Guidance for applicants using the deferral process: registration of UK Phase I clinical trials in ISRCTN: balancing transparency with commercial confidentiality

The EU Clinical Trials Regulation (EU CTR; Regulation EU No. 536/2014), which was implemented on 31 January 2022, introduced new transparency requirements for clinical trial data included in applications to EU Competent Authorities (CA). Registering UK Phase I trials in ISRCTN allows sponsors to meet those transparency requirements but protect commercially confidential information through deferral of publication of trial details.

Article 25 of the EU CTR requires that data submitted to an EU CA as part of an application dossier for clinical trial authorisation (CTA) or a substantial modification, made under the EU CTR, come from a clinical trial that meets minimum transparency requirements. Trials starting after the implementation of the EU CTR on 31 January 2022 must have been registered, *before the trial started*, in a public register that is a primary or partner registry of, or a data provider to, the WHO ICTRP. For trials that started *before* the implementation of the EU CTR, Article 25 can be satisfied through publication or retrospective registration, as described in the section *Guidance on retrospective registration of Category 1 trials that started before implementation of the EU CTR* (below).

During the first year after implementation of the EU CTR, sponsors could still submit new clinical trial applications to EU CA under the EU Clinical Trials Directive (EU CTD; Directive 2001/20/EC), and sponsors can continue to run trials under the rules of the EU CTD for the first 3 years after implementation of the EU CTR. Applications for CTA or substantial amendments made under the EU CTD are not subject to the transparency requirements of the EU CTR. Thus, clinical data submitted in applications made to EU CA under the EU CTD after 31 January 2022 do not have to come from clinical trials that have been published or registered.

The Article 25 transparency requirements do **not** apply to data in UK applications submitted to the MHRA/research ethics committee (REC). While it is a condition of UK ethical approval that trials be registered on a public registry, the Health Research Authority (HRA) allows sponsors to request a *deferral* of registration to protect commercially confidential information (or for other reasons where a strong justification is provided). Sponsors of trials with a deferral agreed by the HRA may satisfy Article 25 by registering limited information in ISRCTN as described below. Although it is not a UK requirement that sponsors register deferred trials before the deferral expires, the HRA has an expectation that sponsors will follow best practice and register deferred trials in ISRCTN as described below, even if the sponsor does not intend to submit the data as part of an application made to an EU CA under the CTR.

The instructions below allow prospective registration of UK Phase I trials in adults, in a WHO primary registry, in line with EU transparency requirements under the EU CTR, but protect commercially confidential information.

In 2015, the EU published transparency rules for clinical trials (*Appendix, on disclosure rules, to the "Functional specifications for the EU portal and EU database to be audited – EMA/42176/2014", EMA/228383/2015 dated 2 October 2015).* Revised rules were adopted in October 2023 (*Revised CTIS Transparency Rules, EMA/263067/2023 dated 05 October 2023*). According to the rules, Phase I trials fall into Category 1 (pharmaceutical development clinical trials; see Appendix A). In recognition of the high commercial sensitivity of these non-therapeutic clinical trials and the negligible benefit to the public of publication of details of those trials, the rules specify that Category 1 trials will be registered prospectively but *publication* of

all but limited trial details will be deferred. Publication of full trial details and trial results will be at 30 months after the end of the trial.

Like the EU register, ISRCTN is a primary registry of the WHO ICTRP and allows deferral of publication of certain details of clinical trials meeting the criteria for Category 1 trials as defined in the EU transparency rules. The data fields to be published in ISRCTN at the time of registration mirror those published in the EU register at the time of the decision on the trial, and the maximum deferral period matches that in the EU transparency rules. In line with those EU rules, registrants must submit for publication the remainder of the trial details within 30 months after the end of the clinical trial. To complete the WHO minimum trial registration dataset, registrants should also post summary trial results, ideally within 30 months after the end of the trial. Summary results can be posted in ISRCTN by uploading a file in the WHO format or providing a link to summary results on another registry, company website or repository. The following guidance explains how to register a Category 1 trial in ISRCTN but defer publication of all but limited details.

The sponsor, or an authorised sponsor's delegate (eg contract research organisation), can register the trial in ISRCTN. It is the responsibility of sponsors' delegates to ensure, before submission to ISRCTN, that they have the sponsor's written approval of the data to be entered in the register; please note that all entries in the register are **permanent** and cannot be deleted. If the trial is not submitted by the sponsor, it is strongly recommended that the sponsor be designated the contact for the trial's registry entry after the full trial details have been published, as the sponsor is best placed to make future updates (eg add trial results, link the registry entry to any future publications or registry entries, and add any generic name assigned to the investigational medicinal product). It is recommended that the arrangements for registration be described in a written agreement between the sponsor and delegate.

Guidance on prospectively registering a Category 1 trial with deferral of publication of all but limited details

The option to register a trial in ISRCTN with a minimal dataset applies only to trials with a deferral agreed by the HRA, whose guidance can be found under <u>Research registration and</u> <u>research project identifiers - Health Research Authority (hra.nhs.uk)</u>. Deferrals allow the applicant to delay full registration of the trial (referred to as a Study on the ISRCTN site), and delay publication of the research summary by the HRA. Deferral applications are made using new IRAS and deferrals will be granted only if you have not already registered the trial on any research registry.

Deferrals are initially granted for 12 months but can be extended for up to 30 months. Once the trial comes to an end, sponsors can ask to extend the deferral for up to another 30 months. Even if the deferral period has not ended, the HRA expects that the trial will be registered in full, and the research summary published in full, as follows:

- when the reason given for the deferral is no longer valid (for example, the trial is no longer commercially confidential for reasons such as: the first summary results have been made public; or full details of the trial have been published in any research registry); or
- immediately, if the trial is terminated early for safety reasons.

So, if you have a deferral in place on the grounds of commercial confidentiality but then register full details of the trial in **any** research registry, the justification for deferral is no longer valid, and you must inform the HRA. The HRA will publish a lay summary on the HRA research

summaries website, and will expect the trial to be registered in full on ISRCTN or clinicaltrials.gov as follows:

- if a minimal dataset has been registered in ISRCTN, the trial must be fully registered in ISRCTN; or
- if a minimal dataset has not been registered in ISRCTN, the trial must be fully registered in ISRCTN or clinicaltrials.gov.

Please note that each registry entry in ISRCTN must reflect the whole trial protocol if it is to meet the WHO standards, which require complete, accurate and meaningful data for each item in the WHO Trial Registration Data Set at the time of registration. It is not possible to use ISRCTN to publish a minimal dataset for *part* of a trial and register full details of the rest of the trial in another registry. Only the following options are available in ISRCTN:

- (1) the whole trial is registered in full in ISRCTN (and in other registries if the sponsor wishes); or
- (2) the whole trial is deferred and a minimal dataset reflecting the whole trial protocol is published in ISRCTN, but *full* details of any part of the trial are not posted in any other research registry until full details of the whole trial are published in ISRCTN.

That is the case even if the commercially confidential part of the trial will be run in the UK and the rest of the trial will be run elsewhere. Sponsors should consider running commercially confidential parts of multi-part trials under a separate protocol.

All new trials must be registered *before they start* if the data generated in those trials are to be included in an application to an EU CA for a CTA or substantial modification made under the EU CTR. Trials registered in ISRCTN before they start are designated *prospective* registrations, whereas trials registered in ISRCTN after they have started are deemed *retrospective* registrations. For your registration to be deemed prospective, you must ensure that the trial has been published in ISRCTN on or before the date that you enter in the 'recruitment start date' field in the ISRCTN dataset; otherwise, your registration occurs after the *anticipated* recruitment start date that was submitted to ISRCTN but before the *actual* recruitment start date. The change of date will result in the registration being designated prospective. For any change to the recruitment start date that will change the registration designation from retrospective to prospective, ISRCTN will request evidence to support the actual recruitment start date. Note that the recruitment start date is the date of the first screening visit.

You must also provide all the required information at the time of registration and at the milestones outlined below.

The process for prospectively registering Category 1 trials with deferral of publication of some of the details is as follows.

- 1. Register for an ISRCTN account, if you do not already have one.
- 2. Enter your trial details as shown in Appendix B. Enter the appropriate 'deferral statement' into fields for which details will be provided at a later date (up to 30 months after the end of the trial).

- 3. Submit your trial, allowing time for it to be reviewed and published before the first screening visit. It is recommended that you make the submission just after you apply for MHRA/REC approval.
- 4. When ISRCTN confirms receipt of your data, respond via email according to the ISRCTN Application Form Guidance, as follows:
 - Quote your 5-digit reference number
 - Provide confirmation that the trial meets the criteria for Category 1 (pharmaceutical development clinical trials) in the EU clinical trial transparency rules. Say which criterion it meets (*eg The trial falls into the following subcategory of Category 1 trials (pharmaceutical development clinical trials): Phase I clinical trials in healthy volunteers).* ISRCTN editors will confirm at this stage that the trial has been registered as a Phase I trial and will liaise with the registrant in the event that the HRA does not approve the deferral.
- 5. Await editorial review by ISRCTN (up to 2 working days), and respond as required.
- 6. Once the record is ready for publication, and you have provided the ISRCTN editor with written confirmation that the trial sponsor has agreed the final dataset, the ISRCTN editor will publish the record and you will receive an email to confirm the ISRCTN registration number.
- 7. The ISRCTN team will send reminders to prompt updates to the record and to check that contact details are still valid. These reminders will be adapted for deferred studies and will primarily ask for dates to be updated as appropriate. There is no need to respond to these reminders if the study record is up to date.
- 8. Provide the following updates (note that all new information will be posted alongside the original information, with the date). The following information **must** be provided to ISRCTN either by email to <u>info@isrctn.com</u> or using the online form 'Update your record'.

a. After review of the trial by the REC and MHRA, provide in the 'Ethics committee approval' field:

• the date and final decision on the trial application

b. Within 30 months after the end of the trial, provide:

- the sponsor trial code, if not already published (to be included in the 'Secondary identifying number(s) ' field)
- the actual date of the end of the trial (in accordance with the definition of the end of that trial that is given in the approved protocol)
- the total number of participants enrolled
- information for all deferred fields, any supplementary information as indicated in Appendix B, and corrections to any information that has changed since the start of the trial

• any other information the sponsor wishes to update (for example, the sponsor may wish to update the public title)

In addition, summary study results should be provided, ideally within 30 months after the end of the trial, to complete the WHO trial registration dataset. Submit results either by email to <u>info@isrctn.com</u> or using the online form 'Report your results', with appropriate attachments or links (eg to basic results on another registry, website or repository), as follows:

- a scientific summary of the study results (including participant flow chart and tabular summaries of: baseline characteristics, primary and secondary outcome measures, and adverse events)
- an optional document containing a plain English summary of the results (a summary in plain language that should include the information specified in the HRA guidance Writing a plain language (lay) summary of your research findings - Health Research Authority (hra.nhs.uk))

The scientific and optional plain English summaries of results will be published in the Study Outputs Table in the ISRCTN registry entry. Please note that it is not mandatory to post summary results of early phase trials, but it is considered best practice to do so.

c. Later during development of the investigational medicinal product, the nominated sponsor contact is to provide:

- summary study results (if not provided within 30 months after the end of the trial; see item b. above)
- date of expected first journal publication of results, URL to results/publications
- if required by sponsor: URL to protocol (published or unpublished) or a file that can be uploaded to the ISRCTN website and accessed by any user
- generic name of the investigational medicinal product (if available) or any other identifier, eg research code

Guidance on *retrospective* registration of Category 1 trials that started before implementation of the EU CTR

All clinical trial data included in an application for CTA or substantial modification made to an EU CA under the EU CTR must come from trials that have satisfied Article 25. For trials starting *before* the implementation of the EU CTR, Article 25 can be satisfied in the following ways.

• For trials that were wholly governed by the EU CTD, the entry in EudraCT is considered to meet the requirements for public registration, even for Phase I trials in adults that were not made public in the EU clinical trials register. So, international Phase I trials with sites both in the UK and the EU are considered to have been registered via EudraCT. That exemption from any requirement for further publication or registration also applies to UK-only Phase I trials in adults that finished before the end of the Brexit transition period (31 December 2020).

- For UK-only Phase I trials in adults that started before implementation of the EU CTR and had not finished by the end of the Brexit transition period (31 December 2020), the transparency requirements can be satisfied in one of two ways:
 - o publication in a peer-reviewed journal; or
 - *retrospective* registration in a public register that is a primary or partner registry of, or a data provider to, the WHO ICTRP (registration after the trial has started).

Thus, UK Phase I trials that do not already satisfy Article 25 through publication, registration, or entry in EudraCT must meet the transparency requirements through publication or retrospective registration **if** the sponsor wishes to submit their data in applications made under the EU CTR. Those trials are:

- UK Phase I trials in adults, with no EU sites, that started under the EU CTD but had not finished by 31 December 2020
- UK Phase I trials in adults, with no EU sites, with a start date between 1 January 2021 and 30 January 2022

This guidance explains how to satisfy Article 25 through retrospective registration.

UK Phase I trials that have not been registered must hold HRA approval for deferral of registration. The trials must be registered fully and publicly when the HRA-approved deferral expires. However, if the HRA-approved deferral still applies:

- the trial data can be included in a UK application to the MHRA/REC
- the trial data **cannot** be included in an application made under the EU CTR to an EU CA, unless the trial is published or registered before the application is submitted

If a sponsor holds a valid HRA-approved deferral but needs to retrospectively register a UK Phase I trial in order to use the data in an application made under the EU CTR to an EU CA, ISRCTN allows sponsors to defer publication of all but limited details until up to 30 months after the end of the trial. However, if the trial finished more than 30 months ago, the trial must be fully registered.

The flowchart below summarises the requirements for retrospective registration of UK Category 1 trials.



- a. To satisfy Article 25 of the EU CTR, the trial must be registered in a public register that is a primary or partner registry of, or a data provider to, the WHO ICTRP
- b. Alternatively, the trial can be published in a peer-reviewed journal

If you wish to retrospectively register a Category 1 trial in ISRCTN and defer publication of all but limited details until up to 30 months after the end of the trial, follow the steps below.

- 1. Follow steps 1 and 2 of the above process for prospectively registering a trial, but note the following:
 - use the appropriate statement in Appendix B for deferred fields in trials registered after REC approval
 - include in your initial registry entry the details of REC approval
- 2. Make your submission.
- 3. Follow step 4 of the above process for prospectively registering a trial, but attach to your email to ISRCTN evidence of the HRA's approval of deferral of clinical trial registration and publication of the research summary for your trial.
- 4. Follow steps 5, 6, 7, 8b and 8c of the above process for prospectively registering a trial and ensure that full trial details are provided within 30 months after the end of the trial.

Appendix A: Category 1 trials

The EU clinical trial transparency rules (*Revised CTIS Transparency Rules, EMA/263067/2023 dated 05 October 2023*) state the following.

'The categorisation of trials, as defined in the Appendix of disclosure rules, and that will remain in place under the revised CTIS transparency rules for CTIS, covers:

1. Category 1 trials - Pharmaceutical development clinical trials:

- Phase I clinical trial in healthy volunteers or patients;
- Phase 0 trial in healthy volunteers or patients, without therapeutic or prophylactic intent;
- Bioequivalence and bioavailability trials;
- Similarity trials for biosimilar product including those conducted in patients where efficacy endpoints are used to determine biosimilarity, where pharmacokinetic and or pharmacodynamic studies are not possible;
- Equivalence trial for combination products or topical products where a pharmacodynamic or efficacy endpoint is used to determine equivalence, and where pharmacokinetic and or pharmacodynamic studies are not possible.'

The Appendix of disclosure rules referred to above is the *Appendix, on disclosure rules, to the "Functional specifications for the EU portal and EU database to be audited – EMA/42176/2014", EMA/228383/2015 dated 2 October 2015.*

Appendix B: ISRCTN dataset for a Phase I trial with deferred publication

The table below provides guidance on the data that should be submitted to ISRCTN for a UK Phase I trial with deferred publication. Information in red concerns updates that should be made after the initial record has been published. Deferred fields are shown in blue. One of the following deferral statements should be entered in deferred fields, as applicable:

- For registration before REC approval of the trial, include the following statement in deferred fields: The sponsor has confirmed that the trial meets the criteria for deferral of publication of the full details of the trial. The full details will be added to the study record within 30 months after the trial has ended.
- For registration after REC approval of the trial, include the following statement in deferred fields: The Health Research Authority (HRA) has approved deferral of publication of the full details of the trial. The full details will be added to the study record within 30 months after the trial has ended.

Field	Initial registry entry for deferred trials	Guidance for applicants
1. Study details		
Title and additional identifiers		
Registration number & date	To be allocated by registry. ISRCTN staff will also add a marker for internal use to indicate that full publication of details is deferred.	
Public title	Phase I trial: [CRO/site name] code: XXX	Give the public title as 'Phase I trial' and include the CRO/site code or another suitable identifier. The full public title may be added within 30 months after the end of the trial, if required by sponsor.
Scientific title	Phase I trial: [CRO/site name] code: XXX [The full scientific title will be published within 30 months after the end of the trial]	Give the scientific title as 'Phase I trial' and include the CRO/site code or another suitable identifier. Provide the full scientific title within 30 months after the end of the trial.
Acronym		Leave blank. If applicable, details can be provided within 30 months after the end of the trial.

Field	Initial registry entry for deferred trials	Guidance for applicants
EudraCT/CTIS number	[EudraCT/CTIS number] or Nil known	Enter EudraCT/CTIS number, or 'Nil known' if the trial has no EudraCT/CTIS number.
IRAS number	[IRAS number]	Enter the IRAS project ID number
ClinicalTrials.gov number	Nil known	The deferral procedure cannot be used if the trial is publicly registered elsewhere, so enter 'Nil known'.
Secondary identifying number(s)	IRAS [IRAS number] [CRO/site name] code: XXXX	Provide the IRAS project ID number and another suitable identifier, such as the CRO trial code. Include the sponsor's protocol code if the sponsor agrees that it can be published; otherwise, provide sponsor code, along with any other trial identifiers (eg references to entries in any other public registers or databases), within 30 months after the end of the trial.
Study Information		
Study hypothesis	[Deferral statement]	Provide details within 30 months after the end of the trial.
Ethics approval required	Select option	 Select option from dropdown list: Ethics approval required Ethics approval not required
Ethics committee approval – Approval status	Select option	 Select option from dropdown list: Not yet submitted Submitted Approved

Field	Initial registry entry for deferred trials	Guidance for applicants
Ethics committee approval – Status date	Date formatted as dd/mm/yyyy	If the trial has not yet been approved, provide date of submission to the MHRA and REC. Provide the date of approval, when available and ideally before the trial starts. If the trial has been approved, provide date of approval by the MHRA and REC.
Ethics committee approval – Ethics committee name	[REC name]	Provide the name of the REC the trial has been submitted to or approved by.
Ethics committee approval - Address	[REC street address]	Provide the street address of the REC the trial has been submitted to or approved by.
Ethics committee approval – City	[REC City]	Provide the city of the REC the trial has been submitted to or approved by
Ethics committee approval - Country	[REC Country]	Select 'United Kingdom'.
Ethics committee approval – Post/Zip code	[REC Postcode]	Provide the REC's postcode
Ethics committee approval - Tel	[REC contact telephone number]	Provide the REC's telephone number, if present
Ethics committee approval - Email	[REC email address]	Provide the REC's email address

Field	Initial registry entry for deferred trials	Guidance for applicants
Ethics committee approval – Reference number	Ref: [REC reference number]	
Third-party confirmation	Upload file or tick 'Third-party confirmation is not currently available and will be provided at a later date'	If there is already evidence from a third-party confirmation that the study exists (for example a letter from the REC, funding agency or government regulatory authority), this can be uploaded and attached to the submission form here. You can use your validation letter from the REC/MHRA or a screenshot from IRAS showing the IRAS ID and confirmation of submission, provided that it includes IRAS project ID number. Although the document will not be made public by ISRCTN, you may wish to redact details such as the trial study title and sponsor protocol code, to preserve confidentiality. If evidence from a third party does not already exist, you can send this to info@isrctn.com as soon as you have this available. ISRCTN will record that this information has been provided and store the document, but the evidence will not be publicly displayed.

Initial registry entry for deferred trials	Guidance for applicants
Examples:	Provide a sentence, briefly summarising the type of trial and number of subjects.
Bioequivalence trial in 24 healthy volunteers	
First-in-man safety, pharmacokinetics and pharmacodynamics trial in 48 healthy volunteers and patients	
Select option	Select option from dropdown list: • Not specified • Interventional • Observational • Other
Select option	Select option from dropdown list (multiple selections permitted): Built environment/local authority Care home Charity/Voluntary sector Childcare/pre-school Community Dental clinic Fitness/sport facility GP practice Home Hospice Hospital Internet/virtual Laboratory Medical and other records
	Examples: Bioequivalence trial in 24 healthy volunteers First-in-man safety, pharmacokinetics and pharmacodynamics trial in 48 healthy volunteers and patients Select option

Field	Initial registry entry for deferred trials	Guidance for applicants
		 Other therapist office Paramedicine Pharmaceutical testing facility Pharmacy Prison/detention Retail/food outlet School Telephone Training facility/simulation
Study type(s)	Select option	 University/medical school/dental school Workplace Other Select option from dropdown list (multiple
		 selections permitted): Not specified Diagnostic Other Prevention Quality of life Screening Treatment Safety
Overall study start date	dd/mm/yyyy	Efficacy Enter date of REC submission.

Field	Initial registry entry for deferred trials	Guidance for applicants
Overall study end date	dd/mm/yyyy	Enter anticipated date of end of study . This is the anticipated date of last data collection (often last participant last visit). Provide the actual study end date within 30 months after the end of the study , or update the anticipated end date if necessary when prompted by ISRCTN.
Condition	Healthy volunteers or [Deferral statement]	Enter 'healthy volunteers' or, if the trial is a non-therapeutic trial in patients, enter the deferral statement and provide details (one phrase or sentence) within 30 months after the end of the trial.
Interventions	[Deferral statement]	Provide details of treatments, randomisation, route and duration within 30 months after the end of the trial.
Intervention Type	Select option	Select option from dropdown list: Not specified Drug Supplement Device Biological/vaccine Procedure/Surgery Behavioural Genetic Other Mixed

Field	Initial registry entry for deferred trials	Guidance for applicants
Pharmaceutical study type(s)	If intervention type is 'Drug', 'Device' or	Select from multiple choice list:
	'Biological/vaccine', select one or more	Pharmacokinetic
	options	Pharmacodynamic
		Bioequivalence
		Dose response
		Pharmacogenetic
		Pharmacogenomic
		Pharmacoeconomic
		Not applicable
		 Other (please specify)
		It is acceptable to choose 'other (please
		specify)' and enter the deferral statement
		into the 'Other' box that appears.
Phase	Phase I	Select Phase I from dropdown list:
		Not specified
		Phase I
		Phase II
		Phase III
		Phase IV
		Phase I/II
		Phase II/III
		Phase III/IV
		Not applicable
Drug/device/biological/vaccine name(s)	[Deferral statement]	Provide details within 30 months after the
		end of the trial.
Primary outcome measure	[Deferral statement]	Provide details within 30 months after the
		end of the trial.
Secondary outcome measures	[Deferral statement]	Provide details within 30 months after the
		end of the trial.

Field	Initial registry entry for deferred trials	Guidance for applicants
Study website		Leave blank. The deferral procedure assumes that the trial does not have a website.
Participant information sheet	Not available in web format.	Enter the text shown. The deferral procedure assumes that the information sheet will not be made available on the internet or via ISRCTN.
Eligibility		
Participant type(s)	Select option(s)	Select the most appropriate option(s) from multiple choice list: • Healthy volunteer • Patient • Health professional • Carer • Employee • Learner/student • Resident • Population • Service user • All • Other
Participant inclusion criteria (please list)	Healthy human volunteer	For trials in healthy volunteers only, you can enter 'healthy human volunteer'.
	Or	If the trial includes patients or requires
	[Deferral statement]	healthy volunteers with specific characteristics (eg specific age ranges, ethnic origin), provide inclusion criteria (as a numbered list) within 30 months after the end of the trial.

Field	Initial registry entry for deferred trials	Guidance for applicants
Age group	Select option	Select option from dropdown list:
		Not specified
		• Adult
		• Senior
		Neonate
		• Child
		• All
		• Mixed
		• Other
		Publication of paediatric trials cannot be
		deferred. 'Neonate', 'Child' and 'All' are not
		acceptable options.
Lower age limit (number)		Leave blank. Add lower age limit within 30
Lower age limit (unit):		months after the end of the trial.
Upper age limit (number)		Leave blank. Add upper age limit within 30
Upper age limit (unit):		months after the end of the trial.
Sex	Select option	Select option from dropdown list:
		• Both
		• Female
		• Male
Target number of participants	N	Enter planned number of trial subjects.
Total final e nrolment		Leave blank.
		Provide actual number of trial subjects within
		30 months after the end of the trial.

Field	Initial registry entry for deferred trials	Guidance for applicants
Participant exclusion criteria (please list)	Does not meet inclusion criteria	If the trial includes patients or requires healthy volunteers with specific
	Or	characteristics (eg specific age ranges, ethnic origin), provide exclusion criteria (as a
	[Deferral statement]	numbered list) within 30 months after the end of the trial.
Recruitment start date	dd/mm/yyyy	Enter actual or planned date of <i>first</i> <i>screening visit.</i> If registration is BEFORE or ON this date, the
		trial will be listed as PROSPECTIVELY registered; otherwise, it will be listed as RETROSPECTIVELY registered.
Recruitment end date	dd/mm/yyyy	Enter planned date of the last visit of the last subject (as Phase 1 protocols usually allow withdrawn participants to be replaced, the last visit of the last subject is considered to be the recruitment end date). Provide the actual recruitment end date within 30 months after the end of the trial, or update the anticipated end date if necessary when prompted by ISRCTN.
Locations		
Countries of recruitment	Select country	Select country(ies) from the search list.
Study participating centres		Create a Study Centre for each site
Name	[Site Name]	Enter site name (not contact name)
Address	[Site address]	Enter site address.
City	[Site city]	Enter site city.
Country	United Kingdom	Enter site country from dropdown list.
Post/Zip code	[Site postcode]	Enter site post code.

Field	Initial registry entry for deferred trials	Guidance for applicants
Plain English Summary		
Plain English Summary	[Deferral statement]	 Provide a lay summary within 30 months after the end of the trial. Include in the summary these subheadings: Background and study aims Who can participate? What does the study involve? What are the possible risks and benefits of participating? Where is the study run from? When is the study starting and how long is it expected to run for? Who is funding the study? Who is the main contact?
Results and Publications		
Publication and dissemination plan	Full trial details will be published up to 30 months after the end of the trial. Publication of some trial details is deferred because of the high commercial sensitivity of this Phase I study and the negligible benefit to the public of Phase I information. Results may be posted on or after the date of publication of full trial details.	
Intention to publish date	dd/mm/yyyy	Enter the anticipated date of publication of results: ideally, within 30 months after the anticipated date of the end of the trial.

Field	Initial registry entry for deferred trials	Guidance for applicants
Individual participant data (IPD) sharing plan	[Provide plan]	Provide a plan for the availability of de- identified participant data (raw data) or a
	<i>Or, of the datasets are not expected to be made available, state:</i>	statement if the datasets are not expected to be made available or if the sponsor will make the data sharing plans available at a later
	The datasets generated and/or analysed during the current study are not expected to be made available because of their high commercial sensitivity and the negligible benefit to the public of publication of results of non-therapeutic clinical trials.	date. If the sponsor will make the plans available at a later date, ISRCTN will ask for a data sharing plan to be added at a later date.
	Or, if the sponsor will make a plan available at a later date, state:	
	The data-sharing plans for the current study are unknown and will be made available at a later date.	

Field	Initial registry entry for deferred trials	Guidance for applicants
IPD sharing plan summary	Select option	 Select one or more option(s) from the dropdown list: Stored in publicly available repository Stored in non-publicly available repository Available on request Published as a supplement to the results publication Other Not expected to be made available Data sharing statement to be made available at a later date For commercial trials, the appropriate option is likely to be 'Not expected to be available'; however, the sponsor may make a commitment to provide a data sharing plan at a later date.
2. Contact		You must enter three contacts: the Principal Investigator (PI), a scientific contact and a public contact. The PI must be named, but the scientific and public contacts can be identified by role or department. The scientific and public contacts can be the same person/role/department, and the PI can serve as each of the three contacts.
Туре	Select option	 For each contact, select an option, or multiple options, from the dropdown list: Principal investigator Scientific Public

Field	Initial registry entry for deferred trials	Guidance for applicants
		NB: In IRAS, the investigator responsible for the entire study is called the 'Chief investigator'; however, this role is 'Principal investigator' in the WHO International Standards for Clinical Trial Registration, which is the standard used in the ISRCTN registry. Enter the information below for each of the
		three contacts.
Title First n ame Last name ORCID ID	Select option [Name of contact]	Select title and enter name. This is mandatory for the PI, but optional for the scientific and public contacts. For the scientific and public contacts, include a role or department name here if the contact is not a named person. For example, for the scientific or public contact, you could select 'Dr' as title, and enter 'Project Management' as first name, and 'Department' as surname. Enter if available; otherwise, leave blank.
Address City Country Zip/Postcode	[Professional address]	Enter the professional address of the contact.
Tel	[Enquiries telephone number]	Enter telephone number (a general enquiries number is strongly recommended)
Email	[Enquiries email address]	Enter an email address for enquiries (a general enquiries email address is strongly recommended)

Field	Initial registry entry for deferred trials	Guidance for applicants
3. Sponsor & Funder		
Sponsor		At least one sponsor organisation must be entered.
Organisation	[Name of sponsor organisation]	Enter name of sponsor organisation.
Address	[Sponsor address]	Enter address of sponsor organisation.
City		
Country		
Zip/Postcode		
Tel	[Sponsor enquiries telephone number] or '-'	Enter a number (including international
		dialling code) for general clinical trials
		enquiries. Enter a hyphen ('-') if none is
		available.
Email	[Sponsor enquiries email address]	Enter a contact email address (a general
		clinical trial enquiries email address is
		strongly recommended).
Туре	Select option	Select type of sponsor from dropdown list:
		Not defined
		Charity
		Government
		 Hospital/treatment centre
		Industry
		• Other
		Research council
		 Research organisation
		University/education
Website		Optional field. Leave blank, unless sponsor
		wishes to provide URL to sponsor's website.
Funder(s)		
Funder Name	Funder organisation	Enter name of funder organisation (which
		may be the same as the sponsor).

Field	Initial registry entry for deferred trials	Guidance for applicants
4. Payment agreement		
Payment method	Funder pays	Select 'Funder pays' from dropdown list.
Trusted funder		Leave unselected
Why did you choose ISRCTN to register your study?	<i>Optional: there is no need to answer this question.</i>	If you choose to answer this question, you can select 'Other (please specify)' from dropdown list and enter 'Deferral'