University of Warwick
Institutional Sponsorship and Oversight Policy

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1. **Definitions**

Within this policy, the following definitions apply:

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<th>Term</th>
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<tr>
<td>Chief Investigator (CI)</td>
<td>The individual with responsibility for the day-to-day running of a study, and for the safety of the study participants. This includes, but is not limited to, responsibility for the study budget, overseeing the work of the study staff, ensuring that the study is conducted rigorously and on time, that the results are made available and that all necessary regulations are complied with at all times.</td>
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<td>CTIMP</td>
<td>Clinical Trial of an Investigational Medicinal Product</td>
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<td>A clinical trial that tests, or uses as a reference, a pharmaceutical form of an active ingredient or placebo.</td>
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<td>This can include a product with a marketing authorisation when used or assembled in a way different from the approved form, or for an unapproved indication, or to gain further information about an approved use.</td>
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<tr>
<td></td>
<td>All CTIMPs are legally required to comply with the Medicines for Human Use (Clinical Trials) Regulations 2004 and associated amendments and fall under the regulation and inspection of the MHRA.</td>
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<td>DSUR</td>
<td>Development Safety Update Report. A common standard for annual safety reporting for clinical trials across the ICH regions. The DSUR replaces the annual safety report as the mechanism for periodic safety reporting in clinical trials.</td>
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<td><strong>GCP</strong></td>
<td>Good Clinical Practice: an international ethical and scientific quality standard provided by the International Council for Harmonisation for the design, conduct, performance, monitoring, auditing, recording, analysis and reporting of clinical trials. It also serves to protect the rights, integrity and confidentiality of trial subjects.</td>
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| **IMP** | Investigational Medicinal Product. A pharmaceutical form of an active substance or placebo being tested, or to be tested, or used, or to be used, as a reference in a clinical trial, and includes a medicinal product which has a marketing authorisation but is, for the purposes of the trial:  
(a) used or assembled (formulated or packaged) in a way different from the form of the product authorised under the authorisation;  
(b) used for an indication not included in the summary of product characteristics under the authorisation for that product; or  
(c) used to gain further information about the form of that product as authorised under the authorisation. |
| **Interventional study** | A clinical study in which participants are assigned to receive one or more interventions (or no interventions) so that researchers can evaluate the effects of the intervention on biomedical or health related outcomes. Participants may receive diagnostic, therapeutic or other types of interventions. Randomised controlled trials or studies that are non-CTIMPs may also be interventional studies. |
| **MHRA** | The Medicines and Healthcare Products Regulatory Agency. An executive agency, sponsored by the Department of Health which is the competent authority for the regulation of CTIMPs in the UK. |
| **Phase I Clinical Trial** | Phase I trials test a small number of subjects to find out how the treatment works in the body. This type of trial aims to find the lowest dose at which the treatment is effective (the minimum therapeutic dose) and the highest dose at which it can be taken without causing harm. |
| **Phase II Clinical Trial** | Phase II trials test the treatment in a small group of up to several hundred people with a given disease or condition. They aim to find out how well the treatment works in larger |
numbers, identify common side effects, and refine the dose and length of treatment.

**Phase III Clinical Trial**
Phase III trials typically compare the treatment across a larger group of patients to gather more detailed information on how well it works in groups of patients and its safety. The results influence the prescribing and patient information of a medicine once it is marketed.

**Phase IV Clinical Trial**
Phase IV trials are carried out after a medicine has been licensed and put on the market. These trials are designed to find out more about the long term harms and benefits of a medicine and to discover new uses for it.

**QMS**
A Quality Management System used by a clinical trials unit to provide management and oversight of research studies, and encompassing Standard Operating Procedures that are regularly updated to reflect the required standards for the development, initiation, delivery, management, monitoring, quality assurance, statistical support and closure of the trial or study.

**Sponsor**
For non CTIMPs, the sponsor is defined by the Research Governance Framework for Health & Social Care (2005) as the individual, organisation or group taking responsibility for securing the arrangements to initiate, manage, and finance the trial or study.

For CTIMPs, the sponsor is defined by The Medicines for Human Use (Clinical Trials) Regulations 2004 as the individual or organisation that takes responsibility for the initiation, management and financing (or arranging financing) of a CTIMP, encompassing responsibility in four main areas:

- Authorisation for clinical trials and research ethics committee opinion
- GCP and the conduct of clinical trial
- Pharmacovigilance
- Manufacture and labelling of investigational medicinal products.

Sole sponsorship refers to the arrangement by which one individual or organisation assumes full and sole responsibility for sponsorship of the study.
Co-sponsorship refers to the arrangement by which the sponsor responsibilities are distributed between two organisations, generally an NHS Trust and a university. In such cases, the responsibility of each sponsor should be clearly outlined in a co-sponsorship agreement.

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<th>SUSAR</th>
<th>Suspected unexpected serious adverse reaction.</th>
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<td>SAE</td>
<td>Serious adverse event. Any untoward medical occurrence in a subject to whom a medicinal product has been administered, (including occurrences which are not necessarily apparently caused by or related to that product) which:</td>
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<td>• Results in death</td>
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<td>• Is life threatening</td>
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<td>• Requires hospitalisation or prolongation of existing hospitalisation</td>
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<td>• Results in persistent or significant disability or incapacity</td>
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<td>• Consists of a congenital abnormality or birth defect.</td>
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‘Important medical events’ may also be considered serious if they jeopardise the subject or require an intervention to prevent one of the above consequences.

The term ‘life-threatening’ in the definition of ‘serious’ refers to an event in which the patient was at risk of death at the time of the event; it does not refer to an event which hypothetically might have caused death if it were more severe.

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<th>UK-CRC registered Clinical Trials Unit (CTU)</th>
<th>A CTU that has been assessed by an international panel of experts in clinical trials research and has achieved UK-CRC Registration status. The UK-CRC website (<a href="http://www.ukcrc-ctu.org.uk/">http://www.ukcrc-ctu.org.uk/</a>) provides details of all UK-CRC registered CTUs.</th>
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<td>SOP</td>
<td>Standard Operating Procedure. A written and formally approved procedure detailing by the method for carrying out a specific task.</td>
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2. Scope

This policy applies to all University of Warwick staff and students who wish to apply for institutional sponsorship as defined by the Research Governance Framework (2005) (RGF). This includes research which is:

- Concerned with the protection and promotion of public health
- Undertaken in the Department of Health and/or with a non-departmental public body
- Undertaken within the NHS
- Undertaken by or within social care agencies.

Projects defined as a Clinical Trial of an Investigational Medicinal Product (CTIMPs) also fall within the provision of The Medicines for Human Use (Clinical Trials) Regulations 2004, and therefore require additional duties of the sponsor. The University’s approach to sponsorship of CTIMPs is outlined within this policy.

The MHRA algorithm provides guidance on the definition of clinical trials as CTIMPs or non-CTIMPs:


Guidance and advice on the correct definition of a clinical trial can also be accessed via the Research Governance Team in Research & Impact Services.

All University staff and students who are developing trials or studies which require a sponsor should contact the University’s Governance Team in Research & Impact Services via sponsorship@warwick.ac.uk at the earliest opportunity, in order that the full implications of sponsorship can be understood, properly budgeted for and appropriately managed. This early referral is particularly important with regards to CTIMPs and interventional trials or studies where specific additional costs may be required to ensure the necessary levels of quality assurance.
3. **Principles of University Sponsorship**

The University of Warwick operates a model of sole and co-sponsorship, subject to the review and approval of the University Sponsorship Committee.

The Sponsorship Committee operates to the principles outlined within this policy, but will assess each sponsorship application on its merits, making a sponsorship decision based on a detailed understanding of the precise nature of the study. For CTIMPs the decision will be based upon the ‘risk adapted approach’ developed and recommended by the MHRA, under which a CTIMP is categorised as Type, A, B, or C.

3.1 **Sponsorship of CTIMPs:**

In cases where the University is asked to assume full and sole responsibility for a CTIMP, including any of Phase I, II, III or IV trials, the University will usually expect the CTIMP to operate within a UK-CRC registered CTU.

In cases where the University is asked to co-sponsor a CTIMP with an NHS Trust, the University will usually expect Phase III and IV CTIMPs to be overseen by a UK-CRC registered CTU. Phase I and II CTIMPs requesting co-sponsorship with an NHS Trust may not require such oversight, but this will be assessed by the Sponsorship Committee on a case by case basis.

In all cases, of a proposed sponsored CTIMP or a medical device or product the CI must ensure that the required MHRA approval is received.

3.2 **Interventional Studies:**

In cases where the University is asked to sole or co-sponsor a medium-high risk interventional study, the University will usually expect the study to operate within a UK-CRC accredited CTU. This will be assessed on a case by case basis.

In cases where the University is asked to sole or co-sponsor a study deemed by the Sponsorship Committee to be a low risk interventional study, the University is unlikely

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1 Type A: risk associated with the IMP is no higher than standard care; B: is somewhat higher than standard care; C: markedly higher than standard care;
to require the oversight of a CTU, subject to the review and approval of the Sponsorship Committee.

3.3 Non-interventional studies:

In cases where the University is asked to sole or co-sponsor a non-interventional study, the University is unlikely to require the oversight of a CTU, subject to the review and approval of the Sponsorship Committee.

3.4 Quality Management System:

The University requires all CTUs that wish to oversee a University sponsored or co-sponsored trial, to hold UK-CRC registration status and to operate a Quality Management System containing clear written procedures. The CTU Quality Management System must include the following essential components:

- Data management
- Document Management
- Management of Investigational Medicinal Products
- Monitoring
- Obtaining and Maintaining Regulatory and Ethical approval
- Pharmacovigilance including Reference Safety Information
- Research Site Management
- Risk assessment
- Statistics oversight
- Computer system validation
- Adequate training of staff including general good practice and required trial or study specific training.

3.5 The Sponsorship Committee operates a risk-based approach, under which all studies are referred for a Committee review, and all CTIMPs are assessed in line with the MHRA endorsed risk adapted approach. Under these criteria, potential risks will be assessed in two categories: (1) ‘Risks to participant safety in relation to IMP’, (2) ‘Other risks associated with the design and methods of the trial’.
3.6 Where co-sponsorship is agreed, a co-sponsorship contract will be drafted and agreed. This contract will define the responsibilities of the relevant CI, NHS Trust/s, and University/ies (and within that), CTU/s as appropriate.

4. **Applying for University Sponsorship**

4.1 Applications for sponsorship must be made by a substantive member of University staff, or a registered student normally in conjunction with their University employed supervisor who will act as the CI. Holders of honorary contracts will not be eligible to apply for University sponsorship without a University CI.

4.2 All University staff and students must receive sponsorship approval prior to submission to the NHS Research Ethics review process. In exceptional circumstances, an intention to sponsor letter may be provided to enable applications to proceed prior to full sponsorship review taking place. This decision will be made at the discretion of the Chair of the Sponsorship Committee.

4.3 An application for University sponsorship or co-sponsorship should be made in accordance with the University of Warwick Institutional Sponsorship SOP, available via the Research and Impact Services web pages.

4.4 In the case of a study which is being undertaken by a student as part/fulfilment of an academic qualification, the application for sponsorship should normally be made in the name of the student’s University-employed supervisor. The supervisor will therefore normally take responsibility as named CI.

5. **Sponsor Oversight: CTIMPS**

The University’s Research Governance Team will take responsibility for provision of appropriate oversight reports to the Sponsorship Committee for CTIMPS through their lifecycle. The following reports should be provided to the Sponsorship Committee on the following basis:
• Monthly:
  o Report on any risks identified since the last meeting of the Committee; protocol and/or GCP Violations/Serious breaches
  o SUSAR line reporting, with any MHRA reported SUSARs also being referred immediately to the Chair of the Sponsorship Committee.

• Annually:
  o Report of DSUR submissions against due dates
  o Compliance of monitoring visits against plan; report of international sites on CTIMPs; Trial Steering Committee recommendations to sponsor
  o Quality Assurance Audit Reports of CTUs. This will include reports from all CTUs managing a University-sponsored or co-sponsored study
  o Compliance with University policies and SOPs including notification of the end of the study and a summary of results.

6. Sponsor Oversight: Non-CTIMPS

The Sponsorship Committee will agree the necessary oversight and reporting mechanisms on a case by case basis for all the studies for which it agrees sponsorship. Required reports will be agreed by the Committee at the commencement of each study. The nature and timing of reports to be presented to the monthly meetings of the Committee will also be agreed by the Committee.

7. Responsibilities of the Chief Investigator (CI)

The University has specific defined expectations of the CI. For each sponsored study, these will be agreed and documented in a signed ‘Agreement of Devolved Sponsor/Co-Sponsor Responsibilities Form.’ The exact wording may change following consultation with the Research Governance Team in Research and Impact Services but will normally include the responsibility to ensure that:

• The CI is registered with the appropriate professional body, has undertaken GCP training and is otherwise up to date in any required continuing professional development activities.

• There are adequate resources in place for the running of the trial or study, in terms of funds, staff, facilities, and infrastructure.
• The medical care of trial subjects and/or study participants is assured during their participation in the study.

• Staff involved in the trial or study have the appropriate GCP training to deliver their delegated elements of the trial/study.

• Regular and timely communication is maintained throughout the trial and/or study with the sponsor, the NHS Research Ethics Committee, and the MHRA as appropriate.

• There is full compliance with the protocol and that any deviations and/or violations are documented and amendments submitted to the appropriate Research Ethics Committee.

• IMP accountability, where required, is assured, with site responsibility clearly delegated to an appropriate pharmacist.

• Where applicable to interventional studies, unblinding and randomisation procedures are followed at all times.

• That GCP guidelines on informed consent are followed at all times.

• That records and reports are appropriately created, managed, stored, and archived, including the Trial Master File, Site Files, CRF and source documentation, financial agreements.

• That all records and reports are readily available for internal or external audits.

• That, where appropriate, the Development Safety Update Report is submitted to the MHRA, and the annual report to the NHS Research Ethics Committee and sponsor.
• That all Serious Adverse Events are included in the annual reporting to the
  sponsor.

• That trial subjects and/or study participants are promptly informed in the
eventuality that the trial or study ends prematurely or is suspended.

• That the final report is provided to the NHS Research Ethics Committee, sponsor, and
  regulatory authorities, as appropriate.

8. Withdrawal of Sponsorship

The University has the discretion to withdraw its sponsorship of a study where
information on the original application changes without prior approval of the
Sponsorship Committee, including but not limited to changes to:

• The Chief Investigator
• Funding
• Co-sponsor status
• Randomisation strategy.

Sponsorship may also be withdrawn if there is a failure to comply with the University’s
Research Code of Practice by the CI or any member of the study team.

9. Amendments to Studies Approved for Sponsorship

Amendments to studies must be considered by the sponsor on a case by case basis to
determine whether they are substantial. The Research Governance Team can provide
information and advice regarding the substantiality of amendments. All substantial
amendments should be authorised by the Research Governance Team before submission.
10. **Sponsorship Policy Management**

This policy will come into effect from the date of adoption (01/03/17). It will be reviewed biennially to check compliance with current UK-CRC, University of Warwick, NHS or other relevant policy.