On the other hand, audits and inspections are 2 forms of quality assurance for clinical research/trials.

AUDITS

Audits are usually carried out on an ad-hoc basis. It can be performed by the institution or the sponsor. Audits, conducted by the NHG Research Quality Management team, apply to all research studies conducted at institutions under the oversight of NHG Domain Specific Review Board (DSRB).

INSPECTIONS

Inspections are also carried out on an ad-hoc basis, but it is usually performed by the regulatory authority (i.e. Health Sciences Authority (HSA) in Singapore). They my be conducted on clinical trials involving medicinal products, where a clinical trial certificate has been issued. GCP Site inspections may be either protocol-specific or systems-oriented. Systems that may be inspected include Investigator site files, informed consent, investigational products, pharmacovigilance, biological samples, monitoring, data management, biostatistics and final reports.

Preparing for Audits and Inspections
As a principal investigator, you are responsible for ensuring that there is adequate preparation for the audit/inspection, cooperation with the auditor/inspector and appropriate follow-up actions.

You may wish to refer to NHG PCR SOP 501-B10 (Handling Audits) for more guidance on how to prepare for an audit/study review by NHG. Prior to that, you may also find the Investigator File Content Template and the Essential Document checklist, provided by NHG-RDO, useful to ensure all essential documents are in the investigator file.

For more details about the inspections by the HSA, you may refer to Guideline on GCP Compliance Inspection Framework, available on their website.

Helpful tools and resources

1. Proper Conduct of Research Standard Operating Procedures and Templates
   www.research.nhg.com.sg/wps/wcm/connect/romp/nhgromp/resources/research+sops
2. Guideline on GCP Compliance Inspection Framework
   www.hsa.gov.sg/publish/hsaportal/en/health_products_regulation/clinical_trials/guidelines/gcp_compliance_inspection.html

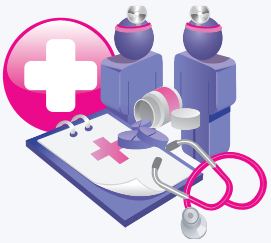
Templates available from NHG-RDO (under the PCR SOP link mentioned above)

1. Investigator File Contents Template
2. Essential Documents Checklist
3. Monitoring Plan Template

References:

Singapore Guideline for Good Clinical Practice (SGGCP)
NHG Proper Conduct of Research Standard Operating Procedures
Health Sciences Authority, Guideline on GCP Compliance Inspection Framework

PROTOCOL NON-COMPLIANCE
DSRB AND SUBJECTS
NOT UPDATED OF STUDY CHANGES



Background

In a recent study, the Principal Investigator (PI) was replaced by the Co-Investigator as the initial PI had left the institution. As the Co-Investigator had been an active member from the start of the study, subject enrolment and other study activities continued without informing the Domain Specific Review Board (DSRB) and research subjects.

In another study, study procedures were not performed due to lack of resources and the PI was in the midst of securing the necessary grant/resources to continue the study. These changes however were not communicated to the DSRB and subjects.

Findings & Implications

The PI had implemented changes to the study without ensuring that prior review and documented approval/ favourable opinion from the DSRB had been obtained. The PI also did not update the information in the Participant Information Sheet/Consent Form provided to the ongoing research subjects enrolled in the study.

By not providing the updated information to the DSRB and research subjects, the PI had compromised on the ethical review and the informed consent process of the study. The changes to the study may affect the subject's willingness to participate or continue participation in the study.

Tips and Recommendations

- It is advisable to always notify the DSRB and Health Sciences Authority (HSA) (if applicable) of changes made to the study. In general, major changes can be done via a protocol amendment, and minor/ administrative changes may be made via a notification.
- To avoid making too many changes to the study, the PI may try as much as possible to finalise study details before submitting it for approval. The PI should also be prepared to implement changes only after receiving favorable approval and opinion from DSRB and HSA (when applicable).
- The PI should update the study protocol and Participant Information Sheet/Consent Form and/or create an addendum for research subjects who had given consent previously to document new information that may be relevant to the research subject's consent.
  Any new information communicated to the research subjects should be documented.

References:

Singapore Guideline for Good Clinical Practice (SGGCP) 4.4.1, 4.5.2, 4.8.2