2 - HUMAN RESEARCH ETHICS COMMITTEES AND THE HREC SECRETARIAT

Clinical Trials

1. Role of the Human Research Ethics Committee (HREC)

The role of the HREC is to protect research participants and to facilitate the ethical conduct of research. The following is a summary of key areas of review, however an HREC is not limited to consideration of these issues.

General Responsibilities

1. Ensure that the design and planned conduct of any human research that it reviews is consistent with the National Statement on Ethical Conduct in Human Research (National Statement).
2. Safeguard the safety, dignity and well-being of people participating in research and facilitate and promote ethical research that is of potential benefit to participants, science and society.
3. Make decisions on the ethical acceptability of research proposals that involve humans (including their tissue and data).

Scientific/Peer Review

4. Describe in the terms of reference whether the processes by which the HREC conducts an assessment of the scientific and ethical merit of a project are separate or combined.

5. Ensure that the importance and relevance of the research question and validity of the proposed setting and methodology has been assessed through scientific/peer review. Where applicable, assess whether there has been appropriate engagement with participant groups (e.g. Aboriginal and Torres Strait Islander peoples) in order to determine how factors, such as the relevance of the proposed research outcome to participants or their communities, has been determined.

a) When accepting scientific peer review that has been conducted by a body other than the HREC, confirm that the review was sufficiently robust and independent of the investigator and sponsor.

b) Where the HREC is conducting independent scientific review:
   - Ensure that the scientific review is undertaken by those familiar with the disciplines and methods of the proposed trial.
   - Where required, arrange for provision of advice from expert reviewers to assist in determining if the trial is acceptable on ethical grounds and meets all necessary scientific, legal and ethical requirements.
   - Ensure that all scientific and administrative elements are addressed in clinical trial protocols by, for example, encouraging non-commercial researchers to use the SPIRIT Checklist
   - Assess the importance and novelty of the research question and whether there has been a satisfactory review of current knowledge, to avoid unnecessary or inappropriate research being conducted.
   - Assess whether there is a clear research question and whether the proposed trial design will answer the research question.
   - Assess sample size and statistical and power issues (e.g. whether the assumptions used in the sample size calculation are appropriate) and whether there are adequate steps to reduce bias.
   - Assess the generalisability of the trial; whether the groups of participants to be included represent the intended population to be treated and seek justification when the reasons for a lack of generalisability are unclear or appear unjustified.
   - Where applicable, assess the protocol's justification for the choice of comparator(s).
   - Where applicable, assess the protocol's explanation of the clinical relevance of chosen efficacy and harm endpoints and any justification provided for the use of surrogate endpoints.
   - Assess all other aspects relevant to research merit and integrity as described in the National Statement.

Recruitment Methods and Participant Selection

6. Assess arrangements for the recruitment of participants and the fairness of the selection criteria including:
    a) The rationale for exclusion of specific participant groups, for example, those with difficulties understanding English, those with sensory impairment, or the elderly
    b) If the research intends to include groups considered vulnerable, assessing whether the research is justified having regard to the principles set out on Section 4 of the National Statement
    c) Any advertising or other materials provided to potential participants
    d) The procedures for screening of potential participants
    e) The justification for any procedures over and above standard care
    f) The justification for withholding any treatment that would be part of normal care

Payments and Incentives and Conflicts of Interest

7. Review both the amount and method of payment to participants to assess whether there are any concerns relating to coercion of, or undue influence on trial participants.
8. Assess measures to manage conflicts of interest involving investigators in accordance with Australian Guidance.
9. Assess measures to manage conflicts of interest involving HREC members or HREC advisors in accordance with Australian Guidance.

Informed Consent Documentation and Procedures

10. Assess the adequacy, readability and completeness of the written information given to participants and the procedures to be followed when obtaining informed consent.
11. Assess whether plans for limited disclosure, opt-out, waiver or other consent processes are warranted having regard to the principles set out on Chapter 2.3 of the National Statement and the relevant jurisdiction's legal advice.
12. Keep under review the adequacy and completeness of the informed consent process and documentation in the light of new information, particularly new information about risks and benefits.

Suitability of the Coordinating Principal Investigator(s) and Team

13. Assess whether the Coordinating Principal Investigator (CPI) and if applicable, key members of the CPI's team (e.g. protocol co−authors) have sufficient expertise to undertake all research activities.

Trial Funding

14. Assess how this research project is currently, or will be, funded in order to assess whether the sponsor is likely to have adequate funds and resources to complete the trial.

Ongoing Oversight

15. Assess whether the mechanisms to monitor the conduct of the trial are adequate and reflect the risks and complexities of the trial.
16. Keep the favourable ethical opinion under review in light of significant developments (e.g. reports of serious breaches of the protocol or Good Clinical Practice [GCP]).
17. Provide opinion on amendments to the trial and review progress reports.

Safety Assessment, Reporting and Monitoring

18. Assess the safety of the proposed trial and whether proportionate systems are in place to mitigate and manage any identified trial risks.
19. Satisfy itself that sponsors have adequate ongoing safety monitoring arrangements in place including the justification for appointing/not appointing a Data Safety Monitoring Board and any 'stopping rules' and criteria for withdrawing individual participants from the trial.

20. Satisfy itself that the sponsor demonstrates its obligation to report to the HREC, anything that may adversely affect the safety of participants or the conduct of the trial.
21. Assess whether changes to risk/benefit reported by the investigator/sponsor are compatible with continued ethical approval.

Use of Biospecimens, Genetic Materials, Stem Cells

22. Review arrangement for the use of biospecimens including any ethically defensible plan to describe the handling of unanticipated findings beyond the aims of the research that may have health implications for the participant and/or their family.
23. Consider the special precautions specific to genetics and stem cell research having regard to the principles set out in the National Statement.

Use of Data

24. Determine whether the research represents any breach of privacy principles and if so, whether the public interest in the research substantially outweighs the public interest for privacy.
25. Assess arrangements for collection, disclosure, use and storage of data related to the trial.

Arrangements for Participants at the End of the Trial

26. Confirm whether the protocol and participant information adequately describes any arrangements for post-trial access to the trial intervention, if applicable.
27. Confirm whether the protocol and participant information adequately describes any arrangements for participants to access trial results/outcomes.

Dissemination and Final Reporting

28. Assess the applicant's intentions to register, publish and disseminate the findings and to make data and tissue available.
29. Ensure that the investigator/sponsor provides a final summary report to HREC which includes information on whether the trial achieved its objectives, the main findings and confirmation that the arrangements for publication or dissemination of the research will be carried out in line with the dissemination plan.

2. Role of the HREC Secretariat

The HREC secretariat[1] provides administrative support and advice on the organisation's processes for ethical review of research studies. Although the precise role of the HREC secretariat may differ among institutions, the following illustrates the typical roles that are delegated to this office.

Pre-approval

1. Advise investigators in the submission of all applications to the HREC.
2. Publish the schedule of HREC meetings and application closing dates.
3. Manage, in liaison with the chair, procedures for obtaining independent scientific review or expert review, if required.
4. Validate applications prior to allocating them to the HREC for review to ensure all documentation is complete and provide instruction on any changes required to non-valid applications.
5. Ensure collection of appropriate fees for HREC review in accordance with institutional policy.
6. Maintain all relevant records on the jurisdiction's information technology systems.
7. Undertake administrative responsibilities related to the HREC and where applicable, HREC subcommittee meetings, for example:
    - Preparing the agenda.

[1] Also known as the Ethics Office/r.

- Distributing agenda and papers.
- Allocating lead reviewers (where this is the practice of the HREC).
- Following consultation with the chair, inviting expert reviewers as required
- Inviting the coordinating principal investigator and, where appropriate, supervisors/student liaison officer or clinical supervisor to attend meetings and making necessary arrangements.
- Recording apologies for absence prior to the meeting.
- Raising with the chair, any concern that a meeting may not be quorate.
- Recording attendance by members and expert reviewers for the discussion of each application for scientific and ethical review.
- Advising the meeting as necessary on compliance with standard operating procedures.
- Preparing the minutes of the meeting for review and approval.
- Notifying investigators of decisions and taking other follow-up action as necessary.

Post-approval

8. Allocate amendments and reports to appropriate review pathways, including subcommittees, including safety reports and reports on breaches, where applicable.
9. Ensure collection of appropriate fees for post-approval HREC review in accordance with institutional policy.

Other

10. Provide secretariat support for and manage the activities of the HREC (and sub-committees if applicable).
11. Maintain records, including databases and filing systems.
12. Undertake analysis of ethics submissions to produce high quality reports, as required, and assist in the preparation of the annual report of HREC activity to the NHMRC.
13. Facilitate access to education programmes for members of the HREC.
14. Manage HREC membership and support personnel and participate in all aspects of their recruitment, selection, induction, continued mentoring, performance management and the assessment of educational opportunities.
15. Promote and provide accurate and timely information, technical advice and education to current and potential researchers, staff and management, for example, via web pages, email, newsletters, and/or memo distribution, and face to face contact.
16. Establish and maintain best practice processes and procedures to ensure all activities of the HREC secretariat are of the highest standard.
17. Monitor relevant regulatory and policy developments to ensure changes are incorporated into local HREC policies and procedures.
18. If required locally, assist in the development of materials for promotional and educational forums on research ethics and present at such forums.
19. Manage the regular review of the HREC terms of reference.

References

National Statement on Ethical Conduct in Human Research (2007)
Australian Code for the Responsible Conduct of Research (2007)
The Note for Guidance on Good Clinical Practice (CPMP/ICH/135/95) as annotated by the TGA
Values and Ethics: Guidelines for Ethical Conduct in Aboriginal and Torres Strait Islander Health Research (NHMRC 2003)
Guidelines for Ethical Research in Indigenous Studies (Australian Institute of Aboriginal and Torres Strait Islander Studies 2012)
Guidelines for Good Clinical Practice E6 (R1) as annotated by the TGA
SPIRIT 2013 Statement: Defining Standard Protocol Items for Clinical Trials (Ann Intern Med 2013; 158:200-207*)*.
CONSORT 2010 Explanation and Elaboration: updated guidelines for reporting parallel group randomised trials (BMJ. 2010; 340: c869).