Guidelines for Reporting Protocol Deviations

INTRODUCTION

The purpose of this document is to provide the SickKids research community with guidance on how to handle and report protocol deviations to the SickKids REB. Only protocol deviations that involve research participants or procedures under the jurisdiction of the SickKids REB need to be reported.

WHAT IS A PROTOCOL DEVIATION AND WHEN DO I REPORT THEM?

What is a protocol deviation?

Any change, divergence, or departure from the design or procedures of a research project protocol that is under the Investigator's control and that has not been approved by the REB. See below for specific examples.

When do I need to report a protocol deviation?

All protocol deviations should be documented, including the rationale/justification for the deviation and PI sign-off. These should be kept in a protocol deviation log (potential template on website) in the study documentation/binder that is maintained by the PI.

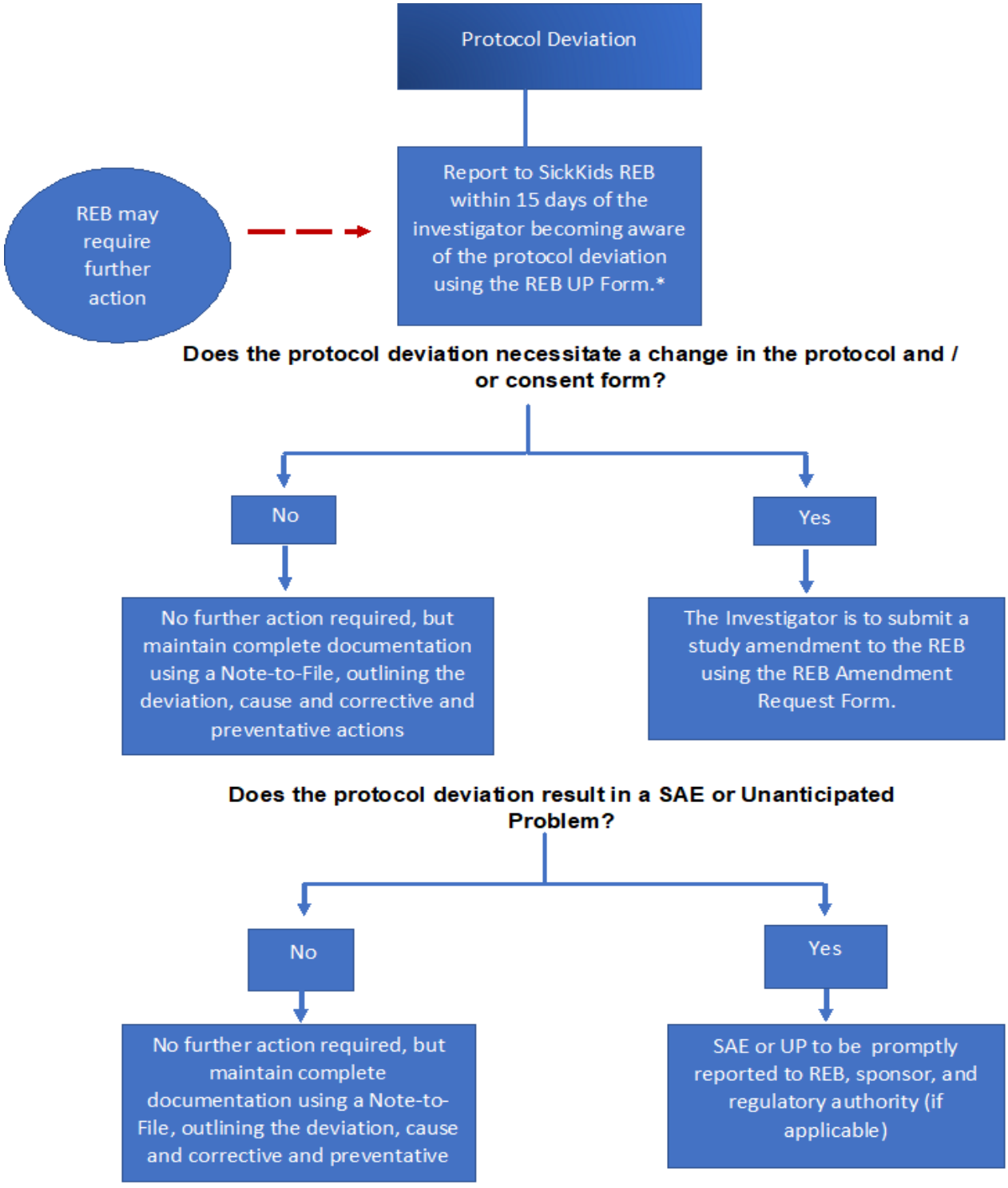
The Investigator must determine whether the protocol deviation meets the criteria of an Unanticipated Problem (unexpected, related/possibly related, places participants or others at a greater risk of harm), and if so they must be reported to the SickKids REB in an expedited fashion using the REB Adverse Event and UP Form (on eREB). These deviations:

- Impact the patient's rights, safety or welfare
- Impact study efficacy
- Impact data integrity

Protocol deviations that are planned in order to protect research participants from imminent physical or psychological harm based on new information obtained during the course of the study must be reported to the REB along with the corresponding safety information and the PI's plan to update the study as required. A protocol amendment should then be submitted to the REB via the eREB or CTO.

*** For guidance on reporting Adverse Events, Serious Adverse Events, please see the SickKids REB Adverse Events and Unanticipated Problem (UP) Reporting Guidance.**

REPORT TIMING AND PROCESS



*Can be accessed from eREB

PROTOCOL DEVIATIONS THAT REQUIRE REPORTING TO THE REB (EXAMPLES)

1. Drug Dispensing / Dosing error

Incorrect dose of drug was administered to the participant

- Unexpected
- Related to the study intervention
- Exposes study participants to increased risk

ACTION REQUIRED: Report to the REB as an UP in the REB UP Form; PI is required to develop and implement a corrective action plan and amend the protocol moving forward, if necessary, to avoid this protocol deviation from happening again in the future.

2. Study Visit Outside of Window

Study participant missed their follow-up study visit at week 29 to complete an in-person interview for a qualitative study; however, they were seen at week 30 instead

- Unexpected
- Related to the study
- Assessed by the PI as not affecting the safety or welfare of the research participant or others, the rights of the participant or the integrity of the study design

ACTION REQUIRED: UP not required, but an amendment is warranted to avoid this protocol deviation from happening again in the future.

3. Informed Consent Obtained After the Initiation of Study Procedures

Vital signs obtained prior to informed consent

- Unexpected
- Related to the study
- Assessed by the PI as affecting the rights of the participant (collection of personal health information without informed consent from research participant)

ACTION REQUIRED: Report to the REB as an UP in the REB UP Form-this is a Protocol Deviation; Inform participant that their personal health information was collected prior to their consent; If participant does not provide consent, information collected for the research study will need to be destroyed; PI is required to develop and implement a corrective action plan and amend the protocol moving forward, if necessary to avoid this protocol deviation from happening again in the future.

Other examples of protocol deviations that need to be reported to the REB:

- Change in study procedure(s) to eliminate immediate hazard(s) to participants
- Enrolment of a participant who did not meet all protocol selection criteria, whether agreed to or not by the study Sponsor
- Over-enrolment (exceeding the target number of participants approved by the REB)
- Deviation in the consent process
- Study procedure performed outside of the required timeframe that, in the opinion of the investigator, may affect participant safety and / or data integrity
- Failure to perform a required study procedure that, in the opinion of the investigator, may affect participant safety or data integrity
- Performance of a study procedure not approved by the REB

ICH GOOD CLINICAL PRACTICE (GCP) REQUIREMENT FOR PROTOCOL DEVIATIONS

The following ICH Good Clinical Practice (GCP) Guidelines can be applied to all REB approved research studies.

ICH GCP (Article 4.5.2)	ICH GCP (Article 4.5.4)
• Investigator should not implement any deviation from, or a change of, the protocol without agreement by the sponsor and prior review and documented approval / favourable opinion from the REB of an amendment.	• Investigators may implement a deviation from, or a change of, the protocol to eliminate an immediate hazard(s) to research participants without prior REB approval.
• **Except** where necessary, deviations from, or changes of the protocol may occur to eliminate an immediate hazard(s) to trial participants or when the change(s) involves only logistical or administrative aspects of the trial (e.g., change in monitor(s), change in telephone number(s))	• As soon as possible, the implemented deviation or change, the reasons for it, and the proposed protocol amendment(s), if applicable should be submitted to: a) The REB fore review and approval b) The Sponsor for agreement, if applicable c) The Regulatory Authority, if applicable