

Independent Scientific Advisory Committee for MHRA database research (ISAC)

Minutes of first meeting held on Tuesday 28th February 2006

Present:

ISAC Members:

Dr Brian Gennery (Chair)
Prof Stephen Evans (until 2pm)
Prof Ian Harvey
Ms Barbara Meredith
Dr Sarah Meredith

MHRA¹:

Prof Sir Alasdair Breckenridge
Dr June Raine
Dr John Parkinson
Mr Jeremy Mean
Dr Sarah Davis (Secretariat)
Mr Stephen Fawbert (Secretariat)
Mrs Susan Soanes (Secretariat Support)
Mr Mick Foy
Dr Bridget King
Mr Shaun Fiddes
Mrs Kavita Chadda
Dr Jane Moseley

MRC:

Dr Angela Cooper (GPRD Data items only)

Apologies:

Prof Amrit Hungin
Prof Paul Little

1. WELCOME

Members were welcomed to the new committee and it was announced that Brian Gennery had agreed that he was willing to act as the Chair of the committee.

2. INTRODUCTION TO ISAC

2.1 Terms of Reference

The committee discussed and endorsed the terms of reference without amendment.

¹ MHRA staff may be present for all or part of the meeting, or for specific items

With regards to the advice the ISAC would provide on Yellow Cards, the MHRA pointed out that this advice was to MHRA and CHM as joint owners of the scheme. The committee was reminded that voluntary reporting could be jeopardised if access to the database was not carefully monitored. The MHRA stated that EU developments are key to the issue of widening access to YC data as the level of data supplied to the Eudravigilance database is determined.

The committee discussed the possible links ISAC would have with other committees undertaking similar scientific review. All agreed that where possible efforts should be made to promote the adoption of similar principles, but that in many areas no best practice had been adopted as these are new areas that are often only tested when a real life case is considered.

2.2 Committee administration and ways of working

Initial Secretariat arrangements for the committee were outlined and the proposed arrangements for the organisation of future meetings described. The committee were reminded that in addition to the annual declaration of interests, they would need to consider any potential conflicts of interest when reviewing individual protocols. It was noted that alternative Chair arrangements would need to be made when conflict of interests (e.g. a protocol from the Chair's organisation) did not permit him to participate in the review of a specific protocol.

Plans to make publicly available summary minutes and an annual report on ISAC's activities were noted. Potential formats for summary minutes and the level of detail for inclusion in the annual report would be discussed by the committee at a future meeting.

Clarification was sought from the committee on what could be provided under the Freedom of Information Act with regards to ISAC papers and emails. The role of the National Research Register as a public record of successful applications to use GPRD or Yellow Card data for research was also raised. The MHRA agreed to investigate these issues further and update ISAC at the next meeting

Following a discussion by members, it was agreed that the MHRA would provide a paper for the next meeting on the possibilities of blinding applications before they are considered by the committee.

3. GPRD DATA

3.1 GPRD: introduction and forward look; how the GPRD Group functions within the MHRA; ethical approval for use of GPRD data

The GPRD Group presented an overview of the GPRD, describing the data held within the database and the principles under which it is operated by the GPRD Group from within the MHRA. The arrangements in place to control

access to and use of the data were described, including the situation with regard to ethical approval.

The committee commented on the need for appropriate approval for the collection and anonymisation of free text, with regard to data protection. It was noted that GPRD procedures would be undergoing review by the MHRA's Caldicott Guardian who would be appointed in March 2006. The committee would be kept informed of progress in this area.

There was some discussion of future plans to implement record linkage between the GPRD and other data sources using a Trusted Third Party to create the linkage based on patient identifiers such as NHS number, postcode and date of birth so that this information would not need to be collected or held by the GPRD Group. The committee felt that Section 60 approval would need to be sought for this work through the Patient Information Advisory Group (PIAG).

3.2 SEAG

The GPRD Group presented a brief history of SEAG and described the work undertaken by this committee during 2005-February 2006, which had included the review of more than 100 new protocols. Examples of the types of issues which had been discussed at SEAG meetings were also presented.

3.3 GPRD Protocol review: specific issues

The GPRD Group outlined the initial procedures for the review of GPRD protocols by ISAC; these would be based on those used previously by SEAG (including the fast track review process which could be requested for studies relating to serious public health issues), and would be modified in due course if necessary. The form on which members would record their comments about a specific protocol (tabled paper 1) was viewed by members. The committee was informed that separate ethical review would automatically be required for any study which involved patient intervention or study-specific record linkage, but that ISAC could additionally refer other protocols for review by a Research Ethics Committee if additional ethical concerns were identified during review of the protocol.

The committee asked whether members could receive a text message alerting them to the fact that they were being sent a protocol which was to undergo fast track review. The MHRA will consider this suggestion and update members at a future date.

3.4 Use of GPRD data by UK academics under the MRC licence

The GPRD Group briefly described the agreement between the MRC and the GPRD Group which facilitates access to GPRD data by UK academics. The committee was informed that review of protocols seeking access to GPRD data under the MRC licence would involve the same procedure as used for other protocols, but that they would be required to comment on the suitability

of the protocol for funding by the MRC. A modified reviewer's comment form (tabled paper 2) had been prepared for this purpose; this form included the issues members would need to consider when assessing suitability of a protocol for MRC funding.

The committee asked for clarification on the eligibility of protocols for MRC funding to allow access to GPRD data, where funding had been received from other sources for other aspects of the project. It was agreed that updated wording would be prepared for question 13 of the application form for GPRD protocols in order to ensure that applicants provide sufficient information about the funding of a project to allow eligibility for MRC funding to be determined.

4. YELLOW CARD DATA

4.1 The Yellow Card database and European developments

The MHRA gave a presentation on the history of the Yellow Card Scheme, reporting rates and reporting methods. The presentation also included information on Signal detection processes and EudraVigilance and the Electronic Transmission of ADR reports within the EU.

4.2 The Independent Review of Access to the Yellow Card Scheme and the Work of the Interim Committee on Yellow Card data

The MHRA gave a presentation on the 2004 Independent Review chaired by Dr Jeremy Metters. The presentation also included information on the data categories the Interim Committee devised in line with Data Protection (DP) and Freedom of Information (FOI) requirements and the application form and guidance notes.

In the discussion that followed it was agreed that the application form would need to be amended to ask if researchers wanted professional reports, patient reports, or both, but wider discussion of the form was deferred until the next meeting.

4.3 The Yellow Card application process

The MHRA introduced Paper 4 on the Yellow Card application process and reminded the committee that it would be considering in particular the methodology of a study, if the study was an appropriate use of Yellow Card data, FOI/DPA implications and interaction with other data sources. Issues around patient communication and consent would be considered by a REC.

The committee asked whether a researcher should ever be put in direct contact with patients, or if communication should be done via a 3rd party as with GPRD studies. It was agreed the MHRA would consider this and there would be more discussion on the application process at the next meeting.

4.4 Requests for Yellow Card data received to date/pending applications

The MHRA introduced Paper 5 outlining the 8 applications received to date and examples of the review undertaken by the Interim Committee. The committee agreed to discuss pending applications in more detail at its next meeting.

5. NEXT STEPS

5.1 Outside Communications

It was agreed that once members had formally confirmed acceptance with NHS AC, the following would be placed on the MHRA website as they became available:

- Membership
- Terms of reference
- Summary minutes
- Meeting dates
- Application forms
- Details of appeal mechanism
- Links to Yellow Card and GPRD websites

The committee expressed the desire that a timeframe for the review of YC applications be put on the website once meeting dates were announced.

5.2 GPRD protocols awaiting review

Since SEAG stopped reviewing newly submitted protocols on 16th February, 4 protocols had been received by the GPRD Group and were ready for circulation to ISAC members for review. It was agreed that these protocols should be sent to members as a single batch.

In order to give members an insight into the sorts of issues commonly raised in connection with GPRD protocols, it was agreed that it would be appropriate for ISAC members to receive copies of the feedback to applicants for 4 protocols reviewed by SEAG and for which reviewer's comments were currently being collated.

It was also agreed that SEAG should be asked to review any protocol previously reviewed by this Group and for which revision/resubmission had been requested, where the revised protocol was received by the GPRD Group by 31st March 2006. ISAC would be responsible for reviewing revised protocols received after this date; since it is possible that the new committee may form an entirely different view of the protocol than that held by SEAG, this should be drawn to the attention of the applicant at the time of resubmission of the revised protocol.

6. ANY OTHER BUSINESS

6.1 Security of computers used by members for ISAC work

The committee asked about the standards of security expected for the computer systems used by members for receiving and storing protocols for review and for sending their comments on protocols to the Chair. This related in particular to the use of computers in members' homes and used for ISAC work.

The MHRA agreed to investigate this issue and report back to members at a future meeting

6.2 Date of next meeting

The next meeting would be held in May 2006, at which time procedural issues and applications for access to Yellow Card data would be considered. The next meeting after this will take place in July. Members' availability for possible dates will be established by e-mail in order to identify suitable dates.

6.3 Start time for future meetings

It was agreed that future meetings would start at 11am.

6.4 Provision of reviewers comments on GPRD protocols

It was confirmed that members should provide comments on GPRD protocols they had reviewed to the Chairman on the proforma discussed (tabled papers 2 & 3); a specific proforma bearing the protocol number and deadline for provision of comments to the chairman would be distributed alongside each protocol.

GPRD/VRMM
April 2006