk of harm is considered **more** than low risk research. See link to the National Statement on Ethical Conduct in Human Research (2007 Updated 2018)

Site Specific Assessment Form – ***Greater than low risk studies*** are now required to be completed on the Research Governance and Ethics Management System (**GEMS**) website which can be located at, Research GEMS . Please review the user guides for step-by-step instructions on how to navigate the Research GEMS.

GEMS is designed to enable a more consistent and streamlined process for research applicants who wish to conduct research within SA Health.

Research GEMS allows researchers to:

- complete their Human Research Ethics Application and Site-Specific Assessment forms
- monitor approval progress and
- submit post approval monitoring to their local Research Office.

All SA Health sites are now accepting new applications for ethics and site assessments through Research GEMS. All Current studies have been migrated into the system and can be accessed through the Research GEMS web-based platform.

Feel Free to contact the NALHN Research Office for further guidance or support **healthnalhnrgo@sa.gov.au**

TECHNICAL SUPPORT

Please review the user guides for step-by-step instructions on how to navigate the Research GEMS system or contact the NALHN Research Office on phone: 818-29346 or email :**healthnalhnrgo@sa.gov.au** for further guidance or support.

HELPFUL HINTS

Frequently Asked Questions regarding GEMS
Completing the site application part C: Department and Services guide

DUAL SUBMISSION

Site assessment and ethical review may occur in parallel. However, the decision to authorise or not authorise the commencement of a research project at the site can only be made once the HREC has approved the project.

ARTIFICIAL INTELLIGENCE (AI) AND LARGE LANGUAGE MODEL (LLM) TOOLS

Data Integrity and Accuracy: Using large volumes of algorithms and data poses a risk of biased or discriminatory outputs, and the algorithms that generate these results are often not transparent to most users. It's essential to regularly monitor and assess AI tool usage to ensure they are being applied responsibly, ethically, safely, and in compliance with laws and government policies. Additionally, implement an incident reporting system and investigative process to detect and address any misuse of AI tools.

For all applications using a new AI product, the researchers need to submit an IT Security Assessment for each product, via the – via Digital Health SA–**Information Asset Classification Assessment pathway** Researchers can find the relevant Information Security policies and email contact for ICT security policies :: SA Health and the Information Asset Classification Assessment form can be found here

CLINICAL TRIAL NOTIFICATION – CTN

As detailed on the Therapeutic Goods Administration of Australia (TGA) clinical trials website, the following avenues provide for the importation into and/or supply in Australia of 'unapproved' therapeutic goods for use in a clinical trial.

Clinical trials that do not involve 'unapproved' therapeutic goods are not subject to requirements of the CTN or CTX schemes. It is the responsibility of the Australian clinical trial sponsor to determine whether a product is considered an 'unapproved' therapeutic good

CTN's are submitted via their online submission portal. Where NALHN is not the CTN sponsor of the clinical trial, it is the responsibility of the study sponsor to submit the application and pay the submission fee.

In some circumstances such as investigator initiated clinical trials, NALHN will agree to act as 'CTN sponsor' for the clinical trial. A researcher must apply to the RGO in order for NALHN to agree to act as CTN sponsor.

In the event NALHN agrees to act as CTN sponsor, any relevant agreements (if any) must be in writing first to clarify the obligations NALHN undertakes in its role as sponsor for a particular study and to determine how the TGA submission fee will be paid by the group or reimbursed to NALHN (as the case may be).

NALHN also require researchers to provide all relevant information to be entered into the online CTN form and to provide the RGO with a copy of the TGA notification letter as soon as practicable. The RGO will liaise with you regarding management of the CTN process for your study. TGA also charge a fee for lodging a CTN which must be paid for by the local research unit out of the Special Purpose Fund (SPF). The NALHN Research office cannot pay the CTN fee.

For sponsor initiated clinical trials, please attach a copy of the eCTN to your SSA.

The online CTN files "Approving Authority Details' for NALHN are as follows:

For investigator initiated clinical trials, the CTN must be submitted to the Therapeutic Goods Administration by the Research Governance Office (please refer to fees schedule for current fees).

Information on the Clinical Trial Notification/Clinical Trial Exemption schemes is available at https://www.tga.gov.au/clinical-trials

For sponsors submitting eCTNs for clinical trials being conducted at Lyell McEwin or Modbury Hospital the approving authority information is provided below:

Name of Approving Authority: Northern Adelaide Local Health Network Incorporated operating as Lyell McEwin Hospital (select appropriate site), or

Northern Adelaide Local Health Network Incorporated operating as Modbury Hospital

Approving Authority Contact Officer: Lorraine Cichon

Position: Research Governance Officer

Contact Phone: +61 8 8182 9346

health.nalhnrgo@sa.gov.au

CLINICAL TRIAL RESEARCH AGREEMENT - (CTRA)

Each clinical trial to be conducted at NALHN and sponsored by a third party must be governed by a written agreement clarifying the obligations and responsibilities of the parties involved in the trial. NALHN will only accept CTRAs that use the standard agreement templates developed by Medicines Australia. Please ensure that each document has been downloaded from the Medicines Australia website found here. The CTRA should be submitted along with the SSA and must be reviewed by the NALHN Research Office prior to execution being undertaken.

The NALHN institutional details should be as follows:

- Name of the Institution "Northern Adelaide Local Health Network Incorporated
- The NALHN ABN should always include "(ABN 46 371 200 573)"
- The NALHN banking details are: -

- Bank: ANZ
- Branch: 18/83 Pirie Street
- BSB: 015 101 Account Number: 838568636
- Account Name: NALHN Oracle Operating
- ABN: 46 371 200 573
- Swift Code: ANZBAU3MXXX

Site Details for inclusion in the template (select appropriate site):

Name of Institution: Northern Adelaide Local Health Network Incorporated, operating as Lyell McEwin Hospital **Address:** Haydown Road, Elizabeth Vale, South Australia 5112 **ABN:** 46 371 200 573
Name of Institution: Northern Adelaide Local Health Network Incorporated, operating as Modbury Hospital Address: 41-69 Smart Road, Modbury, South Australia 5092 **ABN:** 46 371 200 573

The protocol name must be correct and consistent across all documents

The sponsor must be an Australian entity

The Principal Investigator should be named in the Schedule 1. The Principal Investigator may sign the agreement, but this is not required

The Schedule 2 must contain the provision for the payment of Ethics and Governances fees in line with SA Health Research Ethics and Governance Review Fees Schedule, with the full budget being supported by the division's Business Consultant that the study is being undertaken.

Any amendment to the standard agreement must be made using the Special Conditions Schedule via SEBS Committee using NaCTA Review Template found via this link – please ensure to scroll to the bottom of the page to find the *SEBS template Schedule 7 or Schdule 4 varaiation to the CTRA Template*.

SCHEDULE 2:

GOVERNANCE FEE

Research governance submission fees are payable to the Institution according to the current fee schedule. The research governance office will invoice the sponsor directly.

PHARMACY FEE

Be aware that SA Health may require a separate pharmacy agreement. Please contact Health.LMHClinicalTrialsPharmacy@sa.gov.au

PAYEE

All payments listed in this schedule will be made by the Sponsor to Institution upon receipt of a tax invoice by direct credit.

The NALHN banking details are: -

Bank: ANZ
Branch: 18/83 Pirie Street
BSB: 015 101 **Account Number:** 838568636
Account Name: NALHN Oracle Operating
ABN: 46 371 200 573
Swift Code: ANZBAU3MXXX

Note: The sponsor is responsible for study payments and must be the party in Schedule 2 that NALHN will invoice.

For information on how to negotiate the study budget for inclusion in the CTRA please review the Budget negotiation NALHN research projects

INDEMNITY

Medicines Australia Standard Indemnity templates are endorsed by SA Health.

Site details for inclusion in the template (select appropriate site):

Northern Adelaide Local Health Network Incorporated, operating as Lyell McEwin Hospital
("the Indemnified Party")

or

Northern Adelaide Local Health Network Incorporated, operating as Modbury Hospital
("the Indemnified Party")

INSURANCE

The Principal Investigator (PI) is responsible for confirming the insurance and indemnity arrangement for the research project. The PI must provide all required supporting documentation to the RGO. This generally includes copies of the relevant insurance certificates PLUS an email from the partnering organisation confirming that this study is covered by the insurance.

Any changes to insurance (including annual renewal) must be lodged with the RGO for ratification.

Please be aware that some projects will require Legal Governance and Insurance Services (LGIS) to review and approve insurance, and this can delay the processing of your SSA.

SA HEALTH EMPLOYEES

SA Health employees conducting a research project in the capacity of their employment with SA Health are covered by SA Health insurance where approval from a SA Health HREC or National Mutual Acceptance (NMA) HREC has been obtained. No further supporting documentation is required.

DUAL EMPLOYMENT

If the researcher is an SA Health Employee, but has dual employment with a University or South Australian Health and Medical Research Institute (SAHMRI) or another organisation, or is also a university student, and is conducting a research trial/project in the capacity of their non SA Health employment, or as part of their private studies, indemnity must be provided by the University or SAHMRI and/or third party sponsor.

NON-SA HEALTH EMPLOYEES

Conducting research at an SA Health organisation that involve SA Health patients, staff, resources or data to support the project, the PI must provide appropriate insurance documentation from the non-SA Health organisation. Appropriate insurance documentation includes current insurance certificate/s and written insurance approval from the organisation. These requirements include research projects conducted by staff and students of academic institutions, such as Universities.

THIRD PARTY SPONSORS

For clinical research TRIALS with third party sponsors it is a requirement that the Sponsor indemnifies the trial and provides evidence of indemnity, by way of Certificate of Currency (this is in addition to SA Health and/or non-SA Health insurance cover).

For research PROJECTS sponsored by a third party, including commercially sponsored clinical trials, the sponsor must supply evidence of its insurance cover. A sponsor's insurance cover must as a minimum identify the local site, investigator and research staff, and participants involved in the research project. For all commercially sponsored clinical trials, the 'Medicines Australia Form of Indemnity for Clinical Trials – Standard' must also be submitted.

NALHN CREDENTIALLING

NALHN must ensure all staff, contractors, visiting private practitioners, volunteers and students are credentialed. If any of the investigators listed on the application are working at NALHN in clinical capacity, they must have up-to-date credentialing within NALHN. If the credentialing details are out of date, we will request evidence of renewal and the study will not proceed.

NALHN Credentialling Officer- Telephone 08 82821699 or email

Megan Glowik health.nalhncredentialling@sa.gov.au

ESSENTIAL DOCUEMENTS

SSA FEE FORM

The NALHN Office for Research charges fees according to the SA Health Research Ethics and Governance Fees Schedule available here. Please see the SA Health Fee Form –SA Health Research Governance Fee Schedule

Within the SA Health fees schedule there are three categories that are covered:

1. Clinical Trials with Full Commercial Sponsorship

2. Non-Commercially Sponsored Clinical Trials / Cooperative Research Group (CRG)

3. Contract Review To define clinical trials we acknowledge the following the World Health Organisation definition:

A clinical trial is any research study that prospectively assigns human participants or groups of humans to one or more health-related interventions to evaluate the effects on health outcomes

HUMAN RESEARCH ETHICS COMMITTEE (HREC)

NALHN does not have a Human Research Ethics Committee; however, the Research Governance Office will accept any National Mutual Accepted HREC ethics with a Site-Specific Assessment form. NMA Ethics committees can be located on the SA Health website.

STUDY PROTOCOL

The Study Protocol is an essential document for both the HREC and the RGO.

INVESTIGATOR BROCHURE

Where the trial involves drugs and/or devices, the Trial Sponsor will provide the Investigator Brochure. Where devices are approved for use in Australia or internationally, an Instruction for Use (IFU) document could be submitted as a replacement for the investigator brochure.

The title, version and date listed on the Investigator Brochure should be listed in the research protocol and must match those listed on the HREC approval letter (including all future variations).

Please ensure that the filename is “IB_Version_Date”

PARTICIPANTS INFOMRATION SHEETS CONSENT FORM (PISCF)

NALHN endorses use of the NHMRC standardised PICFs which are designed for three categories of participants identified by the National Statement:

When completing the Master PISCF and Site Specific PISCF please refer to the Participant Information Sheets and Consent Forms fact sheet.

INVESTIGATORS CVs

All study Investigators should provide a current copy of their Professional/Academic CV. Please ensure that the CV details relevant research experience, academic qualifications and publications

NALHN CLINICAL TRIAL STUDY TEAM DECLARATION

Declaration by Principal Investigator, Associate Investigators and other research personnel

All research personnel involved in conducting the study must be provided with the NALHN Clinical Trials SSA Form, HREC approval letter and Study protocol. A separate declaration via email must be provided for each team member. Found here

GOOD CLINICAL PRACTICE CERTIFICATE

As part of the implementation of the National Clinical Trials Governance Framework and the Therapeutic Goods Administration (TGA) GCP Inspection Audits, investigators will be required to undertake GCP training and subsequent refresher training to meet compliance as mandated by SA Health.

The various Health Networks are working with SA Health towards ensuring that all staff involved in **any clinical research** (not only those involved in the design and conduct of clinical trials) undertake GCP training and hold a current certificate in GCP. This includes principal investigators, associate investigators, trial managers/coordinators and research nurses etc.

To ensure NALHN is compliant with the minimum training requirements, all staff (NALHN, SAHMRI, University etc) involved with undertaking any clinical research at NALHN must undertake GCP training. Evidence of GCP training will be part of the research ethics and research governance approval processes.

Certificates are kept on file in the Research Governance Office, so if you have provided a certificate within the past two years, you do not need to provide it with every new SSA application.

Further information can be found on the Therapeutic Goods Administration website.

- Global Health Network Training Centre
- Syneos Health (formerly INC Research)

Please note: This is interim advice and further information will be provided when available from SA Health

POLICE CLEARANCES

Non-SA Health staff coming on site as part of a research study must provide a NALHN confidentiality deed and National Police Certificate (NPC) if they are working with adults at NALHN. If the study involves participants under the age of 18, child-related employment screening through the Department of Human Services (DHS) must be provided in place of an NPC. This is to be in compliant with the South Australian Health Criminal and Relevant History Screening Policy Directive available Criminal and Relevant History Screening. There are numerous options for a police check online via accredited agencies. As a way to ensure compliance, screening and confidentiality are standard conditions on our governance authorisation:

It is the responsibility of the Principal Investigator to ensure any non-SA Health personnel who conducts or monitors research meets SA Health screening requirements as per the SA Health Criminal & Relevant History Screening Policy Directive before they access any SA Health site. The cost of any such screening is the responsibility of the individual accessing the site or their employer. Working with children check

CONFIDENTIALDY AGREEMENTS FOR NON- SA HEALTH STAFF

A NALHN confidentiality deed will need to be signed by all non-SA Health staff that will require access to SA Health data.

TRIAL COORDINATOR FORM

NALHN RGO Research Coordinator Authorisation Form | SA Health

RADIATION SAFETY REPORT / STANDARD OF CARE DECLARATION BY PI

Any request for a statement certifying no additional radiation exposure must be submitted to the SAMI Radiation Officer through the Redcap Database.

This rigorous process may attract a fee for reviewing; however SAMI are happy to waive the fees for locally initiated research on request as appropriate.

Research involving gene technology and related therapies, drugs and/or ionising radiation may require specific notification, registration or licence requirements. Please refer to the SA Health Research Ethics Operational Policy Directive.

All research involving any form of radiation must comply with relevant National and State legislation, organisational policies and procedures, and codes and standards of practice provided by the NHMRC and the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA).

Evidence of these requirements (including the HREC approval) should be attached to the SSA to permit the RGO to assess whether the appropriate processes and documents have been completed by the applicant.

ADVERTISING

All advertisements including the SA Health Logo, and all radio/television/press/social media advertising must be first approved by the NALHN Communications Department:

HEALTH.NorthernCommunication@sa.gov.au

Evidence of approval from Media and Communications must be included with your SSA/LNR.

Corporate Identity Policy
https://www.sahealth.sa.gov.au/wps/wcm/connect/ddbe6580462bc31e8967896dc301fde5/Directive_Corporate%2BIdentity_Nov2014.pdf?MOD=AJPERES&CACHE=NONE&CONTENTCACHE=NONE

Social Media Policy

https://www.sahealth.sa.gov.au/wps/wcm/connect/public+content/sa+health+internet/contact+us/social+media+policy+terms+and+conditions+of+use

SA Health Logos

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Government of South Australia
Health Northern Adelaide Local Health Network

OTHER LEGAL CONTRACTS AND AGREEMENTS

The NALHN Executive Director of Medical Service / or nominated delegate is the only person authorised to sign contracts on behalf of NALHN. Do not edit the body of the standard agreement. Any non-standard agreements (not on an approved template) will need to be reviewed by a legal representative prior to signing.

As of SA Health Office for Research, based on advice from the Crown Solicitor's Office (CSO) on June 2022, SA Health employees should not enter into **any** agreements personally with third parties. Only SA Health delegates (which included Northern Adelaide Local Health Network)- NALHN delegates) should enter into a relevant agreement with a third part. Under the terms of the agreement, SA Health will accept liability for the actions of its employees which cause any breach of the terms of the agreement. Please note the SA Health Website here noting the required SA Health directive.

The directive is based on advice from the CSO following review of FDA1572 Form, examples of FDA1572 -like forms and other investigator Agreements, and the Medicines Australia Clinical Trial Research Agreement (CTRA),Medical Technology Association of Australia Clinical Investigation Research Agreement (CIRA) templates. Signature pages for protocols, investigator brochures are investigator agreements containing commitments a Principal Investigator (PI) must agree to abide by.

The CSO advice was clear:
• A PI employed by SA Health (which includes NALHN employees) should not be required to agree to terms and conditions with a third party which are covered by an existing agreement between the sponsor and PI's employer.
• A PI becomes personally liable when signing these documents.

It is essential that any third-party agreements be negotiated and presented for signing at the same time as the researcher lodges the SSA.

These commonly include:

- Collaboration agreements with Universities/Medical Research Institutes/Hospitals
- Funding agreements
- Mutual Confidentiality Agreements
- Material Transfer Agreements (MTAs)
- Multi-Institution Agreements (MIAs)
- Intellectual Property Deeds
- Moral Rights declarations
- Service agreements
- Import/Export permits
- Student scholarship agreements
- Sanctioned Country clearances

Researchers should be aware that contract negotiations may take months, so these should be discussed with the NALHN Research Office at the earliest opportunity.

NEXT STEPS

SIGNING

- Frequently Asked Questions regarding GEMS
- Completing the site application part C: Department and Services guide

LODGING YOUR APPLICATION

For all Greater than Low Risk (SSA) – Follow the GEMS system process as listed above.

Hard copies are not required (except for CTRA and Medicines Australia Indemnity forms)

Note that if your submission is being managed via GEMs you will need to ensure that the CTRA and Medicines Australia Indemnity forms are provided to the NALHN Research Office via email healthnalhnrgo@sa.gov.au

NOTE CONTRACTS are not managed via GEMS. *You need to email these to the.* healthnalhnrgo@sa.gov.au

Once submitted, your application is reviewed by the RGO for final authorisation by the CEO/delegate. **The project must not commence until you receive a letter of authorisation from the RGO**.

NALHN supports dual submission of ethics and governance. While SSAs can be submitted at any time before the project commences, dual submission allows the governance and ethical review to occur in parallel. **Your HREC approval is not sufficient to start the study**. A final endorsement letter will be provided for the SSA only where HREC approval is obtained, and the letter provided to the RGO.

Partially completed (unsigned/invalid) applications will be returned Via the GEMS system as ineligible for you to correct or provide the required corrections and then resubmit via GEMS.

Please contact the RGO if you anticipate a lengthy delay in submitting an SSA.

Contact Us

The NALHN Research Office are happy to assist you in navigating the necessary documents and processes outlined in this guide, and to give advice on project-specific information.

Contact us on +61 8 8182 9346 or email healthNALHNrgo@sa.gov.au

For more information
NALHN Research Office
Phone :08) 8182 9346
email: healthNALHNRGO@sa.gov.au

sahealth.sa.gov.au/nalhn

Government of South Australia
Health
Northern Adelaide Local Health Network

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