SOP 16 Clinical Trial Registration of Investigator-Initiated Trials

1.0 Purpose

To provide guidance to Sponsor-Investigators on prospective registration of clinical trials and the ongoing maintenance of registry records in accordance with international, national and institutional requirements.

2.0 Scope

Applies to University of Melbourne (UoM) Sponsor-Investigators and their delegates conducting single-site or multi-site investigator-initiated interventional studies, and to UoM staff supporting registration and results reporting. Observational studies may also be registered using the following process.

3.0 Responsibility

The responsibility lies with the **trial sponsor or their authorised representative**.

A sponsor is defined by the NHMRC and Therapeutic Goods Administration (TGA) as "an individual, company or institution or organisation which takes responsibility for the initiation, management and/or financing of a clinical trial".

Sponsors may include:

- Pharmaceutical or biotech companies
- Government or international health agencies
- Lead principal investigators (especially in academic or investigator-led trials)

For multi-site studies, the trial should be registered once only, not by each site.

What is the sponsor responsible for?

- Registering the trial in a publicly accessible registry (e.g. ANZCTR)
- Ensuring the accuracy and completeness of the registered information
- Keeping the trial record up to date
- Communicating the registration number and status to collaborators
- Avoiding duplicate registrations for the same trial

An authorised representative may register the trial on the sponsor's behalf, as long as they have permission to agree to the trial registration terms.

4.0 Regulatory and policy requirements

Prospective registration is required by:

- ICMJE: register at or before first participant enrolment in a WHO Primary Registry or ClinicalTrials.gov.
- Declaration of Helsinki (2024): ethical principles include public registration and timely dissemination of results.
- NHMRC National Statement (2023, effective 1 Jan 2024): register interventional trials on a publicly accessible register before recruitment.
- UoM Clinical Trials Policy (MPF1352): researchers must meet applicable ethical and regulatory obligations, including trial registration.

Obligations for studies that meet FDA "Applicable Clinical Trial" criteria:

- Register on ClinicalTrials.gov no later than 21 calendar days after first participant enrolment, and comply with 42 CFR Part 11.
- Submit summary results within 12 months of the Primary Completion Date, including protocol and Statistical Analysis Plan (SAP) for ACTs with Primary Completion Date on or after 18 Jan 2017.
- Include the required ClinicalTrials.gov statement verbatim in informed consent for ACTs and provide Form FDA 3674 certification with specified FDA submissions.

Clinical registries can consider inclusion in the Australian Register of Clinical Registries maintained by the Australian Commission on Safety and Quality in Health Care (see

https://www.safetyandquality.gov.au/publications-and-resources/australian-registerclinical-registries

5.0 When to register

Start the registration process early, ideally alongside ethics submission. Records must be public before the first participant provides consent. If registering prior to ethics approval, set status to "Not yet recruiting" and update the record following approval.

If your study has already started, finished recruiting, or is completed, you can still register as a retrospective registration on the ANZCTR.

Important:

- Some ethics committees require prospective registration
- Many journals only accept results from studies registered before recruitment began

6.0 Choosing a registry

Primary options for UoM trials:

- You can register with: ANZCTR, ClinicalTrials.gov or another WHO/ICMJE-accepted registry. Registering with any one of these is usually sufficient – unless a local authority

(e.g. Human Research Ethics Committees (HREC)) asks you to register on another registry as well.

- ClinicalTrials.gov: required for FDA-regulated ACTs; robust quality checks; supports results posting and study documents.
- ANZCTR: WHO Primary Registry for Australia/New Zealand; improves local visibility; accepts interventional and observational studies. ANZCTR requires at least annual updates or records are flagged "Not up to date".

Multi-registry approach: for Australian trials that are ACTs, register on ClinicalTrials.gov and list the NCT number as a Secondary ID in ANZCTR (and vice versa).

7.0. Registration process

1. Request an account with the appropriate registry or access using existing credentials. Note: The University of Melbourne has a central ClinicalTrials.gov account managed by Clinical Trial Governance. Registry entries are to be drafted by the research team and once sponsorship has been confirmed the draft can be reviewed and submitted by Clinical Trial Governance.
    - If you require user access to the ClinicalTrials.gov account please *submit a ticket through ServiceNow.*
    - ANZCTR accounts are set up and managed by individuals.
2. Create a new study record and complete all mandatory fields (title, design, outcomes, eligibility, contacts, locations). Use plain language summaries.
3. Set recruitment status and anticipated dates; add ethics committee details when available.
4. For multi-site studies, list all participating sites and update site-level statuses.
5. Quality control: address registry queries, then approve and release the record to public.
6. Maintain records: update within 30 days of any material change and at least annually on ANZCTR.

8.0 Results submission and study documents

Submit results to ClinicalTrials.gov no later than 12 months after Primary Completion Date. Upload the full protocol and SAP (if not within the protocol) with results submissions. Redact personal identifiers and trade secrets where permitted.

9.0 Evidence of registration and notifications

File evidence of registration in the Trial Master File. Notify the approving HREC and local Principal Investigators with the registry ID (NCT or ACTRN) and registration date. For ClinicalTrials.gov, save the PDF Receipt; for ANZCTR, save the "View Full Record" as PDF.

10. Key references

- ICMJE Clinical Trial Registration: *https://www.icmje.org/recommendations/browse/publishing-and-editorial-issues/clinical-trial-registration.html*
- WHO ICTRP: *https://www.who.int/tools/clinical-trials-registry-platform*
- ANZCTR update guidance: *https://www.anzctr.org.au/support/HowToUpdate.aspx*
- ClinicalTrials.gov reporting requirements: *https://clinicaltrials.gov/policy/reporting-requirements*
- eCFR 42 CFR Part 11: *https://www.ecfr.gov/current/title-42/chapter-I/subchapter-A/part-11*
- FDA informed consent statement and Form FDA 3674: *https://www.fda.gov/science-research/clinical-trials-and-human-subject-protection/fdas-role-clinicaltrialsgov-information*
- NHMRC National Statement (2023): *https://www.nhmrc.gov.au/about-us/publications/national-statement-ethical-conduct-human-research-2023*
- UoM Clinical Trials Policy MPF1352: *https://policy.unimelb.edu.au/MPF1352/*

Glossary

ANZCTR	The Australian New Zealand Clinical Trials Registry (ANZCTR) is a not-for-profit online register of clinical trials being undertaken in Australia, New Zealand and elsewhere. The ANZCTR includes trials from the full spectrum of therapeutic areas of pharmaceuticals, surgical procedures, preventive measures, lifestyle, devices, treatment and rehabilitation strategies and complementary therapies. Key points about the ANZCTR as published on their website include: All details of trials registered on the ANZCTR are made publicly available Registration is voluntary, but if a registrant chooses to register a trial, certain fields are mandatory. The sponsor (Sponsor-Investigator in the case of investigator-initiated trials) is responsible for registration, including the accuracy of the information submitted and maintaining the record to keep it up-to-date.
Applicable Clinical Trial	An applicable device clinical trial or an applicable drug clinical trial.
Applicable device clinical trial	A prospective clinical study of health outcomes comparing an intervention with a device product subject to section 510(k), 515, or 520(m) of the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 360(k), 21 U.S.C. 360e, 21 U.S.C. 360j(m) against a control in human subjects (other than a small clinical trial to determine the feasibility of a device product, or a clinical trial to test prototype device products where the primary outcome measure relates to feasibility and not to health outcomes); A paediatric post-market surveillance of a device product as required under section 522 of the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 3601); or A clinical trial of a combination product with a

	device primary mode of action under 21 CFR part 3, provided that it meets all other criteria of the definition under this part.
Applicable drug clinical trial	A controlled clinical investigation, other than a phase 1 clinical investigation, of a drug product subject to section 505 of the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 355) or a biological product subject to section 351 of the Public Health Service Act (42 U.S.C. 262), where "clinical investigation" has the meaning given in 21 CFR 312.3 and "phase 1" has the meaning given in 21 CFR 312.21. A clinical trial of a combination product with a drug primary mode of action under 21 CFR part 3 is also an applicable drug clinical trial, provided that it meets all other criteria of the definition under this part.
ClinicalTrials.gov	ClinicalTrials.gov is an online register that provides patients, their family members, health care professionals, researchers, and the public with easy access to information on publicly and privately supported clinical studies on a wide range of diseases and conditions. The website is maintained by the National Library of Medicine (NLM) at the National Institutes of Health (NIH). Most of the records on ClinicalTrials.gov describe clinical trials. ClinicalTrials.gov also contains records describing observational studies and programs providing access to investigational drugs outside of clinical trials (expanded access). ClinicalTrials.gov does not contain information about all the clinical studies conducted in the United States because not all studies are required by law to be registered (for example, observational studies and trials that do not study a drug, biologic, or device). See FDAAA 801 Requirements for more information. ClinicalTrials.gov was created as a result of the Food and Drug Administration Modernization Act of 1997 (FDAMA). FDAMA required the U.S. Department of Health and Human Services (HHS), through NIH, to establish a registry of clinical trials information for both federally and privately funded trials conducted under investigational new drug applications to test the effectiveness of experimental drugs for serious or life-threatening diseases or conditions. NIH and the Food and Drug Administration (FDA) worked together to develop the site, which was made available to the public in February 2000
Clinical Trial	A clinical trial as defined by the NHMRC are trials that can involve investigating new or existing medicines, medical devices and other medical or non-medical interventions. For example, a clinical trial could involve new drugs, medical devices, biologicals, vaccines, surgical and other medical treatments and procedures. Psycho-therapeutic and behavioural therapies help service changes, preventative care strategies and educational interventions are also examples of clinical trials. Researchers might also conduct clinical trials to evaluate diagnostic or screening tests and new ways to detect and treat disease.
Human Research Ethics Committee (HREC)	A body which reviews research proposals involving human participants to ensure that they are ethically acceptable and in accordance with relevant standards and guidelines. The National Statement requires that all research proposals involving human participants be reviewed and

	approved by an HREC and sets out the requirements for the composition of an HREC.
Investigational Device Exemption (IDE)	An investigational device exemption (IDE) allows the investigational device to be used in a clinical study in order to collect safety and effectiveness data. Investigational use includes clinical evaluation of certain modifications or new intended uses of legally marketed devices. All clinical evaluations of investigational devices, unless exempt, must have an approved IDE before the study is initiated.
Investigational Medicinal Product (IMP	A pharmaceutical form of an active ingredient or placebo being tested or used as a reference in a clinical trial, including a product with a marketing authorisation when used or assembled (formulated or packaged) in a way different from the approved form, or when used for an unapproved indication, or when used to gain further information about an approved use.
Investigational Medical Device (IMD)	A device that is the subject of a clinical study designed to evaluate the effectiveness and/or safety of the device.
Investigational New Drug application (IND)	An Investigational New Drug Application (IND) is a request for authorization from the Food and Drug Administration (FDA) to administer an investigational drug or biological product to humans.
Investigator-initiated trials (IITs)	Trials where the investigator initiates and organises a trial with minimal involvement of the institution are referred to as investigator-initiated trials (IITs). In this case, the institution will be usually be responsible for the medico-legal risk and delegate the remaining Sponsor responsibilities to the lead investigator (i.e. Sponsor-Investigator), including the initiation, financing (or arranging the financing) conduct and management (including compliance with GCP and applicable regulatory requirements) of the trial.
Investigator	A person responsible for the conduct of the clinical trial at a trial site. There are four types of Investigator roles used to describe Investigators with different levels of responsibility for the conduct of clinical trials. These are described below. *Associate Investigator* Any individual member of the clinical trial team designated and supervised by the Principal investigator at a trial site to perform critical trial-related procedures and/or to make important trial-related decisions (e.g., associates, residents, research fellows). May also be referred to as sub-investigator. *Coordinating Principal Investigator (CPI)* If a study is conducted at more than one study site, the Principal Investigator taking the additional responsibility for coordination of the study across all sites in a region is known as the Coordinating Principal Investigator (CPI). This role applies to externally sponsored studies where the Sponsor may be a collaborative research group, commercial

	Sponsor or an institution. The Principal Investigator at each site will retain responsibility for the conduct of the study at their site. *Principal Investigator* The PI is the person responsible, individually or as a leader of the clinical trial team at a site, for the conduct of a clinical trial at that site. As such, the PI supports a culture of responsible clinical trial conduct in their health service organisation in their field of practice and, is responsible for adequately supervising his or her clinical trial team. The PI must conduct the clinical trial in accordance with the approved clinical trial protocol and ensure adequate clinical cover is provided for the trial and ensure compliance with the trial protocol. *Sponsor-Investigator* An individual who both initiates and conducts, alone or with others, a clinical trial, and under whose immediate direction the investigational product is administered to, dispensed to, or used by a participant. The term does not include any person other than an individual (eg, it does not include a corporation or an agency). The obligations of a sponsor-investigator include both those of a sponsor and those of an investigator.
Observational study	Observational studies consist of medical research in which the investigator does not assign human subjects to interventions. Observational studies include prospective cohort studies in which individuals receive interventions as part of their medical care, after which the investigator studies pre-specified outcomes to examine the impact of those interventions. Observational studies also include retrospective reviews of patient medical records or relevant literature.
Participant	A participant is a person that is the subject of the research.
Protocol	A document that describes the objective(s), design, methodology, statistical considerations, and organization of a trial.
Participant Information and Consent Form (PICF)	The PICF provides information about research and its requirements so that the prospective participant can decide if they wish to take part in the research. In general, this includes the purpose, methods, demands, risks, and benefits of the research. It must provide information to participants in a concise format that they are likely to understand. It must be participant centered.
Research	For the purpose of this guidance, research includes any research that requires submission to and approval from an HREC and/or research governance office. This may include (but is not limited to) observational research, clinical trials, quality assurance projects and laboratory research.
Standard Operating Procedure (SOP	Detailed, written instructions to achieve uniformity of the performance of a specific function.

Sponsor	An individual, organisation or group taking on responsibility for securing the arrangements to initiate, manage and finance a study.
Sponsor-Investigator	The Sponsor-Investigator is a term used for investigator-initiated studies. It is an individual who is responsible for both the initiation and conduct of a study. The term does not include any person other than an individual. This person will be: • the Principal Investigator for single-site investigator-initiated studies • the Coordinating Principal Investigator for multi-center investigator-initiated studies
Trial Master File (TMF)	Filing repository controlled by the Sponsor/Sponsor-Investigator. It is the collection of essential documents that allows the Sponsor responsibilities for the conduct of the clinical trial, the integrity of the trial data and the compliance of the trial with Good Clinical Practice (GCP) to be evaluated.

○ Revision Chronology

Document History			
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1.0	*25/11/2025*	Initial Version	Katie Ozdowska