STUDY CLOSURE AND ARCHIVING

DOCUMENT NO.:	**CR009 v6.0**
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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 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 Essential Study Documentation) only apply to studies sponsored by NHSL and/or UoE.

4 RESPONSIBILITIES

4.1 It is the responsibility of the CI, or designee (e.g. Trial Manager), to;

- Notify the sponsor(s), R&D, Ethics Committees (e.g. REC) and MHRA (where applicable) once the defined study end point is reached, or if the study date is changed / extended
- Ensure that end of study reports are finalised and submitted to the appropriate bodies on time e.g. to the funder, REC
- Where applicable, publish summary results on the publicly accessible database that the trial was registered with, on behalf of the Co-Sponsors
- Ensure that all essential study documentation is complete and filed in the Trial Master File (TMF) prior to archiving
- Arranging archiving of the TMF with the Sponsor

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

- Notify local R&D offices 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 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 proposal to change the definition of the end of the study as detailed in the protocol, for example, the CI plans to extend/curtail the research beyond/before the stated end date or recruitment target, this should be discussed with the Sponsor Representative. An amendment may need to be submitted to the MHRA (where applicable), REC and R&D.

5.1.2 In addition, if there is an early termination proposal/request, this should be discussed with the Sponsor Representative. This may require amending contracts and will require notification to the MHRA (where applicable), REC and R&D including end of trial documentation. Any decision to amend the study timelines should be documented in writing and filed in the TMF.

5.1.3 For studies subject to combined risk assessment, the events described in sections 5.1.1 and 5.1.2 will trigger a review of the risk assessment by the Sponsor representative. The following items (not an exhaustive list) should be considered: end of trial notification timelines, TSC oversight (as applicable), funder oversight, continuing trials unit roles and possible effect on study

documents. Decisions should be documented in writing and filed in the TMF.

5.1.4 Before the end of study declaration form is submitted, study teams should review the plans that were approved (e.g. by REC) for use of tissue and data collected in the course of the study, providing information to participants, and dissemination of results. If any changes to these arrangements are required then study teams should consider whether an amendment is required before submitting the end of study notification.

5.1.5 Once a study is declared closed by submission of the Declaration of the End of a Trial/Study form then the study cannot be reopened or amended.

5.2 Notification of End of Study to ACCORD Monitors

5.2.1 Where a study is subject to ACCORD clinical trial monitoring, the PI, or designee (e.g. Trial Manager), must contact the ACCORD Clinical Trial Monitor **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) 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 by the CI when the trial has ended at all sites.

5.3.3 The CI, or delegate, must send the Declaration of the End of a Trial Form 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 by the CI 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 the study was submitted via the Combined Review process, the end of trial declaration should be submitted via IRAS. This automatically submits the notification to the REC and MHRA. For trials that were not submitted via the Combined Review process, the form must be completed and emailed to the MHRA and REC.

5.3.6 If a CTIMP did not start following receipt of a Clinical Trials Authorisation (CTA), the CI must notify the MHRA, REC and the sponsor in writing. The CI must explain the reasons for not starting the trial.

5.3.7 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 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

5.4.2 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/. This should be submitted to the REC (which gave favourable opinion) within 90 days of the conclusion of the study or within 15 days of early termination. The CI should also notify the Sponsor Representative.

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 Requirements for study reporting and publication of results are detailed in SOP CR011 (Research Study Reports & Publication of Results).

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 Where a site closes early during the course of a study, for example due to resource issues or lack of recruitment, site closure will be initiated when the final participant completes the study at that site/the decision for closure is made if no recruits.

5.6.3 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. Where applicable, each site will have a close out visit conducted prior to final analysis

of the trial dataset in order to ensure that any site specific data related issues identified during close out are addressed prior to statistical analysis.

5.6.4 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 the ISF.

5.6.5 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
- CR009-F01 Study Closure Checklist
- CM003 Close Out Visits
- GS005 Archiving Essential Study Documentation
- CR011 Research Study Reports & Publication of Results

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
4.0	10 NOV 2020	Minor administrative changes throughout
5.0	24 FEB 2022	Clarification on timing of site closure added to section 5.6 (5.6.2, 5.6.3).
6.0	13 JUN 2024	Responsibilities section clarified with requirement to publish on publically accessible database included (4.1). Addition of items to be considered when a study is terminated early (5.1). Addition of end of trial notification process for studies submitted via Combined Review (5.3). Requirement to notify local R&D of end of study added to non-CTIMP section alongside clarification of notification timelines (5.4). Removal of text regarding additional reporting requirements - CR011 referenced (5.5).

8 APPROVALS

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Alice Graves Alice Graves (May 29, 2024 12:24 GMT+1) APPROVED: Alice Graves, Senior Clinical Trials Monitor, NHSL, ACCORD	May 29, 2024
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