College of Medicine

School of Public Health &Family Medicine

Department of Health Systems & Policy

Pregnant Women as Participants in Clinical Trials: Ethical Framework and Perspectives from Malawi

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Research compliance: What are the rules?

- International Ethics Guidelines
- Regulatory Guidelines (International/National)
- Sponsor Guidelines
- Institutional Research Guidelines

What are the country-specific regulations and guidelines about pregnant women as research participants?

- Malawi Constitution Article 5
  - Academic freedom (a right to be free to research and study and teach)
  - The duty to seek informed consent
  - Respect of privacy and confidentiality
  - Abortion law
  - National commission of science and technology Act and NCST research guidelines on ethics committee jurisdiction(national interest studies)

Are there other laws (other than those governing research) that must also be considered?

- Abortion law
- New HIV law (Issues of privacy & confidentiality)
- Physician disclosure of HIV status

What role, if any, do international guidelines (e.g., CIOMS) and/or regulations (including U.S.) have in your deliberations?

- WHO (encouraging research of neglected groups and diseases)
- FDA
- EMA
- CIOMS Guidelines 18 & 19)
- Belmond report
- GCP
- GMP
- GLP
- GCEP

What has been your experience with previous trials involving pregnant women?

- Overly precautionary approach
- Overly protected
- Paternalistic
- Pregnant women & children neglected or avoided as research participants
- Women and children research questions avoided, neglected or ignored
- There is a need for research equity
- Globally there is a move from reaction to more balanced ethical stand towards research with vulnerable groups (e.g., children & pregnant mothers)

How did you think about questions regarding the risks and benefits?

- How to manage SUSAR
- Disclosure of risk or potential risk
- Principle of necessity
- Precautionary principle
- Justification –the study is responsive to health needs of pregnant women
- The benefit & risk ratios

What do you see as the most significant ethical concerns about conducting an intervention trial with pregnant women?

- Balancing the interest of the mother and of the unborn child
- Balancing the right of the mother to give consent and the right of the unborn to be protected (the duty to protect the unborn)
- Informed consent process and information sheet
- The consent process should be informed and free
- Justify any potential harm with potential benefit (safety of subjects)
- Community Engagement plan and compensation plan
- Monitoring plan

Are there particular areas of confusion or conflict for Ethics Committees and Institutional Review Boards?

- Over protection of children and pregnant women to the research disadvantaging them
- Research equity gap between men, pregnant women and children
- Balancing promotion and protection in research with infants and pregnant women
- A well-trained, active and objective IRB is very important to research that involves human subjects (value & evidence informed decisions

Research Oversight System in Malawi

- Health Research issues in Malawi are co-coordinated by the Division of Health, Social Sciences and Humanities of the National Commission for Science and Technology
- The Division is supported by committees at national and institutional level with legislative anchorage
  - National Committee on Bioethics (Advisory and policy making)
  - National Health Sciences Research Committee (NHSRC)
  - National Social Sciences Research Committee
  - College of Medicine Research and Ethics Committee (COMREC)
  - (PMPB)

Research Oversight in Malawi cont'd

- Key policy regulations of the NCST:
  - Specify cross representation of NHSRC and COMREC; MOU/Agreement procedures ; Conflict of interest management procedures
  - Provide opportunity for NHSRC/COMREC open session discussion with researchers
  - Defines national interest studies and provide some examples of such studies; Specify how to review such studies

Research Oversight in Malawi cont'd

- National Interest Studies:
  - These are studies that deserve particular attention because of their sensitive, political and safety implications;
  - Studies covering the following areas are to be regarded as examples of national interest studies: All vaccine trials; stem cell research; cloning research; all genetic studies; national surveys; and all drug trials where patent issues are involved and where safety issues remain fully unknown

Research Oversight in Malawi cont'd

- National Procedure for Research in Malawi
- Review and Clearance
  - (i) General Health Research : Either by COMREC or NHSRC as per policy measure requirements
  - (ii) Clinical Trials: Either by COMREC or NHSRC for all trials involving well known and well tried registered medications and vaccines in therapeutic doses [as safety and intellectual property issues are already well known]

Research Oversight in Malawi cont'd

- (iii) Clinical Trials involving new drug and vaccine development [where patent issues are involved and safety issues remain fully unknown]
  - To be ethically reviewed by NHSRC or its Ad Hoc Committee established for this purpose
  - PMPB makes a joint review to offer double protection for participants
- Clinical Trial Involving well known and registered medications BUT using doses other than the well tried and registered doses:
  - Requires Review of NHSRC or COMREC, and Determination by NHSRC or COMREC for its necessity to be forwarded to PMPB.

The role of RECs/IRBs in Health Research

- Promote good research
- Human participants protection (Safety, welfare& rights)
- Perform an independent scientific and ethical
- To monitor study
- To promote research results dissemination

Conclusion

- Given the complex nature of research, a thorough and thoughtful review by an IRB will allow a researcher to conduct the best possible study while protecting the rights and welfare of human research subjects
- Women and children should not be excluded from clinical research
- IRBs should ensure that participants are fully informed and free