Archiving of Clinical Trial Data and Essential Documentation

POLICY DETAILS	
Document Type	Standard Operating Procedure
Document name	KHP-CTO/CT/SOP 4.0 Archiving of Clinical Trial Data and Essential Documentation
Version	Final v 6.3 – 27 Sep 2022
Effective from	1 Oct 2022
Review date	9th May 2024
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Superseded documents	v 6.2 – 26 Jun 2020
Relevant regulations/legislation/guidelines	Statutory Instrument 2004 no 1031 Statutory Instrument 2006 no 1928

CHANGE HISTORY			
Date	Version Number	Change details	Approved by
9th Nov 2010	2.0	Transfer to King's Health Partner Livery and minor amendment to archiving process. Glossary update.	Jackie Powell
26th Feb 2013	3.0	Review of archiving process. Administrative change from JCTO to KHP-CTO.	Jackie Powell
10th Oct 2013	4.0	Amended to include archiving of traceability documentation for ATMPs.	Jackie Powell
28th Nov 2016	5.0	Update of Glossary terms, scheduled review, and inclusion of section on considerations for archiving electronic data (section 4.3) and adjustment of section 4.5 to apply only to paper data and documentation.	Jackie Pullen
8th May 2017	6.0	Amendment of section 4.5 to apply to paper and electronic data.	Jackie Pullen

1st Oct 2018	6.1	Minor amendment to include trials managed by KHP-CTO	Jackie Pullen
26th June 2020	6.2	Minor amendment to clarify scope and administrative changes	Jackie Pullen
27th September 2022	6.3	4.1.3 updated as per imminent new guidelines and current practice.	Jackie Pullen

Table of Contents

1.0 GLOSSARY

Archive Document – Document which must be completed for each clinical study archived. The form contains study details, Investigator's details, box contents and details of archivist. A copy should be present in each box archived, with a copy held at the site and the original in the KHP-CTO.

Advanced Therapy Medicinal Product (ATMP) – A medicinal product which is either a gene therapy medicinal product, a somatic cell therapy medicinal product or a tissue engineered product.

Chief Investigator (CI) - A Registered Physician, Dentist, Pharmacist or Registered Nurse who has overall responsibility for the conduct of the trial.

Clinical Trial - Any investigation in human participants, other than a non-interventional trial intended to discover or verify the clinical, pharmacological or other pharmacodynamic effects of one or more medicinal product or to identify any adverse reactions to one or more such products and to study absorption, distribution metabolism and excretion in one or more such products with the object of ascertaining the safety or efficacy of those products.

Good Clinical Practice (GCP) – as defined in the Regulations.

International Council for Harmonisation (ICH) – Produced a series of guidelines in 1996, E6 being the guideline on Good Clinical Practice, otherwise known as ICH-GCP. Formerly known as International Conference on Harmonisation.

Investigator Site File (ISF) – A standard filing system which contains all essential documents held by Principal Investigator(s) conducting a trial which individually and collectively permit the evaluation of the conduct of a trial and the quality of the data produced.

King's Health Partners (KHP) – King's Health Partners Academic Health Science Centre is a pioneering collaboration between King's College London (University) and three of London's most successful NHS Foundation Trusts – Guy's and St Thomas', King's College Hospital and the South London & Maudsley.

King's Health Partners Clinical Trials Office (KHP-CTO) – Established in 2006 by King's College London, Guy's & St Thomas' NHS Foundation Trust and King's College Hospital Foundation Trust to provide a streamlined approach for all aspects of trial administration.

KHP-CTO Standard Operating Procedures (SOPs) - "detailed, written instructions to achieve uniformity of the performance of a specific function," SOPs are the base on which Quality Systems and Processes are conducted and monitored against.

MATTS – MedSciNet's Active Trial Tracking System. An electronic Clinical Trial Portfolio Management System.

Medicines & Healthcare products Regulatory Agency (MHRA) – UK Competent Authority responsible for regulation of clinical trials.

Named Archivist – Person responsible for ensuring archiving requirements are met. Referred to as "Archivist" in this SOP.

Partner Organisations – King's College London, Guy's & St Thomas' NHS Foundation Trust, King's College Hospital NHS Foundation Trust and any other Organisations that may join the KHP-CTO Partnership from time to time.

Principal Investigator (PI) - A Registered Physician, Dentist, Pharmacist or Registered Nurse who has responsibility for the conduct of the trial at a host site.

The Regulations – Medicines for Human Use (Clinical Trial) Regulations 2004 transposed the EU Clinical Trial Directive into UK legislation, as Statutory Instrument 2004/1031. This became effective on the 1st May 2004. An amendment to implement Directive 2005/28/EC was made to the Regulations as Statutory Instrument 2006/1928. As amended from time to time.

Trial Master File (TMF) – A standard filing system which allows the effective storage and location of essential documents, that is the large volume of regulatory and approvals documents needed for clinical research. The filing system can be in the form of single project file or a number of files/filing cabinets, depending on what is deemed most appropriate for a particular clinical trial given its size and complexity. The regulatory and approvals documents within the TMF should be maintained alongside case report forms and source documentation.

2.0 BACKGROUND AND PURPOSE

The purpose of this SOP is to define the local procedure for preparing clinical study records at an investigational site conducting a trial sponsored, co-sponsored, managed or hosted by one or more of the Partner Organisations, and for their subsequent transfer to archive as required in the Regulations and the ICH GCP guidelines.

3.0 SCOPE

This procedure applies to all clinical trials sponsored, co-sponsored or managed by the KHP-CTO Partner Organisations. The archiving process may differ at host sites due to their local policy. However, archiving oversight will be maintained by the KHP-CTO on behalf of the Sponsor. This will include confirmation that the host site has, and adheres to, organisational SOPs that detail the principles described within this SOP to ensure compliance with GCP and UK clinical trial legislation.

4.0 PROCEDURE

4.1 Retention of Clinical Trial Data and Essential Documents

All data and essential documents relating to the clinical study must be archived in accordance with this KHP-CTO SOP and the requirements of the UK Regulations. This applies irrespective of the format in which it is generated, that is, electronic or paper.

4.1.1 Clinical Trials of Investigational Medicinal Products

1. Site Documentation: for at least 5 years after the completion of a clinical study, as defined by "The Regulations".

2. TMF and all Essential Documentation: for a minimum of 25 years or until at least 2 years after the last approval of a marketing application in a region where the ICH guideline applies.

And

3. Until there are no pending or contemplating marketing applications in a region where the ICH guideline applies.

Or

4. As defined in the Sponsor's protocol.

4.1.2 Clinical Trials of Advanced Therapy Medicinal Products

Trial Sponsors, the tissue establishments/procurement organisation, the manufacturer and the Investigator site where ATMPs are developed, manufactured or administered, must keep their parts of the traceability for a minimum of 30 years after the expiry date of the product, or longer if required by the teams of the clinical trial authorisation or by the agreement with the Sponsor. In the case of the tissue establishments, if that period is longer than provided in the Directives, the Sponsor will ensure through contractual agreements that the traceability records are kept for that longer period.

4.2 Storage of Essential Paper Documents

The KHP-CTO has a contract with an external company that can provide an archiving service for research departments within the Partner Organisations that have no archive facilities of their own or have unsuitable archiving facilities as assessed by the KHP-CTO.

Off-site archiving can only be arranged with the prior authorisation of the Named Archivist or delegate within the KHP-CTO.

4.3 Electronic Archiving

The use of electronic systems for such activities as data management, statistical analysis, reporting and trial management systems, means that electronic data also needs to be retained. The data may be held on a server or transposable media. It is recommended that more than one copy is retained (e.g. a backup server or back-up media stored in a separate location is used). Consideration should be given to storing the data in different formats on different types of media or even on the same media from different manufacturers. Access to archived data must be restricted and protected from unauthorised changes to maintain authenticity.

It is important that future access to records and data is maintained. Media used to store data may potentially deteriorate or become obsolete. Therefore, the transfer of data to a new media as technology advances would need to be considered.

4.4 Preparation for Archiving

Before archiving, it is important to assess the contents of the TMF for any records that could be disposed of and those that may be subject to rapid deterioration or need special requirements in order for them to be retained e.g. electronic media, photographs, sample packaging, plastic wallets. It is also essential to ensure that the entire TMF is archived i.e. pharmacy records, laboratory records, data management; statistics and Sponsor correspondence will form part of the TMF. The location of any part of the TMF that is going to be archived separately must be documented in the TMF. In the case of electronic data, if the data has been migrated to a new format for archiving, then transfer should be validated and fully documented, so that it can be subject to audit, to ensure and demonstrate that there has been no loss, change or corruption to the data or metadata and that authenticity is maintained.

When an Investigational research department requests off-site archiving, the following procedure applies:

1. Archivist or delegate will visit Investigational Research Department at the request of the Investigator team to assess the archiving requirements.
2. Archivist or delegate will ensure that the close-out visit has been completed and database has been locked prior to archiving the trial Essential Documents.
3. Archivist or delegate will send archive materials, Clinical Trial Archive Document (see Section 5.1), barcodes, archive clips and archiving boxes to the Investigational site.

4.5 Archiving Process

The Investigator Site research department must prepare the study documents for archiving as follows and as per the Archiving Process Map (see Section 6.1):

1. Remove documentation from lever arch file(s)
2. Remove all paperclips or bulldog clips.
3. Place paperwork onto blue archive clips
4. Pack the TMF, ISF, if applicable all paper CRF's, and any electronic transposable media in the standard archiving boxes with lids.
5. Prepare the Clinical Trial Archive Document (see Section 5.1).
6. Once the above actions are complete, the Named Archivist or delegate, will visit the research team to review the files and complete the Clinical Trial Archive Document. A copy of the Clinical Trial Archive Document will be filed in each box, and a copy given to the Investigator site for their records.
7. The archive box will be sealed, by the Archivist or delegate, with archive cable ties ensuring that any unauthorised attempt to open the box will be evident.
8. Barcode(s) will be securely stuck onto the archive box where it will be clearly visible.
9. When archiving is complete and the box(es) are ready, the Archivist or delegate will arrange collection with external storage company and ensure that the archiving database (MATTS) is updated.

10. The original Clinical Trial Archive Document will be returned to the KHP-CTO offices to be scanned into MATTS and retained within the KHP-CTO.

4.6 Retrieval of Archived Boxes

Archived boxes may be retrieved from storage by the Investigational Study Site as per the Document Retrieval Process Map (see Section 6.2):

1. Essential trial documents must be available at all times for inspection by regulatory competent authorities and other Regulatory bodies.
2. Only the Named Archivist or delegate can instigate the retrieval of an archive box (for example, if required by an auditor). A written request for retrieval must be sent to the Archivist or delegate by the Investigator Site. Telephone requests will not be accepted. The required box(es) will be identified by the Archivist or delegate and sent by courier to the required Investigational research department.

4.7 Returning Archived Boxes to Storage

Following withdrawal, each archive box re-presented to the off-site storage facility for storage will be treated as a new consignment and must be clearly documented showing additional or removed documents.

The archive box(es) will then be dispatched in compliance with Section 4.4 and 4.5 above.

4.8 Destruction of Clinical Trial Data and Archived Essential Study Documents

Archived documentation can only be destroyed once written permission has been obtained in accordance with the study protocol requirements, Sponsor company's SOPs and permission from the following (if applicable):-

1. Sponsor or CRO
2. Investigator Site Host Institution

5.0 RELATED TEMPLATES

5.1 Clinical Trial Archive Document

6.0 RELATED DOCUMENTS

6.1 Archiving Process Map

6.2 Document Retrieval Process Map

7.0 APPROVAL and SIGNATURE

02 November 2022

Jackie Pullen — Date

Director

King's Health Partners Clinical Trials Office