Access to Anonymised Patient Level Data: Experience from GSK

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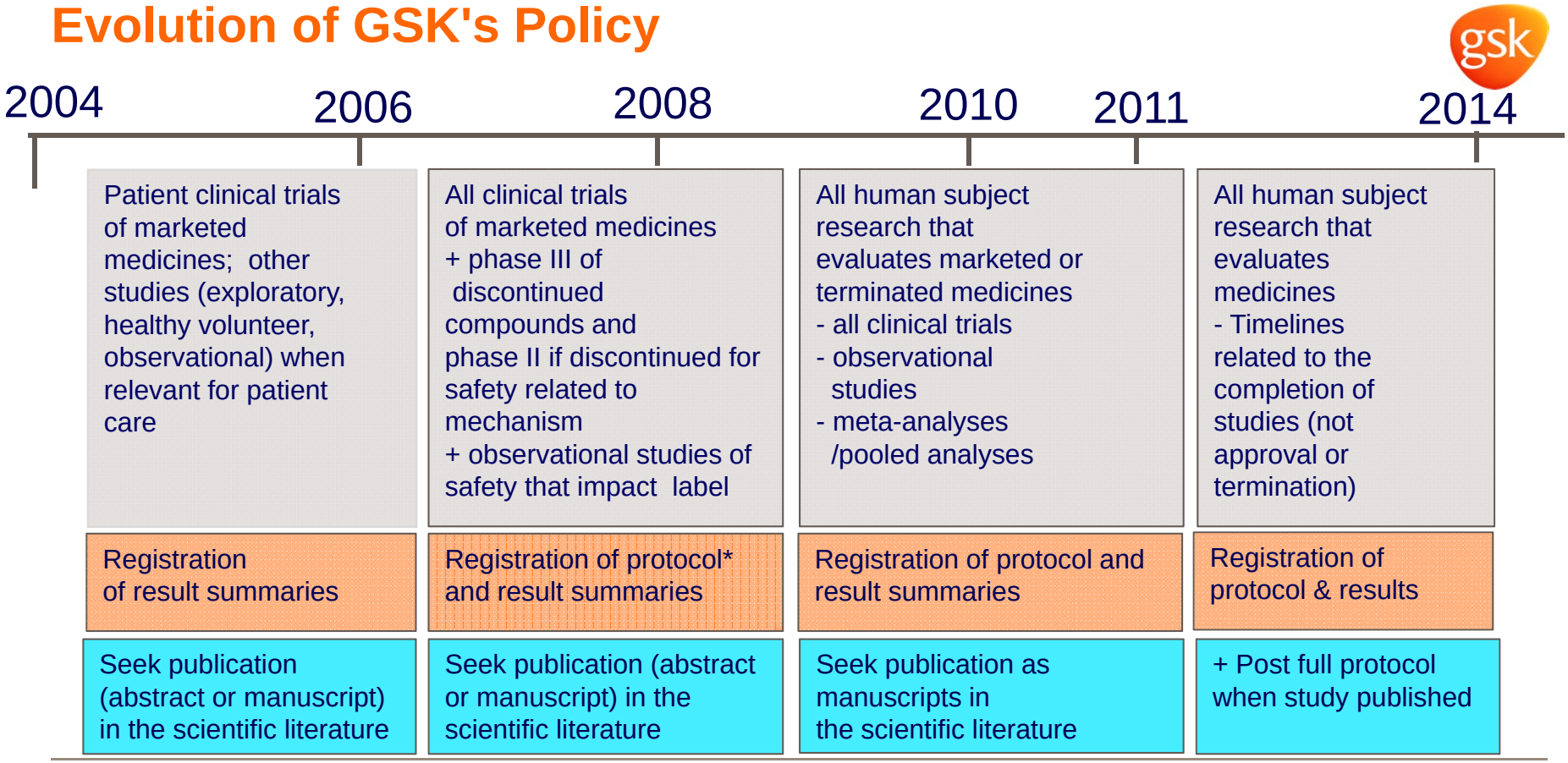
1. Why is GSK Making Clinical Trial Data Available?

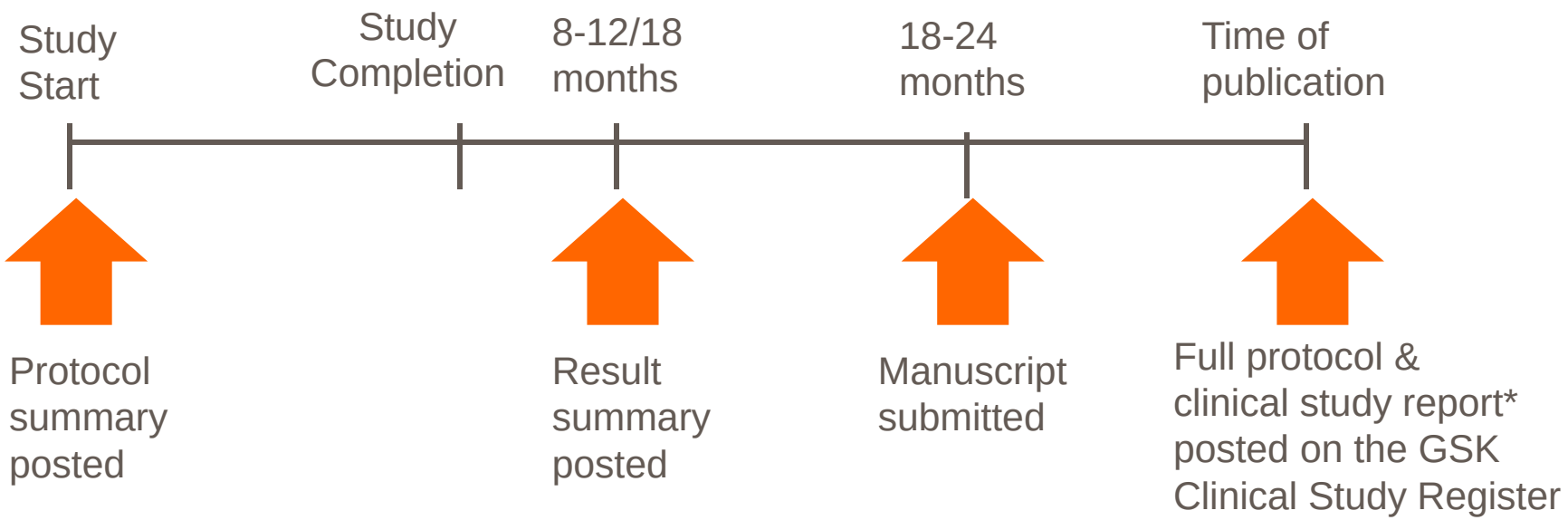
Evolution of GSK's Policy



*All patient clinical trials expanded to all clinical trials in June 2006

Public Disclosure of Clinical Trial Information

All human subject research studies that evaluate investigational or approved medicinal products (phase I-IV, meta-analyses, observational studies)



* CSR posted after approval or termination of the medicine

So Why are We Doing More?

Result summaries and publications have limitations

- Summarise data from the study population with statistics to compare treatment groups.
- Do not include the data from each research participant.

Primary Efficacy Results: Total Population			
Emetic Episodes Day 1 To Day 5	Dose 1	Dose 2	Dose 3
Complete (0 Episodes)	7 (19)	8 (22)	10 (31)
Major (1-2 Episodes)	10 (28)	14 (39)	10 (31)
Minor (3-5 Episodes)	0	1 (3)	0
Failure (>5 Episodes/Rescued)	19 (53)	13 (36)	12 (38)
Dose 2 vs Dose 1	0.848		

Access to Patient Level Data to Examine the Data More Closely or to Combine Data in Meta-analyses

	STUDYID	INVID	CENTREID	USUBJID	SUBJID	AGE	SEX	RACECD	RACE	TRTCD	TRTGRP	ATRTCD	ATRTGRP	VISITNUM	VISIT	AVI
2	AVA10564	2203	38220	AVA10564	2141	75	M	19	White - W	3	8mg RSG X	3	8mg RSG X	30	BASELINE	
3	AVA10564	2203	38220	AVA10564	2141	75	M	19	White - W	3	8mg RSG X	3	8mg RSG X	60	WEEK 12	
4	AVA10564	2203	38220	AVA10564	2141	75	M	19	White - W	3	8mg RSG X	3	8mg RSG X	80	WEEK 24	
5	AVA10564	2203	38220	AVA10564	2142	80	F	19	White - W	3	8mg RSG X	3	8mg RSG X	30	BASELINE	
6	AVA10564	2203	38220	AVA10564	2142	80	F	19	White - W	3	8mg RSG X	3	8mg RSG X	60	WEEK 12	
7	AVA10564	2203	38220	AVA10564	2142	80	F	19	White - W	3	8mg RSG X	3	8mg RSG X	80	WEEK 24	
8	AVA10564	2203	38220	AVA10564	2143	78	F	19	White - W	3	8mg RSG X	3	8mg RSG X	30	BASELINE	
9	AVA10564	2203	38220	AVA10564	2143	78	F	19	White - W	3	8mg RSG X	3	8mg RSG X	60	WEEK 12	
10	AVA10564	2203	38220	AVA10564	2143	78	F	19	White - W	3	8mg RSG X	3	8mg RSG X	80	WEEK 24	
11	AVA10564	2203	38220	AVA10564	2146	70	F	19	White - W	4	Donepezil	4	Donepezil	30	BASELINE	
12	AVA10564	2203	38220	AVA10564	2146	70	F	19	White - W	4	Donepezil	4	Donepezil	60	WEEK 12	
13	AVA10564	2203	38220	AVA10564	2146	70	F	19	White - W	4	Donepezil	4	Donepezil	80	WEEK 24	
14	AVA10564	2203	38220	AVA10564	2147	70	M	19	White - W	1	Placebo	1	Placebo	30	BASELINE	
15	AVA10564	2203	38220	AVA10564	2147	70	M	19	White - W	1	Placebo	1	Placebo	60	WEEK 12	
16	AVA10564	2203	38220	AVA10564	2147	70	M	19	White - W	1	Placebo	1	Placebo	80	WEEK 24	
17	AVA10564	2203	38220	AVA10564	2148	68	M	19	White - W	4	Donepezil	4	Donepezil	30	BASELINE	
18	AVA10564	2203	38220	AVA10564	2148	68	M	19	White - W	4	Donepezil	4	Donepezil	60	WEEK 12	
19	AVA10564	2203	38220	AVA10564	2148	68	M	19	White - W	4	Donepezil	4	Donepezil	80	WEEK 24	
20	AVA10564	2203	38220	AVA10564	2149	77	F	19	White - W	3	8mg RSG X	3	8mg RSG X	30	BASELINE	
21	AVA10564	2203	38220	AVA10564	2149	77	F	19	White - W	3	8mg RSG X	3	8mg RSG X	60	WEEK 12	

Benefits

- Enables further research to benefit medical research and patient care.
- Enables the review of results from individual clinical trials to validate the results.
- Helps avoid duplication of research, unnecessarily enrolling patients into clinical trials and exposing them to risks.
- Strengthens trust in clinical research through enhanced openness and transparency.

Main Issues

- Protecting the privacy and confidentiality of research participants.
- Ensuring the data are used for valid scientific investigation.
- Practicalities of anonymising data and providing data in ways that enable external researchers to understand and navigate the information.

2. The Clinical Study Data Request System

Our Vision

The aim is to help realise a broad, independent solution to allow access to data from clinical trials conducted by multiple companies and organisations.

GSK took a first step in 2013

– In May 2013, GSK launched a system to provide greater access to anonymised patient level data from our clinical trials.

The NEW ENGLAND JOURNAL of MEDICINE

SPECIAL REPORT

Access to Patient-Level Data from GlaxoSmithKline Clinical Trials

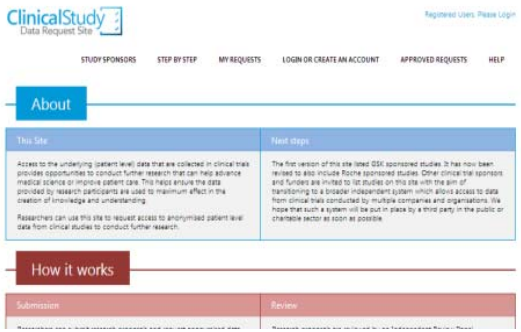
Perry Nisen, M.D., Ph.D., and Frank Rockhold, Ph.D.

N ENGL J MED 369;5 NEJM.ORG AUGUST 1, 2013

The Clinical Study Data Request System

- In Jan 2014, a new multi-sponsor request site launched: www.clinicalstudydatarequest.com.
- Three components:

1 Multi-sponsor **request site**



2 Independent review panel

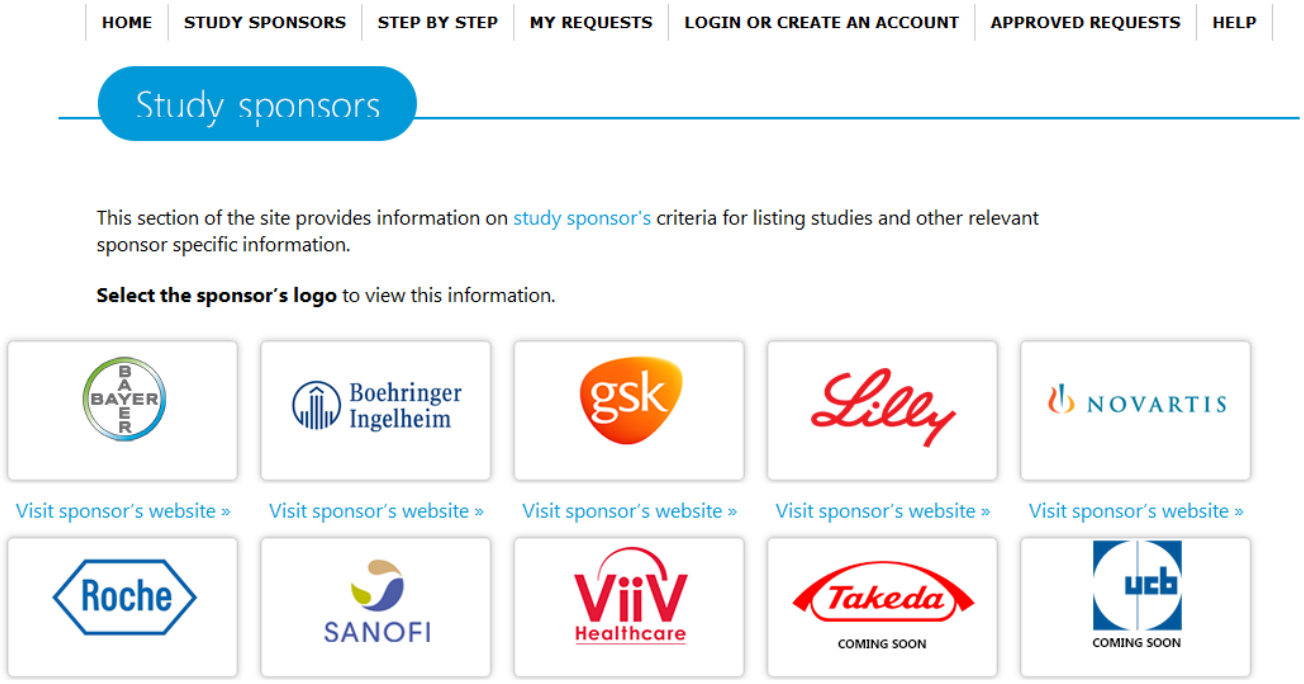
3 Secure access system

Benefits of a common system

- Advantages for researchers and the panel: requests for data from multiple sponsors require one proposal, one review and one set of communications.

- Cost effective:
  - Request site developed (it works and is used).
  - Panel member agreements and panel charter developed.
  - Work flows and communications developed for administration system.
  - Multi-sponsor data access system developed by SAS.

Study sponsors



GSK's commitment

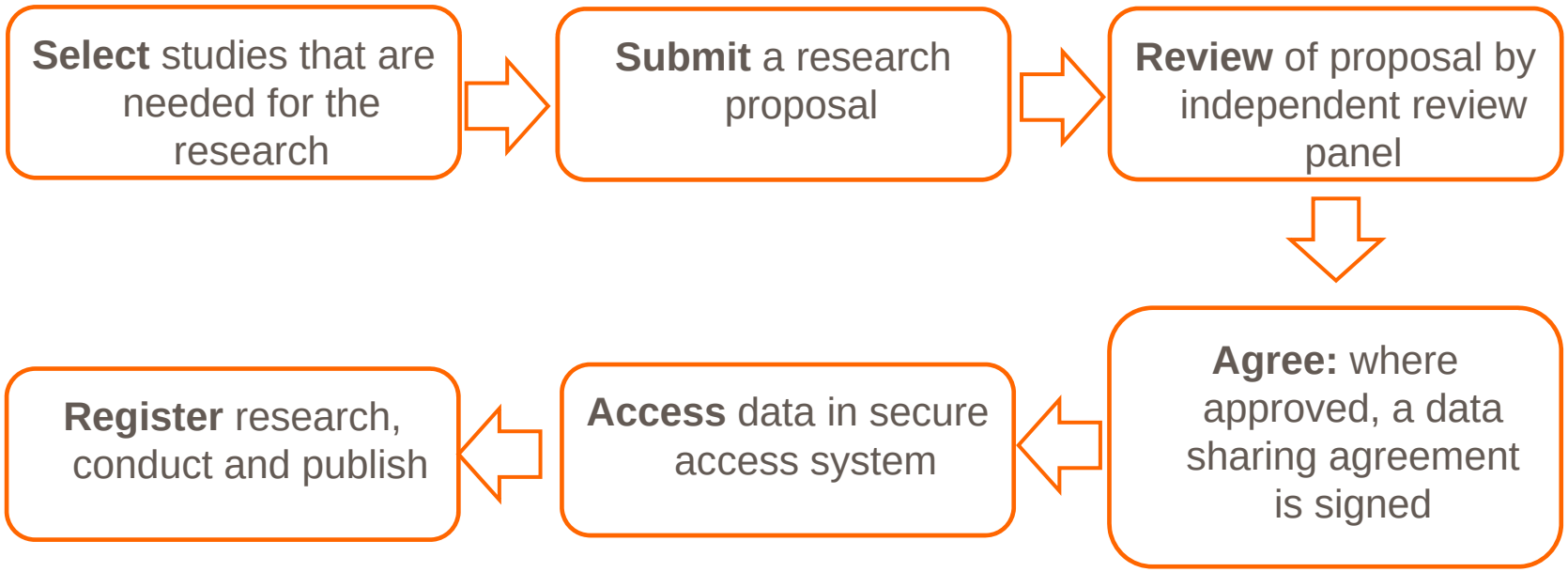
- All interventional trials started from January 1 2013.
- Trials are listed after the primary manuscript has been accepted for publication AND the medicines has been approved / terminated.
- Goal: All interventional trials that were ongoing or started after the formation of GSK in 2001. This listing of 2000+ trials will complete in 2015
- Currently over 950 GSK trials are listed for request.
- Researchers can enquire about the availability of data from other non-listed studies.

What information do we make available?

The following anonymised data and documents (with personally identifiable information redacted) are made accessible in the secure system:

- Raw dataset
- Analysis-ready dataset
- Protocols with any amendments
- Annotated case report form
- Reporting and analysis plan
- Dataset specification
- Redacted Clinical Study Report including modular appendices
  (potentially identifiable information, including patient level data and patient narratives are removed)

How it works for the researcher



The Clinical Study Data Request System One Year on...

The NEW ENGLAND JOURNAL of MEDICINE

Perspective

Data Sharing, Year 1 — Access to Data from Industry-Sponsored Clinical Trials

Brian L. Strom, M.D., M.P.H., Marc Buyse, Sc.D., John Hughes, B.Sc., and Bartha M. Knoppers, Ph.D.

October 15, 2014DOI: 10.1056/NEJMp1411794

Strom BL et al. N Engl J Med 2014. DOI: 10.1056/NEJMp1411794

Experience with the Open-Access Clinical Trial System, May 7, 2013, through May 31, 2014.*

Part of the Process	No. of Proposals
Submission	58
Requirements check	
In process	4
Withdrawn by the requestor	2
Did not meet requirements or further details were required	7
Met requirements	45
Review by independent review panel	
In process	6
Rejected or advised to resubmit	3
Approved or approved with conditions	36
Data-sharing agreement	
In process	12
Withdrawn by the requestor	1
Agreed and signed	23
Data preparation	
In process	10
Complete, with data available	13
Research project in process	13

* A total of 4 of the 37 proposals submitted since January 2014 have included requests for data from multiple sponsors. The requirements check is the check done by the sponsor of the study whose data are being requested to make sure the information is complete and that the proposal meets the requirements of this initiative and the sponsor's requirements for informed consent. Proposals are then sent to the independent review panel.

3. Activity & next steps

Metrics (for www.clinicalstudydatarequest.com)

- A summary of the number of research proposals and enquiries that have been submitted is available on the site (see ‘Approved Requests’).
- Between 7 May 2013 to 31 May 2014:
  - **36** proposals approved or approved with conditions by the panel.
  - **3** requests declined, with advice to resubmit with more information.
  - In addition, enquiries for over **100** studies not yet listed on the site. Over **75%** have received a positive response . Researchers can now include these studies as part of a research proposal submitted to the panel.
- Detail on each proposal available after the data agreement is signed.

Next steps

1. We hope that other industry and academic sponsors will join.

2. The Wellcome Trust is in advanced discussions about the possibility of running the Independent Review Panel for the system. They hope to make a further announcement about their role by the end of the year.

3. We are surveying researchers accessing GSK data to understand their experience of the access system and to inform future improvements.

Thank You