Stakeholders Responsibilities

BRITISH SOCITY FOR RHEUMATOLOGY BIOLOGICS
REGISTER - RHEUMATOID ARTHRITIS

RESEARCH GOVERNANCE:

STAKEHOLDER ACCOUNTABILITIES AND RESPONSIBILITIES

1. Introduction

1.1 The British Society for Rheumatology Biologics Register for Rheumatoid Arthritis (BSRBR- RA) is a non-interventional observational study to collect information concerning patients treated under normal conditions with licensed medicines (the "Project"). The Project and its intellectual property are owned by the British Society for Rheumatology ("BSR") and it operates as an academic independent programme free from influence by the pharmaceutical industry.

1.2 It has been agreed that BSR will be the Project owner and main funder of the register and the role of sponsor, as defined in the UK Policy Framework for Health and Social Care Research ("UK Policy Framework"), will be fulfilled by the University of Manchester, "University"). Both parties (BSR and University) are joint data controllers.

2. Governance Structure and Accountabilities

2.1 The main contract for the Project is between BSR and University. The University has been contracted by BSR and is accountable to BSR for the overall conduct of the Register. To fulfil the requirements of the UK Policy Framework, Professor Kimme Hyrich is the designated Chief Investigator.

2.2 Independent review and oversight of the progress of the Project is provided by the British Society for Rheumatology Biologics Register Steering Committee which acts as a sub-committee to the BSR Executive. In addition a Data Monitoring and Ethics Committee has full access to the data and provides advice on matters relating to patient safety and statistics to the investigators and the Steering Committee.

2.3 Patients are only registered in the study after decisions about their condition and future treatment have been made by the care professionals who prescribe and manage their treatment. Both patients and their care professionals provide data to the study.

2.4 To protect the academic independence of the research team and the review committees an independence " fence" has been established between the research & review teams and the Pharmaceutical companies providing the funding. Dialogue with the Pharmaceutical Companies is closely managed through the BSR. Separate contracts exist with each Pharmaceutical Company who provide finance to the BSR which is restricted to the purpose of funding the register. In return each Pharmaceutical Company may request and receive copies of data in relation to patients treated with their company's product and those patients who are in the comparison cohort/s.

2.5 The Register operates as an independent academic research project and is not subject to medicines regulatory law and guidelines. Data and information on adverse event episodes are forwarded by the research team to the Pharmaceutical Companies to enable them to comply with European law governing the timely reporting of adverse events from individual case safety reports and the preparation of periodic safety update reports to the regulatory authorities.

2.6 In line with the UK Policy Framework and after consultation with the University the key responsibilities of each role are described below.

3. Role Responsibilities

3.1 The allocation of responsibilities in the project are described in the following table:

Item	Responsibility	University	CI	Local NHS PI	BSR	Pharmaceutical Companies
General	Provide an appropriate process of independent expert review that ensures and maintains that the research is of high scientific quality and good value for money.				X	

Item	Responsibility	University	CI	Local NHS PI	BSR	Pharmaceutical Companies
	Ensure and demonstrate compliance with the requirements of the UK Policy Framework.	X	X	X	X	X
	Maintain a project master file with all key Project documents including study materials, past and present staff CV and training records and copies of all publications.		X			
	Monitor the overall conduct and execution of the Project to ensure compliance with the contract between BSR and the University. Such monitoring will include routine audit by the University. BSR may also request to audit the study.	X			X	
	Ensure there is an adequate risk assessment of project risks in place to secure and protect paper records, IT systems and business continuity of the project over the full lifecycle.	X	X	X		

Item	Responsibility	University	CI	Local NHS PI	BSR	Pharmaceutical Companies
1. Study Preparation	a) Ensure that insurance or indemnity arrangements are in place to cover liabilities arising from the management and design of the study. For its part the University is able to compensate without proof of negligence or incurring obligation.	X				
	Ensure insurance or indemnity arrangements are in place to cover the conduct of University staff or BSR staff on University premises.	X				
	Ensure that insurance or indemnity arrangements are in place to cover the conduct of BSR staff or University staff on BSR premises.				X	

Item	Responsibility	University	CI	Local NHS PI	BSR	Pharmaceutical Companies
	b) Secure and administer funding for the Study.	X			X	
	c) Ensure that the appropriate contracts and agreements are in place for the Study.	X			X	
2. Applications and Registration	a) Ensure that the Protocol has undergone independent scientific and statistical review and is compliant with the relevant regulations / guidelines.		X			
	b) Prepare the participant information sheet and consent form and other relevant documents prior to ethics submission.		X			
	c) Prepare and submit ethics application.		X			

Item	Responsibility	University	CI	Local NHS PI	BSR	Pharmaceutical Companies
	d) Obtain HRA permission.		X			
	e) Obtain local NHS approval.			X		
3. Protocol amendments	a) Prepare and submit proposed substantial amendments of the Protocol to the BSRBR Steering Committee and, where agreed, to the relevant ethics committees.		X			
	b) Secure approval for changes to the protocol with the pharmaceutical companies.				X	
	c) Ensure all investigators are aware of dates of approval and implementation of all such amendments.		X			
4. Study Conduct	a) Responsibility to ensure that investigators conduct the study in accordance with Good Clinical Practice, the UK Policy Framework and the laws and statues and any local requirements as may be specified by the host institution.	X	X	X		

Item	Responsibility	University	CI	Local NHS PI	BSR	Pharmaceutical Companies
	b) Ensure that the University research team members are appropriately qualified to undertake the conduct of the study and that they have current substantive or honorary employment contracts in place, where required.	X	X			
	c) Ensure that no participant is recruited to the study until satisfied that all relevant regulatory permissions and approvals have been obtained.		X	X		
	d) Put and keep in place arrangements to allow all investigators to conduct the study in accordance with the protocol.		X	X		

Item	Responsibility	University	CI	Local NHS PI	BSR	Pharmaceutical Companies
	e) Ensure that the study is conducted in accordance with the agreed research protocol *except* where necessary to eliminate an immediate hazard(s). These circumstances must be reported to the CI who will be responsible for reporting within the sponsor organisation, the BSRBR DMEC, and to the research ethics committee.		X	X		
	f) Personal responsibility for the design, management and reporting of the study.		X			
	g) Responsibility for monitoring the study in accordance with the arrangements outlined in the submission to the Sponsor.		X			
	h) Ensure that the rights of individual participants are protected.		X	X		

Item	Responsibility	University	CI	Local NHS PI	BSR	Pharmaceutical Companies
	i) Ensure that patients receive appropriate medical care whilst participating in the study.			X		
	j) Inform appropriate health or social care professionals if their patient is a participant in the study in accordance with the UK Policy Framework.			X		
	k) Maintain and archive study documentation at the University.	X	X			
	l) Maintain and archive study documentation at the local NHS site.			X		
	m) Ensure that all data and documentation are available for the purposes of monitoring, inspection or audit.	X	X	X	X	
	n) Ensure appropriate consent has been provided by each participant before data are transferred to the University research team and a copy of the consent is kept with the patient medical record.			X		

Item	Responsibility	University	CI	Local NHS PI	BSR	Pharmaceutical Companies
	o) Ensure adequate facilities, resources and support are available to conduct the study at the University.	X				
	p) Ensure adequate facilities, resources and support are available to conduct the study at the local NHS site.			X		
	q) Responsibility to report and assist with investigations into any alleged research misconduct undertaken by or on behalf of the Sponsor.	X	X	X	X	X
5. Adverse events	a) Maintain detailed records of all serious adverse events as specified in the protocol.		X			
	b) Report serious adverse events as agreed in the protocol and to legal requirements and in accordance with University policy.		X	X		

Item	Responsibility	University	CI	Local NHS PI	BSR	Pharmaceutical Companies
	c) Ensure that 24 hour SAE reports, monthly reconciliation reports, and 6-monthly reports are generated and submitted in a timely fashion to the relevant pharmaceutical companies as specified in the Pharmacovigilance Standard Operating Procedure.		X			
	d) Ensure that all investigators are, at all times, in possession of the current relevant safety information for the study.		X		X	
	e) Ensure that important and/or urgent safety matters are communicated to the DMEC to receive independent advice and that such matters are notified to the University as employer and sponsor.		X			
	f) Provide reports on the incidence of serious adverse events to the DMEC within agreed timeframes.		X			

Item	Responsibility	University	CI	Local NHS PI	BSR	Pharmaceutical Companies
	g) Provide reports on recruitment to BSR and reports to the BSRBR Steering Committee within agreed timeframes.		X			
	h) Ensure that end of study reports are generated and submitted to the relevant pharmaceutical companies, BSR DMEC and BSRBR Steering Committee (where agreed) within required timeframes.		X			
6. Data management	a) Design of report forms and database		X			
	b) Ensure that: **i**. all reasonable efforts are used to ensure that the data collected, recorded in the database and reported are accurate, complete and identifiable at source; **ii**. in any event data collected, recorded in the database and reported will to a material and substantial extent be accurate, complete and identifiable at source; and **iii**. record keeping and data transfer procedures adhere to the current Data Protection legislation and the University data protection policy.		X	X		

Item	Responsibility	University	CI	Local NHS PI	BSR	Pharmaceutical Companies
7. Publication	a) Maintain a rolling publications plan and secure input and support for it with the BSRBR Steering Committee.		X		X	
	b) All publications to be reviewed by the appropriate interested parties as per the process outlined in the contractual agreements between the parties.		X		X	X
	c) Produce reports for each product on completion of data collection for that cohort as per contractual agreements.		X		X	
8. End of Study and Data Archiving	a) Responsibility to notify all stakeholders of the end of the study (including if terminated early)	X			X	
	b) Ensure that all study records are archived appropriately on conclusion of the study and retained as per University policy and contractual agreements.	X	X		X	

University = The University of Manchester.

Chief Investigator = Chief Investigator as listed on Main Study REC Application *(unless amended by subsequent approvals)*.

Principal Investigator = Designated principal investigator at each local NHS site.

BSR = British Society for Rheumatology.

Pharmaceutical Companies = Pharmaceutical Company for each targeted drug being studied.