

The National Bioethics Committee's Research Ethics Committee
(NBC-REC)

1. Research Ethics Committee (REC)

1.1 The Research Ethics Committee (REC) shall be review research on human subjects. The terms have been derived mainly from principles and generalised for application to both biomedical and social sciences research. A deliberate attempt has been made to avoid detail, as experience will determine the need for revision and elaboration.

2. Content

2.1 All research (medical or social science) projects involving human subjects, whether as individuals or communities, including surveys, drug/device trial, the use of foetal material, embryos and tissues from alive or the recently dead done with

- International Funding specifically given for research done anywhere in Pakistan e.g. Research Advocacy Fund (RAF), DFID, USAID etc
- Funded or supported by the Government of Pakistan
- Any other research either done all over Pakistan or is a multi province
- Drug trials for registration

shall be reviewed and approved by the NBC-REC before a study is started.

2.2 Any change in the study protocol (inclusion/exclusion criteria, change of PI or co PI number of subjects etc.) during at any stage of a study (before starting or during the study) must be informed and approved by NBC-REC to continue the study.

2.2 The duration of approval for a study shall be valid to a maximum period of one (1) year after which a re-approval is required. This will be standard for any study submitted irrespective of its duration whether one (1), five (5) or more years. Any change in conditions that could affect the rights/autonomy/welfare of subjects or serious adverse event during a study must be informed for approval to continue the study.

The Committee shall provide written guidelines on ethical considerations for research involving humans and review them every three years or earlier if required.

3. Method of Working

3.1 The Committee will need substantial administrative and secretarial assistance from the NBC (and PMRC).

3.2 The Committee shall report annually or more frequently, as necessary, to the NBC.

3.3 Authors of research proposals may be invited to attend meetings of the REC if found necessary by the REC members while reviewing their study.

- 3.4 Meetings will be conducted every three months (on the last Saturdays of March, June, September and December) or earlier especially if it can be combined with the NBC meeting. Some or all business may/will be conducted by email if for logistic reasons face to face meetings are not possible.
- 3.5 A minimum of 5 and a maximum of 11 individuals will constitute the NBC-REC
- 3.6 At least 3 members must be present to complete the quorum for meeting if the total number of members is 5 or at least one-third attendance.
- 3.7 Additional member may also be co-opted. These ideally should have some experience in reviewing research for ethical issues or have special expertise that might be required in specific protocols.
- 3.8 A potential list of members that may be co-opted needs to be maintained ideally from all regions of Pakistan and AJ&K.
- 3.9 Decisions will be made by consensus. If consensus is not reached, then the decision will be by voting and in minutes it will be mentioned that consensus was not reached.
- 3.10 In exceptional circumstance urgent/expedited review may be done by at least two or more members and the chairman for approval or disapproval. Such approvals shall be reported to the next meeting of REC. The response letter to the applicant should mention that the decision is through expedited review. (This would be in special circumstance and not for convince)
- 3.11 Studies that do not require direct human subject participants e.g. chart review, already collected data for routine public health reasons etc, case reports may be exempted for review. But these studies and NBC-REC exemption form would have to be submitted to the REC to issue an exemption certificate. Such exemptions shall be reported to the next meeting of REC.
- 3.12 The Committee may withdraw approval if dissatisfied with the conduct of the study.
- 3.13 Confidentiality of the Committee's proceedings should be preserved.
- 3.14 Members of the Committee should declare their conflict of interest, for example when testing the product of a company of which the member is an advisor.
- 3.15 Members should report incidence of misconduct or noncompliance of TOR by any member, promptly to the chair/ secretary.
- 3.16 The voluntary efforts (as member are not remunerated) and contribution to research of NBC-REC members is highly appreciated.

4 Submission

- 4.1 An application for ethical review should be accompanied by:
 - a. Covering letter

- b. Completed application form or exemption form available online at <http://nbcPakistan.org.pk/>
 - c. C.V of the Primary Investigator
 - d. Research Protocol
 - e. Budget to assess justification of funds
- 4.2 Research must only be performed by persons with scientific, clinical, or other relevant qualifications appropriate to the project and expected to have basic knowledge of the ethical standards applicable to the project. The same should be reflected in curriculum vitae attached.
- 4.3 Student's application must be submitted under the responsibility of a qualified supervisor involved in the oversight of the student's work, countersigning the submitted application for ethical review.

5. **Decision-Making**

In making decisions on applications for the ethical review of biomedical research, the committee will do the following:

- 5.1 Submission of study is acknowledged via email / letter and a number assigned.
- 5.2 The study proposal will be circulated to all members however if number of members are adequate or large numbers of protocols are received at one given time - two members will be assigned as primary reviewers.
- 5.3 REC review will be sent to PI within six weeks after submission. In exceptional circumstances expedited review will be done within 2 weeks. NBC-REC charges a fee which differs for multinational vs. national projects and for expedited vs regular review.
(Fee structure is available at http://nbcPakistan.org.pk/assets/guidelines_ethical.pdf)
- 5.4 Once the review by REC is sent to PI, it is expected that the PI must respond within 2-months, if no response from PI is received at the end of 2-months, a letter will be sent to PI stating *'that if in the next 1-month the PI does not respond the study will be considered to be abandoned by PI'* and will be marked as 'Null and Void' in the Submission Record.
- 5.5 A member should withdraw from the meeting for the decision procedure concerning an application if a conflict of interest arises; the conflict of interest should be indicated to the chairperson prior to the review of the application and recorded in the minutes.
- 5.5 Decisions should only be made at meetings where a quorum (See Point 3.4) is present if the meeting is being done face to face.
- 5.6 Method for arriving at a decision would be by consensus when possible. When a consensus appears unlikely, it is recommended that the REC to vote. However decision intimated to the applicant should mention that consensus was not achieved.
- 5.7 Non-binding advice may be appended to the decision.

5.8 In cases of conditional decisions, clear suggestions for revision and the procedure for having the application re-reviewed should be communicated to the applicant;

5.9 A negative decision on an application should be supported by clearly stated reasons.

6. Membership of REC:

6.1 Membership shall include both genders representing researchers, professionals from various disciplines and layperson.

6.2 The appointment of chair-by NBC

6.3 The minimum number of members will be 05, including the chair.

6.4 The duration of appointment shall be for three years and may be renewed for one more term. Any additional term renewal in special circumstances for any member will be in consultation with NBC members. At any given time only half members should retire so as to maintain continuity.

7. Cessation of Membership

7.1 NBC-REC may consider members for cessation of membership in any of the following circumstances:

- a. Members who are absent without prior intimation in three consecutive meetings.
- b. Members unable or unwilling to review 3 proposals consecutively. Members found not complying with the NBC-REC's TOR.

8. Documentation and Archiving

All documentation and communication of an NBC should be dated, filed, and archived according to written procedures. A statement is required defining the access and retrieval procedure (including authorized persons) for the various documents, files, and archives.

It is recommended that documents be archived for a minimum period of 3 years following the completion of a study. Documents that should be filed and archived include, but are not limited to,

- a. TORs, written standard operating procedures of the REC, and regular (annual) reports;
- b. The curriculum vitae of all REC members;
- c. A record of all income and expenses of the REC, including allowances and reimbursements made to the secretariat and REC members;
- d. The agenda of the REC meetings;
- e. The minutes of the REC meetings;
- f. One copy of all materials submitted by an applicant;
- g. The correspondence by REC members with applicants or concerned parties regarding application, decision, and follow-up;

- h. A copy of the decision and any advice or requirements sent to an applicant;
- i. All written documentation received during the follow-up;
- k) The notification of the completion, premature suspension, or premature termination of a study;
- l) The final summary or final report of the study

Sources:

- The terms of reference have taken into consideration recommendations of a sub-committee of the Bioethics Group of Aga Khan University and particularly the report of the Royal College of Physicians of London (1996) titled "Guidelines on the Practice of Ethics Committees in Medical Research Involving Human Subjects" and The Kidney Centre's Ethical Review committees documents.
- Extract from a paper on "Systems For Management Of Research" from Dr. Camer Vellani Dated: June 18, 1999; Edited: January 11, 2000
- TDR/PRD/ETHICS/2000.1: Operational Guidelines for Ethics Committees That Review Biomedical Research, World Health Organization Geneva 2000
Standards and Operational Guidance for Ethics Review of Health-Related Research with Human Participants WHO Library Cataloguing-in-Publication Data © World Health Organization 2011

Annexure I

NBC-REC guidelines on ethical considerations for research involving humans

The guidelines shall be based on but not restricted to the following principles that are extracted from *Standards and Operational Guidance for Ethics Review of Health-Related Research with Human Participants WHO Library Cataloguing-in-Publication Data © World Health Organization 2011* (http://www.who.int/about/licensing/copyright_form/en/index.html). The guidelines would consider:

- a. The appropriateness of the study design in relation to the objectives of the study, the statistical methodology (including sample size calculation), and the potential for reaching sound conclusions with the smallest number of research participants.
- b. Respect for an individual's capacity to make reasoned decisions, and protection of those whose capacity is impaired or who are in some way dependent or vulnerable.
- c. The risks of the proposed research compared to the expected benefits, the research design and competence of the investigators having been assessed.
- d. A proposal must state the purpose of the research; the reasons for using humans as the subjects; the nature and degree of all known risks to the subjects; and the measures for ensuring that all the ethical concerns are addressed, like protecting subjects from harm, maintaining their confidentiality, and respecting their rights and choices.

- e. The subjects of research should be clearly aware of the nature of the research and their role in it.
- f. Consent must be valid. The subjects must be sufficiently informed and have adequate time to decide without pressure. Consent must be obtained from the subjects or surrogates (if applicable) in writing. However studies may be considered for exemption for a written consent by the REC if the proposal is accompanied by an acceptable justification for not acquiring written consent.
- g. Subjects must be able to easily withdraw from a research protocol without giving reasons and without incurring any penalty or alteration in their relationship with providers of services.
- h. Further guidance should be obtained from publications, such as the World Medical Association Declaration of Helsinki: Recommendations Guiding Medical Doctors in Biomedical Research Involving Human Subjects (1989), consultation with experts and other sources, according to need.
- i. REC may ask for update on the progress of approved projects at any given time to ensure that subjects of research are protected from harm, their confidentiality is maintained, and their rights are respected. This period will vary from study to study depending on the risk involved for subjects and can be every three months or less for high risk studies, like drug trials.
- j. The PI will be responsible to submit the report to REC at the end of every year and at the conclusion of the study.