Purpose

To provide a brief overview of the amendment processes available to investigators involved with research approved by Bellberry.

Definitions

Amendment: An 'amendment' is any change to a research project or an approved document that occurs after a Bellberry HREC has approved it.

Substantial amendment: A 'substantial amendment' is a particular type of amendment, which is a change to the protocol or other factors that may affect:

- the aims and objectives of the study or the study design,
- participants' safety or physical or mental integrity,
- the scientific value of the study,
- the conduct or management of the study,
- the quality or safety of any investigational medicinal product used in the study.

A substantial amendment must be reviewed at a full HREC meeting. Other amendments may be reviewed out of session.

Guidance

The Bellberry HRECs are constituted as per the National Statement on Ethical Conduct in Human Research (2025), and relevant expertise is available to ensure all research is scientifically and ethically reviewed. Any amendment to the approved research study is required to be submitted to the reviewing HREC before implementation.

General requirements for studies after approval

An investigator planning to amend a Bellberry-approved research project, or an approved document must submit an amendment form via eProtocol or agreed platform for the HREC to review. It is recommended that the investigator/site reviews the submission responsibilities form (BA F1.1.1 Submissions Requirements Checklist) prior to completion of the amendment form. The Principal Investigator is responsible for ensuring they comply with any site-based governance requirements relating to amendments to their research.

All amendments, except for a change in site or site name, must be submitted via an amendment form in eProtocol or agreed platform. Amendments are categorised according to the extent and impact of any change or changes. Changes in site or site name must be submitted via a Batch Submission (refer to BA G8 Batch Submission Guidance).

The HREC will review the submitted amendment(s). Most amendments are reviewed out of session and do not require full HREC reviews. Examples of amendments that are reviewed out of session are:

- changes to the investigator(s) or study staff,
- changes to the participant information and consent form, protocol, Investigator's Brochure or study documents, site clause documents,
- new advertising material,
- administrative changes such as updating email addresses, CVs, HREC Indemnities,
- addition of a satellite study site,
- submission of new documents for review by the HREC.

For applications via eProtocol:

Post approval submission type	Multi-site studies – who submits?	Form type
General amendment • *change in personnel, sponsor, tax details.* • *temporary or permanent change in site PI.*	• Each site is responsible for updating their application form.	Amendment Question 1
Protocol amendment *In line with GCP, Principal Investigators must submit any study updates impacting participant safety without undue delay.*	• Any approved site can submit. • To be submitted once, on behalf of all. • If the protocol amendment requires updates to a PICF, they must be submitted together. • Where updates are required to the protocol, a DSUR may be submitted in the same amendment. For further information see QM G10 Safety Reporting Guidance.	Amendment Question 2
IB amendment *In line with GCP, Principal Investigators must submit any study updates impacting participant safety without undue delay.*	• Any approved site can submit. • To be submitted once, on behalf of all. • If the IB amendment requires updates to a PICF, they must be submitted together. • Where updates are required to an IB, a DSUR may be submitted in the same amendment. For further information see QM G10 Safety Reporting Guidance.	Amendment Question 3
PICF amendment *In line with GCP, Principal Investigators must submit any study updates impacting participant safety without undue delay.*	• Any approved site can submit. • To be submitted once, on behalf of all.	Amendment Question 4
Lifting of a caveat	• Any approved site can submit. • To be submitted once, on behalf of all.	Amendment Question 4

	• Please state in the amendment how the submission meets the requirements to lift the caveat and attach relevant documents.	
Sponsor termination or suspension of a study • *or any other unforeseen events or any other matters not covered elsewhere with material impact on the study*	• Any approved site can submit. • To be submitted once, on behalf of all.	Amendment Question 4
Safety reporting (see QM G10 Safety Reporting Guidance) • *DSUR/ASR* • *Significant Safety Issue.* • *Any other safety documentation.*	• Any approved site can submit. • To be submitted once, on behalf of all.	AER
Serious Breach (local) (see QM G11 Serious Breach Guidance)	• Submitted by site where event occurred.	PVR
Serious Breach (global issue) (see QM G11 Serious Breach Guidance)	• Any approved site can submit. • To be submitted once, on behalf of all.	PVR
Progress Report (see MAR G4 Progress and Final Report Guidance)	• Each PI responsible for submission of a progress report, relevant to their site. • If a site is due to submit a progress report (i.e., within 30 days of the progress report due date) and are also required to submit an amendment, please submit the PRE first, and contact Bellberry requested expedited review of the PRE.	PRE
Final Report (see MAR G4 Progress and Final Report Guidance)	• Each PI responsible for submission of a final report, relevant to their site.	FR

Substantial amendments

Some amendments involve a greater level of change to the approved study and potential increased risk. The HREC will determine whether additional review is required. Only the HREC can determine whether the change can be assessed as a substantial amendment or whether it is significant enough that it constitutes a different study and will require a new study submission. Where it is deemed a Substantial Amendment, the HREC may also request further documentation to support the review.

The PI will be notified if an amendment is deemed substantial via a comment in eProtocol. The Principal Investigator will then have two courses of action:

1) On advice that the Principal Investigator does not wish to proceed with the submission, the HREC will issue a letter withdrawing the amendment application. The initial project may continue, as only the amendment has been withdrawn.
2) If the Principal Investigator has acknowledged that the amendment is to proceed as a substantial amendment, they will be notified when it has been allocated to a HREC meeting for a full review.

Please note, the PI must confirm the chosen action via a response in eProtocol.

Following the HREC review, comments will be sent to the Principal Investigator via eProtocol by 5 p.m. (ACST) on the Friday after the meeting.

General guidance for full HREC review of substantial amendments

Bellberry HRECs meet each Wednesday evening. Our submission timelines are as follows:

- Once the Principal Investigator confirms their intent to proceed and the application is complete, the amendment will be considered for addition to the next available agenda. If confirmation is received prior to the submission cut off time (Wednesday 5pm) it will usually be reviewed at a HREC meeting on the Wednesday two weeks later. The review may be delayed if additional information or documents are required.
- An investigator can expect to receive comments detailing the HREC's deliberations 2 working days following the HREC meeting.
- All responses to the HREC's requests/comments are reviewed outside of the meetings and a response will be received generally within a week.
- This meeting date to substantial amendment application decision timeline is dependent on the complexity of the study update being reviewed and response time for an investigator to respond to the HREC's questions.
- Responses to the HREC's comments must be submitted within 6 months. If a response is unable to be provided within this timeframe, an extension must be requested via email including when responses may be expected and a brief explanation as to the reason/s for delay. Bellberry will respond

via email to inform if the extension has been granted and for what length of time. If the researcher does not respond and does not request an extension – either via email or within eProtocol, Bellberry will administratively withdraw the amendment.

Changing a Principal Investigator

Permanent change

The HREC requires an updated HREC Form of Indemnity, a full, unabbreviated CV current within the last 24 months (if not already provided to the HREC within the previous 24 months), and an amendment form in eProtocol advising of the change. The change to the Principal Investigator will need to be made in the Personnel Information section. Although not mandated, the HREC has provided templates if a site wishes to formalise the change (please see references).

Temporary change

The HREC requires an amendment to be submitted in eProtocol advising of the change. If the Principal Investigator continues to be responsible for the study and is to continue being listed on any approval letters during this period, the application generally does not need to be changed to the temporary Principal Investigator. However, the Principal Investigator and site should consider a range of factors, and these should be stated on the amendment, including the following but not limited to:

- the phase of the study, for example, if it is a phase I study and participants are being dosed in this period,
- if the study is on hold during this period,
- if the study is still recruiting participants,
- if no assessments of participants will occur during this period – e.g., the participants are in follow-up,
- how participants will be informed of this change.

If the temporary PI is to take over responsibility for the study and is to be listed on ay approval letters during this period, this must be stated on the amendment and the application updated. In this case, an updated HREC Indemnity will need to be provided prior to approval.

An Amendment will need to be submitted advising when the Principal Investigator is resuming responsibility for the study.

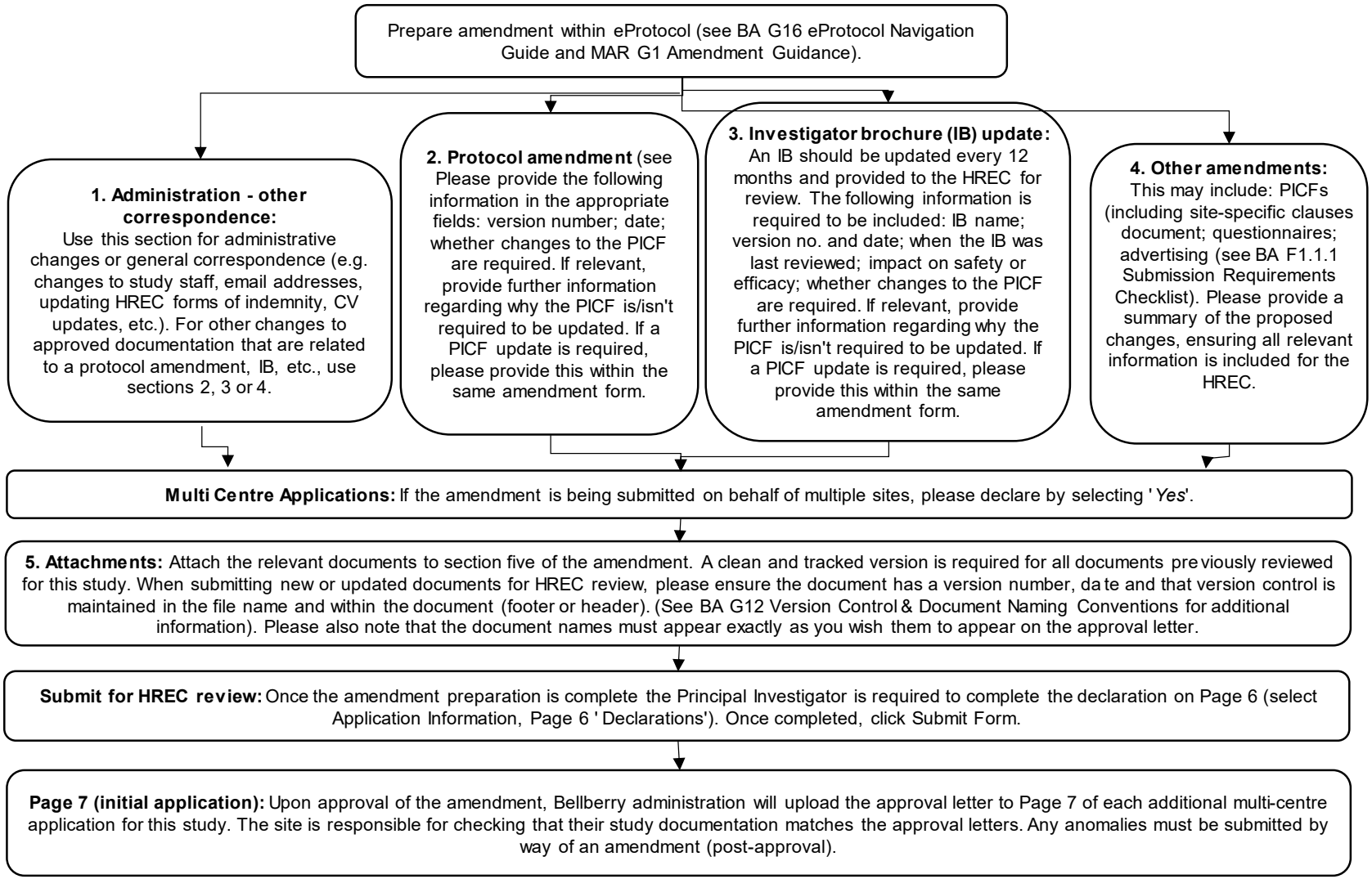
Approval letters

Once the amendment has been approved, an email notification will be sent to the Principal Investigator, registered personnel in the application and that of any additional sites included in the approval. A copy of the approval letter will be available in the eProtocol application. It will list the approved documents and approved site(s). Investigators should review the approval letter to ensure the updated documents are listed correctly and are approved at their site.

References

BA F1.1.1 Submission Requirements Checklist
BA F1.1.5 eProtocol Application Content
BA G8 Batch Submission Guidance
MAR F1.1.6 Change of Principal Investigator Form Template
MAR G4 Progress and Final Report Guidance
QM G10 Safety Reporting Guidance
QM G11 Serious Breach Guidance

Amendment Submission Process:



Amendment Review Process: