Paediatric specific and ethics issues related to implementation of Clinical Trial Regulation

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Disclaimer

The views and opinions expressed in the following slides are those of the presenter.

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- Regulation (EC) 536/2014 published on 27 May 2014;
- Application linked to the full functionality of the EU Clinical Trials Portal and Database (foreseen for 2018);
- A Regulation is directly applicable.

Scope of the Regulation

Regulation applies to all interventional clinical trials with human medicinal products

- New category of low intervention clinical trials with adapted requirements

- Not covered:
  - Non-interventional trials (observational…)
  - Trials without medicinal products (eg: devices, surgery…)

Highlights of the new Regulation

- A streamlined application procedure via a single entry point, the EU portal.
- An harmonised application dossier;
- A harmonised procedure for the assessment of applications for clinical trials, which is divided in two parts. Part I is jointly assessed by all Member States concerned. Part II is assessed by each Member State concerned separately.
- Strictly defined deadlines for the assessment of clinical trial application;
- The involvement of the ethics committees in the assessment procedure in accordance with the national law of the Member state concerned but within the overall timelines defined by the Regulation.
- Extension of the tacit agreement principle to the whole authorisation process which, without compromising safety, will give sponsors, in particular SMEs and academics, increased legal certainty;
- Simplified reporting procedures which will spare sponsors from submitting broadly identical information separately to various bodies and different Member States;
- Increased transparency as regards clinical trials and their outcomes;
- Union controls in Member states and third countries to ensure that clinical trials rules are being properly supervised and enforced.
- Clinical trials conducted outside the EU, but referred to in a clinical trial application within the EU, will have to comply with regulatory requirements that are at least equivalent to those applicable in the EU.

Minor – Article 2(2)(18)

A subject who is, according to the law of the Member States concerned, under the age of legal competence to give informed consent

- **Age for consent differs from Member State to Member State;**
- **Does not tally with the definition of paediatric population in Paediatric Regulation which is defined as a part of population between birth to 18 years (Article 2(1));**

Clinical trials on minors– protection of subjects, Article 32 of Regulation

Clinical trials on minors possible only if:

- a medical condition (for which a treatment tested) only occurs in minors or the clinical trial is essential to validate data obtained by other research methods/trials with persons able to give informed consent, and

- trial relates to the medical condition a minor suffers or it can be carried out only on minors, and

- there is a:

- **direct benefit** for the minor concerned **outweighing the risks and burdens**,

Or

- **some benefit to the population** represented by the minor concerned if such a trial will pose **only minimal risk to, and impose minimal burden** on minor concerned **in comparison with the standard treatment**

Clinical trials on minors– protection of subjects, Article 32 of Regulation

- informed consent of a legal representative;

and

- a minor, capable of forming an opinion, does not oppose (lack of dissent);

and

- minor is involved in the informed consent process and receives information adapted to their age and maturity from an investigator or other member of the team trained of experienced to work with children;

And

- if required by the national law a minor assent (Article 29(8))

Paediatric clinical trials – requirements for the application dossiers

Cover letter:

- description of the specific features of the clinical trial population;
- whether the CT is intended to be a part of the PIP (or link to the PIP if already issued);

Protocol:

- description of groups and subgroups of patients, including subjects with specific needs, e.g. age;
- justification for including subjects who are incapable of giving consent or other special populations (minors);

Paediatric clinical trials - assessment

Article 10

Where the subjects are minors, a specific consideration shall be given to the assessment of the application for authorisation of clinical trial on the basis of **paediatric expertise** or after taking advice on clinical, ethical and psychosocial problems in the field of paediatrics.(1)

If clinical trial provided for participation of **specific groups or subgroups of subjects**, where appropriate, specific consideration shall be given to the assessment of the application for authorisation of clinical trial **on the basis of expertise in the population represented by the subjects concerned**.(2)

Pediatric clinical trials – publication of the results

Clinical Trial Regulation, **article 37(4)** – publication of summary of results and summary for a lay person one year from the end of clinical trial in the EU

Paediatric Regulation, lex specialis to Clinical Trials Regulation – publication of the results 6 months from the end of the clinical trial

Launch of the **public consultation** on the recommendation from ad hoc group on the ethical considerations for clinical trials on medicinal products conducted with minors

http://ec.europa.eu/health/human-use/clinical-trials/developments/index_en.htm

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