NHS
Great Ormond Street Hospital for Children
Research and Innovation

DIRECTORATE OF RESEARCH AND INNOVATION

Joint Research and Development Office

Document Number: GOSH/ICH/SOP/R&D/008	Version Number: 2
Title: **Regulatory Green Light Process for GOSH Sponsored Clinical Trials of Investigational Medicinal Products**	
Effective Date:	02-Feb-2023

	Name	Position
Authored by:	Ilyas Ali	Clinical Trials Manager
Approved by:	Dr Vanshree Patel	Head of Governance, Clinical Trials and Contracts

1. Scope

This SOP is applicable to all the clinical trials sponsored or co-sponsored by Great Ormond Street Hospital (GOSH). The SOP is applicable to the Joint R&D Office Clinical Trials Team with responsibility for performing sponsor activities on behalf of the Trust. The SOP is also applicable if GOSH delegates the green light process to another organisation.

2. Purpose

The purpose of this SOP is to describe the regulatory green light process for Clinical Trials of Investigational Medicinal Products (CTIMPs) where GOSH is acting as a research sponsor. Prior to authorising the start of a clinical trial and the initiation of research sites, the sponsor must ensure that all approvals, contracts, confirmation of capacity, and necessary documentation are in place. Records must be available to verify that all required documents have been received and checked by the sponsor and once these are ready, the trial can commence. This process is referred to as the 'regulatory green light'.

3. Definitions/Abbreviations

CI – Chief Investigator

CTIMP – Clinical trial of investigation medicinal product

CRO – Contract Research Organisation

CTU – Clinical Trials Unit

GOSH – Great Ormond Street Hospital

GLA checklist – Green Light Approval Checklist – A checklist that lists all documents that are required prior to the initiation of a trial at the site/s

Green light release – The final sponsor approval to commence the trial related activities at site.

ISF – Investigator Site File

MHRA – Medicines and Healthcare products Regulatory Agency

PI – Principal Investigator

REC – Research Ethics Committee

SIV – Site Initiation Visit

TMF – Trial Master File

4. Responsibilities

Duties may be delegated but the responsibility always remains with those listed.

Joint R&D Office Clinical Trials Manager is responsible for:

- completing the appropriate checks and issuing the 'green light' to individual sites.
- Ensuring the CI and PI are aware that no site shall commence research activity prior to receiving the sponsor's 'green light'.

The green light process may be delegated to CTU/CRO as required depending on the trial management responsibilities that have been assigned to them in the agreement.

5. Procedure

Clinical Trial Regulatory Green Light Process includes the following steps

5.1 Site Initiation

Once there is confirmation that all approvals and permissions from MHRA, REC and HRA are in place, the site initiation visit(s) (SIV) will be arranged according to the SOP/R&D/006 Monitoring CTIMPs Sponsored by GOSH.

During SIV, the Clinical Trial Manager will check that the supporting departments (e.g. pharmacy, radiology and laboratory) have confirmed that the research can be

delivered in accordance with the approved protocol and supporting documentation is filed in the Investigator's Site File (ISF). The ISF should be complete with the current study documentation and signed agreements, including the confirmation of capacity or equivalent.

5.2 Completion of the Green Light Approval Checklist

On completion of the SIV, the Green Light Approval (GLA) Checklist (FRM/R&D/006) must be completed by the Clinical Trials Manager/Clinical Trials Coordinator to ensure that all essential documents are in place and that any outstanding actions from the SIV have been addressed. Once completed, the form must be signed by the staff member completing it. A single GLA Checklist must be completed for each site.

The completed GLA Checklist will be reviewed and signed-off. The checklist should not be completed and reviewed by the same person. If the Green Light Checklist is completed by the Trial Manager, the Head of Governance will perform the review. The Chief Investigator must also review and sign the checklist.

Once all SIV outstanding actions have been addressed, the Clinical Trials Manager will send the completed GLA Checklist with authorisation for recruitment to the CI at the lead site. The supporting departments and any other relevant individuals (e.g. Pharmacist) will be copied into the email to be notified.

The lead site must retain the related correspondence and the checklist in the TMF (unless the TMF function is delegated to CTU/CRO). All other sites will retain a copy of the Sponsor issued Green Light Approval for Clinical Trial Site Activation email in the ISF (see appendix 1).

For CTIMPs, the IMP should not be shipped to the site/s prior to receiving the sponsor's Green Light Approval.

If a CRO/CTU is involved in the management of a study, they can use either the sponsor's or their own green light release checklist to confirm site activation. The CTU/CRO team will send the completed checklist to GOSH R&D for review and approval. The checklist and sponsor approval e.g., signature on form or email, must be filed in the TMF.

5.3 Escalation of Outstanding Issues

If the site/s fails to address outstanding actions from the SIV in a timely manner the Clinical Trials Manager will escalate this to the Head of Governance, Clinical Trials and Contracts or Deputy Director of R&I, in line with Reporting and Escalation for Clinical Research Studies (GOSH/ICH/SOP/R/005), who will liaise with CI and the site to consider withdrawing the site from the study. If the site is withdrawn, the

sponsor and the CI will inform the relevant bodies about the withdrawal via submitting a non-substantial amendment.

5.4 Compliance

Compliance with this SOP will be reviewed during routine monitoring/audit.

For each site, complete the trial site initiation visit report (as per SOP/R&D/006) which will incorporate all local ISF checks and a green light release approval will be confirmed in the email (see appendix 1).

Systematic or persistent failure to comply with the study procedures and/or this SOP will be seen as non-compliance to GCP and must be bought to the attention of the Head of Governance, Clinical Trials and Contracts who will decide the appropriate action.

6. Related Documents

- GOSH/ICH/FRM/R&D/006 Regulatory Green Light Checklist
- GOSH/ICH/SOP/R/005 – Reporting and Escalation for Clinical Research Studies
- GOSH/ICH/SOP/R&D/006 - Monitoring CTIMPs Sponsored by GOSH

7. References

ICH GCP E6 R2

MHRA Good Clinical Practice Guide, 2012

Statutory Instrument 2004 No. 1031. The Medicines for Human Use (Clinical Trials) Regulations 2004. The Stationary Office Limited. ISBN 0110490487.

8. Appendices

Appendix 1: Sponsor issued Green Light Approval for Clinical Trial Site Activation Email Template

REF: R&D number – Study Title – Site

Dear,

Title:

REC Ref:

R&D Ref:

IRAS:

We are pleased to inform you that, [insert site name], has been approved following satisfying the criteria below and can now be activated.

- The site has all essential documents in place for the site to conduct the study in compliance with the approved protocol and applicable regulatory guidelines.
- The site is aware of all the sponsor's procedures and SOPs for study conduct (such as safety recording and reporting, amendments, notification of any urgent safety measures/ violations or serious breaches) and has read and understood each.
- The site has met all the required regulatory and sponsor requirements.

Please consider this email as the formal Sponsor Green Light Approval for the site, [insert name of site], authorising the initiation of all trial activities. This email will need to be filed in the site's ISF.

Kind regards,

****The Green Light Approval checklist must be attached, if this email is addressed to the lead site.**