Guidance for selecting the Applying Research Principal in ethics applications for research involving collaborations between Karolinska Institutet and healthcare providers in Region Stockholm

Amendments to the Act (2003:460) on Ethical Review of Research Involving Humans

As of 1st January 2020, all involved research principals (entities for the research) must be listed in the ethics application to the Swedish Ethical Review Authority (EPM). The research principals must jointly agree on which of them will submit the ethics application on behalf of everyone and a description of each principal's roles and responsibilities in the proposed project must be included in the application. The applying research principal is responsible for informing all participating research principals of the decision from EPM.

This document aims to guide the selection of the applying research principal (sökande huvudman) and participating research principal (medverkande huvudman).

Selection of applying and participating research principals

According to the Ethical Review Act, the applying research principal is the government agency or the physical or legal entity under whose operations the research is conducted. This could be a university, municipality, region, authority, or private company. A research project may be conducted involving one or more research principals.

Example with two research principals: Research involving patient sampling within healthcare is analysed and processed within the university's operations.

The difference between the applying and participating research principal is best explained as follows: the applying principal has a coordinating role with the Ethical Review Authority (EPM), is responsible for submitting the application correctly and completely, and must inform the other research principals of EPM's decision. Each principal, whether applying or participating, is responsible for the part of the research conducted within their own operations as defined by the ethics application.

Guidance for Collaborative Projects Between Karolinska Institutet (KI) and Region Stockholm

- KI should generally be the applying research principal since most projects are coordinated and managed from KI's operations. For example, analysis of biological samples from a healthcare provider.
- Region Stockholm should primarily be the applying research principal for intervention and/or sampling studies in healthcare where there is more than minimal medical risk to research participants. This ensures that the responsible healthcare manager, as representative of the applying research principal, actively signs the application to EPM.

However, there is no formal obstacle to KI being the applying research principal if all participating research principals agree.

- When a doctoral student at KI is involved in a research project as part of their education, KI must always be listed as a research principal, though not necessarily as the applying research principal. It is sufficient for KI to be included as a participating research principal in this scenario.
- Research principal status is determined by where the research is conducted. An individual's employment status (e.g., dual employment at both Region Stockholm and KI) does not determine research principal status and the individual cannot decide which organisation is the research principal based on their preference. For individuals with dual employment as lecturers or professors at KI and healthcare professionals in Region Stockholm, the research principal should be designated based on where – under whose operations – the project is conducted (KI, Region Stockholm, or both, depending on the study design).
- If multiple research principals are involved, the division of roles between KI and Region Stockholm must be clearly specified in the application to EPM.
- Healthcare providers that only release personal data for research purposes to KI but are not otherwise involved in the study/trial are not considered research principals.

Clinical Trials Information System (CTIS) and the Role of Sponsor and Research Principals

Since the European Medicines Agency introduced CTIS, all applications for medical trials are handled through this system. Ethical review is integrated into the process, meaning no separate ethics application is submitted to EPM; instead, everything goes through CTIS via the Swedish Medical Products Agency. As the term "research principal" does not appear in European regulation, it is not listed in CTIS applications and there is no one place to list all research principals and determine who acts as applying and who acts as participating research principal. In this case, the roles and responsibilities of all research principals must be clearly described in the study protocol that is submitted to CTIS.

How Does the Choice of Applying Research Principal Affect Other Important Questions?

Personal Data Responsibility

The designation of applying or participating research principal in the ethics application does not automatically determine who takes responsibility for personal data.

Intellectual Property Rights (IPR)

Ownership of project materials and/or results (IPR) is not affected by who is the applying research principal. Ownership can be regulated in separate agreements.

Project Funding or Scope

There is no requirement that the funds intended to finance the project must be managed by the applying research principal submitting the application to EPM/CTIS.

Patient Insurance

Patient insurance is not related to who is the applying research principal in an ethics application. To ensure coverage by patient insurance (LÖF), the healthcare activities included in the research must be performed by healthcare personnel within the scope of their employment with a healthcare provider.

KI has its own insurance when, for example, KI staff conduct sampling within KI's facilities. If sampling occurs in hospital facilities but is performed by KI staff, the insurance question must be investigated with the relevant healthcare provider. More information is available on KI's website regarding various insurances.

Multiple Participating Healthcare Providers

In studies involving multiple healthcare providers, agreements may be needed between providers, for example, if staff from Karolinska University Hospital need to conduct part of the study at Södersjukhuset.

Biobank

Following the new Biobank Act effective from 1st July 2023, the responsible biobank no longer needs to be listed in the ethics application. Also note that samples taken within healthcare no longer automatically belong to the healthcare principal's biobank, they may instead belong directly to a biobank at a university, company, or another region.

Document Information

For questions, please contact forskningsstod.karolinska@regionstockholm.se or compliance@ki.se.

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