NATIONAL OFFICE FOR RESEARCH ETHICS COMMITTEES

National Research Ethics Committee

NREC-MD Meeting Minutes

15 September 2022

Attendance

Name	Role
Prof. Barry O'Sullivan	Chairperson, NREC-MD
Prof. Mary Sharp	Deputy Chairperson, NREC-MD
Dr Caitriona Cahir	Member, NREC-MD
Dr Mireille Crampe	Member, NREC-MD
Dr Owen Doody	Member, NREC-MD
Dr Frank Houghton	Member, NREC-MD
Dr Gloria Kirwan	Member, NREC-MD
Ms Orla Lane	Member, NREC-MD
Dr Sarah McLoughlin	Member, NREC-MD
Prof. Tom Melvin	Member, NREC-MD
Dr Declan O'Callaghan	Member, NREC-MD
Dr Clare O'Connor	Member, NREC-MD
Dr Paul O'Connor	Member, NREC-MD
Mr Damien Owens	Member, NREC-MD
Ms Riona Tumelty	Member, NREC-MD

Mr Peter Woulfe	Member, NREC-MD
Dr Lucia Prihodova*	Programme Manager, National Office for Research Ethics Committees
Dr Louise Houston	Project Officer, National Office for Research Ethics Committees
Ms Megan O'Neill	Project Officer, National Office for Research Ethics Committees
Dr Emily Vereker	Head, National Office for Research Ethics Committees
Dr Anne Costello**	Programme Manager, National Office for Research Ethics Committees

*Drafted minutes

*Observer role

Apologies: Prof. Declan Patton, Dr Ruth Davis, Mr Billy McCann, Prof. Therese Murphy, Prof. Susan O'Connell, Dr Catherine O'Neill, Prof. Mahendra Varma

Quorum for decisions: Yes

Agenda

- Welcome (Chairperson)
- Report on Committee business
- Minutes of previous meeting
- Declarations of interest
- 22-NREC-MD-003-SA3
- 22-NREC-MD-031
- 22-NREC-MD-032
- 22-NREC-MD-020-R1
- 22-NREC-MD-021-R1
- 22-NREC-MD-023-R1
- 22-NREC-MD-024-R1
- 22-NREC-MD-025-R1
- 22-NREC-MD-026-R1
- 22-NREC-MD-027-R1

- AOB

- The Chairperson welcomed the Committee, welcomed new members who weren't able to attend the previous meeting and opened the meeting.
- NREC Committee Business Report: The Committee *noted* the report.
- Minutes of previous meeting (18 August 2022) & matters arising: The minutes were *approved*.
- Declarations of interest:
    - Dr Lucia Prihodova (22-NREC-MD-027). Dr Prihodova left the meeting for the review of 22-NREC-MD-027.

Applications

22-NREC-MD-003-SA3

- Principal Investigator: Prof. Faisal Sharif
- Study title: Global SYMPLICITY Registry (GSR) Denervation Findings in Real World (DEFINE) is referred to as the GSR DEFINE study, Including Irish Country Addendum (IMPROVE) – Substantial Amendment.
- Lead institution: University College Hospital Galway, Newcastle Road, Galway, H91 YR71.
- NREC-MD comments
    - The NREC-MD noted that this was application for a substantial amendment of a change to site PI at the St. Vincent's University Hospital.
- NREC-MD decision
    - *Request for further information*
- Further information requested:
    - The NREC-MD noted the submitted documentation provided no information on Dr Shand's experience with the study procedure and no information on Dr Shand's training in Good Clinical Practice and requests an updated CV showing that the necessary experience is present.

22-NREC-MD-031

- Principal Investigator: Prof. Michael J Kerin
- Study title: An open-label, single site, pilot clinical investigation to assess the detectability and sizing of invasive breast cancers, the detectability of benign breast lesions, as well as the differentiation between malignant and benign breast lesions using the Wavelia #2 Microwave Breast Imaging system (Wavelia #2 Pilot #1 Study)

- Lead institution: NUI Galway and Galway University Hospital, Newcastle Road, Galway, H91 YR71.
- NREC-MD comments
  - The NREC-MD noted that this was application for an early-phase pilot study testing a new breast imaging device in participants attending symptomatic breast unit.
- NREC-MD decision
  - *Request for further information*
- Further information requested:
  - The NREC-MD noted that participants will offered to undergo the study examination at two timepoints: a) on the day of first presentation to the symptomatic breast unit or b) during post standard of care assessments, when the patient returns to the breast clinic for confirmation of their results and discussion of their treatment plan. Given the potential stress that the participants will be at the time of receiving their results, the Committee requests a justification for the second timepoint and a comment on whether this strategy might introduce a bias in the participant's profile.
  - The NREC-MD requests a justification for skin assessment being carried out over the phone and requests a justification for this approach.
  - The NREC-MD requests justification for the collection of equality data.
  - The NREC-MD requests that preliminary contact is made with the prospective participant by phone or by letter first, independent to the notification of their appointment.
  - To minimise the risk of any undue influence, the NREC-MD requests that a role of gatekeeper is introduced into the recruitment and consenting process
  - The NREC-MD requests a clarification on whether the study will be made accessible to all prospective participants irrespective of their mobility, and if so how will this be achieved.
  - The NREC-MD noted that the applicants have rightly identified potential prolonged emotional distress as one of the risks of participating in the study and requests clarification on what supports are going to be made available to participants in distress and that a list of available resources and their contact details are included in the participant information leaflet.
  - The NREC-MD noted that the Participant Information Leaflet is overly technical and needs to be revised to improve accessibility.
  - Similarly, the NREC-MD noted that the current study title is not accessible and requests that the applicants consider introducing a lay study title.
  - The NREC-MD requests the wording used to describe current diagnostic methods is revised to a neutral tone.
  - The NREC-MD noted that page 4 of the Participant information leaflet states that "If you leave the study for any reason, the study doctor may ask you to complete some end-of-study evaluations to monitor and assess your safety and well-being. Your doctor will discuss these tests with you at the time of the withdrawal." The

Committee requests justification for this approach and clarification on how does this align with respect for participant's autonomy and freedom to withdraw from the study at any time.

- The NREC-MD noted that the contact information for the Clinical Research Nurse in the submitted participant facing documentation is incomplete and requests this is rectified.
- The NREC-MD noted that a patient brochure was included in the application dossier. The Committee requests clarification on how and when this brochure will be used for.
- As the NREC-MD will never request to access participant data, the Committee requests that the Participant Information Leaflet and Informed Consent Form is amended accordingly.
- The NREC-MD noted that as part of this study, participant data will be processed outside the EU and requests that the Informed Consent Form is amended to include a specific consent for data being transferred and processed outside of EU.
- The NREC-MD requests a clarification on the total funding sum for the study.
- Furthermore, the NREC-MD requests that a financial disclosure/ confirmation of no material interest with the device manufacturer of the study PI is submitted.
- The NREC-MD requests that participants are reimbursed for all reasonable expenses related with their participation in the study.
- The NREC-MD noted that the submitted insurance certificate is due to expire in March 2024 and requests confirmation that the policy will be renewed to cover the entire duration of the study.

22-NREC-MD-032

- Principal Investigator: Mr Peter Lonergan
- Study title: ProVee Urethral Expander System IDE Study
- Lead institution: St. James's Hospital, James Street, Dublin 8, D08 NHY1
- NREC-MD comments
  - The NREC-MD noted that this was application for study aimed to evaluate the safety and effectiveness of the ProVee Device in subjects with lower urinary tract symptoms secondary to Benign Prostatic Hyperplasia (BPH).
- NREC-MD decision
  - *Request for further information*
- Further information requested:
  - The NREC-MD noted that only limited information on the Principal Investigator experience in clinical investigations/ trials was provided and request a full CV highlighting the Principal Investigators experience in running studies of similar scale.

- The NREC-MD requests a clarification on whether all equipment necessary to carry out the study is present at the site.
- To minimise the risk of any undue influence, the NREC-MD requests that a role of gatekeeper is introduced into the recruitment and consenting process.
- The NREC-MD noted that the Participant Information Leaflet is overly technical and requests it is revised to improve accessibility.
- The NREC-MD commended the applicants on provision of a summary Participant Information Leaflet. In line with previous point, the Committee noted that the document is overly technical and requests it is extensively revised and that the applicants may wish to consider this guidance issued by the National Office.
- The NREC-MD noted that while the application form states that participants will have minimum 24 hours to consider their participation, this is not specified in the Participant Information Leaflet and requests it is amended.
- The NREC-MD noted that page 19 of the participant information leaflet states that participants can contact the Committee if they a) have questions, concerns, or complaints that are not being answered by the study team, b) are not getting answers from the study team, c) cannot reach the study team, d) want to talk to someone else about the study, e) have questions about their rights as a study subject. The Committee noted that only the last point falls under their remit and requests the document is amended accordingly.
- The NREC-MD noted that page 20 of the participant information leaflet states that “Some of the information collected could be included in a "limited data set" to be used for other study purposes,” implying broad consent is being sought, and requests clarification and that this is amended. Please note that in line with best practice and Data Protection Act 2018 (Section 36(2) (Health Research) Regulations 2018), both participant consent and independent research ethics review should be sought for specific research proposals once they are clearly defined. To that end, in the consent form, the participants should be asked for a consent to be contacted in the future for such purposes.
- The NREC-MD noted that the Informed Consent Form in its current form is not aligned with requirements set out in the Data Protection Act 2018 (Section 36(2) (Health Research) Regulations 2018) and requests it is revised accordingly in a form of unbundled itemised consent.
- The NREC-MD requests clarification on whether an input from the lead site DPO was sought in completion/ sign-off of the study Data Protection Impact Assessment. If not, the Committee requests a justification for this approach and an assurance that relevant site approvals in accessing participant data are in place.
- The NREC-MD noted that section K14 of the application form indicates that video data will be collected as a part of the study. The Committee requests a clarification and detailed outline of the proposed data processing and use related to the video footage.
- The NREC-MD requests clarification on whether medical records will be used for screening of prospective participants and if yes, that this section of the application form is completed.

- The NREC-MD noted that no list of the Data Safety Monitoring Board was provided and requests clarification if the members have been identified. If yes, the Committee requests a copy of the list along with a declaration of their potential interest in the study.
- The NREC-MD requests that participants are reimbursed for all reasonable expenses.
- Finally, the NREC-MD noted that the submitted insurance certificate is due to expire in March 2027 and requests confirmation that the policy will be renewed to cover the entire duration of the study.

22-NREC-MD-020-R1

- Principal Investigator: Prof. David Burke
- Study title: A single-centre, investigator-led, observational clinical investigation to evaluate the performance of ECG gathered from a single arm for the detection of heart rhythm abnormalities, as compared to hospital telemetry ECG.
- Lead institution: Beacon Hospital, Beacon Court, Bracken Rd, Sandyford Business Park, Sandyford, Dublin 18, D18 AK68.
- NREC-MD comments
  - The Committee noted that this was a response to request for further information issued following the 21 July 2022 NREC-MD meeting.
  - The NREC-MD noted that a copy of data sharing agreement with Beacon Hospital and NUIG was not provided, as requested by the NREC-MD (Ref: Q6d/e), nor was there any comment as to whether an agreement would be implemented. Without a copy of a draft data sharing agreement, the Committee was not assured that the requisite data sharing governance safeguards, required under the Health Research Regulations 2018, will be in place.
  - The NREC-MD noted that only limited detail in response to Q4 on participant selection and recruitment process was provided in the response.
  - The NREC-MD welcomed the appointment of research nurse to the study team to assist with recruitment and consenting process. The Committee were not assured by the ambiguous language in the response 4(d) ‘research nurse may perform the recruitment and consenting process' and would recommend that for future submissions, the role of gatekeeper is introduced throughout the recruitment and consenting process
  - The NREC-MD noted that Mr Oisin McGrath was identified as the point person for complaints and queried the appropriateness of this given his involvement in the study. The Committee also noted that only limited information on the process of dealing with participant complaints was provided. The Committee also noted that in the presented Participant Information Leaflet, Mr McGrath's overall role in the study was not outlined to prospective participants. Given the risk profile and scale of the study, the Committee noted the decision not to appoint a data safety monitoring/ clinical

advisory committee, however in relation to participant complaints, the Committee were not assured that the current study governance structures provided as sufficient support to the study participants.

- NREC-MD decision
  - *Unfavourable*

22-NREC-MD-021-R1

- Principal Investigator: Prof. Robert Byrne
- Study title: LiquID Guide Catheter Extension Safety Study.
- Lead institution: Mater Private Network, Eccles St, Dublin 7, D07 WKW8.
- NREC-MD comments
  - The Committee noted that this was a response to request for further information issued following the 21 July 2022 NREC-MD meeting NREC-MD decision
- NREC-MD decision
  - *Favourable with conditions*
- Associated conditions
  - The Participant Information Leaflet includes contact details for participant queries.

22-NREC-MD-023-R1

- Principal Investigator: Dr Danny Cheriyan
- Study title: Multi-Centre Prospective Observational Cohort Study: To assess the performance of single use duodenoscope.
- Lead institution: Beaumont Hospital, Beaumont Road, Dublin 9, Ireland.
- NREC-MD comments
  - The Committee noted that this was a response to request for further information issued following the 21 July 2022 NREC-MD meeting NREC-MD decision
- NREC-MD decision
  - *Favourable with conditions*
- Associated conditions
  - All necessary site agreements are in place before the study commences.

22-NREC-MD-024-R1

- Principal Investigator: Mr Gerry O'Sullivan

- Study title: Evaluation of the GOREÂ® VIAFORT Vascular Stent for Treatment of Symptomatic Inferior Vena Cava Obstruction with or without Combined Iliofemoral Obstruction.
- Lead institution: University Hospital Galway, Newcastle Rd, Galway, H91 YR71.
- NREC-MD comments
  - The Committee noted that this was a response to request for further information issued following the 18 August 2022 NREC-MD meeting.
  - The NREC-MD welcomed the appointment of Professor Stewart Walsh as the gatekeeper. From the response documentation, eg section D2.1 of the application form or the Participant Information Leaflet, the Committee were not clear whether Prof. Walsh will carry out the recruitment and consenting process for the study, or what qualifications Prof Walsh has more generally.
  - In line with best practice, potential participants should be initially approached about participation in the study by the gatekeeper.
  - The NREC-MD noted that the study budget is under negotiations and that without a finalised budget, the Committee cannot be sufficiently assured that potential undue influence on the investigators and participants has been minimised. Furthermore, the Committee noted that there are also ethical concerns with recruitment of participants for a potentially underfunded study as this could compromise on adequate personnel or the study itself and thus safety and well-being of the participants.
  - The NREC-MD noted that the site DPO input is yet to be obtained and commends the Sponsor's commitment to obtaining the input before commencing. As the DPO input might impact the participant facing documentation, the Committee requests site DPO or input from an equivalent authorised individual with good working knowledge of the Data Protection Act 2018 (Section 36(2) (Health Research) Regulations 2018) is obtained. This feedback must be obtained and provided as part of the resubmission.
- NREC-MD decision
  - *Unfavourable*

22-NREC-MD-025-R1

- Principal Investigator: Prof Faisal Sharif
- Study title: A Prospective, Multi-Center, Open Label, Single Arm Clinical Trial Evaluating the Safety and Efficacy of the Cordella Pulmonary Artery Sensor System in New York Heart Association (NYHA) Class III Heart Failure Patients (PROACTIVE- HF Trial).
- Lead institution: University Hospital Galway, Newcastle Rd, Galway, H91 YR71.
- NREC-MD comments
  - The Committee noted that this was a response to request for further information issued following the 18 August 2022 NREC-MD meeting.

- The NREC-MD noted that the response to the request to clarify the proposed use of data following the study and based on the response, was not satisfied that the data will continue to be collected and used irrespective of participant's wishes not to participate in a follow-up trial or ongoing service evaluation. It is also unclear whether the data will be used for other uses.
- The NREC-MD noted that in response to question 2, only limited information was provided on the risk benefit of the device. Given that this is the third study utilising the Cordella Pulmonary Artery Sensor System, the Committee were not sufficiently assured by the level of detail in the response pertaining to the device itself.
- The NREC-MD noted that the response to the request to introduce a gatekeeper to carry out the recruitment and consenting process for the study as directly contravening the NREC-MD request. In line with best practice, potential participants should be initially approached about participation in the study by the gatekeeper.
- The NREC-MD noted the response to question 3 relating to proposed radiation exposure and commented that the response did not address concerns regarding the radiation doses listed in the application form. The Committee requests that for any future submissions of the study, the proposed radiation is reviewed and a detailed review by the site's medical physicist is provided.
- The NREC-MD noted that page 8 of the Participant Information Leaflet lists risk ratio's of potential adverse effects of the device as requested. The Committee noted these are presented in a rather confusing format, not conducive to the informed consent process.
- The NREC-MD noted that in spite of clarification on the impact of participation in the study on participant's private insurance, the consent item relating to the same has not been removed from page 21.
- The NREC-MD noted that response to question 16 on ongoing use of data following participant withdrawal, indicates that the Participant Information Leaflet and Informed Consent Form have been updated accordingly. The Committee noted that the text on page 18 of the Participant Information Leaflet states that "if you withdraw from the study, but do not withdraw consent, new health information may be collected to the study end," contravening the response.

- NREC-MD decision
  - *Unfavourable*

22-NREC-MD-026-R1

- 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 Radiotherapy Centre Cork, Western Road Entrance, Cork, T12 DV56.

- NREC-MD comments
  - The Committee noted that this was a response to request for further information issued following the 18 August 2022 NREC-MD meeting.
- NREC-MD decision
  - *Favourable with conditions*
- Associated conditions
  - The NREC-MD requests that information on follow up procedures are entirely study specific rather than part of standard care is clearly outlined in all participant facing documentation.
  - The NREC-MD requests that a role of gatekeeper is introduced in the recruitment and consenting process.
  - The NREC-MD requests that participants are only contacted through means shared with the research team, and that no advertising or outreach is carried out via online search/ social media.
  - The NREC-MD requests that a review by the site Data Protection Officer of the study DPIA is obtained and that their comments are incorporated before the study proceeds.

- Due to the large volume of applications, the Chairperson adjourned the meeting with the agreement that a second meeting will be held to deal with any outstanding items.

AOB

- Lucia Prihodova noted that the National Office is holding a webinar on the 27 October and invited all members to register.

NREC-MD Meeting Minutes

23 September 2022

Attendance

Name	Role
Prof. Barry O'Sullivan	Chairperson, NREC-MD
Prof. Mary Sharp	Deputy Chairperson, NREC-MD
Prof. Declan Patton	Deputy Chairperson, NREC-MD
Dr Mireille Crampe	Member, NREC-MD
Dr Owen Doody	Member, NREC-MD
Dr Frank Houghton	Member, NREC-MD
Ms Orla Lane	Member, NREC-MD
Dr Sarah McLoughlin	Member, NREC-MD
Dr Clare O'Connor	Member, NREC-MD
Dr Lucia Prihodova*	Programme Manager, National Office for Research Ethics Committees
Dr Louise Houston	Project Officer, National Office for Research Ethics Committees
Ms Megan O'Neill	Project Officer, National Office for Research Ethics Committees
Dr Emily Vereker	Head, National Office for Research Ethics Committees

*Drafted minutes

*Observer role

Apologies: Dr Caitriona Cahir, Dr Ruth Davis, Dr Gloria Kirwan, Mr Billy McCann, Prof. Tom Melvin, Prof. Therese Murphy, Dr Declan O'Callaghan, Prof. Susan O'Connell, Dr Paul O'Connor, Dr Catherine O'Neill, Mr Damien Owens, Prof Anne Parle McDermott, Ms Riona Tumelty, Prof. Mahendra Varma, Mr Peter Woulfe

Quorum for decisions: Yes

22-NREC-MD-027-R1

- Principal Investigator: Prof Richard Costello
- Study title: CONNected Electronic Inhalers Asthma Control Trial 3 (“CONNECT 3”).
- Lead institution: Beaumont Hospital, Beaumont Rd, Dublin 9, D09V 2N0.
- NREC-MD comments
  - The Committee noted that this was a response to request for further information issued following the 18 August 2022 NREC-MD meeting.
- NREC-MD decision
  - *Favourable with conditions*
- Associated conditions
  - The role of gatekeeper is introduced in the recruitment and consenting process.
  - The current approval is for the two sites named in the application (Beaumont Hospital and St. James’s Hospital) and corresponding number of 22 participants.
  - The NREC-MD values and encourages inclusion in the conduct of studies, and it is the Committees preference is not to exclude participants. However on this occasion the inclusion of pregnant participants is not approved in present form, as the NREC-MD was not sufficiently assured with the information in relation to their involvement, in particular:
    A. The justification for collection of the additional data on pregnancy in the context of assessment of the medical device.
    B. The anticipated use and reporting of the data gathered from participants who become pregnant.
    C. Clarification of whether pregnancy related adverse events are being collected and reported as a part of the study.
    D. Details of any additional safeguards and supports put in place for participants who become pregnant over the course of the study.
    E. The consenting and assenting process, as well as information presented in participant facing documentation, for collection of data throughout pregnancy and following birth.
    F. The consenting process, as well as any participant facing documentation, for ongoing data use for when the child reaches an age of legal consent.
    G. Compliance with Article 66 of the MDR.
  - The NREC-MD requests that inclusion of pregnant participants is submitted to the NREC-MD as a substantial amendment, addressing the points raised above.

AOB

- The Committee noted that the process of review of combination studies would be more efficient if reviewed by a joint Committee formed from members from both NREC-MD and NREC-CT, rather than separately.
- The NREC-MD acknowledged when it comes to decision on application 22-NREC-MD-027, the decision of setting a condition of substantial amendments doesn't follow the usual process. However the Committee noted that issuing an unfavourable decision based on exclusion of pregnant participants goes against the ethos of the Committee of promoting inclusivity, however necessary safeguards to protect participants must be in place. The Committee further noted that this decision can be justified by the fact that the dimension being discussed – inclusion of pregnant participants - is not a core part of the study and that the data gathered from pregnant participants is valuable for future medical practice.
- Set of guidelines
- The Committee asked that the National Office reviews international guidance on involvement of pregnant participants in clinical research, and forms a cross-Committee group which would form a set of guidance on involvement of pregnant participants in clinical research.
- The Chairperson thanked the Committee and closed the meeting.