STUDY CLOSURE AND ARCHIVING

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1 INTRODUCTION

1.1 The Academic & Clinical Central Office for Research & Development (ACCORD) is a joint office comprising clinical research management staff from NHS Lothian (NHSL) and the University of Edinburgh (UoE).

1.2 The definition of the end of study should be clearly documented in the protocol. A change in this definition will require a protocol amendment.

1.3 Archiving requirements should be documented in the protocol.

1.4 Archived documentation needs to be stored in a way which preserves the integrity and readability of the source documents. Storage conditions within each archive facility must contain functional measures to prevent damage from fire, water and natural disasters and any other physical damage. Storage conditions must provide for adequate and suitable space and ensure that materials are maintained in a legible condition. Archived material must be labelled and stored to allow timely and accurate retrieval when required. Access should also be restricted to appropriate individuals only. Archived documents should consist of all the essential documentation defined under ICH GCP and contain all the information necessary to independently verify the study conduct and to recreate the study and its findings if necessary.

2 PURPOSE

2.1 To define the procedure for closing a study that is sponsored by NHSL and/or the UoE. It also outlines who is responsible and the requirements for archiving essential documentation.

3 SCOPE

3.1 The SOP is applicable to clinical researchers at NHSL and the UoE working on a study that is sponsored by NHSL and/or the UoE.

3.2 References to archiving SOP GS005 (Archiving of Essential Study Documentation) only apply to studies sponsored by NHSL and/or studies co-sponsored by NHSL/UoE and research studies hosted by NHSL.

4 RESPONSIBILITIES

4.1 It is the responsibility of the CI, or designee, to;

- Amend the study protocol, if the end of study date is changed/extended, and notify R&D where the study is hosted, the Research Ethics Committee (REC) which authorised the study and the Medicines and Healthcare Products Regulatory Agency (MHRA), where applicable.
- Notify the sponsor(s), R&D, REC and MHRA (where applicable) once the defined study end point is reached.
- Ensure that end of study reports are finalised and submitted to the appropriate bodies on time e.g. to the funder, REC.
- Ensure that all essential study documentation is complete and filed in the Trial Master File (TMF) prior to archiving.

4.2 It is the responsibility of the PI, or designee, to;

- Notify R&D where the study is hosted of the defined end point and when this is reached.
- Arrange a close out visit with the ACCORD Clinical Trials Monitor (where applicable)
- Ensure that all essential study documentation is complete and filed in the Investigator Site File (ISF) prior to archiving.
- Archive the ISF

4.3 The sponsor is responsible for the following tasks;

- Archiving the TMF
- Notifying the MHRA and REC that the research has ended
- Uploading the end of trial summary results to the European Clinical Trials Database (EudraCT) database within the specified timeframe

It should be noted that delivery of these tasks may be delegated to the CI.

4.4 The Clinical Trials Monitor is responsible for performing close out visits in accordance with SOP CM003 (Close Out Visits).

5 PROCEDURE

5.1 Defining the End of the Study

5.1.1 If there is a change to the definition of the end of the study, as detailed in the protocol, or the CI plans to extend the research beyond the agreed proposed end date, this should be discussed with the sponsor representative this may require variation to contracts and notification to the appropriate Research Ethics Committee (REC) and R&D for continued management approval.

5.2 Notification of End of Study to ACCORD Monitors

5.2.1 In studies which are subject to ACCORD clinical trial monitoring, the PI, or designee, must contact the ACCORD Clinical Trial Monitors **before the end of the study** to arrange a monitoring close out visit to any study site(s), in accordance with SOP CM003 (Close Out Visits).

5.3 End of Trial Notification for CTIMP Studies

5.3.1 For a Clinical Trial of Investigational Medicinal Products (CTIMP) that requires a Clinical Trial Authorisation (CTA), the CI must complete a Declaration of the End of a Trial Form when the trial ends. The forms are available on the MHRA website; https://www.gov.uk/guidance/clinical-trials-for-medicines-manage-your-authorisation-report-safety-issues#end-of-trial.

5.3.2 For multi-centre CTIMPs, the Declaration of the End of a Trial Form must be completed when the trial has ended at all sites.

5.3.3 The Declaration of the End of a Trial Form must be sent to the MHRA, REC and the sponsor within 90 days of the trial ending.

5.3.4 A Declaration of the End of a Trial Form must also be completed for CTIMPs that are terminated early. The CI must clearly explain the reasons for terminating the trial and submit the report to the MHRA, REC and the sponsor within 15 days of the trial ending.

5.3.5 If a CTIMP did not start, the CI must notify the MHRA, REC and the sponsor in writing. The CI must explain the reasons for not starting the trial.

5.3.6 The local PI will ensure that the local R&D department have been informed of the end of the study and have completed any other local obligations.

5.4 End of Study Notification for Non-CTIMP Studies

5.4.1 The CI must complete a National Research Ethics Service (NRES) Declaration of the End of a Study Form when the trial ends. The forms are available on the HRA website; http://www.hra.nhs.uk/resources/during-and-after-your-study/end-of-study-notification-studies-other-than-clinical-trials-of-investigational-medicinal-products/. Subsequently, the process described in section 5.3 will be followed, where applicable.

5.5 Additional Reporting Requirements

5.5.1 The CI will write and finalise any required end of study reports and submit these on time e.g. to the funder.

5.5.2 For CTIMP studies, a draft clinical study report must be sent to the sponsor for review prior to finalisation, and the final clinical study report must be sent

to the sponsor and to the REC within twelve months of the end of the study, in accordance with SOP CR011 (Clinical Study Report Preparation - CTIMP).

5.5.3 For CTIMP studies, the sponsor, or designee, will upload the end of trial summary results to the EudraCT database, and once complete, send a short confirmatory e-mail to CT.Submission@mhra.gsi.gov.uk, with 'End of trial: Result-related information: EudraCT XXXX-XXXXXX-XX' as the subject line.

It should be noted that this task may be delegated to the CI.

5.6 Study Site Closure

5.6.1 The Sponsor/CI/PI, or designee, will ensure that all essential study documentation is complete and filed in the TMF/ISF.

5.6.2 Studies subject to monitoring by ACCORD clinical Trials monitors will be closed down according to SOP CM003 (Close Out Visits) and local study teams must ensure that all monitoring issues have been resolved prior to archiving.

5.6.3 For studies that are not subject to monitoring by ACCORD clinical trial monitors or where a close out visit is not required, the local PI, or designee, will complete form CR009-F01 (Study Closure Checklist) prior to archiving

5.6.4 The Sponsor/CI/PI will ensure that all necessary declarations of the end of a study forms, letters and e-mails, and final reports are filed in the TMF/ISF.

5.7 Archiving

5.7.1 The Sponsor and/or CI, or designees, will make arrangements to archive the TMF at the end of the study, referring to SOP GS005 (Archiving Essential Study Documentation), where applicable.

5.7.2 The PI will ensure the ISF, pharmacy file, source documentation and any other documentation required to recreate the study are archived. This includes documentation held at external study sites.

5.7.3 Archived documents, including source data, must be made available upon request by representatives of the sponsor(s), CI, REC or MHRA.

5.7.4 Any transfer of ownership of the archived data must be documented and agreed with the sponsor(s).

5.7.5 Where records are archived on electronic, magnetic, optical or other media, controls should be implemented to ensure that these records cannot be altered without appropriate authorisation and the creation of an audit trail.

5.7.6 If original documents are transferred to other media for archiving, the processes for transfer should be validated and tested to ensure that information will not be lost or altered. The accuracy and completeness of the transfer must also be verified by the local PI or the CI.

5.7.7 Consideration will be given to the threat of material becoming obsolete, with respect to electronic storage media. Archived records held on electronic media will be transferred to a more suitable alternative media if the current electronic media is at risk of becoming obsolete.

5.7.8 When the minimum retention period has been reached, material will not be destroyed without authorisation from the CI and the sponsor(s).

6 REFERENCES AND RELATED DOCUMENTS

- MHRA End of Trial Notification
- National Research Ethics Service (NRES) Declaration of the End of a Study Form
- The Medicines for Human Use (Clinical Trials) Regulations 2004 (SI 1031), as amended
- ICH-GCP E6 (E2) guidelines
- CR009-F01 Study Closure Checklist
- CM003 Close Out Visits
- GS005 Archiving of Essential Study Documentation
- CR011 Clinical Study Report Preparation – CTIMPs

7 DOCUMENT HISTORY

Version Number	Effective Date	Reason for Change
1.0	22 MAR 2011	New procedure
1.1	20 FEB 2014	Update to archiving procedure
2.0	29 AUG 2016	New SOP template. Introduction shortened. Reference to CR009-W01 and Archiving Policy removed (now obsolete). Reference to new Study Closure Checklist form (CR009-F01) added and also reference to new SOP GS005. Additional information added to introduction and main text regarding archiving conditions/requirements. Links to MHRA and NRES websites, and SOP GS005 added. Minor changes to text throughout.
3.0	02 OCT 2018	Update to references

8 APPROVALS

Sign	Date
SIGNATURE KEPT ON FILE AUTHOR: Lynn Smith, Clinical Trials Monitor, NHSL, ACCORD	
SIGNATURE KEPT ON FILE APPROVED: Heather Charles, Head of Research Governance, NHSL, ACCORD	
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