



ICH E6 (R3) GCP GUIDELINE UPDATES:

CLINICAL TRIAL START-UP

ICH E6 (R3) Good Clinical Practice (GCP) Guideline effective 1 Jan 2026:

Get compliant before starting your clinical trials



DOCUMENTATION SETUP

Prior to study initiation:

- Define & document type of source record(s) & location
- Establish data capture methods

Avoid unnecessary transcription between source records & data acquisition tools e.g.

- Paper → Paper → Electronic
- Multiple manual transfers
- Redundant data entry

STUDY TEAM DELEGATION

Create delegation log:

- Verify team members are qualified
- Assign specific tasks for each member
- Document training
- Clinical practice activities may not require delegation, but documentation of departmental involvement & PI authorization is necessary.

Appoint supervisory staff for large teams

PI Change = Create new Delegation Log

EMERGENCY UNBLINDING

Protect participant safety:

- Prepare for emergency unblinding from start of study per protocol without undue delay and hindrance
- Maintain unblinding information with risk mitigation (e.g. controlled access for authorized personnel only)

SERVICE PROVIDER OVERSIGHT

PI is accountable:

To maintain proportionate oversight of 3rd party service providers based on data significance & participant safety risks:

- Have written service agreements defining roles, activities & responsibilities
- Maintain research conduct accountability
- Provide training and ensure record access to persons performing research activities

References:

- ICH E6 (R3) GCP: Sections 2.3.1- 2.3.4, 2.11, 2.12.2
- Updated NHG Health Proper of Conduct (PCR) SOPs 501-A02, A03, B02, B03, C02 - Summary of changes: [NHG Health Proper Conduct of Research SOPs & Templates](#)

