OVERSIGHT OF COMPETITIVE ENROLMENT IN CLINICAL TRIALS, JULY 2026, V 1.0

SAMA Research Ethics Committee

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1. PURPOSE

This SOP defines the procedures SAMAREC will follow to review, approve, monitor, and close-out clinical trials that use a competitive enrolment model. It ensures consistent application of South African regulatory requirements and international ethical guidelines.

2. SCOPE

This SOP applies to:

- All competitive enrolment clinical trial submissions to SAMAREC
- All Principal Investigators (PIs), sponsors, and study teams under SAMAREC oversight
- All SAMAREC reviewers, subcommittees, and administrative staff

3. DEFINITIONS

- **Competitive Enrolment:** A recruitment model where multiple sites compete to enrol participants until a global or regional target is reached, often resulting in rapid or abrupt closure of sites.
- **Recruitment Surge:** A period where participant interest or enrolment increases to a level that may challenge ethical or operational capacity.
- **Early Site Closure:** Cessation of recruitment due to global enrolment being met, not due to local decisions.

4. ROLES AND RESPONSIBILITIES

4.1. SAMAREC Chairperson/Vice-Chair

- Recommends active site audits
- Escalates compliance concerns to NHREC or SAHPRA where required

4.2. Primary Reviewer(s)

- Conducts detailed ethical assessment using the SAMAREC checklist (Addendum 1)
- Evaluates recruitment, consent, data integrity, and safety plans
- Recommends approval, provisional approval or rejection

4.3. SAMAREC Secretariat

- Ensures submissions are complete
- Tracks recruitment and quarterly reporting
- Coordinates audits, site visits, and communications with investigators

4.4. Investigators and Sponsors

- Maintain ethical recruitment and consent processes
- Submit quarterly recruitment and safety reports
- Report recruitment concerns or deviations immediately

5. PROCEDURE: SUBMISSION AND REVIEW

5.1. Pre-Submission Requirements

The Secretariat must verify that the following documents are included before the submission is routed to reviewers:

- Recruitment Risk Mitigation Plan
- Informed Consent Process Plan
- Staffing and Capacity Plan
- Data Integrity Safeguards
- Site Closure and Communication Plan
- Budget, with all per-patient payments and performance incentives disclosed
- PI and Sponsor declarations of conflicts of interest
- Community Engagement Plan
- POPIA compliance strategy

Submissions lacking these must be returned to investigators.

5.2. Ethics Review Procedure

Step 1: Administrative Screening

The Secretariat checks completeness based on the requirements above.

Step 2: Assignment of Primary Reviewer

The Chair assigns at least one clinician reviewer and one ethics (non-clinician) reviewer.

Step 3: Review Against SAMAREC Framework

Reviewers assess the protocol using the SAMAREC Competitive Enrolment Checklist, focusing on:

- Participant autonomy and consent
- Protection of vulnerable groups
- Staffing adequacy for high-speed recruitment
- Safety reporting capacity
- Financial incentives and conflicts of interest
- Equity considerations, fairness of recruitment, align to national diversity goals of site staff

Step 4: SAMAREC Meeting Deliberation

Key items requiring discussion:

- Risk of coercion
- Clarity of consent form regarding competitive enrolment
- Adequacy of site staff during recruitment surges
- Evidence of undue recruitment incentives
- Plans for abrupt site closure

Step 5: Decision

SAMAREC may decide:

- **Approved** (with or without conditions)
- **Provisional Approval (modifications required)**
- **Rejected** (ethical risk outweighs benefit)

Decision is documented in SAMEREC minutes and shared with the PI.

6. PROCEDURE: POST-APPROVAL MONITORING

6.1 Biannual Monitoring Reports

Investigators must submit biannual progress reports containing:

- Number screened, enrolled, and screen failures
- Demographic breakdown (sex, age, race, socioeconomic markers where applicable)
- Reasons for exclusion
- AE/SAE logs and reporting timelines
- Deviations linked to recruitment pressure
- Any complaints or community concerns

The Secretariat logs reports; reviewers evaluate trends.

6.2 Active Site Audit

An active audit may occur if any of the following arise:

- Enrolment rate > 150% of projection
- Screen-failure rate < normal benchmarks
- AE reporting delays
- Community complaints
- Internal whistleblowing
- Any sign of protocol deviation linked to recruitment pressure

Audits may be:

- **Announced** (routine or triggered)
- **Unannounced** (risk-driven)

Audit scope includes:

- Consent documentation
- Eligibility verification
- Data quality and safety files
- Staffing adequacy
- Recruitment practices
- Conflict-of-interest compliance

Audit outcomes are communicated formally, with timelines for corrective action.

6.3 Consent Process Audits

SAMAREC may request:

- Random sampling of consent forms
- Assessment of timing, completeness, and comprehension
- PI explanation of consent procedures during high-volume periods

Findings feed into risk classification (low, medium, high).

7. PROCEDURE: EARLY SITE CLOSURE OVERSIGHT

Step 1: PI Notification

PI must notify SAMAREC within 72 hours of early closure.

Step 2: Participant Protection

The PI must demonstrate:

- Continued follow-up for all enrolled participants
- Proper communication to community and stakeholders
- Clarified responsibilities for AE reporting post-closure

Step 3: Data Close-Out Review

SAMAREC may require:

- Review of early-closure data quality
- Verification of participant continuity
- Safety event reconciliation

8. NON-COMPLIANCE PROCEDURES

If ethical risks or violations are identified:

8.1 Minor Non-Compliance

- Written feedback and training required
- Corrective Action Plan (CAP) due within 14 days

8.2 Major Non-Compliance

May result in:

- Suspension of recruitment
- Mandated retraining
- Directed monitoring
- Reporting to NHREC or SAHPRA

8.3 Severe Breaches

Examples: falsified consent, coerced recruitment, falsified eligibility. Actions may include:

- Termination of SAMAREC approval
- Institutional notification
- Regulatory reporting
- Investigator sanctions

9. RECORD KEEPING

SAMAREC must maintain:

- All competitive enrolment submissions
- Minutes of discussions and decisions
- Quarterly reports
- Audit findings
- Corrective action documentation

Records must comply with POPIA and institutional retention policies.

10. REVIEW AND REVISION OF SOP

This SOP will be reviewed every **two years**, or earlier if:

- National regulations change, NHREC standards evolve
- New ethical risks emerge

ADDENDUM 1: SAMAREC REVIEWER CHECKLIST

1.1 Scientific & Ethical Justification

1. Is the study scientifically valid and socially valuable for the South African context?
2. Is competitive enrolment justified by the study design or condition?

1.2 Major Participant Protection Issues

3. Are major risks clearly described and adequately mitigated?
4. Is safety monitoring adequate for high-speed recruitment?
5. Are follow-up and care guaranteed even if the site closes early?

1.3 Competitive Enrolment–Specific Ethics Risks

6. Is there a plan to prevent undue pressure or coercive recruitment under time pressure?
7. Does the site have sufficient staff to maintain ethical recruitment pace?
8. Are eligibility assessments protected against “rushed” screening?
9. Is there a clear plan for abrupt early site closure?

1.4 Consent Requirements

10. Does the consent form clearly state that enrolment is competitive and may close prematurely?
11. Does the consent process ensure voluntariness despite recruitment urgency?

1.5 Fairness & Equity

12. Does the recruitment plan avoid unfair exclusion of slower-to-reach groups?
13. Are materials available in appropriate languages for the study population?

1.6 Data Protection (POPIA)

14. Is there a POPIA-compliant data governance plan suitable for rapid data flow?

1.7 Sponsorship & Financial Ethics

15. Are per-participant payments or performance incentives ethically acceptable (no undue pressure)?

ADDENDUM 2: CLIENT BRIEFING

SAMAREC INDUSTRY CHECKLIST (FOR SPONSORS & CROs)

Competitive Enrolment Clinical Trials – Submission Readiness Checklist

Purpose: To ensure sponsors submit competitive-enrolment trials that fully meet SAMAREC's ethical expectations and South African regulations.

2.1 Scientific Justification

- Have you clearly justified *why* competitive enrolment is needed for this study (e.g., global recruitment strategy, rare disease, methodological need)?
- Have you demonstrated the study's scientific and social value in the South African context?

2.2 Participant Protection Measures

- Have you identified all participant risks and outlined mitigation strategies suitable for fast-paced enrolment?
- Have you ensured that participant follow-up will continue uninterrupted if the site closes early?

2.3 Managing Recruitment Pressure

- Have you provided a detailed plan describing how the site will prevent undue influence, coercion, or rushed decision-making?
- Are eligibility assessments protected from shortcuts or recruitment pressure?

2.4 Informed Consent Requirements

Does the consent form explicitly state:

- that enrolment is competitive;
- that recruitment may close abruptly;
- that expressing interest does *not* guarantee participation?

Have you described how the consent process will ensure voluntariness despite urgency?

2.5 Equity & Community Considerations

- Does your recruitment plan avoid unfair exclusion of slower-to-reach groups (e.g., rural patients, low-literacy individuals, older adults)?
- Have you provided a community engagement plan aligned with NDoH 2024 expectations, including explanation of competitive enrolment to communities?

2.6 Data Protection (POPIA)

- Have you submitted a POPIA-compliant data governance plan suitable for high-volume or accelerated screening and data entry?

2.7 Site Staffing & Capacity

Have you demonstrated adequate staffing to maintain ethical and protocol-compliant recruitment at high speed, including:

- trained consent staff
- clinician oversight
- safety monitoring capacity
- data entry/quality assurance support?

2.8 Financial & Contractual Ethics

- Have all per-participant payments been disclosed?
- Have you confirmed that no payment structures create incentives for unethical recruitment speed or volume?
- Are indemnities, responsibilities, and monitoring obligations clearly assigned?

2.9 Early Site Closure Plan

Have you included a detailed early-closure plan covering:

- participant communication
- community communication
- follow-up continuity
- data handling
- roles and responsibilities?

2.10 Final Sponsor Self-Assessment

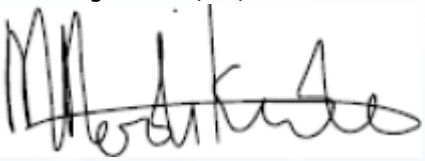
- Have you confirmed that all required documents per NDoH 2024 and SAMAREC SOP are included (e.g., community engagement plan, data governance plan, risk-mitigation plan, staffing plan)?
- Are you confident that your submission clearly demonstrates participant protection even under competitive-enrolment pressure?

Approved by:

Nasheen Naidoo

Name Of SAMAREC Chairperson:

Date Signed: 14/06/2026



Name of SAMA CEO:

Date Signed: 26 June 2026