16.1. Purpose

The purpose of this standard operating procedure (SOP) is to describe the procedures for monitoring and oversight of an IEC approved protocol.

16.2. Scope

This SOP applies to all IEC approved studies for which off-site and a routine or for-cause on-site monitoring may be undertaken by the IEC.

16.3. Responsibility

It is the responsibility of the IEC or Chairperson and Member Secretary to decide to conduct off-site and on-site monitoring. If further required it is the responsibility of the designated IEC member(s) to perform on-site monitoring of selected study site(s).

16.4. Detailed instructions

The monitoring process involves two major oversight activities as given below:

- Off-site monitoring/oversight - Review done by Ethics Committee during full Committee meetings on quarterly, half yearly and annual progress report basis depending on the risk involved and duration of the study.
- On-site monitoring/oversight - Review at random done by member secretary in consultation with the Chairperson and assessed by IEC designated members for on-site routine or 'for-cause' monitoring.

16.4.1. Off-sight Monitoring

This will be done on 3 monthly basis for protocols of 6 months duration and on 6 monthly basis for those of longer duration. The selection of files for review will be at random.

- IEC requirements
    - Compliance with approved protocol and conditions if any
    - Maintenance and confidentiality of records

- Progress reports and completion report
- Publications if any during period of study
- Whether information is submitted for -
  - Any proposed changes in protocol
  - Any unforeseen events that might ethically be unacceptable for continuing the project and would require amendments
  - Any new information positive or negative from related studies

- A report will be prepared addressing any shortcomings and nonconformities observed by suggesting corrective and preventive action. The report will be sent to PI for clarification and correction and submitted to IEC for review and appropriate course of action as continuation/discontinuation/suspension/ termination.
- The report has to be filed for Record.

16.4.2. On site monitoring

Selection of study sites

- Routine monitoring for a site may be decided at the time of approval of the project by the Full Committee, which is recorded in the IEC decision form *AX 03/SOP 7A/V1) and* in the IEC minutes.
- *"For-cause monitoring"* will be performed at sites for reasons identified by any member of the IEC, after approval by the Chairperson.
- The reasons for identifying a particular site for "*for-cause monitoring*" could include any one or more of the following:
  - Large number of Protocol deviations,
  - Protocol violations even after initial warning,
  - Large number of studies carried out at the study site or by the investigator,
  - Large number of Serious Adverse Events (SAE) reports,

- High recruitment rate,
- Complaints received from participants or any other person,
- Frequent failure to submit the required documents,
- Any other cause as decided by IEC.

15.4.2. Before the visit

- Irrespective of the cause for conducting monitoring the following procedure will be followed :
  - The Chairperson will identify and select one or more IEC members (henceforth referred to as monitors) to conduct monitoring of a site.
  - The selected members will be given an appointment letter in this regard.
  - The agenda of monitoring will be decided by the identified monitors in consultation with the Member Secretary and Chairperson
  - The Secretariat will decide the date of the monitoring in consultation with the monitors and the PI.
  - The final date will be communicated to the PI and monitors (with a request to be available).
  - The monitor will receive from secretariat the relevant reference material and/or project documents, review them and make appropriate notes/ changes.
- Monitors will carry with them Site Monitoring Visit Report Forms (if applicable) collected from the Secretariat.

15.4.3. During the visit

- The Monitor will follow the check list and:
  - check the log of delegation of the team, responsibilities of study team,
  - Check if the site is using latest IEC approved versions of the protocol, informed consent documents, case record forms, diaries, advertisements, etc.

- observe the informed consent process, if possible,
- review randomly selected participants' files to ensure that participants are signing the correct informed consent,
- check if the investigational product accountability is adequately controlled and documented throughout the product flow at the study site (arrival, dispensing, use, return from the subject and return/destruction after the study), storage times, conditions and acceptability of expiry dates and if sufficient supplies are available, wherever applicable,
- verify that the investigator follows the approved protocol and all approved amendment(s), if any,
- ensure that for clinical trials the investigator and the investigator's trial staff are adequately informed about the trial,
- verify that the investigator and the investigator's trial staff are performing the specified study functions, in accordance with the approved protocol and any other written agreement between the sponsor and the investigator/institution, and have not delegated these functions to unauthorized individuals,
- verify that the investigator is enrolling only eligible subjects,
- Determine whether all SAEs are appropriately reported within the time as per the applicable regulatory requirement(s). Case record forms would be checked to review the safety data i.e. Adverse Events (AEs) and SAEs for the volume or severity of adverse events,
- review the project files of the study to ensure that documentation is filed appropriately,
- review the source documents for their completeness, and
- collect views of the study participants, if possible,

- The Monitor will fill the Site Monitoring Visit Report Forms (if applicable), sign with date.

15.4.4. After the visit

- The Monitor will submit the completed Site Monitoring Visit Report Forms (if applicable) to the IEC secretariat within 7 working days of conducting a site monitoring visit or at the time of full board meeting (whichever is earlier).
- The report should describe the findings of the monitoring visit.
- The Member-Secretary will present the monitoring report at the next full board IEC meeting and the concerned Monitor will provide additional details/ clarifications to members, as required.
- The IEC will discuss the findings of the monitoring process and take appropriate specific action by voting or combination of actions, some of which are listed below:
    - Continuation of the project with or without changes,
    - Restrictions on enrolment,
    - Recommendations for additional training,
    - Recruiting additional members in the study team,
    - Revising/ providing qualifications/ experience criteria for members of the study team,
    - Termination of the study,
    - Suspension of the study, etc.
- If the Monitor has findings that impact on safety of the participant the Monitor will inform the Member Secretary on the same day. The Member Secretary will discuss with the Chairperson and any one of the actions described above will be taken.
- The final decision taken at the full board IEC meeting will be recorded in the Site Monitoring Visit Report Form.
- The Secretariat will convey the decision to the Principal Investigator in writing within 14 working days of the meeting.

- The Secretariat will place the copy of the report in the protocol file.

15.5. Annexures

Annexure 1 AXO1/SOP 16/V1 - Site Monitoring Visit Report

Annexure 2 AXO2/SOP 16/V2 – Monitoring of Audiovisual recording of AV consent Process

Annexure 1: AX 01/SOP 16/V1

Site Monitoring Visit Report

(Please tick the box corresponding to the answer)

IEC project no.	Date of Visit:
Study Title:	
Principal Investigator and Department:	
□Government agency □ Others _____	

Date of IEC approval: Date of Initiation of the study: Duration of study:
Reason for monitoring: R□utine F□-cause (State reason/s)

Last monitoring done, if any,

□ Yes Date of last monitoring _____ __

□ No

Project Status: 1. Ongoing

2. Completed

3. Recruitment Completed

4. Follow-up, extension study

5. Suspended

6. Terminated □

In case of the response to the above question is option 5 or 6, kindly provide reason/s: _____

_____

Recruitment Status: □ Total patients to be recruited : _____

□ Withdrawn: _____ Reason: _____

_____

_____

Are the present study team members as per the list approved by the IEC □ Yes □ No	Comment:
Are site facilities appropriate? □ Yes □ No	Comment:
Is the recent version of Informed Consent Document (ICD), after IEC approval, used? □ Yes □ No	Comment:
Whether appropriate vernacular consent has been taken from all patients? □ Yes □ No	Comment:
Any other findings noted about the ICDs? □ Yes □ No	Comment:
Is recent IEC approved version of protocol used? □ Yes □ No	Comment:
Have the eligibility, inclusion exclusion criteria been Adhered to? □ Yes □ No	Comment:
Was informed consent process witnessed?	Comment
Were participants interviewed?	Comment
Any adverse events found? □ Yes □ No	Comment:

Any SAEs found? □ Yes □ No	Comment:
Were the SAEs informed to IEC within timelines specified by CDSCO? □ Yes □ No	Comment:
No. of deaths reported: □ Deaths possibly related to participation in the trial: Any other non-death study related injury	_____ _____ _____ _____ □ Yes □ No □ NA Comments (If Any) _____ _____
Compensation paid for study related injury or death	□ Yes □ No □ NA Comments (If Any)
Are there any protocol non-compliance deviations/violations? □Yes □ No	Comment:
Have the protocol non-compliance deviations/violations been informed to IEC? □ Yes □ No	Comment:

Are all Case Record Forms up to date? ☐ Yes ☐ No	Comment:

Are storage of data and investigating products locked? ☐ Yes ☐ No	Comment:
How well are the participants protected? ☐ Good ☐ Fair ☐ Not good	Comment:
Any other remarks ☐ Yes ☐ No	Give details:
Duration of visit:_____ hours	Starting from: Finish:
Name of the study team member/s present: Signature _____	Date:
Name of IEC members and representatives who attended monitoring visit:	
Completed by: Signature:_____	Date:

Final Decision at the UEC meeting held on _____

_____

_____

Signature of Chairperson, IEC with date

Annexure 2: AX 02/SOP 16/V1

Monitoring of Audiovisual recording of AV consent Process

1. Facility where informed consent process should be carried out - (well lit, free from noise, privacy ensured):
    - Yes _____ No_____
    - Remarks:_____
2. The consent is taken in language the participant/LAR understands best and is literate in.
    - Yes _____ No_____
    - Remarks:_____
3. Introduction of each person (person conducting the informed consent discussion participant/ legally acceptable representative (LAR) / impartial witness) involved during informed consent process and information about necessity for audiovisual recording
    - Yes _____ No_____
    - Remarks:_____
4. Information to the participant/ LAR and impartial witness (as applicable) that the process of taking the consent is being recorded for the purpose of documentation as required by the government rules.
    - Yes _____ No_____
    - Remarks:_____
5. Information to the participant/ LAR and impartial witness (as applicable) that the confidentiality of information and privacy of participants is assured.
    - Yes _____ No_____
    - Remarks:_____

6. Information to the participant/ LAR and impartial witness (as applicable) that the recording may be shown to government agencies or members from the IEC.
    - Yes _____ No_____
    - Remarks:_____
7. Explanation or narration by the person conducting the informed consent discussion.
    - Yes _____ No_____
    - Remarks:_____
8. Questions asked by the potential participant/LAR are answered satisfactorily.
    - Yes _____ No_____
    - Remarks:_____
9. Allowing ample time and opportunity to read/understand the information in the informed consent document or discuss the same with family members.
    - Yes _____ No_____
    - Remarks:_____
10. Reading out by the participant/LAR (or having read out by impartial witness) the statements mentioned in Informed Consent and stating whether participant agrees or not for each statement.
    - Yes _____ No_____
    - Remarks:_____
11. Documentation of signatures of all those involved in the Informed Consent Process.
    - Yes _____ No_____
    - Remarks:_____
12. Clarity and completeness of AV recording

- Yes _____ No_____
- Remarks:_____

13. Storage of recording in password protected laptop/ desktop computer and/ or hard drive and labelled CD with access allowed only to the principal investigator and designated members of the study team.
    - Yes _____ No_____
    - Remarks:_____

16.7. Flow chart

No.	Activity	Responsibility
1	Selection of study sites	IEC Member Secretary / Chairperson
2	Identification of IEC members for monitoring during meeting	Chairperson
2	Inform Principal Investigator in writing	Secretariat
3	Review of IEC protocol file prior to visit and collect Site Monitoring visit report from IEC office	IEC member
4	Review or monitoring of site	IEC member
5.	Complete the monitoring report and present in IEC meeting	IEC member
6.	Communication of IEC decision to PI	Secretariat