National Research Ethics Committee

NREC-MD Meeting Minutes

21 November 2024

Attendance

Name	Role
Prof. Barry O'Sullivan	Chair, NREC-MD
Prof. Mary Sharp	Deputy Chair, NREC-MD
Prof. Declan Patton	Deputy Chair, NREC-MD
Dr Mireille Crampe	Member, NREC-MD
Dr Ruth Davis	Member, NREC-MD
Dr Frank Houghton	Member, NREC-MD
Ms Orla Lane	Member, NREC-MD
Prof. Cara Martin	Member, NREC-MD
Mr Billy McCann	Member, NREC-MD
Dr Sarah McLoughlin	Member, NREC-MD
Prof. Therese Murphy	Member, NREC-MD
Dr Declan O'Callaghan	Member, NREC-MD
Dr Clare O'Connor	Member, NREC-MD
Dr Joanne O'Dwyer	Member, NREC-MD
Mr Damien Owens	Member, NREC-MD
Mr Peter Woulfe	Member, NREC-MD
Ciaran Horan	Administrative Assistant, National Office for Research Ethics Committees
Louise Houston*	Project Officer, National Office for Research Ethics Committees

Sarah McLoughlin	Programme Officer, National Office for Research Ethics Committees
Lucia Prihodova	Programme Manager, National Office for Research Ethics Committees
Emily Vereker	Head of Office, National Office for Research Ethics Committees

Apologies: Dr Caitriona Cahir, Dr Daniel Coakley, Dr Owen Doody, Dr James Gilroy, Dr Gloria Kirwan, Prof. Tom Melvin, Dr Paul O'Connor, Prof. Mahendra Varma, Ms Simone Walsh

Quorum for decisions: Yes

Agenda

- Welcome (Chairperson)
- Report on Committee business
- Minutes of previous meeting
- Declarations of interest
- 24-NREC-MD-028
- 24-NREC-MD-029
- 24-NREC-MD-030
- 24-NREC-MD-031
- 24-NREC-MD-020-R2
- 24-NREC-MD-023-R1
- 24-NREC-MD-026-R1
- 24-NREC-MD-018-SM1
- 23-NREC-MD-002-SM4
- 21-NREC-MD-009-SM2
- 22-NREC-MD-026-SM2
- AOB

- The Chairperson welcomed the Committee, acknowledged apologies sent by applicable members and opened the meeting.
- NREC Committee Business Report: The Committee noted the report.
- Minutes of the previous meeting (17 October 2024) were approved.

- Matters arising from the previous meeting: none
- Declarations of interest: none

Applications

24-NREC-MD-028

- Principal Investigator: Prof Jarushka Naidoo
- Study title: Clinical Performance Study Protocol for Use of VENTANA PD-L1 (SP263) CDx Assay for Determining PD-L1 Status in Genmab Phase 3 Trial GCT1046-06
- Lead institution: Beaumont Hospital
- NREC-MD decision:
  - *Request for further information*
- Further information requested:
  - The NREC MD noted inconsistencies in the total number of participants to be enrolled in Ireland as listed in the site suitability forms and request clarification on the total number of participants to be enrolled in Ireland.
  - Provide information about the frequency of site monitoring visits conducted by the sponsor for the duration of the performance study.
  - The NREC-MD noted that the documentation does not specify who will have access to participants' data and request confirmation regarding who and for what purpose will have access to participants' data.
  - The NREC-MD noted discrepancies across the documentation in relation to the location of diagnostic sample testing and request clarification along with assurance that the respective laboratories operate to recognised standards/ certification.
  - The NREC-MD request clarification on the retention and if applicable intended use of biological samples and data of participants who do not pass pre-screening carried out as a part of the performance study. If retained, the Committee request a justification as returning the samples to the clinical site is deemed more ethical.
  - The NREC-MD noted that the study includes retention of biological samples and data from the pre-screening study for future research (Page 8 of PIL/ICF under 'How will my coded data be used?' and Page 9 of PIL/ICF under 'How long will my data and sample be stored?').
    - Note that the Data Protection Act 2018 allows for the use of broad, not blanket, consent when it comes to further processing of personal data for the purposes of health research. Consent for future use of data must be limited to a particular disease area or more generally in that area or a related area of health research and must be clearly described in the Participant Information Leaflet. An example would be limiting future use of study data to the disease and / or medicinal product / device being studied.
    - Furthermore, future uses of samples require explicit unbundled consent item to be added to the ICF.

    - Note that any such future studies are a subject to separate REC review.
- The NREC-MD noted that there is limited information on the clinical trial in the pre-screening PIL/ICF, and that the pre-screening PIL/ICF refers to the clinical trial PIL/ICF for more information which is relevant to pre-screening informed consent. Clarify if participants will receive the main CT trial ICF at the same time as the pre-screening ICF. Alternatively, the content of the two documents (pre-screening and main PIL/ICF) are to be revised to ensure relevant content is presented to participants at the right time of consent.
- The NREC-MD request that the risks of a false positive result are clearly described in the pre-screening PIL/ICF, particularly the risk of being included in a trial for IMPs that will not benefit them, the risk of side effects from that IMP, and the risk of not being prescribed a more appropriate treatment programme.
- The NREC-MD request that all analyses of the biological samples are clearly described in the pre-screening PIL/ICF, including any mutational analyses which are currently described in the main PIL/ICF.
- The NREC-MD request clarification on the consenting process – who and when will approach participants and will any of the consenting activities include electronic consent (econsent)/ remote consent.
- The NREC-MD request clarification on whether the participant's GP will be informed about their patients' participation in the performance study.
- The NREC-MD noted that PI CVs were last updated in 2023. Provide up-to-date CVs for all PIs.

24-NREC-MD-029

- Principal Investigator: Dr Darren Mylotte
- Study title: VitaFlow Liberty™ Transcatheter Aortic Valve System Post-Market Clinical Follow-up Study - VitaFlow LIBERTY Europe
- Lead institution: University Hospital Galway
- NREC-MD decision:
    - *Favourable with conditions*
- Associated conditions:

- The NREC-MD noted that participants who are not fluent in English are not eligible to participate in the study. Given the type of the study (post-market clinical follow up study) the Committee request a due consideration is given to whether participation could be expanded to such participants.
- The PIL/ICF is revised to clearly outline from the o the processes, treatments, risks and benefits of the post-market clinical follow up study as opposed to those of the procedure and device which are understood to be the standard of care.
- The Clinical Study Agreement (Page 5) refers to the follow-up of participants who leave the study to ask why they left. The NREC-MD request it is clearly stated to participants

that this is optional to minimise the pressure on the participant to state the reason/ remain in the study.

- The NREC-MD noted the DICOM images will be shared accessed from outside EU (China) and request that standard contractual clause is in place to ensure that all data processing will be carried out in line with GDPR.
- Furthermore, please provide a clarification whether the images/ data will be transferred or accessed from outside of the EU.
- Provide clarification whether the sponsor can in principle access the key used to anonymise data.
- As the standard of care involved in the study will require ionising radiation, the NREC MD Application Form Section O28 requires a signature of a radiologist. Please re-submit an accessible version of the Application Form with Section O28 signed by a radiologist. If a scanned version is necessary to provide the signed form, also provide an un-scanned version including the other information required by Section O28.
- Provide a budget that clearly details the breakdown of the budget for the study.

24-NREC-MD-030

- Principal Investigator: Mr James Walsh
- Study title: Randomised Controlled Trial comparing partial calcanectomy plus local application antibiotic impregnated bone graft substitute for calcaneal osteomyelitis vs partial calcanectomy alone (The ACHILLS Trial)
- Lead institution: Beaumont Hospital
- NREC-MD decision:
  - *Favourable with conditions*
- Associated conditions:

- Provide a clarification to the National Office about the study funding – how is the study funded and what is the total study budget.
- Participants are approached about their participation by a research nurse whenever feasible.
- The NREC-MD noted that the PIL/ICF were well put together and accessible, highlighting the usefulness of the flowchart.
- To further assist participants, the Committee request that you revise the layout of first page of PIL andmove the contact details of some collaborators to a more suitable section of the PIL.
- NREC-MD will never request access to participant data. Remove reference to the ethics committee and Department of Health accessing participant data. Please revise the PIL/ICF accordingly.
- Please include information on how long participants are likely to be hospitalised following the procedure.

- NREC-MD request participants are reimbursed for all reasonable study related expenses, such as travel expenses in line with the EUREC statement on compensation of research participants.

24-NREC-MD-031

- Principal Investigator:
- Study title:
- Lead institution:
- NREC-MD decision:
  - *Request for further information*
- Further information requested:
  - The NREC-MD noted inconsistency across the submitted documentation in the total number of participants enrolled in Ireland; NREC-MD application form: 40 in total, Beacon hospital Site Suitability Form: 60. Please clarify the total number of participants to be enrolled in Ireland.
  - The NREC-MD noted that participants of childbearing age will be required to use double contraception if included in the study. Please clarify whether contraception is required for the duration of the entire study or only part of the study and update the Participant Information Leaflet/ Informed Consent Form (PIL/ICF) accordingly.
  - The NREC-MD noted that certified translation machines available to facilitate inclusion of participants who are not proficient in English. Please clarify:
    - If these machines are certified to cover medical and research terminology.
    - Whether these participants will receive a copy of translated PIL/ICF. Please note that translations must be completed by a certified translation provider, and the translation certificates submitted to the NREC-MD in advance of distribution of translated documents.
  - The NREC-MD request a clarification about stopping rules for control vs active arm of the study and that these are clearly outlined in the PIL/ICF.
  - The NREC-MD request clarification on whether the 12m visit will be conducted over the phone or in person.
  - The NREC-MD request clarification of the blinding process – Please clarify whether any aspects of the study are “blind”, and whether the clinical trial personnel completing the assessments are aware of the intervention.
  - The NREC-MD request that participants are allowed minimum 24 hours to consider their participation in the study and that this is reflected in the participant facing documentation.
  - The NREC-MD noted that section F7 of the application form indicates that identification of potential participants will not involve access to identifiable information. Given that participants are going to be selected from existing clinical lists, please clarify.

- The NREC-MD noted that data from the study will be shared with OpenAI in US to write narratives about adverse events. Please outline what data and in what format will be shared with the OpenAI.
- The NREC-MD noted that information about a data breach will only be shared with participants if “deemed high risk”. Please clarify the criteria based on which this will be determined and provide justification for this approach.
- The NREC-MD noted that the Statement of compliance suggests but does not confirm the data may be processed in a country outside of the EU. Please clarify where the data will be processed and stored. If data will be transferred outside of the EU, provide evidence of a contractual agreement for the transfer.
- The NREC-MD noted that the section on “benefits” covers the benefits for those in the active study arm only and requests it is revised.
- In line with the Data Protection Act 2018 (Section 36(2) (Health Research) Regulations 2018, the NREC-MD request the ICF is revised to include separate consent for data processing and for transfer of data outside of EU (if applicable).
- The NREC-MD request a confirmation that the study insurance is in line with the State Indemnity Guidance SIG 10: Indemnity and Insurance Arrangements for Clinical Trials Health Research Between DSA Healthcare Enterprises and Academic Institutions (link here) as the attached policy does not appear to provide sufficient cover of €6.5mil for 40 participants.
- Furthermore, confirm that the insurance policy will be renewed after Jan 2025.
- The NREC-MD request that the investigational devices and all study related procedures to be provided to participants free of charge. No cost should be incurred by the participants either directly or indirectly (via insurance).

24-NREC-MD-020-R2

- Principal Investigator: Prof Ronan Cahill
- Study title: CLASSICA: Validating AI in Classifying Cancer in Real-Time Surgery - Study 2
- Lead institution: Mater Hospital
- NREC-MD decision:
  - *Favourable*

24-NREC-MD-023-R1

- Principal Investigator:
- Study title:
- Lead institution:
- NREC-MD decision:
  - *Favourable with conditions*

- Associated conditions:
  - Information on the prespecified sub-study on participants who will undergo optical coherence tomography to be included in the participant information leaflet and explicit consent for taking part in the sub study is included in the informed consent form.
  - The investigational devices and all study related procedures to be provided to participants free of charge. No cost should be incurred by the participants either directly or indirectly (via insurance).

24-NREC-MD-026

- Principal Investigator:
- Study title:
- Lead institution:
- NREC-MD decision:
  - *Unfavourable*
- NREC-MD comments:
  - In line with existing literature, some of which you have provided with the response to request to further information, the Committee have determined that the use of a sham procedure as outlined in this study protocol is not ethically justified. According to the 2024 European Society of Cardiology guidelines, renal denervation is an accepted intervention for hypertension, which further highlights that the risks associated with the proposed study design are not justifiable, and that an alternative active control, non-inferiority trial randomised controlled trial design could be used instead of sham.

24-NREC-MD-018-SM1

- Principal Investigator: Dr Austin Duffy
- Study title: Clinical performance study for use of the FOLR1 (2.1) Clinical Trial Assay in Study IMGN853-0424: A Randomized Phase 2 Study of Ocular Toxicity Evaluation and Mitigation During Treatment with Mirvetuximab Soravtansine in Patients with Recurrent Ovarian Cancer with High Folate Receptor-Alpha Expression
- Lead institution: Mater Misericordiae University Hospital
- NREC-MD decision:
  - *Favourable with conditions*
- Associated conditions:
  - The Site Suitability Form to be updated to include the title of the performance study rather than the title of the clinical trial.

23-NREC-MD-002-SM4

- Principal Investigator: Prof. Gábor Szeplaki

- Study title: An observational post-marketing study for evaluation of ongoing safety and effectiveness of catheter mapping and ablation using commercially approved BWI medical devices for the treatment of patients with cardiac arrhythmias
- Lead institution: Mater Private Network
- NREC-MD decision:
  - *Favourable*

21-NREC-MD-009-SM2

- Principal Investigator: Prof. David Keegan
- Study title: A prospective, multicenter post-marketing clinical investigation of the SING IMT System, model NG SI IMT 3X in patients with central vision impairment associated with end-stage age-related macular degeneration
- Lead institution: Mater Misericordiae Universtiy Hospital
- NREC-MD decision:
  - *Favourable*

22-NREC-MD-026-SM2

- Principal Investigator: Dr Paul Kelly
- Study title: Effectiveness of the SpaceOAR Vue System in Subjects with Prostate Cancer being Treated with Stereotactic Body RadiothErapy (SABRE)
- Lead institution: Bon Secours
- NREC-MD decision:
  - *Favourable with conditions*
- Associated conditions:
  - The pop up that appears on the home-screen when you access the video, asking participants to submit their personal/ contact details prior to seeing the video, should be removed.
  - The narration speed of the video may be too fast paced for all individuals to clearly follow. Please consider slowing down the pace of the video so as to improve accessibility.
  - As far as it is possible, the sponsor should ensure that hosting platform and video content do not impact viewers experience/ profile information on other social media/ internet platforms e.g. cause advertising related to this disease.

- AOB: None