What is Institutional Ethics Committee?

It is an independent body formally designated to review, approve, and monitor biomedical and behavioral research involving humans with the aim to protect the rights and welfare of the subjects. It is an independent body whose responsibility is to ensure the protection of the rights, safety and well-being of human subjects involved in a clinical trial and to provide public assurance of that protection.

What is the composition of IEC?

As per DCGI/ICMR guidelines, IEC is composed of a minimum of 7, and maximum of 15 members. The members are selected so as to have an equitable representation of all specialties in TMC. It and includes scientific and non-scientific members, clinicians and non - clinicians, a clinical pharmacologist, members of the community, a lawyer-expert in ethics, a social worker / layperson / patient representative to represent different points of view.

The composition should be as follows:-

1 Chairperson (not – affiliated to TMC)
2 Co-Chairperson (not – affiliated to TMC)
3 Member secretary (TMC Staff member)
4 1-2 clinicians (not affiliated to TMC)
5 4 clinicians (TMC staff members)
6 DSMSC Member Secretary
7 Basic medical scientist
8 Clinical Pharmacologist
9 One legal expert or retired judge or medico-legal expert
10 One social scientist / representative of non-governmental voluntary agency/ philosopher / ethicist / theologian
11 One lay person from the community

What is the tenure of the IEC?

At TMC, 2 years.

No of IECs at TMC with registration nos.

Tata Memorial Centre- IRBs are registered with Drug Controller General India.

- IEC-I has Ethic Committee Registration No. ECR/170/Inst/MH/2013 issued under Rule 122DD of the Drugs & Cosmetic Rules 1945
- IEC-II Ethic Committee Registration No. ECR/414/Inst/MH/2013 issued under Rule 122DD of the Drugs & Cosmetic Rules 1945.
- IEC-III Ethics Committee Registration No. ECR/149/Inst/MH/2013 issued under Rule 122DD of the Drugs & Cosmetic Rules 1945.

In addition to the above , the quorum must fulfill following criteria-

i) A quorum should include at least one member whose primary area of expertise is in a non-scientific area, a clinician, and at least one member who is independent of TMC/research site and has no immediate family member affiliated to TMC.

ii) No quorum should consist entirely of members of one profession or one gender.

What are quorum requirements for IEC meeting

- All research projects for approval by the full board of the IEC shall be reviewed at convened meetings at which a majority of the members of the IEC are present. In order for the research to be approved, it shall receive the approval of a majority of those members present at the meeting. The presence of the following five (5) members is required to form part of the quorum without which a meeting cannot be convened and a decision regarding the project cannot be taken. These 5 members should have the following representation:
  (a) basic medical scientists (preferably one clinical pharmacologist);
  (b) clinicians
  (c) legal expert;
  (d) social scientist or representative of non-governmental voluntary agency or philosopher or ethicist or theologian or similar person;
  (e) lay person from the community;

When an alternate member attends a meeting as a substitute for a regular member, the alternate member's participation counts toward the quorum requirements. Alternate members will serve in the same representative capacity as the member for whom they substitute

What is **Data Safety Monitoring Safety Subcommittee**?

The Data Safety Monitoring Subcommittee (DSMSC) is a subcommittee of the IEC, and is essentially responsible for monitoring patient safety and assessing data during the course of the study in a manner that contributes to the scientific and ethical integrity of the study**.**

How can I submit my project for IEC review?

Use application form (give link address)

Requirements of copies and other for submision

What are the submission timelines?

For the initial review of study, investigators should submit all study related documents to the IEC, no fewer than fourteen (14) days before the next scheduled meeting

How many hard copies are required for initial review?

- Thesis: 1 hard copy + soft copy,
- Investigator-initiated studies: 4 hard copies + soft copy
- Pharma-sponsored studies: 15 hard copies or 4 hard copies + soft copy

Where should I submit my project?

Where are the submissions done?

- IEC office , 3rd Floor, Main Building

Who to contact for queries related to submissions?

Contact person- IRB Administrator,

IRB office, Main Building, 3rd Floor,

Contact number- 022-24177262

email-tmhethics@gmail.com

What are mandatory documents for submission of study for initial review?

1) Project Submission Form
    a. Grouping of Project
    b. Project Fact Sheet
    c. Project Submission Overview
    d. Budget Sheet for the Proposed Study
2) Participant Information Sheet & Informed Consent Forms (ICFs), for studies in children, parent consent form and in case of children between age 7-18 years of age- Child Assent Forms and Parent consent forms - in English, Hindi and Marathi are mandatory and any other language if required [Refer (AX5-V3/SOP 03/V3)]
3) Investigator's Brochure (if applicable)
4) Case Record Form
5) One page, recent, signed and dated curriculum vitae of the investigators indicating qualifications and relevant experience.
6) Agreement to comply with national and international GCP protocols for clinical trials
7) Regulatory clearance from appropriate regulatory authorities i.e. DCGI approval / ICMR /Health Ministry Screening Committee(HMSC) (if applicable)
8) For international collaborative study Memorandum Of Understanding between the collaborating institutes
9) Clinical Trial Agreement (if applicable)
10) Insurance/Indemnity policies, indicating who are covered (if applicable)
11) Any other important information relevant to the study
12) Decision of other Ethics Committees (If required / asked for)
13) Participant recruitment and enrollment procedures/advertisement (if any).

What is amendment?

Any change in protocol and documents from that of previously IEC approved protocol/document.

How are the amendments submitted?

The PI should highlight the modification/s in the amendment, along with a summary of changes.

How many hard copies are required for the amendments?

- Thesis: 1 hard copy + soft copy,
- Investigator-initiated studies: 4 hard copies + soft copy
- Pharma-sponsored studies: 15 hard copies or 4 hard copies + soft copy

Are there any guidelines for devising ICF and is the Sample format of an Informed Consent Document available?

Kindly refer to IEC SOP - AX4-V3/SOP03/V3 Guidelines for devising ICF and Sample format of an Informed Consent Document

Is the Sample format of Child Information Sheet and Assent Form available?
Yes, IEC SOP AX5-V3/SOP 03/V3

When are the meetings scheduled?

Each IECs meet once in a month.

IEC-I meets last Friday of every month

IEC-II meets second Friday of every month

IEC-III meets third Friday of every month

What types of reviews undertaken by IECs?

Full board- All research involving more than minimal risk, proposals/ protocols which do not qualify for exempted or expedited review and projects that involve vulnerable population and special groups shall be subjected to a full board review by all the members.

Expedited review- An expedited review is an accelerated review of research proposal with no more than minimal risk. A review process is by IEC subcommittee and the decision is notified to the full board.

Exemption - does not require the IEC approval for its conduct.

What is minimal risk?

Minimal risk would be defined as one which may be anticipated as harm or discomfort not greater than that encountered in routine daily life activities of the general population or during the performance of routine physical or psychological examinations or tests. However, in some cases like surgery, chemotherapy or radiation therapy, great risk would be inherent in the treatment itself, but this may be within the range of minimal risk for the research participant undergoing these interventions since it would be undertaken as part of current everyday life (ICMR 2006).

Who decide types of review for the project?

Member Secretary, IEC

What are the types of IEC decision?

- Approved- The study is approved in its present form
- Approved with modifications- This is a conditional approval. The revisions are required; these will be reviewed either by the Member Secretary, IEC or in some cases by the respective lead discussant on behalf of the full board. Such revised proposals will not be taken up for the full board review. If revisions are found satisfactory, approval will be granted. In case of approved with modifications (conditional approval) clear suggestions and reasons for same for revision will be specified.
- Resubmit- Extensive revisions are necessary. Principal Investigator has to comply with the changes suggested by IEC and respond to the queries. The revised project will then be reviewed in the next full board meeting.
- Not approved- The study is not approved in its current form. A negative decision on an application will be supported by clearly stated reasons. If the investigator wishes to appeal to the decision, he/she may do so by contacting the IEC Secretariat
- Defer- The decision cannot be arrived at present and therefore post pone to next meeting. Grounds for this: lack of quorum, lack of expertise etc

How does the IEC makes the decision ?

Decisions will be arrived at through consensus/unanimous or majority opinion amongst the voting members of IEC. The decision-making is thus concerned with the process of deliberating and finalizing a decision. When a consensus is not possible, the IEC will vote.

Voting Procedure;

1. This may be in the form of voice vote, show of hands, or by secret ballot, as determined by the Chairperson, IEC.
2. All members except the Chairperson are entitled to one vote.
3. However, in case of a tie, the Chairperson will have the casting vote

The concurrence/voting of the members will be recorded in the minutes as- Agreed/Disagreed/ Abstained/Recused.

- Agreed: in favor
- Disagreed- Against
- Abstain: Present but did not agree/disagree

- Recused: Listed under “Members Present” but not present for the discussion and decision on the study .

How ‘Conflict of Interest’ are handelled in IEC meetings

Does any committee member with a conflicting interest in a proposal participate in discussion and decision making?

Any committee member with a conflicting interest in a proposal will abstain from deliberations and in the decision making process on that proposal, except to provide information as requested by the committee. Such abstentions will be recorded in the minutes.

Can PIs appeal to IEC Decision?

If an investigator disagrees with the IEC decision to disapprove or terminate a study, the Investigator may submit a written appeal of the decision to disapprove of the IEC decision within 15-20 days of being notified of the decision. The appeal should address the specific concerns of the IEC and the IEC basis for disapproval.

What is Continuing Review Application (CRA)?

The purpose of continuing review is to monitor the progress of the study which was previously approved; not only for the changes but to ensure continued protection of the rights and welfare of research subjects.

When is the continuing review submission required?

All studies at intervals appropriate to the degree of risk but not less than once a year. Depending upon the degree of risk to the participants, the nature of the study, the vulnerability of the study participants and duration of the study, IEC may choose to review the study more frequently.

Who reviews the CRA?

Data Safety and Monitoring subcommittee (DSMSC) and Institutional Ethics Committee (IEC)

What is Lapse in IEC Approval?

If an investigator fails to submit an electronic Continuing Review Application to the IEC or the IEC does not approve continuation of the research one year before the date of lapse, the research must stop. All of the following research procedures must stop:

- Subject recruitment or enrollment
- Collection of data/information
- All research-related interventions or interactions with currently enrolled subjects*
- Data analyses involving subject identifiable data

*Exception: Research-related interventions or interactions with currently enrolled subjects can continue only if stopping the research would jeopardize the rights or welfare of current subjects. The IEC must make this determination and decide which subjects should continue with the intervention during the lapse. A request for such an exception must be made in the writing to the IEC by the PI.

What is Protocol Violation?

Protocol Violation- Divergence or departure from the expected conduct of an approved study not consistent with the current Institutional Ethics Committee approved version of the research protocol, consent document or addenda.

This usually

- constitutes a change in the conduct of the research that should have received prospective IEC review and approval prior to implementing the change; or
- has harmed or posed a significant risk of harm to a research subject or others; or
- has damaged the scientific integrity of the data collected or confounded the scientific analysis of the study results; or
- has resulted from willful or voluntary misconduct on the part of a Principal Investigator or a member of the research team.

Examples:

- patient being consented after the screening procedures are completed
- patient being consented after the first dose of the drug has been given

What is Protocol deviation –

Divergence or departure from the expected conduct of an approved study not consistent with the current Institutional Ethics Committee approved version of the research protocol, consent document or addenda is a protocol deviation if it:

- has no substantive effect on the risk posed to a research subject or others;
- will not affect the subjects' willingness to participate in the study;
- has no substantive effect on the value of the data collected;
- does not confound the scientific analysis of the study results; and
- did not result from willful or voluntary misconduct on the part of an Investigator or a member of the Investigator's study team.

Examples:

- wrong version of the informed consent form being used
- sample collections at different time points than specified in the protocol
- patient following up on days not specified in the protocol

What is Protocol Waiver?

It is a prospective deliberate decision to deviate from the protocol that has been approved by the sponsor. Such waivers must be notified to and approved by IEC Member Secretary/Chairperson.

e.g. Protocol Waiver means a prospective decision by a sponsor or investigator to permit accrual of a subject who does not satisfy the approved inclusion/exclusion criteria for enrollment (age, concurrent medication).

What is non-compliance?

Noncompliance is defined as failure to comply with national regulations, IEC policy or the determinations or requirements of the IEC.

What is Serious Adverse Event (SAE)?

Serious Adverse Event (SAE) or Serious Adverse Drug Reaction (Serious ADR) is

Any untoward medical occurrence (due to the participation in the concerned trial)

that at any dose that:

• results in death,

• is life-threatening,

• requires inpatient hospitalization or prolongation of existing hospitalization,

• results in persistent or significant disability/incapacity,

or

• is a congenital anomaly/birth defect

What are SAE reporting timelines?

- All SAEs including Deaths should be reported *within 24 hours of their occurrence* to
    1. IEC
    2. Sponsor or its representative
    3. CDSCO (in case of studies that have required approval of the CDSCO)

What are IEC responsibilities in case of studies that require CDSCO approval?

In case of Death occurring to the clinical trial subject, the IEC shall forward it's report on the serious adverse event of death, after due analysis, along with its opinion on the financial compensation, if any,

to be paid by the sponsor or his representative to the Chairman of the Expert Committee constituted by the CDSCO, with a copy of the report to the CDSCO within twenty one calendar days of the occurrence of the serious adverse event of death.

In case of serious adverse event other than death occurring to the clinical trial subject, the IEC shall forward its report on the serious adverse event after due analysis along with its opinion on the financial compensation, if any to be paid by the Sponsor or his representative, to the CDSCO, within twenty one calendar days of the occurrence of the serious adverse event.

How long are study files maintained in IEC?

The study files are maintained in an easily accessible and secure place for at least 5 years after the study closure.

What happen after completion of the archival period?

The master files will be disposed off by the IEC secretariat after the archival period of 5 years.

How are documents retrieved?

In case any investigator needs a copy of any document from the master file, he/she should make a written request. (AX1 –V3/SOP10/V3). The IEC staff will furnish a copy of the required document within a week with the IEC Secretary's consent. The IEC will issue a copy of the following documents on formal written request.

When can IEC terminate or suspend?

The IEC can terminate or suspend previously approved trial in following circumstances:

- When research is not conducted in accordance with IEC policies.
- When research is associated with unexpected serious harm to participant
- Failure to submit CRA
- For e.g.- Frequency of SAEs occurring at trial site may require the study to be prematurely terminated for the safety of the patients.
- If protocol non-compliance/violation is detected

What is monitoring?

It is a quality assurance procedure to monitor the overall progress of institutional clinical trials and for ensuring adherence to clinical trial and procedural requirements.

What is on cause monitoring?

For cause monitoring will be performed at sites for reasons identified by any member of IEC, approved by Chairperson. For cause monitoring could be initiated, in any of the following conditions:

- for high number of protocol violations
- Too many studies carried out by Principal Investigator
- high number of SAE reports
- high recruitment rate
- non-compliance or suspicious conduct
- any other cause as decided by IEC

Who provides information in case of any participants/patients requests and complaints

It is the responsibility of the IEC Member Secretary to provide the required information to the research participants/ research participant's representatives/patient, in the case of queries received.

Is there a form for patients/subjects requests and complaints?

Yes, (Form AX1- V3/SOP 16/V3) request record form

What is Vulnerable population?

Vulnerable persons are those who are relatively (or absolutely) incapable of protecting their own interests. More formally, they may have insufficient power, intelligence, education, resources, strength, or other needed attributes to protect their own interests.

"Vulnerable" or "special" classes of subjects include as listed below

This list may not be exhaustive as there may be circumstances in which other groups are considered vulnerable, women for example, in an orthodox patriarchical society, or terminally ill cancer patients.

- pregnant women, human fetuses and neonates,
- prisoners,
- children,
- cognitively impaired persons
- students and employees, sub-ordinates
- minorities (as defined by national constitution and / or socio-economically backward, refugees and such others.
- economically and/or educationally disadvantaged
- AIDS/HIV+ subjects.
- Terminally ill Subjects