HREC Standard Operating Procedure (1)

1. Purpose

This document provides standard operating procedures for the Vial Australia Human Research Ethics Committee (Vial Australia HREC) in reviewing applications for human research. It ensures that Vial Australia HREC operates in accordance with the National Statement on Ethical Conduct in Human Research (2025) incorporating all updates by the National Health and Medical Research Council, Australian Research Council and Universities Australia.

2. Scope of Review

Vial Australia HREC will exclusively review submissions from Vial Australia Pty Ltd (a subsidiary of VIAL). As part of its operational policy, Vial Australia HREC will not accept or review submissions from external organisations or entities outside of Vial Australia Pty Ltd. This ensures that all research and safety evaluations under consideration are aligned with the specific focus and objectives of Vial Australia's initiatives.

All submissions made to Vial Australia HREC must adhere to the defined guidelines and formats as outlined in this SOP. Any deviations will result in the submission being returned without review. External inquiries for submission will not be considered.

Vial Australia HREC does not grant retrospective ethics approval. Researchers must ensure that commencement dates and timelines are correct prior to submitting proposals for review. A judgement that a human research proposal meets the requirements of the National Statement and is ethically acceptable must be made before research can begin and before full funding for the proposal is released.

3. Abbreviations and Definitions

3.1 Acronyms

Acronym	Definition
HREC	Human Research Ethics Committee
NHMRC	National Health and Medical Research Council

AHEC	Australian Health Ethics Committee
PI	Principal Investigator
SSI	Significant Safety Issue
RGO	Research Governance Office
ERMS	Ethical Review Management System
CTN	Clinical Trial Notification
CTX	Clinical Trial Exemption
PICF	Participant Information and Consent Form
GCP	Good Clinical Practice
DSUR	Development Safety Update Report
GMO	Genetically Modified Organism

3.2 Definitions

Term	Definition
Adverse Event	A pharmaceutical adverse event is any undesirable or unintended effect experienced by a subject after taking a medication, regardless of whether the drug is considered the direct cause. Adverse events can range from mild reactions, such as headaches or nausea, to more severe outcomes like organ damage, life-threatening conditions, or death.
Clinical Trial	Any investigation in human subjects intended to discover or verify clinical, pharmacological, and/or other pharmacodynamic effects of an investigational product(s), and/or to study absorption, distribution, metabolism, and excretion of an investigational product(s) with the object of ascertaining its safety and/or efficacy.
Ethical Review Management System	The ERMS website is used for applications and reports to Vial Australia HREC.
Investigator's Brochure	Compilation of clinical and non-clinical data on the investigational product(s) relevant to the study of investigational product(s) and human subjects.
Multi-centre Research	Research that is conducted at more than one site.
National Statement	The National Statement on Ethical Conduct in Human Research (2025).

Principal Investigator	The individual who takes overall responsibility for the research project and submits the project for ethical and scientific review.
Research Protocol	A document that details the objectives, design methodologies, statistical considerations and organisation of the research project.
Risk	A potential for harm or discomfort. It involves the likelihood that a harm or discomfort will occur, and the severity or magnitude of the harm or discomfort, including their consequences. Risk can apply to an individual research participant, groups, communities as well as to non-participants such as family members. Risk can be associated with the conduct of research or the proposed outcomes of the research (National Statement Chapter 2.1).
Safety Review Committee	An independent data monitoring committee that may be established by the sponsor to assess at intervals the progress of a clinical trial, the safety data, and the critical efficacy points, and to recommend to the sponsor whether to continue, modify, or stop a clinical trial.
Serious Adverse Event	Any adverse medical occurrence that: led to a death; led to a serious deterioration in health of a patient, user or other; a life-threatening illness or injury; a permanent impairment of body function or permanent damage to body structure; a condition requiring hospitalisation or increased length of existing hospitalisation; condition requiring unnecessary medical or surgical intervention; fetal distress, fetal death or congenital abnormality/birth defect; might have led to death or a serious deterioration in health had suitable action or intervention not taken place; malfunction of a device such that it has to be modified or temporarily/permanently taken out of service; a factor (deterioration in characteristics or performance) found on examination of the device.
Sponsor	The company, institution or organisation, body or individual that takes overall responsibility for the conduct of the trial and usually initiates, organises and supports the clinical trial.
Therapeutic Good	Defined as a good which is represented in any way to be, or is likely to be taken to be, for therapeutic uses (unless specifically excluded or included under Section 7 of the Therapeutic Goods Act 1989). Therapeutic means a product for use in humans in connection with: preventing, diagnosing, curing or alleviating a disease, defect or injury; influencing, inhibiting or modifying a physiological process; testing the susceptibility of persons to a disease or ailment; influencing, controlling or preventing conception; testing for pregnancy; used as an ingredient or component in the manufacture of therapeutic goods; replacement or modification of parts of the anatomy.

4. Relevant Legislation and Guidelines

Applicants should have read, and be familiar with, the following documentation and ensure that applications are consistent with:

- National Statement on Ethical Conduct in Human Research (2025)
- Australian Code for the Responsible Conduct of Research (2018)
- The Commonwealth Privacy Act 1988
- NHMRC Guidelines Under Sections 95 and 95A of the Privacy Act 1988

5. Risk Assessment of Research

5.1 Shared Responsibility Framework

In accordance with Chapter 2.1 and Section 5 of the National Statement on Ethical Conduct in Human Research (2025), the assessment of risk in human research is a shared responsibility:

- The researcher is responsible for conducting an initial risk assessment and indicating the proposed level of review.
- The institution, in this case, VIAL or any of its subsidiaries, including Vial Australia Pty Ltd, is responsible for determining whether a research project requires full HREC review or may proceed via a lower risk review pathway. Organisational risk assessment is conducted independently of and prior to HREC ethical review.
- The reviewing body, Vial Australia HREC, affirms or questions this risk classification and may refer the project for full HREC review or delegate to the Executive Committee depending on the assessed risk.

Vial Australia HREC will consider both the researcher's justification and the institutional classification when confirming the level of ethical review. Where the risk assessment is not aligned with the National Statement or raises concerns, Vial Australia HREC reserves the right to reclassify the review pathway accordingly.

5.2 Risk Profile Framework

Risk in human research exists on a continuum. In accordance with Chapter 2.1 of the National Statement on Ethical Conduct in Human Research (2025), the assessment of risk should consider both the likelihood that harm will occur and the severity of any harm, including its consequences.

The National Statement distinguishes between two broad categories of risk:

Risk Category	Description
Lower Risk	Research in which there is no foreseeable risk of harm to participants or others. Lower risk research may range from minimal risk (no risk of harm

	or discomfort, but potential for minor burden or inconvenience) to low risk (no risk of harm, but risk of discomfort and potential burden).
Higher Risk	Research in which the risk for participants or others is greater than discomfort. Higher risk research carries risk of harm and requires review by a Human Research Ethics Committee.

Key distinctions:

- Harm refers to physical, psychological, social, economic, or legal harm that may occur as a result of participation in research.
- Discomfort includes minor side-effects, anxiety, embarrassment, or temporary pain that does not have lasting consequences.
- Burden and inconvenience (such as time given up and travel costs) are not considered types of harm or discomfort, and therefore are not viewed as risk. However, the impact of any burden or inconvenience on participants should be considered and balanced against the potential benefits of the research.

5.3 Research Requiring Full HREC Review

5.3.1 Higher Risk Research

Research in which the risk for participants or others is greater than discomfort is considered higher risk research and requires full ethics review by Vial Australia HREC. This includes research where there is a foreseeable risk of harm to participants, whether physical, psychological, social, economic, or legal.

5.3.2 Research Types Requiring Full HREC Review

Full ethics review by Vial Australia HREC is required for the following types of research, as identified by the relevant sections and chapters of the National Statement (2025):

Consent and Deception:

- Section 2.3.4: Research that involves active concealment or planned deception, or aims to expose illegal activity.
- Section 2.3.9: Research proposals requesting a waiver of consent involving personal information in medical research or personal health information.

Data, Biospecimens and Genetic Research:

- Chapter 3.1: Research involving identifiable data where specific consent considerations apply.
- Chapter 3.2: Collection of human biospecimens for research purposes, including biobanks (refer to National Statement for full details regarding

prospective collection, use of stored specimens, and related consent requirements).
- Chapter 3.3: Genomic research, except where information used cannot identify an individual and no linkage of data is planned, which may be determined to carry lower risk.
- Chapter 3.4: Animal-to-human xenotransplantation.

5.3.3 Research Involving Participants Who May Experience Increased Risk

The National Statement (2025) requires researchers and reviewers to consider potential sources of increased risk arising from the characteristics and circumstances of individual participants when viewed in the context of a specific research project.

Important: Increased risk is not an automatic consequence of a participant belonging to a particular group. Rather, it is a matter of degree that exists on a spectrum and may arise from multiple sources. Increased risk may also vary over time as a participant's circumstances change and/or a research project progresses.

Research involving the following participant groups or contexts does not automatically require full HREC review. The appropriate level of review should be determined based on an assessment of the actual risks presented by the specific research proposal:

- Chapter 4.2: Pregnancy, the human fetus and human fetal tissue
- Chapter 4.3: Children and young people
- Chapter 4.4: People in dependent or unequal relationships
- Chapter 4.5: People experiencing physical or mental ill-health or disability
- Chapter 4.6: Research conducted in other countries
- Chapter 4.7: Research with Aboriginal and Torres Strait Islander people and communities
- Chapter 4.8: Research conducted during natural disasters, public health emergencies or other crises

However, where the involvement of these participants or contexts elevates the risk profile of the research to higher than low risk (i.e., where there is foreseeable risk of harm), the research must be reviewed by the full Vial Australia HREC.

5.3.4 Determining the Appropriate Level of Review

When assessing whether research requires full HREC review, Vial Australia HREC will consider:

1. The nature of the research activities and their potential to cause harm
2. The characteristics and circumstances of the participants in the context of the specific research
3. The research context, including setting, methodology, and any power imbalances
4. The adequacy of proposed safeguards and risk mitigation strategies
5. The researcher's justification for the proposed level of review

Where there is any uncertainty about the appropriate level of review, the research should be referred to the full Vial Australia HREC for consideration.

5.4 Lower Risk Review Pathway

5.4.1 Definition of Lower Risk Research

Lower risk research describes research in which there is no foreseeable risk of harm to participants or others. This includes:

- Minimal risk research: Research in which there is no risk of harm or discomfort, but which includes potential for minor burden or inconvenience.
- Low risk research**:** Research in which there is no risk of harm, but in which there is a risk of discomfort, and in which there may also be a foreseeable burden.

5.4.2 Review Pathways for Lower Risk Research

Lower risk research may be reviewed through one of the following pathways, as appropriate to the assessed level of risk:

(a) Delegated Review by the Vial Australia HREC Executive Committee

Research classified as low risk may be reviewed by the Vial Australia HREC Executive Committee under delegated authority from the full Committee. The responsibility for reviewing lower risk research has been delegated to the Committee Chair, who may consult with other Executive Committee members as appropriate.

(b) Exemption from Ethics Review

Only certain categories of lower risk research may be eligible for exemption from ethics review. In accordance with Section 5.1.17 of the National Statement (2025), research may be eligible for exemption if it carries lower risk to participants or the community and satisfies one or more of the following conditions:

(i) The research involves the use of collections of information or data from which all personal identifiers have been removed prior to being received by the researchers, and researchers explicitly agree:

- not to attempt to re-identify those with whom the information or data is associated;
- to take all reasonable steps to prevent re-identification for unauthorised purposes or access by those who are not authorised; and
- that any sharing of research data during or after the project will not create additional risks of re-identification.

(ii) The research is restricted to surveys and observation of public behaviour using information that was or will be collected and recorded without personal identifiers, and is highly unlikely to cause distress to anyone associated with the information or the outcomes of the research.

(iii) The research is conducted as part of an educational training

program in which the research activity is for training purposes only and where any outcomes or documentation are for program use only.

(iv) The research uses only information that is publicly available through a mechanism set out by legislation or regulation and that is protected by law.

Important: Research that involves the use of data that includes personal information without consent cannot be granted an exemption from ethics review.

5.4.3 Researcher Responsibilities

Researchers are required to:

1. Conduct an initial risk assessment when submitting an application
2. Indicate whether the research may be eligible for consideration as lower risk, providing appropriate justification on the Vial Australia HREC application form
3. Provide sufficient information for the institutional and HREC assessment of risk

5.4.4 Institutional and HREC Confirmation

The determination of the appropriate review pathway involves shared responsibility:

- The researcher conducts an initial risk assessment and proposes the level of review.
- The institution (VIAL or its subsidiaries, including Vial Australia Pty Ltd) determines whether a research project requires full HREC review or may proceed via a lower risk review pathway.
- Vial Australia HREC (or the Executive Committee for delegated review) affirms or questions this risk classification and may refer the project for full HREC review if the assessed risk warrants it.

Where the risk assessment is not aligned with the National Statement or raises concerns, Vial Australia HREC reserves the right to reclassify the review pathway accordingly.

6. Submission Requirements

6.1 Plain Language Requirement

In accordance with Section 5.2.7 of the National Statement on Ethical Conduct in Human Research, applications should be completed in terminology readily understood by an informed layperson, as the reviewing committee consists of members from varied backgrounds.

6.2 Acronym Usage

- Acronyms to be used as nicknames for studies should not have the potential for ridicule or misrepresentation.

- The first time an acronym is used in the application, the words must be written out in full, with the acronym placed in parentheses immediately after.

6.3 Document Standards

All documents submitted should be dated and version controlled. If revisions occur during the course of the research, revised documents must be submitted to Vial Australia HREC as an amendment. All amendments to documentation require edit tracking, with a comprehensive change history log, version, and date adjustments as appropriate.

6.4 Required Documents Checklist

The following documents are required for all studies and should be provided when submitting a research application for ethical review. Vial Australia HREC will retain copies of all documentation (including any correspondence) in the form in which they were approved.

Component	YES	N/A	NO
1. Cover letter signed by the Principal Investigator: ● A brief description of the project including the Phase of the study if it is a clinical trial ● Information on the trial site ● A list of supporting documentation submitted including version dates/numbers ● For commercially sponsored research studies: the name and address of the sponsor organisation / CRO / CRA for the HREC review (if applicable) ● Principal Investigators should not be a student. If the project is student research, then the student's main supervisor should be listed as Principal Investigator ● If this is an amendment application, the cover letter should detail an explanation of the changes			
2. HREC Application Form			
3. Study Protocol / Project Description (the protocol should contain the formal design or specific plan for the research)			
4. CV for Principal Investigator: summarised CV with recent relevant experience – maximum 10 pages. CVs are not required for other researchers.			
5. Letters of Approval from other Human Research Ethics Committees (if applicable)			

6. Participant Information Consent Form (PICF): ● Full letterhead with contact details ● If there are more than one PICF (e.g. different target groups of participants, different sites, etc.), it should be clear which group or differentiator the PICF is aimed at ● Written in plain simple English, interpretable for the general public ● Local researcher's name and contact details included (i.e., site-specific) ● Consent for all procedures (e.g. access to medical records, audio/video recording – dot points for non-optional items; Yes / No boxes only for optional items) ● A space for study participant's printed name and signature, and date and time of consent ● A space for witness / interpreter's printed name and signature (if applicable) ● A space for the researcher's printed name and signature			
7. Clinical Trial Notification (CTN) Form(s), including the original CTN forms with details for each site (Clinical trials only)			
8. Clinical Trial Approval (CTA) Form (Clinical trials only) (if applicable)			
9. Investigator's Brochure			
10. Questionnaires / surveys / interview guides / other instruments			
11. Data collection tool(s) (e.g. Data Collection Form, Case Report Form)			
12. Certificate of Insurance (Clinical trials)			
13. Clinical Trial Registration Number and public register details			
14. Form of Indemnity (HREC Review Only Form) for each participating site			
15. Copy of the Form of Indemnity (Standard Form) for each participating site (Clinical trials)			
16. Advertising materials (including transcript for advertisement, flyers, e-mail, website, letter, telephone calls etc.)			
17. Letter of invitation / Letter to GP etc. (if applicable)			
18. Other correspondence e.g. FDA reviews,			

correspondence with other HRECs, expert independent reviews, peer review etc. (if applicable)			
19. Signatures: PI may sign on behalf of other investigators if applicable			
20. Department head printed name, signature and role in the Organisation/Institution. If only electronic signatures can be provided, attach a letter or email from the researcher as evidence of consent for the use of their electronic signature and acknowledgement of support to the research study.			
21. Ionising Radiation Certificate (if applicable)			
22. License for dealings with Genetically Modified Organism (GMO) (if applicable)			
23. Radiation exposure documentation: either a letter from the PI stating that radiation exposure is part of normal clinical management/care, or if radiation exposure is additional to normal clinical management/care, an independent assessment report by a Medical Physicist of the total effective dose and relevant organ doses including risk assessment (if applicable)			
24. Risk profile of research (Lower or Higher risk) shall be defined			

Note: A checklist of documents required is available on the vialhrec.com website under work instructions.

7. Processing of Applications

7.1 Submission via ERMS

All relevant application documents must be submitted via the Vial Australia HREC Ethical Review Management System (ERMS). Researchers will email contact@vialhrec.com to request an account be set up for submission, after which they will be assigned an account for ERMS access.

It is the responsibility of the researcher to ensure that the application is complete, with all relevant documentation attached, including obtaining the signatures of the Principal Investigator, co-investigators and the Sponsor/Department Head prior to submission.

If the Principal Investigator will not be contactable on their normal phone number (as listed in the application) when the Ethics Committee convenes, additional contact details should be supplied.

7.2 Assignment of Project Identification Number

Once received by Vial Australia HREC via the ERMS, the research application is assigned a unique project identification number. This unique identifier is to be used by the researchers in all correspondence to Vial Australia HREC regarding that research project.

7.3 Validation Assessment

When an ethics application is received, Vial Australia HREC members must perform a validation assessment of the submission. Validation involves determining if the form and attached documents are appropriate, complete and accurate, including appropriate signatories. This is conducted on the ERMS.

If validated, the application is assigned to a Vial Australia HREC meeting within a week. If more information is required, a request for the additional information will be made to the applicant.

If the application is invalid (i.e., not all documents were submitted), Vial Australia HREC must comment why it is not valid to allow the applicant to re-submit an alternative form or withdraw the project.

7.4 Acknowledgement of Applications

Upon submission of an application, Vial Australia HREC will acknowledge acceptance of the application for scientific and ethical review by email to the applicant within two working days of receipt of the application. Acknowledgement types include:

- Application acknowledgement of receipt
- Application acknowledgement of receipt with invitation to Vial Australia HREC meeting
- Application acknowledgement of receipt and invalid notification
- Application acknowledgement of receipt and notification of expert reviewer consultation

8. HREC Review of Applications

8.1 Meeting Procedures

Once the application is validated, a meeting is held with the appropriate members of Vial Australia HREC, or comments are sent to the Chair by members who cannot attend.

8.2 Ethical and Scientific Assessment

Vial Australia HREC ethically assesses each application in accordance with the National Health and Medical Research Council (NHMRC) National Statement on Ethical Conduct in Human Research and other relevant guidelines and legislation. Vial Australia HREC must ensure that it is sufficiently informed on all aspects of a research protocol, including its scientific validity, in order to make an ethical

assessment. The review will consider both scientific and ethical components of the research project.

8.3 Review Questions for Consideration

Vial Australia HREC members and external expert reviewers should consult the following questions to inform their review and decision-making of initial submissions and amendment/renewal requests (as applicable with respect to the nature of the application).

The Research Project:

- Is the hypothesis/aim clear and valid? Does the research proposal demonstrate that the research is justifiable in terms of its potential contribution to knowledge?
- Is the research based on current literature, prior observation, approved previous studies, and where relevant, laboratory and animal studies?
- Is the research question useful and likely to yield new information, enhance understanding, or clarify existing uncertainty?
- Has this or similar research been carried out before, or in the same or similar contexts?
- Is the research proposal designed to ensure that any risks of inconvenience, discomfort, or harm to participants are balanced by the likely benefits?
- What is the overarching design of this research (e.g., qualitative, quantitative, observational, experimental)?
- Is the proposal complete, or is further information or evidence required to support the aims, hypothesis, or proposed methodology?
- Are there any design or other deficiencies that require modification?
- Are there points of uncertainty or ambiguity that require clarification?
- If indicated, have the perspectives of potential participant groups, the wider community, or other disciplines been incorporated?
- Does the value of the project justify its conduct with humans (or animals, if relevant)?
- What are the clinical implications (if any) of the expected results?

The Researchers:

- Do the researchers have necessary qualifications, competence and experience?

The Methodology and Research Design:

- Are all aspects of research methodology clearly described?
- Is the methodology appropriate to achieve the aim/intent of the project?
- Review methodology, for example appropriateness of design in terms of: randomisation/stratification, sample size, objectives, design issues, outcomes, inclusion/exclusion criteria, analysis and statistical validity.
- Has the protocol adequately addressed the research specific safety issues?
- How valid/effective are the participant information sheets (if any) and other documents in relation to the protocol?

8.4 Use of External Expert Reviewers

Where possible, the need for external expert review should be identified during the validation assessment phase (Section 7.3), allowing sufficient time for expert advice to be obtained and provided to Vial Australia HREC members prior to the meeting.

Where Vial Australia HREC does not possess the required expertise to review a research proposal or component of an application, the Chairperson (or delegate) may seek advice from an external expert reviewer.

Advice from external expert reviewers is sought through the following procedure:

a. Notification is sent to the Principal Investigator either before or following the Vial Australia HREC meeting explaining that a final decision will not be made on the application until advice is obtained from an expert reviewer. The letter notifies the Principal Investigator of the issues of concern to Vial Australia HREC, but does not request further information or clarification.

b. A suitable expert reviewer is identified by the Chairperson / Executive Officer or by Vial Australia HREC during the meeting.

c. The Chairperson or Executive Officer initially contacts the prospective expert reviewer(s) by telephone or email to establish whether they are available to provide expert advice within the required time frame and that they have no connection with the research that might give rise to a conflict of interest. The expert reviewer is advised about confidentiality requirements and is bound by a Confidentiality Agreement.

d. The Executive Officer specifies in writing the issues of concern to Vial Australia HREC and the expert advice required, and requests written advice and/or attendance (but not voting) at the Vial Australia HREC meeting. The Executive Officer ensures that the expert reviewer declares any conflict of interest and signs a declaration and confidentiality agreement.

A copy of the application form is provided together with any supporting documentation required by the expert reviewer. The Chairperson considers the advice of the expert reviewer and makes an independent decision on the ethical and scientific acceptability of the application. The advice is recorded in the minutes.

8.5 Participant Advocates

The Vial Australia HREC Chair must consider whether an advocate for any participant or group of participants should be invited to the Vial Australia HREC meeting to ensure informed decision-making. It is the responsibility of the Vial Australia HREC Chair or delegate to action this.

8.6 Decision-Making

Vial Australia HREC endeavours to reach a decision concerning the ethical and scientific acceptability of a project by unanimous agreement. Where a unanimous decision is not reached, the decision is considered to be carried by a majority of the members who examined the project. The vote including numbers for and against (and numbers of members abstaining from voting where applicable) is noted in the minutes.

If Vial Australia HREC decides that further information or responses from the investigator should be considered at a further meeting of Vial Australia HREC, the PI (and/or delegate) is invited to attend the Vial Australia HREC meeting in order to provide clarification and answer any further questions raised.

9. Consent and Alternatives to Consent

9.1 Opt-Out Approach (Alternative to Consent)

Before approving the use of an opt-out approach for research, Vial Australia HREC must be satisfied that:

- Involvement in the research carries no more than a low risk in the public interest and the proposed activity substantially outweighs the public interest in the protection of privacy
- The research activity is likely to be compromised if the participation rate is not complete, and the requirement for explicit consent would compromise the necessary level of participation
- Reasonable attempts are made to provide all prospective participants with appropriate plain language information explaining the nature of the information to be collected, the purpose of collecting it, and the procedure to decline participation or withdraw from the research
- Reasonable time period is allowed between the provision of information to prospective participants and the use of their data so that an opportunity for them to decline to participate is provided before the research begins
- Mechanism is provided for prospective participants to obtain further information and decline to participate
- The data collected will be managed and maintained in accordance with the relevant security standards
- There is a governance process in place that delegates specific responsibility for the project and for the appropriate management of data
- The opt-out approach is not prohibited by State, Federal or International Law

  Note: Given Vial Australia's focus on clinical trial research, the opt-out approach is unlikely to be applicable to most submissions reviewed by Vial Australia HREC. This section is included for completeness.

9.2 Waiver of Consent

A waiver of the requirement for informed consent may be granted in accordance with Sections 2.3.9 and 2.3.10 of the National Statement on Ethical Conduct in Human Research (2025).

Where appropriate, such a waiver may be approved by:

- The full Vial Australia HREC, or
- The Vial Australia HREC Executive Committee may approve waiver requests **only** where the research is classified as low risk **and** does not involve personal information in medical research or personal health information as described in Section 2.3.9. This includes, but is not limited to, identifiable genetic material, re-identifiable datasets, or linked health records. Where there

is any uncertainty regarding the nature of the information involved, the waiver request must be referred to the full Vial Australia HREC.

Where a waiver request falls outside the scope of delegated authority, it must be reviewed by the full Vial Australia HREC.

Before deciding to waive the requirement for consent, Vial Australia HREC must be satisfied that:

- Involvement in the research carries no more than low risk to participants
- The benefits from the research justify any risks of harm associated with not seeking consent
- It is impracticable to obtain consent (for example, due to quantity, age or accessibility of records)
- There is no known or likely reason for thinking that participants would not have consented if they had been asked
- There is sufficient protection of their privacy
- There is an adequate plan to protect the confidentiality of data
- In case the results have significance for the participants' welfare, there is, where practicable, a plan for making information arising from the research available to them (for example, via a disease specific website or regional news media)
- The possibility of commercial exploitation of derivatives of the data or tissue will not deprive the participants of any financial benefits to which they would be entitled
- The waiver is not prohibited by State, Federal or International law

10. Review Outcomes and Notification

10.1 Decision Categories

Vial Australia HREC, after consideration of an application at a meeting, makes one of the following decisions:

- To approve the project as being ethically acceptable, with or without conditions
- To provide provisional approval to the project with requested amendments, which may then be reviewed for final approval by the Vial Australia HREC Chair and/or HREC Executive Committee
- To defer making a decision on the project until the clarification of information or the provision of further information to Vial Australia HREC
- To not approve the project

Upon receipt of the Vial Australia HREC letter of approval and any other internal requirements, the research project is permitted to commence.

10.2 Notification Process

The applicant is notified in writing of the Vial Australia HREC decision within seven working days following the review meeting.

If Vial Australia HREC determines that further information, clarification or amendment is required for the consideration of a project, the correspondence to the applicant clearly articulates the reasons for this determination and outlines the information that is required. Where possible, requests for additional information, clarification and/or amendment refer to the National Statement or relevant pieces of legislation.

If the requested information is not received from the applicant within 60 days of the letter being sent, the project may be dismissed and the applicant may be required to resubmit the project at a later date.

Vial Australia HREC endeavours to openly communicate with researchers to resolve outstanding requests for further information, clarification or amendment of projects relating to ethical issues.

10.3 Content of Approval Notification

Vial Australia HREC notifies the applicant of ethical approval of a project only when all outstanding requests for further information, clarification or amendment have been satisfactorily resolved. Notification of ethical approval is in writing and contains the following information:

a. Title of the project

b. Name of Principal Investigator

c. Unique project identification number

d. The version number and date of all documentation reviewed and approved by Vial Australia HREC, including Clinical Protocols, Patient Information Sheets and Consent Forms, Advertisements, Questionnaires, et cetera

e. Date of Vial Australia HREC approval

f. Conditions of Vial Australia HREC approval

10.4 Content of Rejection Notification

If Vial Australia HREC determines that a project is ethically unacceptable, the notification of Vial Australia HREC's decision includes the grounds for rejecting the project with reference to the National Statement or other relevant pieces of legislation.

10.5 ERMS Status Updates

The status of the project is updated on ERMS following all decisions.

11. Amendments and Renewals

11.1 Submission of Amendments

All proposed amendments to approved research must be submitted to the Research

Governance Office (RGO) at VIAL for preliminary assessment. The RGO is responsible for determining the initial classification of the amendment as substantial (major), minor, or administrative, in accordance with internal policy and the National Statement.

Amendments assessed as requiring HREC review (e.g., major or ethically relevant minor changes) will be referred to Vial Australia HREC for ethical consideration.

11.2 HREC Review of Amendments

Vial Australia HREC may:

- Affirm the institutional classification
- Request clarification, or
- Reclassify the amendment and adjust the level of review as appropriate

All substantial amendments approved by Vial Australia HREC will be documented and communicated to the Principal Investigator.

11.3 Amendment Submission Requirements

Requests must outline:

- The nature of the proposed changes and/or request for extension
- Reason/s for the request
- An assessment of any ethical implications arising from the request on the conduct of the research

All amended documents must have the changes highlighted and contain revised version numbers and dates. Two copies of the updated documents should be provided – one with 'track changes' and one 'clean' copy.

11.4 Review Process for Amendments

Substantial amendments (amendments to the protocol or any supporting documentation) should normally be reviewed at meetings for scientific and ethical considerations. Amendments that are not substantial do not require full ethical review. It is the responsibility of the HREC, in consultation with other members where necessary, to determine whether or not an amendment is substantial.

Other members may be consulted where necessary and the documents may be considered in the Vial Australia HREC meeting.

Where it appears that the amendment may significantly affect the scientific value of the trial, for example because it modifies the recruitment targets, the selection criteria or the data analysis, Vial Australia HREC may request that the applicant provide evidence for further scientific review in support of the amendment.

Amendments or renewals that do not require full ethical review will be reviewed by the Vial Australia HREC Executive Committee.

11.5 Urgent Safety Amendments

Where an urgent protocol amendment is required for safety reasons, the Chair may

review and approve the request (with the help of an expert reviewer if necessary). In such circumstances, the amendment or renewal information is tabled* at the next Vial Australia HREC meeting.

11.6 Requests for Further Information

If Vial Australia HREC or Chair determines that further information, clarification or amendment is required for the consideration of the request for amendment or extension, the correspondence to the investigator clearly articulates the reasons for this determination and outlines the information that is required. Where possible, requests for additional information, clarification and/or amendment refer to the National Statement or relevant pieces of legislation.

11.7 Ratification and Documentation

Amendment and renewal requests approved by the Vial Australia HREC Chair are ratified by Vial Australia HREC at a subsequent meeting.

All reviewed and approved requests for amendments and extensions are recorded, and the status of the project is updated in the Vial Australia HREC ERMS.

*In this SOP, the term "tabled" refers to an item being formally presented to Vial Australia HREC. Depending on the context, tabled items may be:

- Noted (i.e., for information only); or
- Ratified (i.e., where prior decisions made under delegated authority are formally endorsed by the full committee).

12. Safety Reporting

Vial Australia HREC shall require, as a condition of approval of each project, that researchers report Significant Safety Issues (SSIs, as identified by the TGA) and other Adverse Events to the RGO according to the following procedure.

12.1 Significant Safety Issues

SSIs must be reported in a prompt manner if the information impacts the continued ethical acceptability of the trial. This includes cases where the information requires, or indicates the need for, a change in the trial protocol or Information Statement, including change monitoring (using the Safety Event or Device Deficiency Report).

Notification of SSIs submitted by the PI (or delegate) to RGO must include:

- Advice from the PI as to whether, in their opinion, the adverse event was related to the protocol or in case of a device trial, whether the adverse event was related to the study device
- Advice from PI as to whether, in their opinion, the adverse event necessitates an amendment to the protocol and/or the patient information sheet/consent form
- Advice from the PI regarding whether the event was expected or unexpected as per the protocol or for device trials as per the safety profile of product

- Advice from the PI as to whether the event has been notified to the Independent Safety and Data Monitoring Board or Safety Review Committee (if applicable)

12.2 Annual Safety Reports

Annual reports must be reported without undue delay (using the Annual Safety and Progress Report).

For Commercially Sponsored Trials, the executive summary of safety information produced for internal regulators such as a Development Safety Update Report (DSUR), may serve as the annual safety report sent to Vial Australia HREC (a full DSUR is not required). The timing of the annual safety report may be aligned with the reporting cycles of global companies or aligned with the annual progress report sent to Vial Australia HREC.

12.3 Other Adverse Events

Any adverse event that occurs as a part of research which falls into one or more of the categories below must be submitted to the HREC via ERMS without delay:

- Is a deviation from or violation of the protocol which affects patient safety
- May result in a claim against the hospitals
- Is unexpected and possibly related to the procedure of the study
- Requires a change in the consent form
- Requires a change in the conduct of the study (i.e., Protocol)

13. Monitoring of Approved Research

Vial Australia HREC monitors approved projects to ensure compliance with the protocol and relevant legislation and guidelines as per Vial Australia HREC approval. All ongoing human research projects with ethics approval granted by Vial Australia HREC are eligible to be audited, including clinical trials, observational studies, clinical audit activities and public health research projects. Studies from all risk profiles will be audited; however, higher risk studies will be the focus of more audits than those considered to be lower risk.

13.1 Selection for Audit

Projects may be selected for auditing for a variety of reasons:

- Human Research Ethics Committee request:
    - Following approval of new protocol
    - As a condition of approval (i.e., scheduled audit following commencement of approved research); or
    - Due to the classification of risk
- Random selection
- A complaint (i.e., from a participant, parent, fellow researcher)
- Annual report verification

13.2 Annual Safety and Progress Reports

Vial Australia HREC will receive an Annual Safety and Progress Report (frequency to be determined by the Vial Australia HREC review) for each research site of a research project via the ERMS.

The Annual Report should address the following:

Research Project Details:

- Description and analysis of new/relevant safety findings
- Implications of the safety findings on the risk and benefit of the project
- Describe any measures, taken or proposed to minimise risk
- Comment from sponsor

Safety Monitoring:

- Has the safety monitoring plan been reviewed or adapted in the past 12 months?
- Has a safety monitoring plan been implemented?
- Does the project have a Safety Review Committee?
- How many times has the SRC reviewed the project in the past 12 months?
- Comment on safety monitoring

Investigator's Brochure:

- Has the Investigator's Brochure been reviewed?
- Does the Investigator's Brochure require an update with new relevant information?

Site Research Investigators:

- List any investigator who has joined the research team in the past 12 months or since the date of the previous report. Indicate whether each new investigator is listed on an amendment.

Good Clinical Practice Training:

- List of investigators who have completed GCP training in the past 12 months or since the date of the previous report

Research Project Commencement:

- Research project commencement/initiation date at site
- If the research project has not commenced, an explanation should be provided

Research Project Status:

- Current status of research project at the site
- Expected date of completion
- Brief summary of the research project status
- Is extension of ethical approval required past current approval date?

Audit:

- Has the research project been subject to an audit at the site in the past 12 months (or since previous report)?
- Date of audit
- Name of auditor

Protocol:

- Is the research project being conducted according to the protocol?
- Are all the conditions of Vial Australia HREC approval being met?

Recruitment at Site:

- Recruitment target
- Recruitment to date
- Withdrawn to date
- Is recruitment on target?
- Provide reason(s) for participant withdrawal
- If recruitment is not on target, provide an explanation

Consent:

- Did Vial Australia HREC waive the informed consent requirement?

Safety Issues:

- Have there been any AEs, SAEs, or USADEs that have raised safety issues in relation to the research project, which occurred in the past 12 months (or since previous report) and are yet to be reported to the reviewing Vial Australia HREC?

Funding:

- Status of research project budget

Insurance:

- Is the insurance certificate current?
- If a current insurance certificate (or extract) for the next 12 months is not attached, an explanation should be provided

13.3 Final Reports

At the completion of study, a final report will be submitted to Vial Australia HREC by the researcher (via the ERMS). After review of the aforementioned documents, a formal acknowledgement will be sent to the PI.

14. Suspension or Withdrawal of Approval

Vial Australia HREC or the institution (VIAL or any of its subsidiaries, including Vial Australia Pty Ltd) may take action in response to safety concerns, ethical breaches,

or non-compliance with approved protocols.

14.1 Suspension of Ethics Approval

A temporary hold may be issued by the Chairperson or Vial Australia HREC on the conduct of a research project. During suspension:

- Recruitment and study procedures must cease immediately.
- The Principal Investigator (PI) must submit a written action plan addressing the issues leading to suspension.
- The HREC will determine, based on review, whether the suspension is lifted or escalated to withdrawal.
- Suspension does not require a new ethics application for reinstatement unless the required changes are substantial.

14.2 Withdrawal of Ethics Approval

This occurs when Vial Australia HREC formally revokes ethics approval for a project due to unresolved ethical concerns or significant breaches of protocol. Withdrawal:

- Terminates all research activity under that approval.
- Requires the PI to submit a new ethics application to resume the project.

14.3 Withdrawal of Institutional Authorisation

This may be enacted by the Research Governance Office (RGO) or institutional leadership (VIAL) independently of the HREC decision and will halt all site-level activity. Reinstatement requires re-authorisation.

14.4 Participant Notification Requirements

In accordance with the National Statement (Sections 5.4.14–5.4.19), where suspension or withdrawal may affect current or prior participants:

- The PI must propose a communication plan for notifying participants, which may include revised Participant Information and Consent Forms (PICFs), letters, or verbal explanations.
- Vial Australia HREC will review and approve the participant communication materials before dissemination.
- The notification must address the reason for the suspension or withdrawal, any potential impact on participants' wellbeing or data, and offer contact information for questions or concerns.
- In cases where there is immediate or significant risk to participants, notification must occur as soon as practicable and be coordinated with the HREC and RGO.

14.5 Final Decision and Notification

- Vial Australia HREC makes the final decision regarding reinstatement or withdrawal after full committee consideration.
- The PI and study contact will be notified in writing of the decision within two working days.
- The status of the project will be updated in the Electronic Research

Management System (ERMS).

15. Site Authorisation

15.1 Site Specific Assessment

Site Specific Assessment (SSA) is a component of institutional research governance and separate to the ethical review of research proposals by Vial Australia HREC.

The SSA process involves assessing the suitability of the research proposal for the Health Service site and ensures that adequate resources exist for satisfactory conduct and completion of the project.

The appropriate site application form must be submitted by the Principal Investigator (PI) or Delegate to the RGO Admin.

15.2 RGO Review and Authorisation

The Research Governance Office (RGO) must conduct a site review and provide a recommendation to the Chief Executive (CE) or delegate. The CE/delegate must authorise or not authorise the project occurring at the site, with consideration of the RGO recommendation. Authorisation by the CE/delegate and receipt of an authorisation letter by the researcher is required before research commences at or involving that site.

15.3 Document Consistency Review

The RGO must review all application documents to ensure that information between the SSA, research protocol, application for data (if applicable), and any other agreements is consistent and remains consistent when amendments are made.

Version History

Version Number	Version Date	Author	List of Changes
1.0	October 12, 2024	Amna Ali	N/A: Initial Release
2.0	January 5th, 2026	Nikolajs Zeps	Merged former SOP1 and SOP2; consolidated submission requirements and application processing. Aligned with National Statement (2025): revised risk framework to two-category continuum model; replaced automatic HREC review for participant groups with risk-based assessment; clarified lower risk pathways and exemption criteria; corrected waiver delegation authority; merged redundant

			review questions; added external expert review timing guidance; renamed Section 9 to reflect opt-out as alternative to consent; clarified post-approval audit selection; updated all NS references and removed placeholder notes.