

Standard Operating Procedure CCTU/SOP006

EU Clinical Trial of Investigational Medicinal Product (CTIMP) Archiving

1. Scope

This SOP applies to:

- R&D and Clinical Trials Office (CCTU) staff involved with Trust sponsored EU Clinical Trials of Investigational Medicinal Products (CTIMPs)
- Chief Investigators (CI) and Principal Investigators (PIs) within the Trust (either as substantive employees or under an honorary contract) working on Trust/University sponsored EU CTIMPs

This SOP does not apply to commercially sponsored research or research sponsored by an external non-commercial organisation.

2. Purpose

To ensure that archiving is carried out according to:

- The Medicines for Human Use (Clinical Trials) Amendment Regulations 2006 which state that the Sponsor and Chief Investigator shall ensure that the documents contained or which have been contained in the Trial Master File are retained for at least 5 years after the conclusion of the trial
- Trust Information Governance
<http://connect/index.cfm?articleid=8278>
- When a trial involves minors (under 18 years of age) essential documents must be retained until the youngest participant reaches the age of 22 or for 5 years after the end of the trial, whichever the longer
- That during that period they are (a) readily available to the licensing authority on request; and (b) complete and legible
- That all trial documentation is archived for the duration stipulated in the Corporate Policy, Records: Preservation, Retention and Destruction

3. Definitions and Abbreviations

The headings below contain the definitions of terms and meaning of abbreviations used within the document.

Common abbreviations and definitions can be found in CCTU/INF001 Common Abbreviations and Definitions.

3.1. Definitions

Term	Definition
Trust-Sponsored	Sponsored by Cambridge University Hospitals NHS Foundation Trust (CUH) or sponsored by CUH jointly with The University of Cambridge
Essential Documents	Essential documents is the collective term for those documents that individually or collectively permit the evaluation of the conduct of a trial and the quality of the data produced. Essential Documents include the Trial Master File, source documents, Case Report Forms, Sponsor File and the Pharmacy File. (Complete listing in section 8, ICH-GCP E6 (R1).
Source Documents	Source Documents are original documents, data and records, eg. hospital records, clinical and office charts, laboratory results, memoranda, participant's diaries, pharmacy dispensing records and copies or transcriptions certified after verification as being accurate copies, microfiches etc from any departments involved in the clinical trial.
Sponsor File	The Sponsor File comprises a selection of Essential Documents for the trial, which confirms compliance with sponsor's governance procedures and provide evidence of sponsor oversight and management of the trial.
Pharmacy File	The Pharmacy File is a standard filing system which allows the effective storage and location of Essential Documents relating specifically to IMP Management and Dispensing Procedures.

3.2. Abbreviations

Abbreviation	Meaning
TMF	The Trial Master File is a standard filing system which allows the effective storage and location of Essential Documents. The filing system can be in the form of a single project file or a number of files as deemed most appropriate. The TMF also encompasses the Pharmacy Files
ISF	The Investigator Site File is a standard filing system which allows the effective storage and location of Essential Documents relating to the conduct of the study at the Participating Site. As with the TMF, the filing system can be in the form of a single project file or a number of files as deemed appropriate. The ISF also encompasses the Participating Site Pharmacy Files
CRF	Case Report Forms are printed, optical or electronic documents designed to record all of the protocol required information for each trial participant
CI	Chief Investigator
CTM	Clinical Trial Monitor
PI	Principal Investigator

4. Undertaken by

Sponsor

The Trust is responsible for the archiving of the Sponsor File and associated documents. Archiving of the TMF and associated documents is delegated to the Chief Investigator.

Chief Investigator

The CI is responsible for the archiving of Essential Documents as part of the TMF. In a multi-centre trial the CI is also responsible for the archiving of essential documents at the participating sites, however this can be delegated to the Principal Investigator (PI) at that site under the Participating Site Agreement.

It is the responsibility of the Chief Investigator to inform the PIs at each site when these documents no longer need to be retained in archive.

Principal Investigator

The PI is responsible for the archiving of Essential Documents as part of the Investigator Site File at their respective site in accordance with the requirements of the Sponsor (or the CI as appropriate) the institution and local requirements.

Clinical Trial Monitor

The CTM is responsible for performing the trial close down visit prior to the TMF being archived.

Named Archivist

The named archivist where in post is responsible for the co-ordination and compliance of all archiving performed within their jurisdiction.

5. Items Required

CCTU/FRM016 Archiving Check List

CCTU/FRM015 Archiving Box Label

CCTU/FRM017 Archive Record Form

Box label from the Trust off site archive service provider

Corporate Policy, Records: Preservation, Retention and Destruction

6. Summary of Significant Changes

Updated to emphasise that the Corporate Policy Records: Preservation, Retention and Destruction should be used to determine the duration of archive for all trial files.

7. Method

The following sections provide a description of the processes to be followed when implementing this document's procedures.

7.1. Data Protection

When handling data/documents from clinical trials, staff should ensure that they comply with the requirements of the Data Protection Act 1998 and the Trust's Data Protection Policy and Procedures available on the intranet <http://connect/index.cfm?articleid=958>

Any queries regarding data protection issues should be directed to the Data Protection Officer for the relevant Trust.

7.2. What to archive

All Essential Documents should be archived i.e., Trial Master File, CRFs, Source documents, Sponsor File and the Pharmacy file.

Note: if source data is contained within the medical notes archiving should be carried out in accordance with the requirements of the host NHS Trust.

A list of documents to be archived can be found in ICH GCP E6 (R1) Section 8.

7.3. When to Archive

Clinical trial related documentation can only be archived once the trial has been officially completed and the End of Trial Notification/Declarations submitted to the Independent Ethics Committee (IEC), the Regulatory Authority (RA) and the copies submitted to the Sponsor.

The completion of the trial shall be determined by the Chief Investigator and may vary among studies.

The definition of completion of a clinical trial should be documented clearly in the Clinical Trial Protocol.

7.3.1. Investigator Site Files at Participating Sites

Participating sites are responsible for their own archiving as stipulated in the Participating Site Agreement.

Essential Documents should be archived once the trial is officially completed at their site e.g.

- The declarations to the regulatory bodies have been made
- The site has undergone a final close out visit (if performed)
- The close out report issued and the final report written

7.3.2. Trial Master Files, Local Investigator Site Files and Essential Documents at Sponsor Site

Addenbrookes ISFs and CRFs can be archived with the TMF

Essential Documents need to be archived once the trial is officially completed at all participating sites e.g.

- The final participating site close out visit has been completed (if performed)
- The close out report issued
- The final report written
- The trial close down visit has been performed by the CTM

The TMF should contain details of each participating sites archiving arrangements including the location of the archive and the named archivist and details of the trial close down visit.

7.3.3. Sponsor Files at Sponsor Site

The Sponsor is responsible for the archiving of the Sponsor file.

- Essential Documents are archived once the trial is officially completed
- The trial close down visit has been performed by the CTM with the Chief Investigator and the trial team
- The Sponsor File is the last file to be archived
- The Sponsor File must contain details of the CI's archiving arrangements for the TMF, including the location of the archive and the named archivist. These details should be recorded on the Archive Record Form CCTU/FRM017
- Once prepared for archiving as in 7.4 the Sponsor files will be:
 - Boxed in current approved Archiving boxes from the offsite archive service provider
 - Added to the R&D/CCTU archiving list
 - Sent to the offsite archive service provider

7.4. How to Archive

Documents need to be stored in a way that preserves their integrity and readability and restricts access to appropriate individuals only

- An Archive Checklist should be used during the process of archiving to ensure that all Essential Documents are archived refer to CCTU/FRM016
- The archive administrator for each department should maintain a record of archived Essential Documents. Use form CCTU/FRM017
- Records should include:
 - Details of the clinical trial
 - The archiving location
 - Date of archive and date to be destroyed (if available)
 - The named archivists who are authorised to access the documents
- Large documents should be bound together using plastic treasury tags
- The use of archiving bags is highly recommended
- Remove all plastic wallets
- Any documents which are prone to fading or wearing notably waxed fax paper or overhead projector papers should be photocopied onto plain A4 paper for archiving
- Any electronic documentation should be printed for archiving and should be archived alongside the electronic media e.g. CD or USB Device

- Details of the archiving arrangements for the TMF should be notified to the Clinical Trials Unit once finalised
- All essential documents should be boxed and labelled using CCTU/FRM015 or the label provided by the offsite archive service provider

7.5. Access to Archived Documents

- Upon request from the sponsor, monitor, auditor, IEC or RA, the investigator or CCTU should make available for direct access all requested trial-related records
- Any transfer of ownership of the data or documents must be documented
- The new owner shall assume responsibility for archiving
- Access to archives should be restricted to the named individuals responsible for the archives
- Any alterations to the records must be traceable and clearly documented

7.6. Where to Archive

- The documents should be archived in an appropriate room or dedicated locked cupboard (consider fire protection without water sprinkler systems, water protection, pests etc)
- The room or cupboard must be secure with access only by authorised personnel
- If suitable archive facilities cannot be found use the Trusts off-site Archive Service Provider. Details can be provided by the CCTU upon request

7.7. Archive Costs

It is the responsibility of the CI or PI as delegated to review archiving costs for the trial and ensure these are budgeted for.

The Sponsor will assume no responsibility for the payment of archiving costs for the Essential Documents for any trial.

Archiving costs can include:

- Off-Site Archiving Service Providers
- Archiving Materials, e.g. Boxes, Treasury Tags, Archiving Bags
- Trial Staff Resource

8. Monitoring Compliance with the Effectiveness of this Document

a. Process for Monitoring compliance and Effectiveness

As part of routine monitoring visits, audit and inspection

b. Standards/Key Performance Indicators

This process forms part of a quality management system. Documents are reviewed every two years

9. References

The Institute of Clinical Research, 2008, Abbreviations used in Clinical Trials.

- ICH Harmonised Tripartite Guideline for Good Clinical Practice
- EU Directive 2001/20/EC of the European Parliament and of the Council of 4 April 2001
- EU Directive on Principles and Guidelines for Good Clinical Practice Commission Directive 2005/28/EC
- Medicines for Human Use (Clinical Trials) Regulations 2004
- Medicines for Human Use (Clinical Trials) Amendment Regulations 2006

10. Associated Documents

- CT002 – Pharmacy, Clinical Trial: Termination Procedure
- CCTU/SOP010 – Maintenance of Sponsor Files for EU Clinical Trials
- Corporate Policy, Records: Preservation, Retention and Destruction
- Trust's Data Protection Policy and Procedures

11. Equality and Diversity Statement

This document complies with the Cambridge University Hospitals NHS Foundation Trust service equality and diversity statement.

12. Disclaimer

It is the user's responsibility to check against the electronic library that this printed out copy is the most recent issue of this document.

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