Prevention of over-volunteering in Europe: ”How to get a European-wide acceptable system going?”

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Conflict of interest

No grants received form any company mentioned in this presentation

Presentation is non-commercial and the author always controlled the content of the slides

Agenda

Framing the landscape of study volunteering	Frequency
	Types
	Location
Central Register Databases in Europe	
Observations on registration and registers	
Proposal going forward	

Frequency of Volunteering

Guidelines for Phase 1 Clinical trials (abpi)

Subjects must neither:	Take part > one trial at a time
	Receive > 10 milliSievert of radioactivity in any 12-month period
	In general, subjects should not receive an IMP systemically < 3 months after the previous one

Studies with Healthy Volunteers

Types	Phase I studies
	Phase II studies with healthy volunteers as comparator
	Vaccination studies
	Device studies
	Studies with a diet
	Investigator driven studies (academia)
	Observational studies

Where?

Where	
	Phase 1 units
	Hospital departments
	Vaccination centres

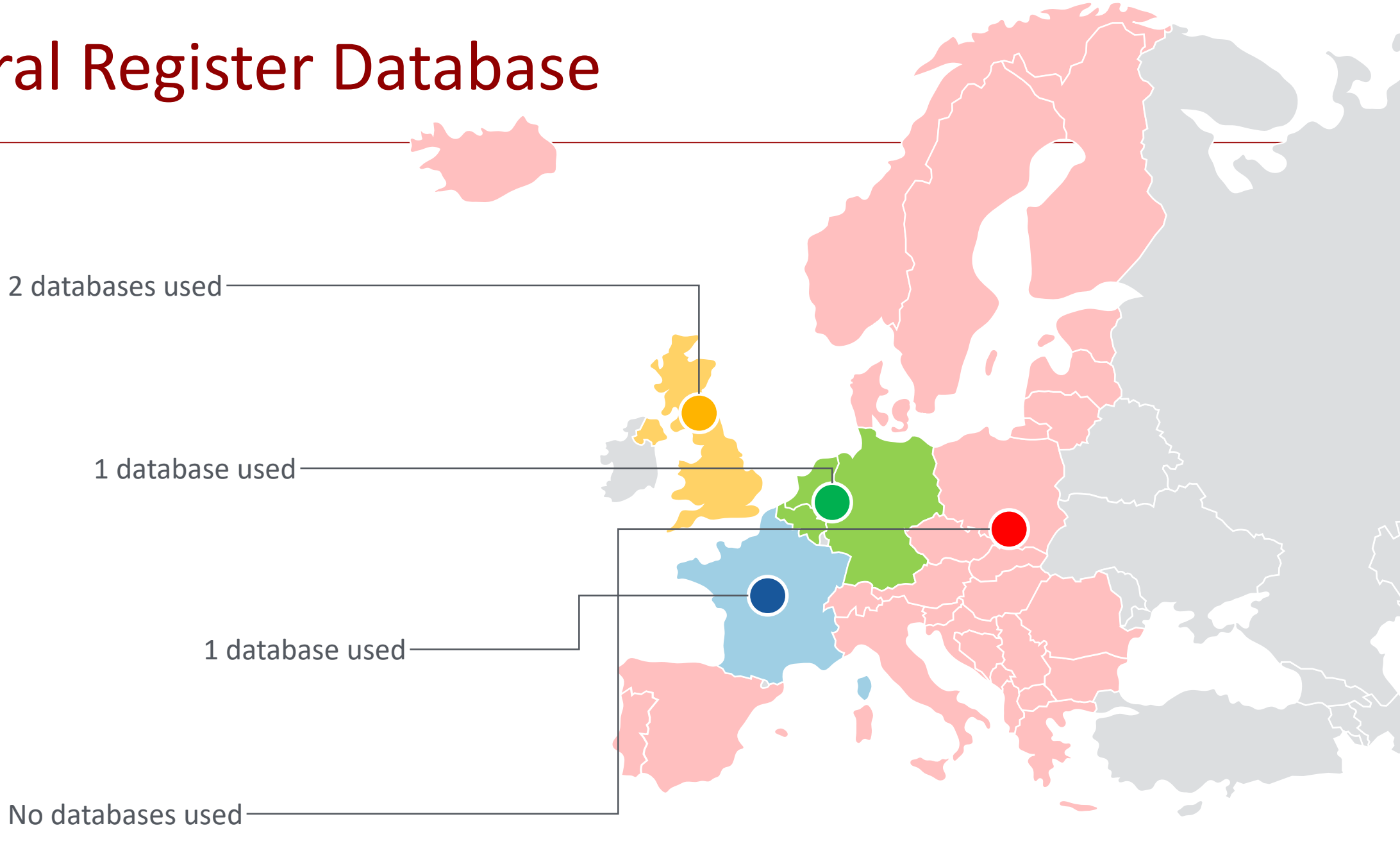
Volunteer temptations

Why participate?	Payment
	Travel reimbursement
	Internet information: where, payment

Number of participating Healthy Volunteers

- 816 STUDIES 2016 (Clinicaltrials.gov)
- > 28.500 SUBJECTS/YEAR

Central Register Database



United Kingdom

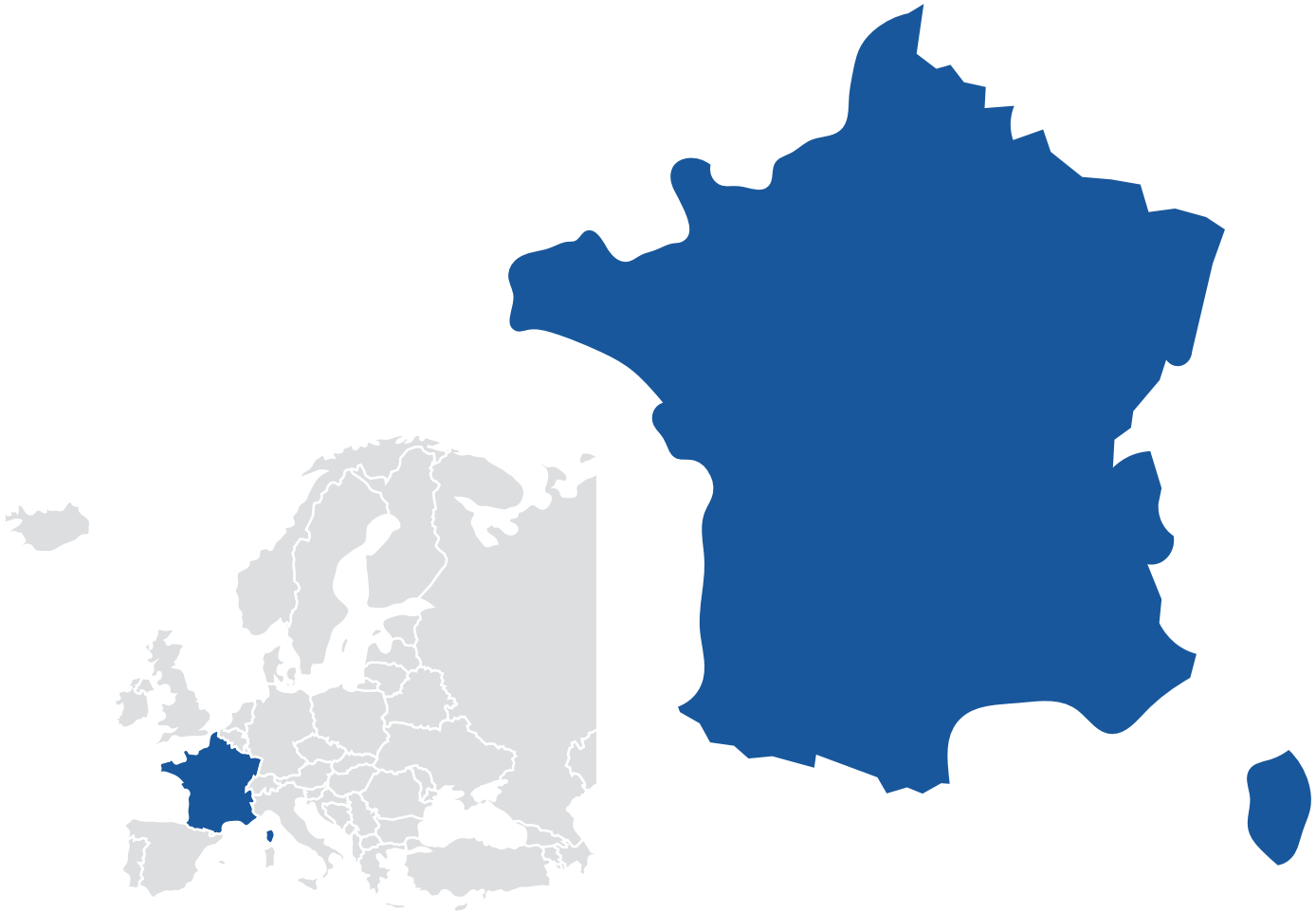
TOPs

- 2013 Health Research Authority
- MHRA accreditation - IRB approval
- Insurance number/passport & nationality
- Web-based
- Free

NVR

- Open access database of 1 commercial site
- Web-based
- Free

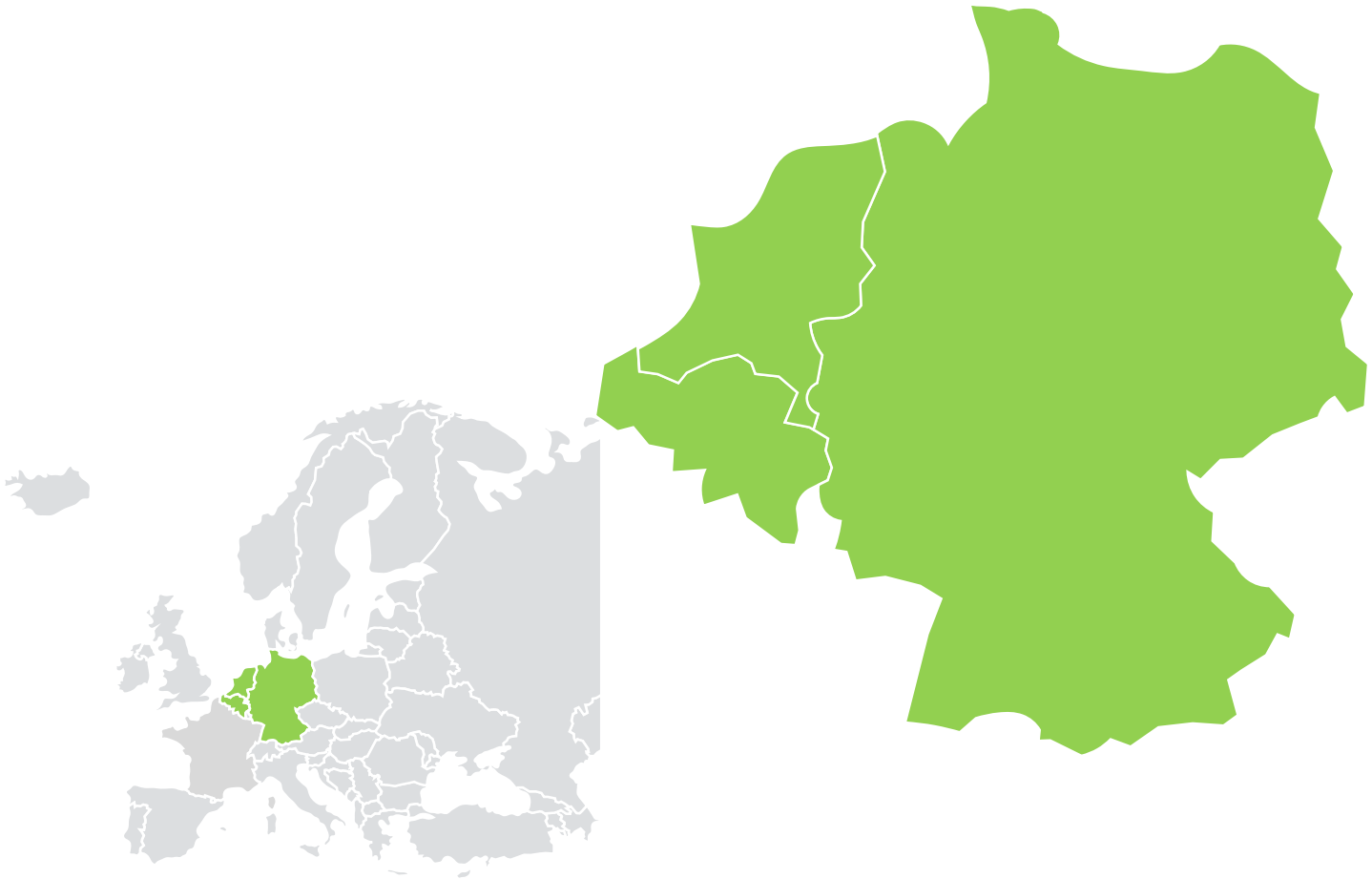
France



VRB

- French Ministry of Health
- Mandatory 1988
- Compensation
- Social security number + initials
- Web-based
- Free

Belgium – Germany - Netherlands



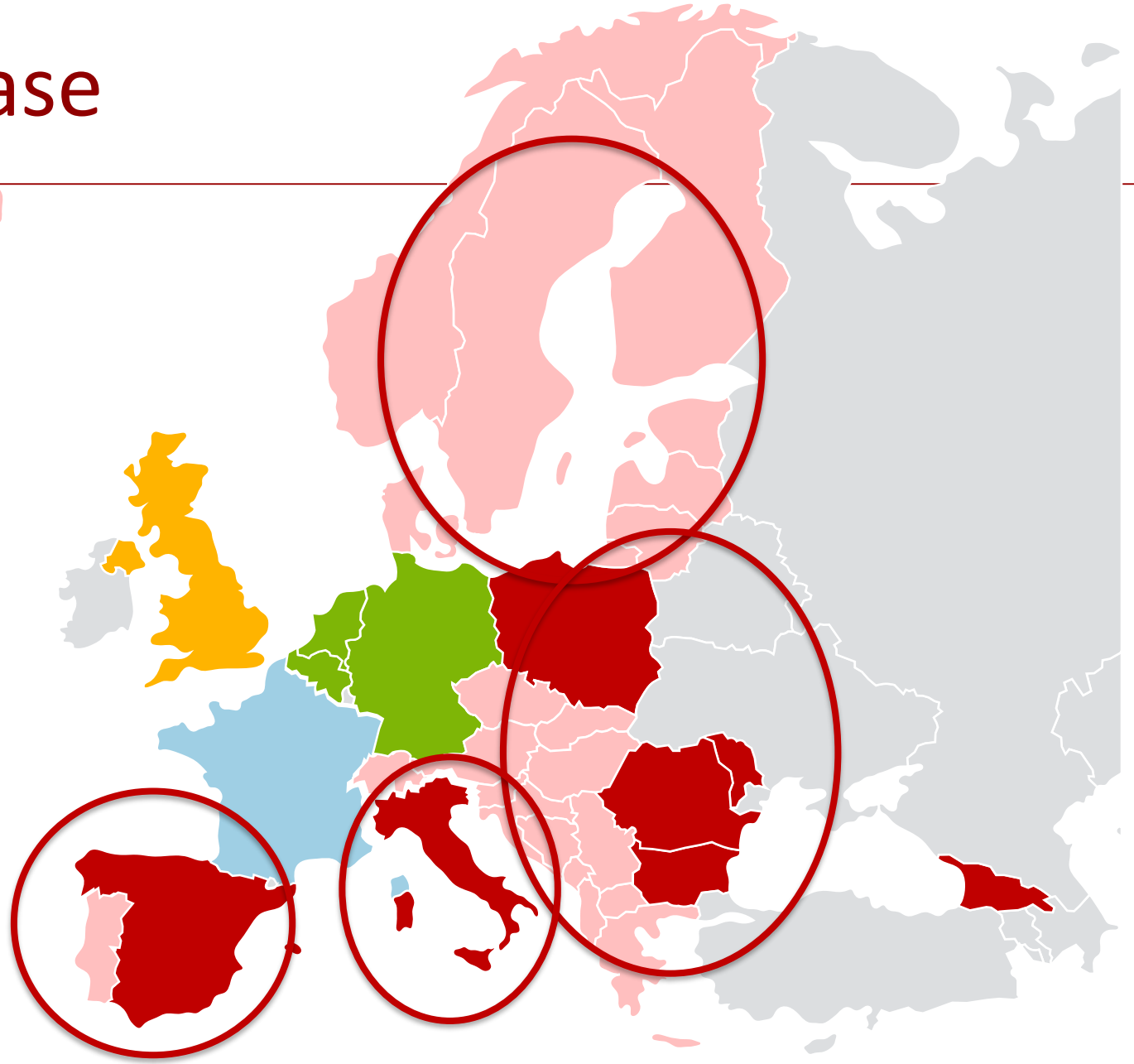
VIPCHECK

- Privately owned
- Data ID
- Payment
- **Not web based**
- **Bad support**
- **Not used by all sites**
- **Future?**

Central Register Database

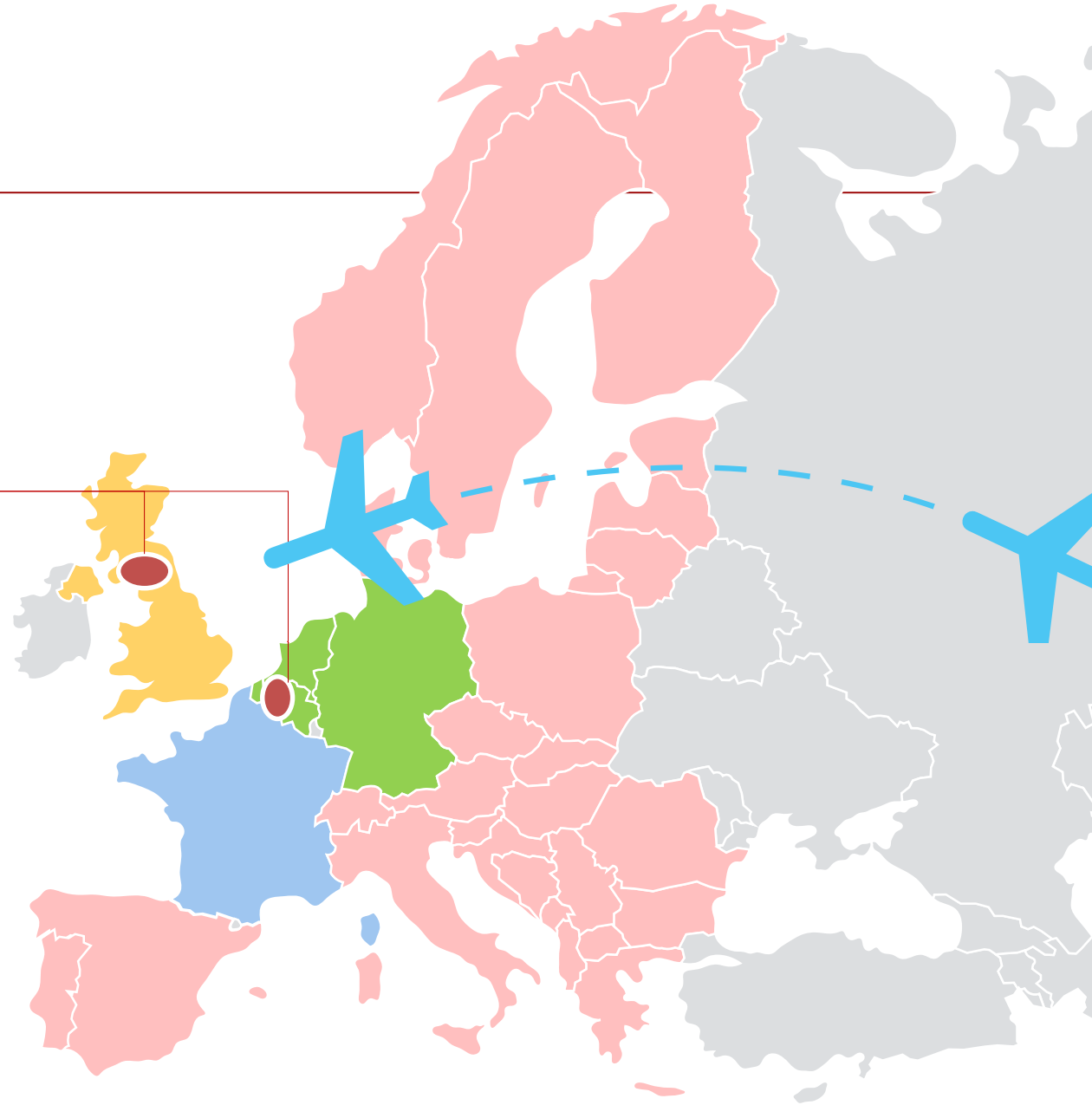
No databases used

?? Subjects ??



Bridging studies

Bridging studies with Japanese HV



Central Register HV Databases in Europe

Conclusion:

French & UK people should stay in their country

No waterproof system in

Germany, The Netherlands, Belgium

Existing systems not used by all institutions

No system in other European countries

They do not prevent simultaneous and multi participation

Ethical, Legal & Medical Concerns

Concerns:	Possibility of unknown interactions
	Possibility of contaminated study parameters
	Uncontrolled radiation exposure
	Unknown consequences for the research subjects
	Loss of insurance coverage for research subjects

Working Group: User Requirements

The Netherlands	PRA (A. Kamps & R. Nijssen)
	CHDR (E. Jonxis)
	QPS (I. Den Daas)
Germany	B.I. (P. Liedl & M. Manzoni)
Belgium	SGS (K. Vermeiren & L. Janssen)
	JnJ (G. Hasting)
	Pfizer (C. Meganck & D. Malisse)
	Research Aalst (A. Peremans)

Other Databases

EUROPE DUPCheck	CNS Phase II, III Request by pharmaceutical companies Expansion possible to Phase I
US Verified Clinical Trials RSVP (DUPCheck)	Phase I, II, III Used by pharmaceutical companies VCT: Willing to expand to Europe

Global European Subject Database

Requirements:

Mandatory for all institutions in Europe including healthy volunteers	
Unique subject identifier	Sex + birthdate Different options Finger print / iris scan?
Web-based	
Dealing with language specific characters	
Proof of verification (reports) – review by Pharmaceutical Companies	

Global European Subject Database

Requirements:

- Standardized procedures
- User friendly and not time consuming
- Confidentiality – Data Protection Laws
- Support
- Also patients?

Options for the future

Option 1

EMA

- Make one of the existing databases mandatory for European studies / create new database

(Draft Guideline FIH studies) Concomitant exposure of subjects to IMPs across trials, consideration may be given to trial sites participation in e.g; **national initiatives to prevent over-volunteering**, where available

Option 2

EUFEMED

- PSSS (non-commercial approach)
- Development necessities
- Maintenance & Support costs

Option 3

API

Centralised database

Owned by EMA?
EUFEMED?

User Interface Product

TOPs, VRB, DUPCheck, VCT …
EDC systems

Option 4

Pharmaceutical Companies

- Make register in a database mandatory for their studies
- Uncontaminated study parameters
- Naïve study population
- Safety subjects

Overall Conclusion

Conclusion:

Need for European regulation and legislation on participation of Healthy Volunteers in all types of clinical trials in Europe

Need for central European Subject Database

Raise the ethical standards and safety of clinical research in Europe to a higher level

March 13, 2006

Revision European guidelines for FIH phase I clinical trials

January 10, 2015

Updated EMA Guideline on strategy to identify and mitigate risks for FIH and early clinical trials with investigational medicinal products

20??

European Database
Mandatory

QUESTIONS AND ANSWERS