# 金玉良研课程笔记

金玉其质 妙药良研 您掌心里的临研学院





# 笔记速递|李宾:一起来读 ICH-GCP E6(R2)(二)

# 李宾

## 编者语:

4月18日,希米科(北京)医药科技公司董事总经理李宾老师对ICH-GCP E6(R2)第一部分的65个术语做了精彩解读,并列举了很大量真实案例来帮助大家理解。课后线上研友积极互动,提出了很多工作中遇到的疑惑,李宾老师——给出解答,课程直播和答疑内容4月25日已经以笔记形式在金玉良研订阅号推出。

第二部分是 GCP 的 13 条基本原则,第三部分介绍了 IRB / IEC 在临床试验中的职责、组成、工作内容,这两部分内容相较于旧版 GCP 尽管基本上没有新的增补,但是 GCP 的原则直接体现出临床试验执行应遵循的基本精神,不可逾越。这 13 条原则该如何解读?IRB / IEC 对受试者权利、安全和健康的保护具体怎么实施?ICH-GCP E6(R2)学习与解读系列课程第二讲,李宾老师继续带您解读!以下内容为本次课程精华汇总,欢迎阅读!

(本篇笔记根据录音整理而成,未经研师审阅,完整视频可以前往金玉良研服务号观看)





# 正文:

大家上午好!很高兴受邀又来到金玉良研,开始我们 ICH-GCP E6(R2)的第二讲。今天的主要内容是 ICH-GCP E6(R2)的第二部分和第三部分。



GUIDELINE FOR GOOD CLINICAL PRACTICE E6(R2) –PART 2&3







## 第二个部分是 ICH-GCP 的 13 个基本原则。

# ICH-GCP E6 (R2)

- 2.1 Clinical trials should be conducted in accordance with the ethical principles that have their origin in the Declaration of Helsinki, and that are consistent with GCP and the applicable regulatory requirement(s).
- 2.2 Before a trial is initiated, foreseeable risks and inconveniences should be weighed against the anticipated benefit for the individual trial subject and society. A trial should be initiated and continued only if the anticipated benefits justify the risks.



第一条原则说的是,ICH-GCP 伦理原则是基于赫尔辛基宣言的。要注意
"…in accordance with…",是说 GCP 伦理原则要和赫尔辛基宣言相一致;
"…their origin in…"是说 GCP 伦理原则是来自于赫尔辛基宣言。要尊重伦
理,尊重赫尔辛基宣言。

第二条原则指出在启动一个临床试验之前,预见的收益是大于风险的,这个临床试验是有科学道理的。



# ICH-GCP E6 (R2)

- 2.3 The rights, safety, and well-being of the trial subjects are the most important considerations and should prevail over interests of science and society.
- 2.4 The available nonclinical and clinical information on an investigational product should be adequate to support the proposed clinical trial.
- 2.5 Clinical trials should be scientifically sound, and described in a clear, detailed protocol.



第三个原则和 CRA 的工作很密切。对受试者权益的保护要高于科学和社会收益。所以,伦理相关问题、知情同意书问题、受试者损害相关的等等问题,都是临床试验中最重要的问题。

第四个原则是说现有的临床及非临床资料要足够的支持这个临床试验。



第五个原则要求临床试验必须有一个全面、详细、清晰的方案。美国 FDA2013 年 11 月颁布了《A Risk-Based Approach to Monitoring》中强 调了方案的重要性。一个良好的方案是保证临床试验质量的重要环节。



- 2.6 A trial should be conducted in compliance with the protocol that has received prior institutional review board (IRB)/independent ethics committee (IEC) approval/favourable opinion.
- 2.7 The medical care given to, and medical decisions made on behalf of, subjects should always be the responsibility of a qualified physician or, when appropriate, of a qualified dentist.
- 2.8 Each individual involved in conducting a trial should be qualified by education, training, and experience to perform his or her respective task(s).



第六个原则,临床试验实施之前必须得到伦理委员会批准。IRB 和 IEC 都指的伦理委员会,在美国叫 IRB,加拿大及欧洲一些国家叫 IEC。



第七个原则,指出与临床相关的决定必须由有行医资格的医生作出。这一条和研究者授权表相对应。PI必须是由有行医资格的医生来担任,没有行医资格的人员可以担任 sub-I,但是不能做出医学判断、开具处方、体格检查等。

第八个原则,参与临床研究的相关人员必须是合格的,经过相关的教育和培训,还要有临床研究相关经验。



- 2.9 Freely given informed consent should be obtained from every subject prior to clinical trial participation.
- 2.10 All clinical trial information should be recorded, handled, and stored in a way that allows its accurate reporting, interpretation and verification.

#### **ADDENDUM**

This principle applies to all records referenced in this guideline, irrespective of the type of media used.





第九个原则是说,在参与临床研究之前,所有的受试者要自愿签署知情同意书。

第十个原则要求了临床研究相关的所有资料都应记录、处理和保存,并且都能准确报告,解释和验证。

增补的内容主要是针对临床研究一些新的工具,比如 EDC,图像等,新的工具就会有新的法规指南,对应的有新的要求。



- 2.11 The confidentiality of records that could identify subjects should be protected, respecting the privacy and confidentiality rules in accordance with the applicable regulatory requirement(s).
- 2.12 Investigational products should be manufactured, handled, and stored in accordance with applicable good manufacturing practice (GMP). They should be used in accordance with the approved protocol.





第十一个原则说的是要保护受试者的隐私。受试者鉴认代码表中记录有受试者的姓名、家庭住址等信息,国内的临床试验还会把身份证号和手机号记录下来。另外,注意,不要在医院电梯里讨论受试者的病情,因为这样有可能侵犯受试者的隐私。

第十二个原则说的是研究用药物。研究用药物的生产、处理和储存应符合 GMP 的要求。但是没有说药物必须在 GMP 车间生产出来。



2.13 Systems with procedures that assure the quality of every aspect of the trial should be implemented.

#### ADDENDUM

Aspects of the trial that are essential to ensure human subject protection and reliability of trial results should be the focus of such systems.





第十三个原则是说临床研究的每个环节必须有 SOP 来保证研究的质量。研究中心的 SOP 在核查中会被检查。

这个增补内容是说,临床研究的质量管理系统必须能保证受试者的权益以及试验结果的可靠性。这条内容的增加是和美国 FDA《A Risk-Based Approach to Monitoring》中的要求相对应。

现在看一下第三部分内容:伦理委员会。



#### 3.1 Responsibilities

3.1.1 An IRB/IEC should safeguard the rights, safety, and well-being of all trial subjects. Special attention should be paid to trials that may include vulnerable subjects.





"Vulnerable subjects"指弱势群体。伦理委员会必须保护参与临床研究的受试者权益、安全和健康,特别是弱势群体。弱势群体包括儿童、军人、医药公司职员等。



## 3.1 Responsibilities

#### 3.1.2 The IRB/IEC should obtain the following documents:

trial protocol(s)/amendment(s), written informed consent form(s) and consent form updates that the investigator proposes for use in the trial, subject recruitment procedures (e.g., advertisements), written information to be provided to subjects, Investigator's Brochure (IB), available safety information, information about payments and compensation available to subjects, the investigator's current curriculum vitae and/or other documentation evidencing qualifications, and any other documents that the IRB/IEC may need to fulfil its responsibilities.

The IRB/IEC should review a proposed clinical trial within a reasonable time and document its views in writing, clearly identifying the trial, the documents reviewed and the dates for the following:

- approval/favourable opinion;
  - modifications required prior to its approval/favourable opinion;
  - disapproval / negative opinion; and
  - termination/suspension of any prior approval/favourable opinion.



伦理委员会要审核哪些文件?包括方案、ICF、研究者手册、研究者简历, 这四个文件是必须的。还有其他文件,比如受试者招募广告。在我国,还要审



核空白的 CRF 样表。伦理委员会审核研究者简历,是为了审核研究者的能力和 资质是否能保护受试者并正确的实施临床研究,这一点在我国不是很突出。

在美国,如果研究者所处的医院有自己的伦理委员会,首先要经过本院的伦理委员会批准。本院伦理委员会可以书面授权给中心伦理委员会来审核批准。 但都是先以自己中心的伦理委员会审核批准为主。

伦理委员会应该在一定的时间内对临床研究进行审核批准,并且必须有记录。伦理委员会批准的方式有:

- 批准
- ) 修改后批准
- **一 不批准**
- **〕** 对之前已批准的试验进行终止



# ICH-GCP E6 (R2)

#### 3.1 Responsibilities

- 3.1.3 The IRB/IEC should consider the qualifications of the investigator for the proposed trial, as documented by a current curriculum vitae and/or by any other relevant documentation the IRB/IEC requests.
- 3.1.4 The IRB/IEC should conduct continuing review of each ongoing trial at intervals appropriate to the degree of risk to human subjects, but at least once per year.



伦理委员会一定要对研究者的合格性进行判定。伦理委员会批准一个临床研究后,还要继续对临床研究进行审核。一般每年至少审核一次,有的中心是每季度审核一次。

国外,伦理委员会会在三个月或一年要求研究者提供一些研究相关信息,可以是纸质的,也可以从网上填写。





#### 3.1 Responsibilities

- 3.1.5 The IRB/IEC may request more information than is outlined in paragraph 4.8.10 be given to subjects when, in the judgement of the IRB/IEC, the additional information would add meaningfully to the protection of the rights, safety and/or well-being of the subjects.
- 3.1.6 When a non-therapeutic trial is to be carried out with the consent of the subject's legally acceptable representative (see 4.8.12, 4.8.14), the IRB/IEC should determine that the proposed protocol and/or other document(s) adequately addresses relevant ethical concerns and meets applicable regulatory requirements for such trials.



4.8.10 是知情同意书的二十条内容。伦理委员会可能会要求知情同意书中提供一些其它的和受试者权益、安全和健康相关的内容。多中心试验,各个中心伦理委员会对知情同意书的要求不同,可能会增加一些内容,就会导致 ICF 有很多版本,CRA 要注意版本号与中心相对应。

对于非治疗目的的研究,受试者参与不会得到任何获益,特别是知情同意书 是由法定代理人签署的情况,伦理委员会要尤其关注是否符合要求。





#### 3.1 Responsibilities

- 3.1.7 Where the protocol indicates that prior consent of the trial subject or the subject's legally acceptable representative is not possible (see 4.8.15), the IRB/IEC should determine that the proposed protocol and/or other document(s) adequately addresses relevant ethical concerns and meets applicable regulatory requirements for such trials (i.e., in emergency situations).
- 3.1.8 The IRB/IEC should review both the amount and method of payment to subjects to assure that neither presents problems of coercion or undue influence on the trial subjects. Payments to a subject should be prorated and not wholly contingent on completion of the trial by the subject.



签署知情同意书时,受试者若是昏迷状态或者不能本人签署,由法定代理人签署,这种情况要在方案中描述清楚,需要有足够的理由,并符合伦理和法律法规要求。

伦理委员会要审核,付给受试者的费用不会对其参与临床研究产生影响,不能用费用来吸引受试者参与试验。受试者交通费应该是受试者来一次支付一次,而不是最后一次性给受试者。





# 3.1 Responsibilities

3.1.9 The IRB/IEC should ensure that information regarding payment to subjects, including the methods, amounts, and schedule of payment to trial subjects, is set forth in the written informed consent form and any other written information to be provided to subjects. The way payment will be prorated should be specified.



受试者补偿费用一定要写在知情同意书中,同时要写清楚按照节点付费的方

式。





#### 3.2 Composition, Functions and Operations

- 3.2.1 The IRB/IEC should consist of a reasonable number of members, who collectively have the qualifications and experience to review and evaluate the science, medical aspects, and ethics of the proposed trial. It is recommended that the IRB/IEC should include:
  - (a) At least five members.
  - (b) At least one member whose primary area of interest is in a nonscientific area.
  - (c) At least one member who is independent of the institution/trial site.
- Only those IRB/IEC members who are independent of the investigator and the sponsor of the trial should vote/provide opinion on a trial-related matter.

A list of IRB/IEC members and their qualifications should be maintained.



3.2 部分主要写的是伦理委员会的组成、职能和运作。我国 GCP 和 ICH-GCP 以及 FDA 中关于伦理委员会的组成,都有一些不同。ICH-GCP 建议:伦理委员会至少有 5 个人;至少有一个人员是非科学领域者(在中国要求有律师);至少有一个人要独立于临床研究中心之外。同时,只有独立于研究者和申办方之外的人员可以投票。PI 不可以参与自己负责的项目审核投票。还要获得伦理委员会成员表。





# 3.2 Composition, Functions and Operations

- 3.2.2 The IRB/IEC should perform its functions according to written operating procedures, should maintain written records of its activities and minutes of its meetings, and should comply with GCP and with the applicable regulatory requirement(s).
- 3.2.3 An IRB/IEC should make its decisions at announced meetings at which at least a quorum, as stipulated in its written operating procedures, is present.



伦理委员会应该有书面的操作流程并有相关记录。伦理委员会对于伦理审评 意见作出决定。





## 3.2 Composition, Functions and Operations

- 3.2.4 Only members who participate in the IRB/IEC review and discussion should vote/provide their opinion and/or advise.
- 3.2.5 The investigator may provide information on any aspect of the trial, but should not participate in the deliberations of the IRB/IEC or in the vote/opinion of the IRB/IEC.
- 3.2.6 An IRB/IEC may invite nonmembers with expertise in special areas for assistance.



只有参与伦理审查的人员才能进行投票。这里的"参与"有两种,一个是在现场,一个是不在现场(其它形式参加),具体根据伦理委员会要求来定。PI可以参与会议,但是不能进行投票。对于特殊领域,可以邀请外部专家参与讨论。





- 3.3.1 Determining its composition (names and qualifications of the members) and the authority under which it is established.
- 3.3.2 Scheduling, notifying its members of, and conducting its meetings.
- 3.3.3 Conducting initial and continuing review of trials.



伦理委员会运作流程,首先要确定伦理委员会的组成;然后确定会议时间、 通知参会人员、实施会议;最后,对临床研究进行初始及持续审核。





- 3.3.4 Determining the frequency of continuing review, as appropriate.
- 3.3.5 Providing, according to the applicable regulatory requirements, expedited review and approval/favourable opinion of minor change(s) in ongoing trials that have the approval/favourable opinion of the IRB/IEC.



还要确定持续审核的频度,多久审核一次。在临床研究已经被批准的前提下,有些方案增补或者是很小的修改,可以采用快速审查。有的很小的修改,直接备案即可。大的修改,可能需要上会审查,对应的可能会对 ICF 做修改。





- 3.3.6 Specifying that no subject should be admitted to a trial before the IRB/IEC issues its written approval/favourable opinion of the trial.
- 3.3.7 Specifying that no deviations from, or changes of, the protocol should be initiated without prior written IRB/IEC approval/favourable opinion of an appropriate amendment, except when necessary to eliminate immediate hazards to the subjects or when the change(s) involves only logistical or administrative aspects of the trial (e.g., change of monitor(s), telephone number(s)) (see 4.5.2).



伦理委员会应确保在伦理委员会批准研究之前,没有受试者参与临床研究。

一旦发现没有经伦理委员会批准就给患者用药的,就是非常重大的问题。

重大的方案修改,必须得到伦理委员会批准才能实施。除非这个方案增补是为了减少对受试者可能立即发生的损害,比如之前 1000mg 剂量对受试者会造成生命威胁,要立即改为 500mg,这个是可以的。





- 3.3.8 Specifying that the investigator should promptly report to the IRB/IEC:
  - (a) Deviations from, or changes of, the protocol to eliminate immediate hazards to the

trial subjects (see 3.3.7, 4.5.2, 4.5.4).

- (b) Changes increasing the risk to subjects and/or affecting significantly the conduct of the trial (see 4.10.2).
- (c) All adverse drug reactions (ADRs) that are both serious and unexpected.
- (d) New information that may affect adversely the safety of the subjects or the conduct of the trial.



研究者需要将方案的偏离(即使偏离是为了减少对受试者可能产生的即刻的 损害),对受试者风险发生改变的事件,SUSAR以及可能会影响受试者安全 和权益的新的信息报告给伦理委员会。报告要求根据每个伦理委员会的规定会 不同,但都是基于ICH-GCP中的要求。





- 3.3.9 Ensuring that the IRB/IEC promptly notify in writing the investigator/institution concerning:
  - (a) Its trial-related decisions/opinions.
  - (b) The reasons for its decisions/opinions.
  - (c) Procedures for appeal of its decisions/opinions.



伦理委员会的相关决定要及时通知研究者,包括临床试验相关的决定,作出决定的原因,实施决定的程序。这个说明了伦理委员会和研究者应及时对于试验相关内容进行沟通。





#### 3.4 Records

The IRB/IEC should retain all relevant records (e.g., written procedures, membership lists, lists of occupations/affiliations of members, submitted documents, minutes of meetings, and correspondence) for a period of at least 3-years after completion of the trial and make them available upon request from the regulatory authority(ies).

The IRB/IEC may be asked by investigators, sponsors or regulatory authorities to provide its written procedures and membership lists.



伦理委员会应保存所有的相关记录,包括:书面程序,成员表,专业人员名单,递交资料,会议记录,书信等。要求这些记录至少保存到临床研究结束后三年。监管部门检查时,必须要有这些记录。

研究者、申办方或者监管当局可以要求伦理委员会提供伦理审查程序和成员 名单。

今天的内容就到这里,谢谢大家!



# 答疑荟萃

Q1: Risk based monitoring 确实有助于提高研究管理的效率,但是作为质量管理体系的一部分,要开展实施 RBM 是不是需要公司的高层有很大的决心和勇气去推动,想问问李老师现在是否已经有大的公司已经努力推动 RBM?

A: 在美国 FDA 提出 RBM 之前,已经有一些国际大公司在开展 RBM。远程监查,数据管理部门远程对数据进行管理,确实可以提高效率降低成本。但是远程监查不能完全取代现场监查,该做的现场监查还得做。只是频率和监查要求发生变化,频率可能会降低,但是要求越来越高。

Q2:临床试验采血,如果是到固定的采血站采血,采血护士经常是倒班的,不固定,是否需要收集每个护士的简历?是否需要每个护士都授权?因为涉及的护士可能有几十个。

A:最好的方法是全部收集简历,每个护士都授权,进行相关培训。在美国, 采血护士和研究没有关系,我们出具一个 note to file 将此情况作了说明。但 是在 audit 时,可能会是一个 finding。

Q3:中心实验室的 lab kits 过期了,正确的应该怎么处理并记录呢?



A: 过期的和未过期的 lab kits 要分隔开,避免混淆,根据中心实验室的 SOP 进行销毁并记录。

# Q4:临床研究中设计受试者鉴认代码表的目的是什么?

A:如果受试者发生 SAE,需要紧急处理,通过鉴认代码表上的真实信息可以迅速找到受试者病历及其他相关临床研究文件。但是,要注意保护受试者隐私。

Q5:伦理批准修订版 ICF 是一个日期,1 周后收到批件,再1 周后对研究者进行了培训,以哪个时间点作为决定受试者签署新版还是旧版 ICF 版本的依据呢?方案也同理,以哪个时间点决定试验采取新版还是旧版方案?

A:是以批件上批准的那个时间点为准,方案同理。都是在批准之后签署和执行。

Q6:多中心临床试验中,试验已经开始,但是某中心需要修改方案(非小问题修改),那么所有中心都需要重新过伦理么?



A:如果研究已经开始了,某中心要修改方案,只能是这家中心退出研究;如果这家中心是组长单位,这个研究可能就要重新开展了。各中心要重新过伦理。

Q7:对于 3.3.7 研究者发起的科研型项目,牵头单位首先入组几例病人,在入的过程中不断的修改方案,也没有来的及重新递交伦理,在组长单位入组期间其它中心递交的都是初版,拿到批件后入组是按最新的方案执行,后续再补充新方案的递交,这样是否可行?

A:上市后研究对于这种情况肯定是不可行的,违背 GCP。科研项目尽管不按照 GCP 执行,但是基本原则是一样的,所以也是不行的。整个过程要进行详细记录说明,和伦理委员会进行沟通。

# 尾声

感谢李宾老师的精彩分享和详细解答!同时感谢现场及线上众多研友的热情参与互动!如有更多关于ICG-GCPE6(R2)的相关的疑问,可以随时在笔记下方留言区提出,我们工作人员集中汇总后,会再次邀请李宾老师给予书面解答。



# 精彩预告

请继续锁定金玉良研直播间,ICH-GCP E6(R2)学习与解读系列课程之第三讲:研究者,李宾老师带您继续畅读新法规,敬请期待!





金玉良研订阅号 畅读临研资讯



金玉良研服务号 观看直播课程