Site Initiation and Close-out

1. **Purpose:**
   
   To describe the procedures related to site initiation and close-out of a clinical trial.

2. **Scope:**
   
   Applicable to all phases of clinical investigation of medicinal products, medical devices and diagnostics.

3. **Staff this document applies to:**
   
   Principal Investigator, Associate Investigator, research coordinators and other staff delegated trial-related activities by the Principal investigator.

4. **Procedures:**

   4.1 **Site Initiation**

   The procedure outlined below refers to a “sponsored” study. Where the investigational study is “investigator initiated” and the “sponsor” is the institution, the investigator should undertake both investigator and monitor roles unless an external monitor has been assigned by the institution.

**Prior to initiation the investigator/s should:**

- Arrange with the monitor the scheduled date, time and location of the study initiation visit.
- Review the Investigator’s Brochure and any up-to-date information on the investigational product. The Investigator/s must be familiar with the product, including pre-clinical toxicology, pharmacology, pharmacokinetics and up-to-date clinical data if applicable.
- Ensure that the procedures stated in the study protocol are applicable in their centre and fully understood.
- Ensure that sub Investigator/s, pharmacist/s, research coordinators and any other relevant staff involved with the study have been advised of the meeting and are able to attend.
During the initiation the investigator/s or delegate should:

- Establish that the Investigator’s Site Mater File contains all the required regulatory documents.
- Provide a list of study personnel and functions in the study to the clinical monitor.
- Provide curricula vitae of the sub Investigators involved.
- Ensure that the names and contact numbers of the relevant medical and study personnel of the sponsor are available and documented clearly.
- Ensure that all relevant study site personnel fill out the Site Personnel/Signature Log.
- Check that the procedures and plans for storage, dispensing and return of investigational product have been agreed and finalised with the Sponsor and Pharmacist (if applicable).
- Review the documents used in the shipment of the investigational products to the study site.
- Check that the quantity of CRFs that have been requested or shipped to the study site are sufficient for the number of subjects/patients that are likely to be recruited into the study.
- Check that other related supplies are available, or are to be shipped to the study site at a later date, and that they are available in sufficient quantities.
- Check that laboratory facilities and arrangements for the dispatch of samples to the laboratory are organised and that any specialised equipment that may be required will be available throughout the period of the trial, e.g. centrifuge freezer, etc.
- Establish who will be responsible for CRF completion and clarify the procedure for entering data in the CRF, as well as making changes and corrections.
- Ensure an understanding of the requirements that source documents and raw data will need to be available during monitoring visits to enable the monitor to perform source data verification at each monitoring visit.
- Review the arrangements for organising and maintaining study files.
- Ascertaining that the procedures relating to the archiving of study records at the end of the study is agreeable to the sponsor.
- Establish the next monitoring visit with the Monitor.

4.2 Premature Termination or Suspension of Trial

If the trial is prematurely terminated or suspended for any reason, the investigator/institution should:

- Promptly inform the trial subjects, should assure appropriate therapy and follow-up for the subjects, and, where required by the applicable regulatory requirement/s, should inform the regulatory authority/authorities.
In addition:

If the investigator terminates or suspends a trial without prior agreement of the sponsor, the investigator should:

- Inform the institution where applicable, and the investigator/institution should promptly inform the sponsor and the HREC.
- Provide the sponsor and the HREC with a detailed written explanation of the termination or suspension.

If the sponsor terminates or suspends a trial, the investigator should:

- Promptly inform the institution where applicable and the investigator/institution should promptly inform the HREC and provide the HREC a detailed written explanation of the termination or suspension.

If the HREC terminates or suspends its approval/favourable opinion of a trial the investigator should:

- Inform the institution where applicable and the investigator/institution should promptly notify the sponsor and provide the sponsor with a detailed written explanation of the termination or suspension.

4.3 Site Close-out

The Investigator/s should:

- Inform the sponsor of the completion of the study.
- Provide a summary report of the trial’s outcome to the ethics committee and the regulatory authorities, if required.
- Keep documentation and correspondence in the trial master file in accordance with 8.4 ICH.
- Ensure arrangements for archiving of trial documents are clarified (see section 6 of VMIA SOP 007).
- Ensure appropriate final disposition of any investigational product. This may include return to the sponsor or destruction of remaining materials. Refer to VMIA SOP 005 for details.
Glossary

Case Report Form (CRF)
A printed, optical, or electronic document designed to record all of the protocol required information to be reported to the sponsor on each trial participant.

Delegate
A person delegated specific but appropriate tasks in relation to the conduct of a clinical trial.

Good Clinical Practice (GCP)
A standard for the design, conduct, performance, monitoring, auditing, recording, analyses, and reporting of clinical trials that provides assurance that the data and reported results are credible and accurate, and that the rights, integrity, and confidentiality of trial participants are protected.

Human Research Ethics Committee (HREC)
A body which reviews research proposals involving human participants to ensure that they are ethically acceptable and in accordance with relevant standards and guidelines. The National Statement requires that all research proposals involving human participants be reviewed and approved by an HREC and sets out the requirements for the composition of an HREC.

International Conference on Harmonisation (ICH)
International Conference on Harmonisation of Technical Requirements for Registration of Pharmaceuticals for Human Use is a joint initiative involving both regulators and research-based industry focusing on the technical requirements for medicinal products containing new drugs.

Investigator
An individual responsible for the conduct of a clinical trial at a trial site and ensures that it complies with GCP guidelines. If a trial is conducted by a team of individuals at a trial site, the investigator is the responsible leader of the team and may be called the Principal Investigator. In this instance they may delegate tasks to other team members.

Investigator initiated trial
A clinical trial that is undertaken by the investigator whereby the investigator and/or their institution takes on the role of the sponsor in addition to their role as investigator.

Principal Investigator (PI)
An individual responsible for the conduct of a clinical trial at a trial site ensuring that it complies with GCP guidelines. If a trial is conducted by a team of individuals at a trial site, the investigator is the responsible leader of the team and may be called the Principal Investigator. In this instance they may delegate tasks to other team members.

Monitoring
The act of overseeing the progress of a clinical trial and ensuring that it is conducted, recorded, and reported in accordance with the protocol, Standard Operating Procedures (SOPs), Good Clinical Practice (GCP), and the applicable regulatory requirement(s).

Sponsor
An individual, company, institution or organisation which takes responsibility for the initiation, management, and/or financing of a clinical trial.
Source Documents
Original documents, data, and records (e.g., hospital records, clinical and office charts, laboratory notes, memoranda, participants' diaries or evaluation checklists, pharmacy dispensing records, recorded data from automated instruments, copies or transcriptions certified after verification as being accurate copies, microfiches, photographic negatives, microfilm or magnetic media, x-rays, participant files, and records kept at the pharmacy, at the laboratories and at medico-technical departments involved in the clinical trial).

Associate Investigator
Any individual member of the clinical trial team designated and supervised by the investigator at a trial site to perform critical trial-related procedures and/or to make important trial-related decisions (e.g., associates, residents, research fellows).

Appendices:

   Appendix 1: SOP Change Log
   Appendix 2: Example Initiation check-list
   Appendix 3: Example Close out check-list

Legislation/References/Supporting Documents:

1. Note for guidance on Good Clinical Practice (CPMP/ICH/135/96) annotated with TGA comments DSEB, July 2000, sections 4 and 8.4.


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TBC
**APPENDIX 1: SOP CHANGE LOG**

<table>
<thead>
<tr>
<th>Version No.</th>
<th>Reason for Issue</th>
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<tbody>
<tr>
<td>1</td>
<td>First Issue</td>
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## APPENDIX 2: INITIATION CHECKLIST

<table>
<thead>
<tr>
<th>ACTIVITY</th>
<th>Done</th>
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<tbody>
<tr>
<td>Ensure the meeting is scheduled and all relevant staff are able to attend (Investigator, study coordinator, sponsor, pharmacist, other relevant people such as laboratory staff). It is usual to confirm the initiation by letter</td>
<td>☐</td>
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<tr>
<td>Review Investigational Product overview and background</td>
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<tr>
<td>Review with investigator and relevant staff their understanding of the protocol, study procedures, investigational product, randomization procedures, unblinding procedures and timelines</td>
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<tr>
<td>Review that site resources are adequate to conduct the trial</td>
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<tr>
<td>Review with investigator and relevant staff Safety Reporting procedures and principles of Good Clinical Practice (ICH-GCP), including informed consent procedures, investigator responsibilities, record keeping and ethics reporting.</td>
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<tr>
<td>Review contents of Site Master File to ensure that:</td>
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<tr>
<td>- the current approved copy of the protocol, Informed consent form &amp; Investigational Brochure are present and align with the ethics committee approval documentation</td>
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<tr>
<td>- the ethics approval documentation is present and signed</td>
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<tr>
<td>- a copy of the CTN/CTX form is present and complete</td>
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<tr>
<td>- all necessary agreements are present and signed (Clinical trial Agreement, Indemnities, insurance)</td>
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<td>- all site staff CVs are present and signed</td>
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<td>- Laboratory normal ranges and relevant accreditation are present</td>
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<tr>
<td>Complete staff delegations log</td>
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<tr>
<td>Review investigational product shipment records</td>
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### APPENDIX 3: CLOSE-OUT CHECK LIST

<table>
<thead>
<tr>
<th>ACTIVITY</th>
<th>Done</th>
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</thead>
<tbody>
<tr>
<td>Ensure all protocol required data has been collected</td>
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<tr>
<td>Finalise accountability and disposition of test drug</td>
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<tr>
<td>Verify that all study files are complete (see Study Master File checklist)</td>
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<tr>
<td>Discuss overall study conduct at the site</td>
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<tr>
<td>Collect final signatures for any data queries, signature logs or reports</td>
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<tr>
<td>Discuss archiving of original data and documents</td>
<td>☐</td>
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<tr>
<td>Dispose of or return any remaining trial specific supplies</td>
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<tr>
<td>Formally close the site</td>
<td>☐</td>
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</tbody>
</table>