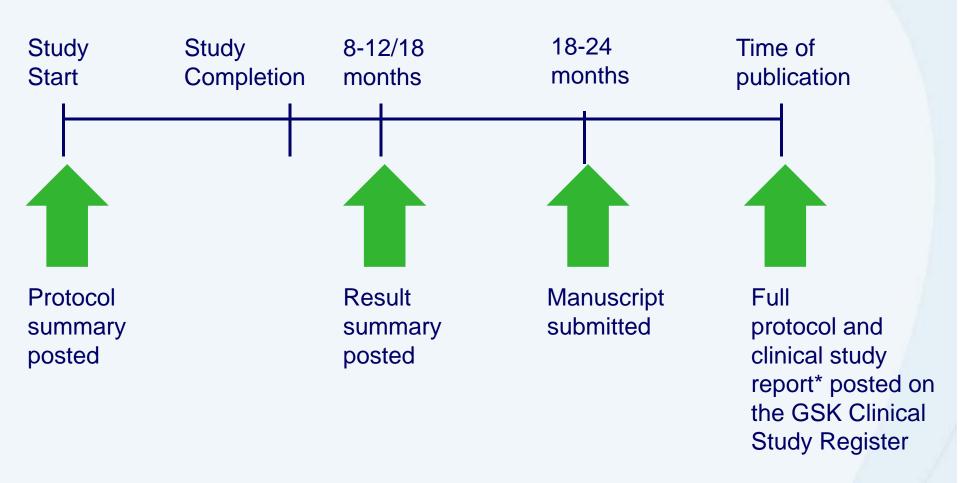


Access to Anonymised Patient Level Data from GSK Clinical Trials

GSK Publicly Discloses Clinical Research Information

<u>All human subject research</u> studies that evaluate investigational or approved medicinal products – (phase I-IV, meta-analyses, observational studies)



^{*} CSR posted after approval or termination of the medicine

Result Summaries and Publications Have Limitations

Publicly disclosed results:

- Summarise data from the study population with statistics to compare treatment groups
- > Do not include the primary data from each research participant

Primary Efficacy Results: Total Population				
Emetic Episodes Day 1 To Day 5	Dose 1	Dose 2	Dose 3	
Treatment Response, n (%)				
Complete (0 Episodes)	7 (19)	8 (22)	10 (31)	
Major (1-2 Episodes)	10 (28)	14 (39)	10 (31)	
Minor (3-5 Episodes)	0	1 (3)	0	
Failure (>5 Episodes/Rescued)	19 (53)	13 (36)	12 (38)	
p-value (stratified for centre)				
Dose 2 vs Dose 1	0.848			
Dose 2 vs Dose 3	0.467			

Benefits of Greater Access to Patient Level Data

- ➤ Enables the identification of trends and associations that may provide greater insight or help develop hypotheses and theories for further research
- ➤ Enables the review of results from clinical trials to validate the results
- ➤ Helps ensure the data provided by research participants are used to maximum effect in the creation of knowledge and understanding
- Strengthens trust in clinical research through enhanced openness and transparency

Main Issues

- Protecting the privacy and confidentiality of research participants
- > Ensuring the data are used for valid scientific investigation
- Practicalities of anonymising data and providing data in ways that enable external researchers to understand and navigate the information

A Solution

Research sponsors





Independent Data Custodian



Undertakes scientific review of proposals

Reviews
expertise and
management
of any conflicts
of interest

Manages privacy

Researchers



Submits scientific proposals and analysis plans

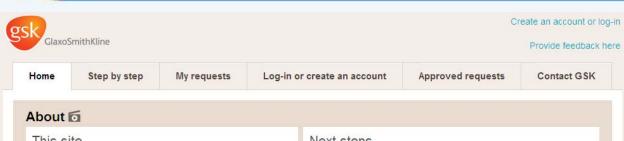
Agreements to protect privacy, and publish the results



The aim of GSK's initiative is to help realise a broader solution with an Independent Data Custodian



Request site (https://clinicalstudydata.gsk.com)



This site

Access to the underlying (patient level) data that are collected in clinical trials provides opportunities to conduct further research that can help advance medical science or improve patient care. This helps ensure the data provided by research narticinants are used to maximum effect in the

How it works

Researcher anonymised conduct furt

creation of

Submission of requests

Researchers can submit research proposals and request anonymised data from clinical studies we have listed on this site. Studies are listed after the medicine studied has been approved by regulators or terminated from development and the study has been accepted for publication.

We have initially included global studies conducted since 2007; over the next two years we will go back to the date GSK was formed (December 2000). In addition, all studies (including local studies) starting in or after 2013 will be included. There are currently approximately 200 studies listed on this site. We estimate that over 100 studies will be added in September 2013.

Researchers can also enquire about the availability of data from our clinical studies that are not listed on the site before they submit a research proposal... »

Next steps

We recognise that there may be different ways to provide greater access to patient level data for further research and that our approach is likely to evolve as we gain experience and receive feedback. We aim to update this site based on this experience and foodback in Sontember 2013

Review of requests

Research proposals are reviewed by an Independent Review Panel. External independent advisors for this initiative appointed by GSK will be the initial review panel.

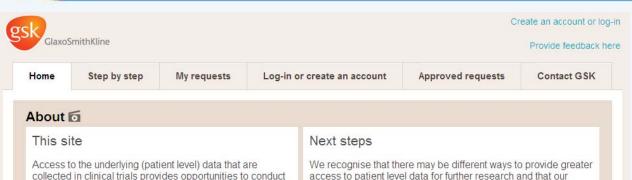
GSK is not involved in the decisions made by the panel.

Enquiries about access to data from studies not on this site are answered by GSK... »

Access to data

Following approval and after we receive a signed Data Sharing Agreement, access to the data needed for the research is provided on a password protected website... »

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Access to data

Following approval and after we receive a signed Data Sharing

Get started

View

You can view studies listed on this site before creating an account... »

View and submit

After you create an account, you can select studies and submit a research proposal or enquiry... »

Available Clinical Studies will Build



- Researchers can submit research proposals and request data from clinical studies we have listed on the site
- Studies are listed after the medicine studied has been approved by regulators or terminated from development and the study has been accepted for publication
- We have included global studies conducted since 2007; approximately 200 studies are listed
- Over the next two years we will add global studies going back to the formation of GSK
- We will also include all studies (including local studies) we start in or after 2013
- We estimate that over 100 studies will be added in September 2013

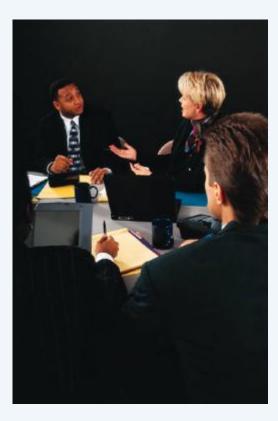
Researchers Submit Research Proposals Using an On-line Form with these Items

Lay Summary Title Study Design Studies Selected and **Section A:** Research Plan **Study Populations** Primary and Secondary **Endpoints** Statistical Analysis Plan **Publication Plan** Post or Position Name **Section B:** Information Employer, Company, Education, Professional about the Research Team Research Institution or Qualifications and Memberships **Affiliation Section C: Section D: Section E:** Funding of the Potential Conflicts of Other Information **Proposed Research** Interest (CoI)

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Research Proposals will be Reviewed by an Independent Panel

The panel will consider:



- The scientific rationale and relevance of the proposed research to medical science or patient care
- ➤ The ability of the proposed research plan (design, methods and analysis) to meet the scientific objectives. This is a high-level review
- > The publication plan for the research
- ➤ Real or potential conflicts of interest that may impact the planning, conduct or interpretation of the research and proposals to manage these conflicts of interest
- The qualifications and experience of the research team to conduct the proposed research (a statistician with a degree in statistics or a related discipline should be part of the research team)

Researchers can Ask us About the Availability of Data from GSK Studies not Listed Before they Submit a Research Proposal

Enquiry Form Please complete this form in	English.				
To find out if we can provide data from our studies that are not listed on this site please search the GSK Clinical Study Register and provide the GSK Study Identification Number and the study title below. Alternatively, provide other reference information so we can identify the study. For example, a clinicaltrials.gov identification number or publication reference. Where we are able to provide access, we will do so if the Independent Review Panel approves your submitted research proposal and we receive a signed Data Sharing Agreement.					
GSK Study Id. No.	Study Title	Other Refere	ence Information		
		^	△ Add Another Study		
		~	~		

GSK Review of Enquiries



Have the studies been published or accepted for publication?

Are the studies of terminated or authorised medicines (in approved indications)?

Do we have the data? (e.g. many observational studies use data from third party databases)

Do we have the legal authority to provide the data? (e.g. the medicine may have been out-licensed to another company)

Can we effectively anonymise the data? (e.g. for studies of rare diseases we will consider this on a case by case basis)

Are there any practical constraints? (e.g. there may be issues related to the size of genetic databases)

What resources are required to retrieve and anonymise the data and documents?

Our Intent is to Provide Access to Data Where we Can



Where we are able to provide access, we will do so if the Independent Review Panel approves the submitted research proposal and we receive a signed Data Sharing Agreement

*Have you received an answer to a previous enquiry related to this research proposal?



Please provide the enquiry Reference Name and Number



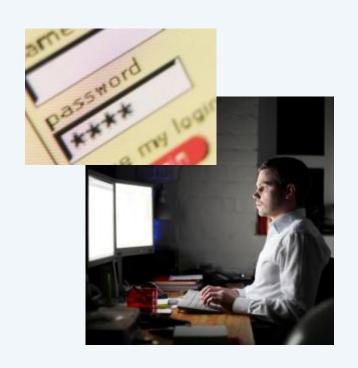
A Data Sharing Agreement will be put in place

The Data Sharing Agreement includes requirements to:



- > Only use the data for the agreed purpose
- Not to attempt to establish the identities of research participants
- ➤ Inform regulatory authorities and GSK of any safety concerns as soon as they are identified
- > Post and seek publication of the research
- Provide GSK with a copy of the manuscript after submission to a peer reviewed journal
- Allow us to use any invention that comes out of the research and negotiate any further rights in good faith

Access to Data is Provided in a Secure Password Protected Internet Site



- Controls in place to prevent data being downloaded or transferred
- Analytical software provided (e.g. "R" and SAS)
- Data can be combined and analyses downloaded

This helps to protect the privacy and confidentiality of research participants and helps ensure the data are used for the agreed research purpose

Data and Documents Provided for Each Study



- Raw dataset
- Analysis-ready dataset
- Protocols with any amendments
- Annotated case report form
- Reporting and analysis plan
- Dataset specifications
- Clinical study report (appendices which include patient level data are not included)

Helpline support will be available to help researchers understand and navigate the data

Summary

- We have taken a first step and established a system where researchers can request access to anonymised patient level data from our studies
- We recognise that there may be different ways to provide greater access to patient level data for further research and that our approach is likely to evolve as we gain experience and receive feedback
- We would like our initiative to transition to a broader independent system to allow access to data from clinical trials conducted by multiple companies and organisations and hope that such a system will be put in place by a third party in the public or charitable sector as soon as possible. GSK is actively engaged in encouraging the development of such a system.