STU-SOP-TS-009 – Standard Operating Procedure on Applying for Ethics Approval

1. Purpose

This Standard Operating Procedure (SOP) describes the procedure of applying for NHS National Research Ethics Service (NRES) Research Ethics Committee (REC) approval to conduct a research project. All health-related trials or other research studies which involve NHS participants, time, or resources must seek approval from an appropriate NRES REC.
The information within this standard operating procedure (SOP) is summarised. Detailed guidance is available via the Health Research Authority (HRA) website: http://www.hra.nhs.uk/research-community/applying-for-approvals/.
The process to follow for ethics approval for Clinical Trials of Investigational Medicinal Products (CTIMPs) is also detailed on the HRA website.

Health related research studies which involve humans, their tissue or data but do not require NRES REC approval still require approval by an appropriate REC. In these instances, it will likely be one of the Swansea University (SU) internal RECs. The policy and guidance for submission for SU REC review can be found on the University intranet via the online research ethics system (link below).

For international projects, there may be the requirement for a local research review, which will be additional to a UK review.

2. Background

RECs exist to protect the rights, safety, dignity and well-being of research participants whilst facilitating ethical research that is of potential benefit to participants, science and society.

The UK policy framework for health and social care (2017) requires that research involving humans, their tissue or data in the NHS must receive an appropriate ethical review. This is required for each project based on its protocol. Sub studies to the main research project with separate protocols also require an appropriate ethical review.

The HRA website details what projects an NRES REC can review.

The NHS REC approval system also covers other approvals and permissions e.g. health and social/community care research, prison and probation services research.

Similar local regulations and requirements are in place in other countries across the world.

3. Roles and Responsibilities

The **Sponsor** has overall responsibility for ensuring that appropriate approvals are in place before research involving the NHS can begin. Although the Sponsor can delegate

responsibilities for submission to any ethics committee, they remain accountable for project management and should have oversight of all delegated functions.

The **Chief Investigator** (CI) is responsible for ensuring they have identified and agreed a Sponsor prior to submitting a research project for NRES ethical review. The CI must also ensure favourable ethical opinion, local NHS R&D permission and all other relevant approvals are in place, before recruitment begins. Responsibilities may be delegated.

The **Principal Investigator** (PI) is responsible for ensuring that ethical approval is in place or imminent prior to coordinating the local NHS R&D permission process.

The **Trial Manager** (TM) is usually responsible for compiling documentation for ethical approval, entering information onto the online system and coordinating signatures with the Sponsor to enable submission. The TM will also file all submission and approval documentation in the Trial Master File (TMF) and disseminate information to enable local approval processes to begin.

External use of SOP: this SOP and Associated Documents (AD) may be used for research projects not adopted by STU where Swansea University (SU) staff and associated NHS organisations require guidance. In such instances, oversight responsibility for any associated tasks will not be the responsibility of STU.

4. Procedure

The HRA website details the tasks involved in applying for ethical approval https://www.hra.nhs.uk/approvals-amendments/what- approvals-do-i-need/research-ethics-committee-review/applying-research-ethics-committee/

4.1 Agreeing the Research Sponsor

Sponsor arrangements for the research project must be confirmed before a project can be submitted for NRES ethical review, as a signature on behalf of the Sponsor is required. It is usual for the substantive employer of the CI to be the Sponsor or for student projects the registered University.

4.2 Completing the application form on the IRAS system

Applications must be made on the standard form available from the Integrated Research Applications System (IRAS) at www.myresearchproject.org.uk.

For help and guidance on creating an account or using IRAS please consult https://www.myresearchproject.org.uk/help/hlpethicalreview.aspx.

Instructions on account creation, form completion and electronic authorisations are available through the 'Help' pages and via the online IRAS e-learning module.

When the project application form is complete (the full data set), it should be electronically authorised by the CI, other relevant signatories and Sponsor. Any change made, must be approved by the Sponsor.

Any access or change made to the IRAS form after electronic signatures have been assigned will invalidate all signatures.

The online system will automatically generate an 'Applicant's Checklist' for completion (one for the ethics application and any other review bodies required). Completion of the checklists are required for a valid submission to the REC with the IRAS form and all supporting project documents outlined.

Preparing an IRAS form and documents for submission to the REC
Step by step instructions can be found on the 'E-submission' tab within the IRAS system. Each step of this process must be followed or the application to the REC will not be valid. There is also a verification tool available to help assess if all required documents and steps are passed.

The REC will send an email with an attached letter indicating whether the project is valid or not. The letter will also invite the CI, key investigators and the Sponsor to attend the virtual REC meeting, at a specific time.

4.3 Submitting the project application to an NRES REC

When all project documents are finalised and the required signatures have been obtained, the project application must be booked into a REC through the Online Booking Service and submitted to the allocated REC (or your selected REC) electronically through IRAS on the same day that you book for ethical review.

Online Booking Service
The online booking service is used for all IRAS form applications for project-based research in the NHS (or HSC in Northern Ireland) view and for HRA approval where required.

The online booking service is available 24 hours a day, 7 days a week. Guidance on how to make a booking is available in IRAS, via the e-submission tab of the form you wish to submit. This provides a detailed process and direct link to the booking portal. https://www.hra.nhs.uk/about-us/committees-and-services/online-booking-service/

When booking, you will require access to your application form as questions will be asked to determine which RECs are suitable, depending on study type. Some project applications must be reviewed by a flagged REC, for other research projects, it may be recommended that a flagged committee is used, or that projects are suitable for the proportionate review service (PRS).

On the day of booking an email confirmation will be received containing the REC name and project reference.

Proportionate Review Service
If the project is suitable for PRS, this will be highlighted as an option by the online booking service.

PRS provides an accelerated, proportionate review for research projects which raise no material ethical issues, have minimal risk, burden or intrusion for research participants. These applications are reviewed by a Sub-Committee of a REC. The review is as rigorous as a full REC review and will not affect the opinion given. The final decision of the review is notified to the applicant by email with a letter attachment.

Health Research Authority (HRA) and Health and Care Research Wales (HCRW) Approval

Research teams should always check the HRA or HCRW websites to ensure the most up to date process is followed. An overview of the current process is below.

The HRA and HCRW Approval brings together the assessment of governance and legal compliance with the independent ethical opinion provided by a REC for the NHS in England and Wales and is required for all project-based research involving the NHS and Health and Social Care. This replaces the need for local checks of legal compliance at each participating organisation in England and Wales. Participating organisations now focus their resources on assessing, arranging and confirming their capacity and capability to deliver the research project.

For new studies led from Scotland of Northern Ireland with English or Welsh sites, the national R&D coordinating function of the lead nation will share information with the HRA and HCRW Approval teams who will assess and issue approval for English and Welsh sites.

For projects which have gained approval prior to the HRA and HCRW approval process, subsequent amendments for projects which have NHS sites in England will need to use the current process.

Confidentiality Advisory Group – Research or Non-Research projects

Research and non-research projects involving access to confidential patient information without consent in England and Wales should apply to the Confidentiality Advisory Group (CAG).

Research applications are prepared by completing a form on the IRAS. Supporting document requirements are set out in the checklist for the form.

Non-research applications should complete the section 251 form. Supporting document requirements are set out in the annexe to the form.

The HRA provides information on precedent set categories. These are common situations which have been identified and a precedent for the processing of these agreed by the CAG. Applications under a set category will be processed in a timelier manner than those outside the set categories.

All documents should be provided in black and white, labelled with a title, version number and date. Application forms should not include embedded documents.
Detailed information on the CAG, application guidance and information on completing the IRAS form or section 251 form are available from the HRA website: https://www.hra.nhs.uk/approvals-amendments/what-approvals-do-i-need/confidentiality-advisory-group/

4.4 NRES Ethics Approval Process

The REC will issue an ethical opinion for a project within 60 calendar days of receiving the valid application submitted for full REC review.

PRS projects should receive a final opinion within 21 days.

The 60-day clock may stop once to request further information from the applicant. If the response provided is not satisfactory, the REC may request a second response to the same questions (no new issues can be raised) or can reject the application. The clock only re-starts when a complete response is received.

A final decision letter will be issued within 10 working days of the REC review meeting.

The REC approval letter will indicate that the research project must not start at a site until all other relevant approvals have been granted (e.g., CAG) and local R&D permission has been given for that site.

The REC favourable opinion letter must be filed in the TMF alongside copies of the signed REC application, the supporting documents submitted for review and any correspondence relating to the review process. If the project involves multiple sites, a copy of the favourable opinion letter should be sent to each PI for inclusion in each site file.

The research project should start within 12 months of the date of the favourable opinion from the REC. A research project is generally considered to have commenced when any procedures in the protocol are initiated. Where research does not commence within 12 months, the CI should inform the REC in writing. An Annual Progress Report (APR) template form may be used for this purpose (see section 4.5).

If the project does not start within 24 months, a further explanation should be given to the REC in writing. An APR template form may be used for this purpose. The REC may remove the ethical opinion and decide that a new application is required, or they may grant a further 12 months of approval.

After the initial approval decision, the REC must approve all substantial amendments to the protocol.

Any changes to the end date specified in the application should be notified in writing. It is advisable to update the REC via submission of an APR. This only becomes a substantial amendment should it be related to other amendments that would be substantial.

All amendments must be approved by the Sponsor before submission. The approval of amendments is described in STU-CT039 Substantial and Non-substantial Amendments.

4.5 Annual Progress Reports

The project approval received will advise on the annual progress report (APR) requirements for a research project.

In the majority of cases with an NRES REC approval there will be no requirement to submit a formal APR. When an APR is required this should be submitted 12 months after the date on which the favourable ethics opinion was given. The HRA website should be accessed to provide the current APR template form.

Although an APR may not be required, changes which affect the ethics approval to a project should still be submitted as an amendment. If the research has a delay in recruitment commencing, is terminated early or temporarily suspended all review bodies should still be notified within 15 days. Although not formally required it may be advisable to update the REC via an APR.

The research sponsor or institutional REC's may require an APR. In some instances, this update may be required regardless of NRES requirements. Researchers will be notified of this through the sponsor review process.

5. References

- Health Research Authority website (HRA) - http://www.hra.nhs.uk/
- UK policy framework for health and social care research (2017) - https://www.hra.nhs.uk/planning-and-improving-research/policies-standards-legislation/uk-policy-framework-health-social-care-research/
- Swansea University online research ethics application system - https://www.swansea.ac.uk/research/research-integrity-ethics-governance/research-ethics/new-online-research-ethics-system/

6. Associated Documents

Number	Title	Location
N/A	N/A	N/A

7. Abbreviations

List of Abbreviations	
APR	Annual Progress Reports
CI	Chief Investigator
HCRW	Health and Care Research Wales
HRA	Health Research Authority
HSC	Health and Social
IRAS	Integrated Research Application System
NHS	National Health Service
NRES	National Research Ethics Service
PI	Principal Investigator
PRS	Proportionate Review Service
REC	Research Ethics Committee
SOP	Standard Operating Procedure
STU	Swansea Trials Unit
SU	Swansea University
TM	Trial Manager
TMF	Trial/Project Master File

8. Appendices

Appendix 1: Document History

Version No:	4	**Effective Date:**	08 Aug 2024
Description of changes:	Update to procedure		