

STANDARD OPERATING PROCEDURE

STH Investigator

**Archiving of Essential Documentation
 Generated During Clinical Research**

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Effective Date	1 August 2014	Author	Zoe Whiteley
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Approved by (name & role)	Dipak Patel, Research Manager	Date 30 June 2014	
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Standard Operating Procedure: STH Investigator

Archiving of Essential Documentation Generated During Clinical Research

This SOP has been produced in accordance with **Medicines for Human Use (Clinical Trials) Regulations 2004 and subsequent amendments, ICH Good Clinical Practice (GCP) & Research Governance Framework.**

This SOP will outline the procedure to be followed by investigators for the archiving of essential documentation generated during clinical research conducted in STH.

Background

In accordance with the Medicines for Human Use (Clinical Trials) Amendment Regulations 2006 and the ICH-GCP, archiving of essential documentation is mandatory for all studies involving investigational medicinal products (IMPs). The Medicines for Human Use (Clinical Trials) Amendment Regulations 2006 embrace the principles set out in the ICH-GCP guidelines relating to the handling and archiving of study documentation generated during the course of a clinical trial and these regulations apply to all those parties involved in a trial (investigator, monitor, sponsor, pharmacy).

As the sponsor and host organisation for clinical research involving IMPs, investigational devices, surgical intervention and varied non-interventional clinical research, STH has a responsibility to ensure that archiving arrangements are in place for all essential documents generated during the course of research in accordance with the standard of GCP and all applicable Regulations. See Appendix 4 for details of periods of retention for the various categories of research conducted in STH.

The requirements of ICH-GCP and the Medicines for Human Use (Clinical Trials) Amendment Regulations 2006 are:

ICH Harmonised Tripartite Guideline for Good Clinical Practice

'The investigator/institution should maintain the trial documents as specified in Essential Documents for the Conduct of a Clinical Trial and as required by the applicable regulatory requirements. The investigator/institution should take measures to prevent accidental or premature destruction of these documents'

Essential documents should be retained until at least 2 years after the last approval of a marketing application in an ICH region and until there are no contemplated marketing applications in an ICH region or at least 2 years have elapsed since the formal discontinuation of clinical development of the investigational product. These documents should be retained for a longer period however if required by the applicable regulatory requirements or by an agreement with the Sponsor. It is the responsibility of the Sponsor to inform the investigator/institution as to when these documents no longer need to be retained.'

Section 8 of ICH-GCP details those essential documents which should be retained by the investigator in the investigator site file (ISF) and those which should be kept by the study sponsor in the Trial Master File (TMF). Details of these documents are given in Appendix 3.

Medicines for Human Use (Clinical Trials) Amendment Regulations 2006:

The sponsor and the chief investigator shall ensure that the documents contained, or which have been contained, in the TMF are retained for at least 5 years after the conclusion of the trial and that during that period are—

- (a) readily available to the licensing authority on request; and*
- (b) complete and legible*

All clinical trials of IMPs will adhere to the above regulations and guidance. At STH we will take the stance that high risk trials of medical devices or surgical interventions will work to the same principles as trials of IMPs. All non-interventional research will be required to archive study documentation

appropriately but the period of retention of documentation will be substantially less than that for high risk studies – see Appendix 4.

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Acronyms

SOP	Standard Operating Procedure
STH	Sheffield Teaching Hospitals
ICH-GCP	International Committee of Harmonisation – Good Clinical Practice
IMP	Investigational Medicinal Product
R&D	Research & Development
CTRU	Clinical Trials Research Unit
TMF	Trial Master File
ISF	Investigator Site File
CRFs	Case Report Forms

Definitions

Archiving in the context of clinical research relates to the collection for long term storage of **essential documents** that individually and collectively permit the evaluation of the conduct of a trial and the quality of the data produced. Section 8 of ICH-GCP lists those documents which are considered to be essential documents.

Procedure

1. Clinical Trials of Investigational Medicinal Products (IMPs)

1.1 STH Sponsored IMP Trials

Prior to Authorisation

1. For single centre studies the Investigator completes the Single Site Internal Study Management Arrangements Form at the request of the Research Department R&D Coordinator, providing details of the proposed archiving arrangements for the trial. For multi-

centre studies the R&D Coordinator will ensure that archiving arrangements are delegated accordingly in the CTRU /CRO collaboration agreement and in site agreements.

2. The R&D Coordinator confirms that the arrangements are satisfactory. The following guidance, which reflects the requirements of the UK Medicines for Human Use (Clinical Trials) Amendment Regulations 2006 and produced using the guidelines prepared by the European Forum for Good Clinical Practice, will be used to gauge the suitability of an archiving facility.

Confidentiality & Security

Filing space should be available for the storage of TMF and local ISF during the conduct of the clinical trial. ISFs will normally be stored in an investigator's office or local filing area. At the end of the trial the files must be transferred to a suitable archiving facility if the investigator has access to one or transferred off STH premises to a dedicated off-site archiving facility.

Record Keeping

Investigators must ensure that data are recorded and stored correctly and accurately. This not only includes data recorded on Case Report Forms (CRFs) but also all original source data (patient medical notes for example), laboratory test results, radiological images and pharmacy data (drug dispensing records and drug accountability records for example).

Environmental Conditions

The minimum requirement is for documentation to be stored in conditions that minimise the risk of damage or loss of information. The risk of damage from water should be reduced by storing documentation above floor level and away from overhead water pipes. Documentation should be located in areas with minimal variation in temperature and humidity if stored for long periods of time.

Period of Document Retention

The sponsor and the chief investigator shall ensure that the documents contained, or which have been contained, in the TMF and ISF are retained for at least 5 years after the conclusion of the trial. The sponsor and chief investigator shall ensure that the medical files of trial subjects are retained for at least 5 years after the conclusion of the trial.

3. The R&D Coordinator will confirm that proposed archiving arrangements are satisfactory. For STH sponsored IMP studies, where proposed arrangements are not satisfactory the R&D Coordinator will require the Investigator to use the Research Department's preferred off-site archiving facility, CINTAS Document Management in Leeds – see Appendix 7 for contact details.
4. The Investigator must ensure that there will be sufficient funds available to cover the cost of employing an off-site archiving facility at the end of a trial. As such, the cost of archiving trial documentation must be accounted for when costing a trial.
5. If the Investigator is to employ an off-site archiving facility, other than CINTAS Document Management, they will file a copy of the service level agreement between the off-site archiving provider and the investigator in the ISF. It may not be possible to set up the contract until near the end of a trial but investigators must note that as part of the ongoing monitoring of STH sponsored IMP trials, the Research Department will expect to see a contract in place before the end of the trial so that arrangements are in place for the safe archiving of trial documentation as soon as required.

Investigators can use the label in Appendix 6 to identify files/boxes containing archived documents.

During the Trial

6. The R&D Coordinator will conduct a monitoring visit of the trial site when recruitment to the trial commences. As part of the routine monitoring visit, the Research Coordinator will assess where the ISF is located and note whether storage arrangements are satisfactory and in line

with the arrangements advised by the investigator prior to authorisation. The expected standards for an archive are detailed in point 2 above.

7. If the interim storage of the ISF is found not to be in accordance with regulations the investigator will have to take action to ensure that the site file is stored appropriately.

When the Trial has ended

For the purposes of archiving of essential documentation, the end of the trial will be considered to be the point at which all data analysis is complete and the trial documentation no longer needs to be accessed by the investigator.

8. The Investigator will notify the R&D Coordinator of the end of the trial (see above definition).
9. The Investigator will liaise with any STH support departments involved in the trial (Pharmacy, Radiology, Laboratory Medicine etc) regarding any trial documentation which these departments hold which can be archived with the ISF.
10. The R&D Coordinator will confirm with the Investigator that all data analysis is complete and whether the site file can be archived. If the site file is ready to be archived the Investigator will complete the log of archived documents and label for archived documents (Appendices 5 & 6) and send a copy of the log to the STH Research Department. Upon receipt of the form the R&D Coordinator or delegate will file a copy in the R&D Master File.
11. The R&D Coordinator or delegate will archive the R&D Master File with CINTAS Document Management at least one year after the study has ended. The STH Research Department database status and diary page will be updated accordingly.
12. The Investigator will be informed by the R&D Coordinator as to when the archived ISF can be destroyed. The destruction of essential documents should be documented by the Investigator and the STH Research Department. This record should be retained at the investigator site, and a copy should be retained by the STH Research Department, for a further five years from the date that the essential documents were destroyed. See Appendix 4 for the period of retention for documents generated during STH sponsored IMP trials.

1.2 Non-Commercially Sponsored IMP Trials (external to STH)

For trials which are non-commercially sponsored, the responsibilities for defining the requirements of archiving arrangements lies with the trial sponsor which is in accordance with the regulations. Investigators with support from the R&D Coordinator liaise with the funders of such trials to confirm that the necessary funding will be provided to cover archiving of trial documentation.

Prior to Authorisation

1. The R&D Coordinator on behalf of Investigators will establish with Research Councils, Charitable Bodies, Academic Institutions or other NHS Organisations who will be the sponsor of the research.
2. The R&D Coordinator and Research Accountant on behalf of the Investigator will establish the funding that will be available to cover the cost of archiving at the end of the trial.
3. The archiving arrangements for the trial will be agreed between the sponsor and the STH Research Department prior to commencement of the trial and delegated responsibilities documented in the site agreement.

When the Trial has ended

It is the responsibility of the trial sponsor to notify the Investigator of what they consider to be the end of the trial.

4. The Investigator will determine from the study sponsor what is to be considered the end of the trial and when trial documentation can be archived.
5. Following confirmation from the trial sponsor the Investigator will notify the R&D Coordinator of the end of the trial. The Investigator will arrange for the site files to be archived either in an appropriate location on site or at an off-site archiving facility as approved by the study sponsor.
6. The Investigator will liaise with any STH support departments involved in the trial (Pharmacy, Radiology, Laboratory Medicine etc) regarding any trial documentation which these departments hold which can be archived with the ISF.
7. The Investigator should complete and retain a log of archived documents as provided by the Sponsor (example templates are provided in Appendix 5 & 6 if required). The investigator is requested to inform the Research Department that the ISF has been archived. The R&D Coordinator will update the archiving status on the Research Department database.
8. The Sponsor will notify the Investigator of when the archived site file can be destroyed and the Investigator will notify the R&D Coordinator of the expected date of destruction.

1.3 Commercially Sponsored Trials

Prior to Authorisation

1. The Sponsor will confirm archiving arrangements with the Investigator and will inform the Investigator of the required period of retention of documents and the date when documents may be destroyed.
2. If the Sponsor has delegated the responsibility to archive the site file to the Investigator, the R&D Coordinator with the assistance of the Research Accountant will negotiate with the Sponsor the provision of funds to cover the cost of the archiving of the ISF following the end of the study.
3. The Research Accountant will ensure that where agreed by the sponsor the costs of archiving are covered in the Clinical Trial Agreement.

When the Trial has ended

4. The Sponsor representative will notify the Investigator of the end of the trial and arrange a site close out visit.
5. Following the site close out by the Sponsor representative, Investigators who have been delegated the responsibility to archive site files by the Sponsor will arrange for documents to be archived. The Investigator will arrange for the site files to be archived either in an appropriate location on site or at the Trust preferred off-site archiving facility, CINTAS archiving boxes and CINTAS Document Management contact details will be provided by the Research Department upon request by the Investigator.
6. The Investigator will liaise with any STH support departments involved in the trial (Pharmacy, Radiology, Laboratory Medicine etc) regarding any trial documentation which these departments hold which can be archived with the ISF and CRFs.
7. The Investigator should complete and retain a log of archived documents as provided by the Sponsor (example templates are provided in Appendix 5 & 6 if required). The Investigator is requested to inform the Research Department that the site files have been archived. The R&D Coordinator will update the archiving status on the Research Department database.
8. The Sponsor should notify the Investigator of when the archived site files can be destroyed and the Investigator should notify the R&D Coordinator of the expected date of destruction.

Where site files are archived on site, the investigator will arrange for the files to be destroyed per Trust confidential waste policy. Where site files are archived by CINTAS Document Management, the Research Department will request return of the site files for destruction as per the Trust confidential waste policy.

9. Where the study files have been archived by the Investigator for a period of 15 years and the Sponsor has not informed the investigator that the site files can be destroyed, the Investigator in conjunction with the R&D Research Coordinator will notify the Sponsor contact of intention to destroy the site files.

2. Principles for Trials of Devices and Surgical Intervention

Given the risk associated with trials investigating the use of devices and surgical procedures, the Research Department will adopt the same principles and procedures as for IMP studies. See sections 1.1 -1.3 above for details of the principles and procedures to be followed when archiving trial documentation generated during trials of medical devices and surgical interventions. See Appendix 4 for details of the recommended periods of document retention for device and surgical intervention trials.

3. Principles for Non-interventional Research

1. Investigators are responsible for arranging for the site files for non-interventional studies to be archived following the end of a study and, as for interventional research, must consider the need for an archiving facility prior to commencing their research.
2. Investigators will confirm archiving requirements with the study Sponsor prior to the research commencing. The Sponsor will confirm for how long documents will need to be archived following the end of a study – see Appendix 4 for guidance.
3. The Investigator will notify the Research Department of the end of the study and intention to archive essential documents as confirmed with the study Sponsor (the point at which access to study documentation is no longer required and the documents can be placed in an archive).
4. The Investigator will arrange for the ISF to be archived in a suitable location either on STH/University premises if appropriate for the purpose or at an off-site facility as agreed by the study Sponsor. The Investigator should complete and retain a log of archived documents as provided by the Sponsor (example templates are provided in Appendix 5 & 6 if required).
5. The Investigator is requested to inform the Research Department that the ISF has been archived. The R&D Coordinator will update the archiving status on the Research Department database.
6. The Sponsor will notify the Investigator as to when documentation can be destroyed and the Investigator will notify the R&D Coordinator of the expected date of destruction.

4. Retrieving Files from Archiving

1. If there is a need to retrieve archived study documentation, the requester will need to inform the Archiving Lead of the study number(s), the box reference number(s), the reason for retrieval, the location the boxes will be stored on return and the approximate required retrieval duration. Unless otherwise agreed between the requester and the Research Manager via the Archiving Lead, the retrieval duration will be four weeks.
2. The Archiving Lead will obtain a quote for the archiving retrieval, taking into account the cost of sending the archived study documentation back to CINTAS for re-archiving. The requester

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will confirm if this cost can be covered by the investigator, sponsor (if applicable) or other available funds.

3. Once the funding for retrieval has been confirmed, the Archiving Lead will request the archived study documentation from CINTAS Document Management. The archived study documentation is normally delivered to the STH Research Department, but if there is a large amount of archived study documentation, delivery directly to the requester can be arranged.
4. The requester must ensure that the archived study documentation containing confidential information is kept securely and away from any potential fire or water damage, as reasonably possible.
5. The requester will inform the Archiving Lead when they have finished with the retrieved archived study documentation. The Archiving Lead will then arrange for CINTAS Document Management to pick up the archived study documentation to be re-archived.
6. If the requester requires the retrieved archived study documentation for longer than was agreed, the Archiving Lead will discuss with the Research Manager to decide if this is appropriate.
7. On receipt of the invoice from CINTAS, the Archiving Lead will confirm with the Research Accountant the agreed relevant funding sources.

**Appendix 1
Documents Associated with the SOP**

	Document	Create	S- drive	Website	Database	Who
1	STH Policy – Code of Practice for the Management of Records		No	STH Website	No	N/A

**Appendix 2
SOP Revisions and History**

SOP number	Effective date	Reason for change	Author
THIS SOP			
A127	01 August 2014	Added information regarding retrieval of archived documents	ZW
PREVIOUS SOPs			
A127	03 June 2013		JDM
A127	April 2011		GM

Appendix 3
Essential Documents for the Conduct of a Clinical Trial Involving IMPs

In accordance with ICP GCP, the following documents should be kept within the Investigator site file and the Sponsor's files.

Documents <i>Documents to be in files before a trial starts:</i>	Located in the Files of the Investigator	Located in the Files of the Sponsor
1. Investigators brochure	✓	✓
2. Protocol and amendments and a sample case report form (CRF)	✓	✓
3. Information given to trial subjects		
3.1 Informed consent form (including translations)	✓	✓
3.2 Information sheet	✓	✓
3.3 Adverts for recruits		
4. Financial Agreement Grant Award Letter	✓	✓
5. Insurance statement 5.1 Indemnity form	✓	✓
6. Signed agreements (between involved parties)	✓	✓
7. Dated documented approval of all trial related documents.		
7.1 By REC	✓	✓
7.2 Composition of REC (where available)	✓	✓
8. Regulatory Authority approval/ Authorisation (where required)	✓	✓
9. CV's of the following:		
9.1 Investigator	✓	✓
9.2 Co-investigator	✓	✓
9.3 Research Nurse	✓	✓
10 Normal values and ranges for medical/ laboratory/technical procedures /tests included in the protocol	✓	✓
11. Certification/accreditation for medical/ laboratory/technical procedures/tests	✓	✓
12 Sample of label(s) attached to IMP containers		✓
13 Instructions for handling investigational product	✓	✓
14 Shipping records for investigational products	✓	✓
15 Certificate of analysis of IMP shipped		✓
16 Decoding procedures for blinded trials	✓	✓
17 Master randomisation list		✓
18 Pre-trial monitoring report		✓
19. Trial initiation monitoring report	✓	✓
<i>Documents filed during the conduct of a study</i>		
20. Relevant communications	✓	✓
20.1. Letters	✓	✓
20.2. Faxes	✓	✓

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20.1	Emails	✓	✓
20.2	Meeting notes	✓	✓
20.3	Notes of telephone calls		
21	Monitoring visit reports	✓ If STH sponsored	✓
22	Certificates of analysis for new batches of IMPs		✓
23.	Documentation of IMPs and trial-related materials shipment	✓	✓
24.	Updates of medical/laboratory/technical procedures & tests	✓	✓
25.	Updates of normal values & ranges for procedures/tests included in the protocol	✓	✓
26.	Signed informed consent forms	✓	
27.	Source documents	✓	
28.	Signed dated and completed Case Report Forms (CRF)	✓ (copy)	✓ (original)
29.	Documentation of CRF corrections	✓ (copy)	✓ (original)
30.	Serious Adverse Events (SAEs): Notification by originating investigator to sponsor of SAEs and related reports	✓	✓
31.	Serious adverse drug reactions reported by sponsor (if any) to regulatory authorities and Ethics Committees of unexpected serious adverse drug reactions and other safety information	✓	✓
32.	Safety information	✓	✓
33.	Interim or annual reports to regulatory bodies/ethics	✓	✓
34.	Subject screening log	✓	✓
35.	Subject identification code list	✓	
36.	Subject enrolment log	✓	
37.	CVs for new investigators	✓	✓
38.	Signature sheet	✓	✓
39.	IMP accountability at the site	✓	✓
40.	Record of retained body fluids/tissue samples	✓	✓
41.	Investigator brochure updates	✓	✓
42.	Amendments to protocol/information sheets/consent form/CRF	✓	✓
43.	Ethical approval of amendments/revisions	✓	✓
<i>Documents filed at the end of a trial</i>			
44.	Investigation product accountability at site	✓	✓

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45. Documentation relating to IMP destruction	✓	✓
46. Completed subject identification code list	✓	
47. Audit certificate (if available)	✓	✓
48. Final trial close-out monitoring report	✓	✓
49. Treatment allocation and decoding information		✓
50. Final report by investigator to regulatory bodies/ethics	✓	✓
51. Clinical Study Report	✓	✓

Appendix 4

Recommended Period of Archiving of Essential Documentation

The following matrix outlines the duration for which the STH Research Department would expect the Investigator to retain the essential documentation generated during the course of a research project. For those studies involving investigational devices or surgical intervention, the same principles will be followed as for trials of IMPs to reflect the risk associated with these types of study. For studies that do not involve regulatory submissions i.e. non interventional research that does not involve the use of an IMP or a device, the minimum period for archiving should be at least five years after completion of the study in line with DH recommendations.

#	Category of Study	Recommended Period of Retention of Investigator Site File	Location of Investigator Site File	Point at which Site Files can be destroyed
1	IMP Study – STH Sponsored	15 years	In a suitable location on STH premises approved by Research Department or at an agreed off-site facility	15 years after the declaration by PI of the end of the study.
2	IMP Study – Non-commercially Sponsored	At least 5 years (longer if sponsor requires)	Investigator should negotiate with the sponsor for the off-site storage of documents.	The sponsor will notify the PI of when documents can be destroyed.
3	IMP Study – Commercially Sponsored	At least 5 years (longer if sponsor requires)	Investigator should negotiate with the sponsor for the off-site storage of documents.	The sponsor will notify the PI of when documents can be destroyed.
4	Investigational Device Study – STH Sponsored	As for IMP studies (#1)	As for IMP studies (#1)	15 years after the declaration by PI of the end of the study.
5	Investigational Device Study – externally Sponsored	As for IMP Studies (#2 or #3)	As for IMP Studies (#2 or #3)	As for IMP Studies (#2 or #3)
6	Surgical Intervention Study – STH sponsored	As for IMP Studies (#1)	As for IMP studies (#1)	15 years after the declaration by PI of the end of the study.
7	Surgical Intervention Study – externally sponsored	As for IMP Studies (#2 or #3)	As for IMP Studies (#2 or #3)	As for IMP Studies (#2 or #3)
8	Non-interventional Study	5 years	In a suitable location on STH premises or at an off-site facility as agreed with the sponsor	5 years after declaration by PI of the end of study

**Appendix 5
Record of Archived Essential Documentation for a Clinical Trial**

Please complete and retain a copy of this form in the archived investigator site file and keep a copy at the investigator site as a record of documentation sent to archive.

STH Study No:	
Study Title:	
Study Sponsor:	
Investigator Name:	

Document	Location of Archived Document (e.g. on site/off site archive & file No/archive box No)	Date Documents Archived	Planned Destruction Date of Archived Documents	Dated Documents Destroyed

1. I can confirm that the above documents have been archived in accordance with all applicable Regulations.

Signed..... (Investigator's signature)

Date.....

2. I can confirm that the above documents have been destroyed in accordance with all applicable Regulations.

Signed..... (Investigator's signature)

Date.....

Please return a copy of this form to the STH Research Department, 11 Broomfield Road, Sheffield, S10 2SE

Appendix 6
Label for Archived Documents

ARCHIVED DOCUMENTS

Project STH Ref	
Project Title	
Principal Investigator	
Box Description	
Archive Box Number (e.g. box X of X)	
DO NOT DESTROY BEFORE	
Research Office Use	
Cintas Account Ref	STH4
Research Office Box Number	

NB: In the event that this box is moved from this location please inform the STH Research Department (Tel: 0114 2265431 Fax: 0114 2265937)

Appendix 7
Off-site Archiving Specialist Contact Details

Cintas Document Management UK Ltd
Ashfield Way
Whitehall Road Industrial Estate
Leeds
West Yorkshire
LS12 5JB

<http://www.cintas.co.uk/>

0113 384 1000