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The PedCRIN Project: Informed consent for neonatal trials – Points to consider

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Abstract

Background

The Paediatric Clinical Research Infrastructure Network (PedCRIN), a project financed by the European Commission, developed practical tools supporting the set-up and management of non-commercial clinical trials in neonates. Within PedCRIN, obtaining informed consent for neonatal trials was identified as an important issue for researchers to improve enrolment of subjects.

Methods

Following team discussions including representatives from a patient organisation, and a review of the literature points to consider and a checklist were developed to support researchers preparing for informed consent discussions.

Points to consider

Obtaining informed consent from parents of critically ill neonates can be challenging. Their decision-making process is influenced by the severity of the child's condition, the benefit-risk balance, their emotional state and the quality of the relationship with the clinical team.

Independent of local legislation, parents may prefer that consent is sought from both. Misconceptions about the absence of risks or unrealistic expectations about benefits should be openly addressed to avoid misunderstandings which may harm the relationship with the clinical team. Continuous consent can be sought where it is unclear whether the free choice of parental consent has been compromised. Requesting input from parent organisations improves the quality of consent forms.

Conclusions

Obtaining informed consent is a dynamic process building on trusting relationships. It should include open and honest discussions about benefits and risks. Investigators may benefit from training in effective communication. Finally, involving parents in neonatal research including the development of the informed consent form and the process of obtaining consent should be considered standard practice.

Key words: Neonatal, Clinical trials as topic, Informed consent, Guidance, Ethics

What is known about this topic?

- Obtaining parental consent for neonatal studies is challenging
- Poor understanding of the benefits and risks of neonatal trials and their rationale are frequent reasons of refusing consent
- Issues related to the consent setting influence the likelihood of parental understanding and consent

What this study adds?

- Key factors influencing parental consent decisions are summarised
- A checklist of points to consider when talking to parents about the possible inclusion of a neonate into a clinical trial has been built
- The checklist may help researchers to optimise the setting for seeking parental consent

BACKGROUND

Children, including neonates, have long been excluded from clinical research due to ethical and practical challenges.[1] This has led to a situation where up to 90% of newborn babies admitted to neonatal intensive care units are treated at least once with off-label or unlicensed medicines.[2-4] This is associated with a higher risk of lack of efficacy, serious adverse drug reactions and medication errors.[5-7]

In 2007 the European Paediatric Regulation governing the development and authorisation of medicines for children, came into force.[8, 9] In addition, the European Commission (EC) is financing various European projects for the development of a paediatric research infrastructure.[10] In this context the Paediatric Clinical Research Infrastructure Network (PedCRIN), a four-year project, was initiated in January 2017.[11] PedCRIN combines the expertise of the European Clinical Research Infrastructure Network (ECRIN) and the European Paediatric Clinical Trial Research Infrastructure (EPCT-RI) with the aim of supporting the set-up and management of non-commercial clinical trials in children.[11]

At the beginning of the PedCRIN project, in 2017, a survey was conducted among researchers to understand what the needs of the research community are with regards to clinical trials in children.[12] Based on the results of this survey a series of neonatal topics were developed with the aim of responding to these questions and developing a set of practical tools for researchers.[13]

The aim of this article is to summarise the key points researchers may want to consider when preparing for the informed consent discussion with parents.

METHODS

Based on the survey results researchers indicated that they would welcome support with the informed consent process.[12, 13] Following team discussions including representatives from a patient organisation, and an initial, targeted review of the literature the following question was formulated for the development of a neonatal tool:

- What are some of the practical points to consider during informed consent discussions with parents of neonates to be included into a clinical trial?

POINTS TO CONSIDER

Introduction

Obtaining informed consent for a clinical study from parents of critically ill neonates can be challenging.[14-17] In this context it may be helpful to remember that parents would have expected to have a healthy baby.[18] Witnessing the severity of their child's condition is extremely stressful for parents and the neonatal intensive care unit (NICU) setting can be intimidating.[18-20]

Parents may feel overwhelmed by the large amount of information they receive, time pressure and their emotions.[18, 21-24] Taking voluntary decisions under such circumstances can be very difficult.[18, 23, 26] The parent's decision-making process on trial participation is influenced by the severity of the child's condition, the perceived benefit-risk balance of trial participation, their emotional state, timing of the request and the quality of the relationship with the clinical team,

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2
3 amongst others.[23, 27] However, most parents will respond positively to requests for inclusion
4 into a well-designed clinical trial.[22, 28]
5

6 Antenatal visits are unique opportunity to provide general information to future parents about
7 neonatal research currently being conducted at the hospital.[29] For specific neonatal conditions
8 these visits can also be an opportunity to discuss with parents the potential inclusion of their child
9 into a study.[30] This may provide parents with more time to discuss compared to providing this
10 information only at the time of inclusion.[18, 23, 26, 31] Antenatal discussions may also provide
11 an opportunity to introduce the investigator to the family. Deferred consent for may be used for
12 the recruitment into studies of life-threatening neonatal conditions.[32] However, multicentre
13 studies may need to consider differences in local practices and the acceptability of deferred
14 consent.[32]
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18 Awareness of the difficulties some parents may experience may help to ensure that trial
19 procedures and communication are optimised to meet their needs.[33] Cultural differences
20 should be taken into account and information should be provided in the parent's native
21 language.[34-36] Understanding the perspective of parents on the conduct of neonatal clinical
22 trials is important for successful recruitment. Requesting input from parent organisations has
23 been shown to increase recruitment number and improve the quality of trial protocols and
24 consent forms.[37-40]
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27

28 **Informed consent discussion**

29 Depending on local legislation, informed consent needs to be provided either by one or both
30 parents/legal guardians.[41] However, independent of the legislation, parents may prefer that
31 consent is sought from both.[36] Parental decisions are strongly influenced by how the
32 information is provided, timing and content.[23] Whilst, from a legal perspective, the written
33 informed consent form is important, many parents feel that the conversation and verbal
34 information provided is more important.[42] Having a script or check list which can be gone
35 through together with the parents may help ensuring all relevant information is not only provided
36 but also understood by the parents/ legal guardians. Written informed consent documents can be
37 difficult to read and parents may feel that they are lengthy.[43-45] The readability of these
38 documents can be improved by requesting input from parent or patient organisations and by
39 adhering to existing guidelines.[41, 46, 47]
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44 **Parental decision-making process**

45 The decision-making process of families during consent is dynamic and will be facilitated by
46 building trusting relationships through the provision of transparent and clear information on the
47 benefit-risk of available treatment options and ensuring the needs of families are addressed
48 proactively.[48-53] Attention should be paid to the possible misconceptions parents may have
49 about the absence of any risk and unrealistic expectations about the benefits of the clinical trial as
50 this may lead to misunderstandings and harm the trust parents have placed in the clinical
51 team.[23]
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54 A variety of techniques are available to improve the understanding of the information provided
55 during the informed consent process.[52, 55] Spending more time with parents appears to be the
56 most effective measure in obtaining parental consent, whilst time pressure may lead to difficulties
57 in having their agreement.[55-57] Jansen-van der Weide et al. have proposed to adapt the consent
58 process to the time constraints depending on the urgency for treatment.[57] However, it is
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important to remember that parental decision making in extremely stressful situations may be difficult and their ability to provide voluntary consent may be temporarily impaired.[58] Miller et al. have developed a tool to assess the degree of the voluntariness of a parent’s decision.[58] Furthermore, continuous consent can be sought in trials where it is unclear whether the free choice of parental consent has been compromised.[59, 60]

Who should be seeking informed consent?

Clinical trial regulations and regulatory documents provide guidance on the informed consent process.[47, 49] If informed consent is sought by an investigator, who is not the treating physician, parents may have difficulties establishing a trusting relationship and this should be addressed proactively by the study team.[61, 62] On the other hand, if informed consent is requested by the treating physician parents may find it difficult to decline the request and may create conflicts of interest for the physician.[63] One way of addressing these challenges is to introduce the investigator to the parents during standard clinical practice, for example at a routine visit to the clinic or ward rounds.[61, 62]

Finally, it can be challenging to ensure that the informed consent conversation provides all the relevant information and that the language used is understandable.[43] Sponsors may consider training investigators on effective communication and what kind of information needs to be included.[43]

To support researchers preparing for the informed consent process of a neonatal trial a checklist of points to consider was developed, which summarises key information from this article. (Table 1)

Table 1 Check list of points to consider when talking to parents about the possible inclusion of a neonate into a clinical trial

Points to consider during informed consent process	Done	Delayed	Not applicable	Comments
Informed consent setting				
Consider approaching parents prior to delivery[29]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Both parents should be present[36]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Both parents should be asked for consent[36]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Offer the possibility to have the responsible nurse and/or doctor, trusted friend and/or family member or a parent from a NICU association joining the conversation[50]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Introduce the investigator/ HCP who will be seeking consent during routine contacts with the parents[61, 62]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Ensure parents are comfortable and trust the investigator/ HCP seeking consent[50]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In multinational trials local beliefs, customs and traditions should be taken into consideration[35]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Consent information				
Information needs to be clear and well structured[44, 45]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Information should be provided in the parent’s native language[36]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Pause for questions – don’t rush[23]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Provide written information where parents can find additional, independent information and talk to NICU parent organisations[48]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Reassure that their decision to participate or not will not change level of care[53]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Clarify that parents can always change their mind and that this does not have any consequences for the routine treatment of their child[53]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Be prepared to re-explain and re-consent[50, 58]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Adapt communication to what the parents can take in at the time[18, 25]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If parents are struggling with the decision-making process, acknowledge that it is difficult[50, 53]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If parents are anxious provide more support and ask how you can help them, reassure that they should take their time to decide[50,53]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Benefits study treatment			
Don't exaggerate benefits[50]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Explain how the study will benefit the child[53]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Explain how the study will benefit neonates with the same condition[53]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Risks of study treatment			
Be upfront about potential risks of the study treatment and the comparator[48, 50]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Explain how study related risks will be minimised[53]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Address concerns about pain and discomfort proactively[54]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Study procedures			
Explain whether and how the study will interfere with routine clinical care[53]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Be clear about additional procedures and follow up – other than what is normally done[40]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Explain how additional follow up (other than routine) will be organised and address any questions about reimbursement of costs for transport and additional child care[40]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

HCP= Health care professional; NICU= Neonatal Intensive Care Unit

CONCLUSIONS

Obtaining informed consent for neonatal research is challenging. This was confirmed in a survey of paediatric researchers in the context of the PedCRIN project. Therefore, a tool was developed which is described in this paper. The tool is providing background information on specific aspects of consent for neonatal trials and a check list of points to consider which may be used by researchers preparing for informed consent. Future research may examine how this tool performs and how it can be improved. Finally, involving parents at all stages of neonatal research including the development of the informed consent form and the process of obtaining consent should be considered standard practice.

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Conflict of interest statement

All authors consider not having any competing interests for this systematic review. BA has worked for GlaxoSmithKline between October 2006 and September 2009 and holds company shares. Between October 2009 and May 2015 she has worked for Novartis.

Contributors

CK led the PedCRIN project. DB conducted the survey. BA, VE and EJA developed the question. BA and VE reviewed the literature. BA wrote the article. All authors reviewed the draft article and contributed with comments.

REFERENCES

1. Mulugeta YL, Zajicek A, Barrett J, *et al.* Development of Drug Therapies for Newborns and Children: The Scientific and Regulatory Imperatives. *Pediatr Clin North Am* 2017;64(6):1185-1196. doi:10.1016/j.pcl.2017.08.015.
2. Jobe AH. Off-Label Drugs in Neonatology: Analyses Using Large Data Bases. *J Pediatr* 2019;208:9-11. doi:10.1016/j.jpeds.2019.01.038.
3. Yackey K, Stukus K, Cohen D, *et al.* Off-label Medication Prescribing Patterns in Pediatrics: An Update. *Hosp Pediatr* 2019;9(3):186-193. doi:10.1542/hpeds.2018-0168.
4. Nir-Neuman H, Abu-Kishk I, Toledano M, *et al.* Unlicensed and Off-Label Medication Use in Pediatric and Neonatal Intensive Care Units: No Change Over a Decade. *Adv Ther* 2018;35(7):1122-1132. doi:10.1007/s12325-018-0732-y.
5. Knight M. Adverse drug reactions in neonates. *J Clin Pharmacol* 1994;34(2):128-135. doi:10.1002/j.1552-4604.1994.tb03976.x.
6. Conroy S. Association between licence status and medication errors. *Arch Dis Child* 2011;96(3):305-306. doi:10.1136/adc.2010.191940
7. Bellis JR, Kirkham JJ, Thiesen S, *et al.* Adverse drug reactions and off-label and unlicensed medicines in children: a nested case-control study of inpatients in a pediatric hospital. *BMC Med* 2013;11:238. doi:10.1186/1741-7015-11-238.
8. European Commission (EC). Regulation (EC) No 1901/2006 of the European Parliament and of the Council of 12 December 2006 on medicinal products for paediatric use and amending Regulation (EEC) No 1768/92, Directive 2001/20/EC, Directive 2001/83/EC and Regulation (EC) No 726/2004. *Official Journal of the European Union*, 27.12.2006; L 378/1. Available: https://ec.europa.eu/health/sites/health/files/files/eudralex/vol-1/reg_2006_1901/reg_2006_1901_en.pdf [Accessed 17 September 2019].
9. European Commission (EC). Regulation (EC) No 1902/2006 of the European Parliament and of the Council of 20 December 2006 amending Regulation 1901/2006 on medicinal products for paediatric use. *Official Journal of the European Union*, 27.12.2006; L 378/20. Available: https://ec.europa.eu/health/sites/health/files/files/eudralex/vol1/reg_2006_1902/reg_2006_1902_en.pdf [Accessed 17 September 2019].
10. European Commission (EC). Medicines for Children. Available: https://ec.europa.eu/health/human-use/paediatric-medicines_en [Accessed 3 June 2020].
11. Paediatric Clinical Research Infrastructure Network (PedCRIN). Overview. Available: <https://www.ecrin.org/projects/pedcrin> [Accessed 29 May 2020].
12. Ruggieri L, Bartoloni F, Ceci A, *et al.* Deliverable 3.1: Survey on infrastructure and service needs for paediatric and neonatal trials. *PedCRIN* 2019. Available: https://www.ecrin.org/sites/default/files/PedCRIN/PedCRIN%20Deliverables/WP3%20D3.1_%20Survey%20Report%20on%20infrastructure%20and%20service%20needs%20for%20paediatric%20and%20neonatal%20trials%20FV_28082017.pdf [Accessed 29 May 2020].
13. Aurich B, Elie V, Evelyne Jacqz-Aigrain E, *et al.* Deliverable D3.5: Procedures for setup of neonatal trials. *PedCRIN* 2017. Available: https://www.ecrin.org/sites/default/files/PedCRIN/PedCRIN%20Deliverables/WP3%20D3.5_Procedures%20for%20the%20set%20up%20of%20neonatal%20clinical%20trials_FV_28022019.pdf [Accessed 29 May 2020].
14. Wilman E, Megone C, Oliver S, *et al.* The ethical issues regarding consent to clinical trials with pre-term or sick neonates: a systematic review (framework synthesis) of the empirical research. *Trials* 2015;16:502. doi:10.1186/s13063-015-0957-x.
15. Megone C, Wilman E, Oliver S, *et al.* The ethical issues regarding consent to clinical trials with pre-term or sick neonates: a systematic review (framework synthesis) of the analytical (theoretical/philosophical) research. *Trials* 2016;17(1):443. doi:10.1186/s13063-016-1562-3.
16. Meinich Petersen S, Zoffmann V, Kjærgaard J, *et al.* Disappointment and adherence among parents of newborns allocated to the control group: a qualitative study of a randomized clinical trial. *Trials* ;15:126. doi: 10.1186/1745-6215-15-126.
17. Lawton J, Hallowell N, Snowdon C, *et al.* Written versus verbal consent: a qualitative study of stakeholder views of consent procedures used at the time of recruitment into a peripartum trial conducted in an emergency setting. *BMC Med Ethics* 2017;18(1):36. doi:10.1186/s12910-017-0196-7.
18. Jollye S. An exploratory study to determine how parents decide whether to enroll their infants into neonatal clinical trials. *J Neonatal Nurs* 2009;15(1):18-24. doi: 10/1016/j.jnn.2008.07.012.
19. Vecchi Brumatti L, Montico M, Russian S, *et al.* Analysis of motivations that lead women to participate (or not) in a newborn cohort study. *BMC Pediatr* 2013;13:53. doi: 10.1186/1471-2431-13-53.
20. Pritchard VE, Montgomery-Hönger A. A comparison of parent and staff perceptions of setting-specific and everyday stressors encountered by parents with very preterm infants experiencing neonatal intensive care. *Early Hum Dev* 2014;90(10):549-55. doi: 10.1016/j.earlhumdev.2014.07.006.

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21. Latour JM, Duivenvoorden HJ, Hazelzet JA, *et al.* Development and validation of a neonatal intensive care parent satisfaction instrument. *Pediatr Crit Care Med* 2012;13(5):554-9. doi: 10.1097/PCC.0b013e318238b80a.
22. Cartwright K, Mahoney L, Ayers S, *et al.* Parents' perceptions of their infants' participation in randomized controlled trials. *J Obstet Gynecol Neonatal Nurs* 2011;40(5):555-65. doi: 10.1111/j.1552-6909.2011.01276.x.
23. Snowdon C, Elbourne D, Garcia J. "It was a snap decision": parental and professional perspectives on the speed of decisions about participation in perinatal randomised controlled trials. *Soc Sci Med* 2006;62(9):2279-90. doi: 10.1016/j.socscimed.2005.10.008.
24. Ward FR. Chaos, vulnerability and control: parental beliefs about neonatal clinical trials. *J Perinatol* 2009;29(2):156-62. doi: 10.1038/jp.2008.139.
25. Freer Y, McIntosh N, Teunisse S, *et al.* More information, less understanding: a randomized study on consent issues in neonatal research. *Pediatrics* 2009;123(5):1301-5. doi: 10.1542/peds.2007-3860.
26. Manning DJ. Presumed consent in emergency neonatal research. *J Med Ethics* 2000;26(4):249-53. doi: 10.1136/jme.26.4.249.
27. Thomas M, Menon K. Consenting to pediatric critical care research: understanding the perspective of parents. *Dynamics* 2013;24(3):18-24.
28. Morley CJ, Lau R, Davis PG, *et al.* What do parents think about enrolling their premature babies in several research studies? *Arch Dis Child Fetal Neonatal Ed* 2005;90(3):F225-8. doi: 10.1136/adc.2004.061986.
29. McCarthy KN, Ryan NC, O'Shea DT, *et al.* Parental opinion of consent in neonatal research. *Arch Dis Child Fetal Neonatal Ed* 2019;104(4):F409-F414. doi: 10.1136/archdischild-2018-315289.
30. Ayers S, Sawyer A, Düring C, *et al.* Parents report positive experiences about enrolling babies in a cord-related clinical trial before birth. *Acta Paediatr* 2015;104(4):e164-e170. doi:10.1111/apa.12922.
31. Kenyon S, Dixon-Woods M, Jackson CJ, *et al.* Participating in a trial in a critical situation: a qualitative study in pregnancy. *Qual Saf Health Care* 2006;15(2):98-101. doi:10.1136/qshc.2005.015636.
32. den Boer MC, Houtlosser M, Foglia EE, *et al.* Deferred consent for the enrolment of neonates in delivery room studies: strengthening the approach. *Arch Dis Child Fetal Neonatal Ed* 2019;104(4):F348-F352. doi:10.1136/archdischild-2018-316461
33. Eiser C, Eiser JR, Mayhew AG, *et al.* Parenting the premature infant: balancing vulnerability and quality of life. *J Child Psychol Psychiatry* 2005;46(11):1169-77. doi: 10.1111/j.1469-7610.2005.00415.x.
34. Simon CM, Kodish ED. Step into my zapatos, doc: understanding and reducing communication disparities in the multicultural informed consent setting. *Perspect Biol Med* 2005;48(1 Suppl):S123-38. doi: 10.1353/pbm.2005.0030.
35. Natale JE, Lebet R, Joseph JG, *et al.* Racial and Ethnic Disparities in Parental Refusal of Consent in a Large, Multisite Pediatric Critical Care Clinical Trial. *J Pediatr* 2017;184:204-208.e1. doi: 10.1016/j.jpeds.2017.02.006.
36. Neyro V, Elie V, Thiele N, *et al.* Clinical trials in neonates: How to optimise informed consent and decision making? A European Delphi survey of parent representatives and clinicians. *PLoS One* 2018;13(6):e0198097. doi: 10.1371/journal.pone.0198097.
37. Boote J, Julious S, Horspool M, *et al.* PPI in the PLEASANT trial: involving children with asthma and their parents in designing an intervention for a randomised controlled trial based within primary care. *Prim Health Care Res Dev* 2016;17(6):536-548. doi: 0.1017/S1463423616000025.
38. Bate J, Ranasinghe N, Ling R, *et al.* Public and patient involvement in paediatric research. *Arch Dis Child Educ Pract Ed* 2016;101(3):158-61. doi: 10.1136/archdischild-2015-309500.
39. Bakhbakhi D, Siassakos D, Storey C, *et al.* PARENTS 2 study protocol: pilot of Parents' Active Role and ENGagement in the review of Their Stillbirth/perinatal death. *BMJ Open* 2018;8(1):e020164. doi: 10.1136/bmjopen-2017-020164.
40. Harvey M, Nongena P, Edwards D, *et al.* We knew it was a totally at random thing': parents' experiences of being part of a neonatal trial. *Trials* 2017;18(1):361. doi: 10.1186/s13063-017-2112-3.
41. Lepola P, Needham A, Mendum J, *et al.* Informed consent for paediatric clinical trials in Europe. *Arch Dis Child* 2016;101(11):1017-1025. doi: 10.1136/archdischild-2015-310001.
42. Lentz J, Kennett M, Perlmutter J, *et al.* Paving the way to a more effective informed consent process: Recommendations from the Clinical Trials Transformation Initiative. *Contemp Clin Trials* 2016;49:65-9. doi: 10.1016/j.cct.2016.06.005.
43. Koyfman SA, Reddy CA, Hizlan S, *et al.* Phase I Informed Consent (POIC) Research Team. Informed consent conversations and documents: A quantitative comparison. *Cancer*. 2016;122(3):464-9. doi: 10.1002/cncr.29759.
44. Simonds VW, Garrouette EM, Buchwald D. Health Literacy and Informed Consent Materials: Designed for Documentation, Not Comprehension of Health Research. *J Health Commun* 2017;22(8):682-691. doi: 10.1080/10810730.2017.1341565.
45. Wang LW, Miller MJ, Schmitt MR, *et al.* Assessing readability formula differences with written health information materials: application, results, and recommendations. *Res Social Adm Pharm* 2013;9(5), 503-516. doi: 10.1016/j.sapharm.2012.05.009.
46. European Commission (EC). Ethical considerations for clinical trials on medicinal products conducted with the paediatric population - Recommendations of the ad hoc group for the development of implementing guidelines for Directive 2001/20/EC relating to good clinical practice in the conduct of clinical trials on medicinal products for human use, 2008. Available: https://ec.europa.eu/health/sites/health/files/files/eudralex/vol-10/ethical_considerations_en.pdf [Accessed 17 September 2019].

- 1
- 2
- 3 47. Medical Research Council (MRC). Consent and Participant Information Guidance, 2019. Available: <http://www.hrdecisiontools.org.uk/consent/links.html> [Accessed 17 September 2019].
- 4
- 5 48. McCarthy M. US researchers failed to disclose risks of newborn study, finds government office. *BMJ* 2013;346:f2367. doi: 10.1136/bmj.f2367.
- 6
- 7 49. Marc-Aurele KL, Steinman SL, Ransom KM, *et al.* Evaluation of the content and process of informed consent discussions for neonatal research. *J Empir Res Hum Ethics* 2012;7(3):78-83. doi:10.1525/JER.2012.7.3.78.
- 8
- 9 50. DeMauro SB, Cairnie J, D'Ilario J, *et al.* Honesty, trust, and respect during consent discussions in neonatal clinical trials. *Pediatrics* 2014;134(1):e1-3. doi: 10.1542/peds.2013-3720.
- 10
- 11 51. Mundy CA. Assessment of family needs in neonatal intensive care units. *Am J Crit Care* 2010;19(2):156-63. doi: 10.4037/ajcc2010130.
- 12
- 13 52. European Commission (EC). Ethical considerations for clinical trials on medicinal products conducted with minors - Recommendations of the expert group on clinical trials for the implementation of Regulation (EU) No 536/2014 on clinical trials on medicinal products for human use, Revision 1, 18 September 2017. Available: https://ec.europa.eu/health/sites/health/files/files/eudralex/vol-10/2017_09_18_ethical_considerations_with_minors.pdf [Accessed 17 September 2019].
- 14
- 15 53. Hoberman A, Shaikh N, Bhatnagar S, *et al.* Factors that influence parental decisions to participate in clinical research: consenters vs non consenters. *JAMA Pediatr* 2013;167(6):561-6. doi: 10.1001/jamapediatrics.2013.1050.
- 16
- 17 54. Franck LS, Cox S, Allen A, *et al.* Parental concern and distress about infant pain. *Arch Dis Child Fetal Neonatal Ed* 2004;89(1):F71-5. doi: 10.1136/fn.89.1.f71.
- 18
- 19 55. Flory J, Emanuel E. Interventions to improve research participants' understanding in informed consent for research: a systematic review. *JAMA* 2004;292(13):1593-601. doi: 10.1001/jama.292.13.1593.
- 20
- 21 56. Clinical Trials Transformation Initiative (CTTI). CTTI Recommendations: Informed consent, November 2015. Available: <https://www.ctti-clinicaltrials.org/sites/www.ctti-clinicaltrials.org/files/CTTI-InformedConsent-Recs.pdf> [Accessed 17 September 2019].
- 22
- 23 57. Jansen-van der Weide MC, Caldwell PH, Young B, *et al.* Clinical Trial Decisions in Difficult Circumstances: Parental Consent Under Time Pressure. *Pediatrics* 2015;136(4):e983-92. doi: 10.1542/peds.2014-3402.
- 24
- 25 58. Miller VA, Ittenbach RF, Harris D, *et al.* The decision making control instrument to assess voluntary consent. *Med Decis Making* 2011;31(5):730-41. doi: 10.1177/0272989X11398666.
- 26
- 27 59. Allmark P, Mason S. Improving the quality of consent to randomised controlled trials by using continuous consent and clinician training in the consent process. *J Med Ethics* 2006;32(8):439-43. doi: 10.1136/jme.2005.013722.
- 28
- 29 60. Gupta UC. Informed consent in clinical research: Revisiting few concepts and areas. *Perspect Clin Res* 2013;4(1):26-32. doi: 10.4103/2229-3485.106373.
- 30
- 31 61. Dekking SA, van der Graaf R, van Delden JJ. Strengths and weaknesses of guideline approaches to safeguard voluntary informed consent of patients within a dependent relationship. *BMC Med* 2014;12:52. doi: 10.1186/1741-7015-12-52.
- 32
- 33 62. Dekking SA, van der Graaf R, Kars MC, *et al.* Balancing research interests and patient interests: a qualitative study into the intertwining of care and research in paediatric oncology. *Pediatr Blood Cancer* 2015;62(5):816-22. doi: 10.1002/pbc.25444.
- 34
- 35 63. Black L, Batist G, Avar D, *et al.* Physician recruitment of patients to non-therapeutic oncology clinical trials: ethics revisited. *Front Pharmacol* 2013;4:25. doi: 10.3389/fphar.2013.00025. eCollection 2013.
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Narrative review of informed consent for neonatal trials – Practical points to consider and a check list

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19 Abstract

20 The Paediatric Clinical Research Infrastructure Network (PedCRIN), a project financed by
21 the European Commission, conducted a survey in 2017 among 663 researchers involved
22 in paediatric research networks assessing the needs of the paediatric research
23 community. The response rate was 22.2%. Using a Likert scale (0=not needed to
24 4=extremely needed) the survey had six large themes and researchers could add a free
25 text comment at the end.

26 Taking the results of the survey into account and following a narrative review of the
27 literature and team discussions, including representatives from a patient organisation,
28 practical points to consider and a checklist were developed for informed consent
29 discussions with parents.

30 Obtaining informed consent from parents of critically ill neonates can be challenging. The
31 parental decision-making process is influenced by the severity of the child's condition, the
32 benefit-risk balance, their emotional state and the quality of the relationship with the
33 clinical team. Independent of local legislation, parents may prefer that consent is sought
34 from both. Misconceptions about the absence of risks or unrealistic expectations about
35 benefits should be openly addressed to avoid misunderstandings which may harm the
36 relationship with the clinical team. Continuous consent can be sought where it is unclear
37 whether the free choice of parental consent has been compromised. Obtaining informed
38 consent is a dynamic process building on trusting relationships. It should include open
39 and honest discussions about benefits and risks. Investigators may benefit from training
40 in effective communication. Finally, involving parents in neonatal research including the
41 development of the informed consent form and the process of obtaining consent should
42 be considered standard practice.

43 The overall aim of this narrative review was to either identify publications who provide a
44 practical answer in the format of a check list or to create such a list, if none was found in
45 the literature.

46 **Key words:** Neonatal, Clinical trials as topic, Informed consent, Guidance, Ethics

47 What is known about this topic?

- 48 ➤ Obtaining parental consent for neonatal studies is challenging
- 49 ➤ Poor understanding of the benefits and risks of neonatal trials and why trials are needed
50 are frequent reasons of refusing consent
- 51 ➤ Issues related to the consent setting influence the likelihood of parental understanding
52 and consent

53 What this study adds?

- 54 ➤ Key factors influencing parental consent decisions are summarised
- 55 ➤ A checklist of points to consider when talking to parents about the possible inclusion of a
56 neonate into a clinical trial has been built
- 57 ➤ The checklist may help researchers to optimise the setting for seeking parental consent

58 BACKGROUND

59 Children, including neonates, have long been excluded from clinical research due to
60 ethical and practical challenges.[1] This has led to a situation where up to 90% of newborn
61 babies admitted to neonatal intensive care units are treated at least once with off-label or
62 unlicensed medicines.[2-4] This is associated with a higher risk of lack of efficacy, serious
63 adverse drug reactions and medication errors.[5-7]

64 In 2007 the European Paediatric Regulation governing the development and
65 authorisation of medicines for children, came into force.[8, 9] In addition, the European
66 Commission (EC) is financing various European projects for the development of a
67 paediatric research infrastructure.[10] In this context the Paediatric Clinical Research
68 Infrastructure Network (PedCRIN), a four-year project, was initiated in January 2017.[11]
69 During the PedCRIN project the expertise of the European Clinical Research
70 Infrastructure Network (ECRIN) and the European Paediatric Clinical Trial Research
71 Infrastructure (EPCT-RI) was combined with the aim of developing points to consider
72 documents (so called "Tools") for researchers to support the set-up and management of
73 non-commercial clinical trials in children.[11]

74 The aim of this article is to summarise the key points researchers may want to consider
75 when preparing for the informed consent discussion for a neonatal trial.

76 METHODS

77 At the beginning of the PedCRIN project, in 2017, an online survey was conducted (4 April
78 to 15 May 2017) among 663 researchers involved in European and international
79 paediatric research networks (e.g. ESDPPP, GRiP, INC, ENCePP).[12] The objective was to
80 understand what the needs of the research community are with regards to clinical trials
81 in children. The response rate was 22.2%. Using a Likert scale of 0 (not needed) to 4
82 (extremely needed) the survey grouped topics previously identified into six large themes
83 and researchers had the possibility to add a free text comment.[12,13] Based on the
84 results of this survey a series of neonatal topics were developed with the aim of
85 responding to these questions and developing a set of practical tools for researchers.[14]
86 The survey questions are provided in Supplemental material Table S1 and the results are
87 summarised in Supplemental material Figure S1.[12]

88 One of the topics highlighted by the survey concerned the informed consent process and
89 one of the free text comments suggested the development of "Strategies to improve the
90 enrolment in clinical trial".[12] The challenges surrounding neonatal consent have
91 previously been highlighted by a Delphi survey.[15] Neyro et al. reported that parents and
92 healthcare professionals agreed on 58 items to be included in the informed consent
93 information.[15] A narrative review of the literature was conducted in PubMed and of
94 regulatory guidance documents issued by the European Medicines Agency in February
95 2019. The PubMed search terms were "informed consent" and "neonatal clinical trials"
96 (up to 31 January 2019, limits: article in English, age group: newborn, full text available).
97 Additional publications were retrieved from the references of the articles reviewed.

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3 98 The review aimed to identify articles which provided insight into the challenges faced by
4 99 parents, investigators and health care professionals in the context of obtaining informed
5 100 consent for neonatal trials. Particular attention was paid to publications proposing
6 101 practical solutions to improve the process. The results of the survey, available literature
7 102 and professional experience of team members were taken into consideration. Team
8 103 discussions including representatives from a patient organisation (EV and MHED), a
9 104 neonatologist and paediatric pharmacologist (EJA), a paediatrician (BA) and a project
10 105 leader of paediatric clinical research (VE) were held and the following question was
11 106 formulated for the development of a neonatal tool:

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15 107 ➤ What are some of the practical points to consider during informed consent discussions
16 108 with parents of neonates to be included into a clinical trial?

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19 109 The rationale for this question was that the consent discussion with parents does not
20 110 easily fit into established processes of informed consent. It is often obtained in
21 111 circumstances which may make taking a valid decision challenging.[16-18] The
22 112 understanding and process of parental consent in such extreme circumstances is
23 113 informed by ethics guidelines, trial procedures driven by regulations, behavioural science,
24 114 the needs of parents and feedback from HCPs. For the purpose of developing a tool that
25 115 can be used by investigators these very varied topics had to be included into one single
26 116 tool. Thus, the overall aim of this narrative review was to either identify existing
27 117 publications who provide a practical answer in the format of a check list that can be used
28 118 by investigators or to create such a list, if none was found in the literature.

33 119 **Patient and public involvement**

34 120 The involvement of parents and patient representatives is an integral part of the PedCRIN
35 121 project with a dedicated team reflecting on processes to improve their involvement in the
36 122 design, conduct and reporting of paediatric clinical trials.[19] The results of the survey
37 123 were discussed with representatives of a patient organisation involved in PedCRIN. The
38 124 tool was then codeveloped with them. The representatives of the patient organisation
39 125 suggested to publish the tool. The article was written in collaboration with the aim of
40 126 distributing the tool.

45 127 **POINTS TO CONSIDER**

46 128 Reviewing the literature no publication was identified providing a check list for
47 129 investigators on the practical points to consider when preparing for the informed consent
48 130 discussion with parents.

49 131 Obtaining informed consent for a clinical study from parents of critically ill neonates can
50 132 be challenging.[16,20-22] In this context it may be helpful to remember that parents
51 133 would have expected to have a healthy baby.[23] Witnessing the severity of their child's
52 134 condition is extremely stressful for parents and the neonatal intensive care unit (NICU)
53 135 setting can be intimidating.[23-25]

54 136 Parents may feel overwhelmed by the large amount of information they receive, time
55 137 pressure and their emotions.[23,26-29] Taking voluntary decisions under such

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3 138 circumstances can be very difficult.[23,28,30] The parent's decision-making process is
4 139 influenced by the severity of the child's condition, the perceived benefit-risk balance of
5 140 trial participation, their emotional state, timing of the request and the quality of the
6 141 relationship with the clinical team, amongst others.[28,31] However, most parents will
7 142 respond positively to requests for inclusion into a well-designed clinical trial.[27,32]

11 143 **Informed consent setting**

12 144 Routine antenatal visits are a unique opportunity to provide general information to all
13 145 future parents about neonatal research currently being conducted at the hospital.[33] For
14 146 certain neonatal and maternal conditions these visits can also be an opportunity to
15 147 provide more specific information and discuss with parents the potential inclusion of
16 148 their child into a study.[34] This may provide parents with more time to discuss compared
17 149 to providing this information only at the time of inclusion.[23,28,30,35] The timing of
18 150 detailed discussions will depend on when the diagnosis of the neonatal condition has been
19 151 confirmed, the delivery date and the individual circumstances of the women and their
20 152 family.[36,37] Parental decision making in favour of trial participation is facilitated by
21 153 parents having sufficient time to consider their decision.[38-40] Antenatal discussions
22 154 may also provide an opportunity to introduce the investigator to the family. Deferred
23 155 consent may be used for the recruitment into studies of life-threatening neonatal
24 156 conditions.[41] However, multicentre studies may need to consider differences in local
25 157 practices and the acceptability of deferred consent.[41] Depending on local legislation,
26 158 informed consent needs to be provided either by one or both parents/ legal
27 159 guardians.[42] However, independent of the legislation, parents may prefer that consent
28 160 is sought from both.[15]

29 161 Clinical trial regulations and regulatory documents provide guidance on the informed
30 162 consent process.[43,44] If informed consent is sought by an investigator, who is not the
31 163 treating physician, parents may have difficulties establishing a trusting relationship and
32 164 this should be addressed proactively by the study team.[45,46] On the other hand, if
33 165 informed consent is requested by the treating physician parents may find it difficult to
34 166 decline the request and may create conflicts of interest for the physician.[47] One way of
35 167 addressing these challenges is to introduce the investigator to the parents during
36 168 standard clinical practice, for example at a routine visit to the clinic or on ward
37 169 rounds.[45,46]

38 170 The decision-making process of families during consent is dynamic and will be facilitated
39 171 by building trusting relationships through the provision of transparent and clear
40 172 information on the benefit-risk of available treatment options and ensuring the needs of
41 173 families are addressed proactively.[44,48-52] Attention should be paid to the possible
42 174 misconceptions parents may have about the absence of any risk and unrealistic
43 175 expectations about the benefits of the clinical trial, as this may lead to misunderstandings
44 176 and harm the trust parents have placed in the clinical team.[23]

177 **Consent information**

178 Awareness of the difficulties some parents may experience may help to ensure that trial
179 procedures and communication are optimised to meet their needs.[53] Cultural
180 differences should be taken into account and information should be provided in the
181 parent's native language.[15,54,55]

182 Parental decisions are strongly influenced by how the information is provided, timing and
183 content.[28] Whilst, from a legal perspective, the written informed consent form is
184 important, many parents feel that the conversation and verbal information provided is
185 more important.[56] Having a script or check list which can be gone through together with
186 the parents may help ensuring all relevant information is not only provided but also
187 understood by the parents/ legal guardians. Written informed consent documents can be
188 difficult to read and parents may feel that they are lengthy.[57-59] Understanding the
189 perspective of parents on the conduct of neonatal clinical trials is important for successful
190 recruitment. Requesting input from parent organisations has been shown to increase
191 recruitment numbers and improve the quality of trial protocols and consent forms.[42,
192 43,60-64] Involving parent organisations should follow a structured process such as
193 described by BLISS, for example.[65]

194 A variety of techniques are available to improve the understanding of the information
195 provided during the informed consent process.[51,66] Spending more time with parents
196 appears to be the most effective measure in obtaining parental consent, whilst time
197 pressure may lead to difficulties in having their agreement.[39,40,66] Jansen-van der
198 Weide et al. have proposed to adapt the consent process to the time constraints depending
199 on the urgency for treatment.[40] However, it is important to remember that parental
200 decision making in extremely stressful situations may be difficult and their ability to
201 provide voluntary consent may be temporarily impaired.[67] Miller et al. have developed
202 a tool to assess the degree of the voluntariness of a parent's decision.[67] Furthermore,
203 continuous consent can be sought in trials where it is unclear whether the free choice of
204 parental consent has been compromised.[17,18] Continuous consent provides the
205 opportunity to initially seek parental assent followed by full consent once parents had the
206 opportunity to make a valid informed consent decision.[16] An example would be assent
207 for trial inclusion in an emergency situation, followed by full consent once the neonate is
208 stabilised.

209 Finally, it can be challenging to ensure that the informed consent conversation provides
210 all the relevant information and that the language used is understandable.[57] Sponsors
211 may consider training investigators on effective communication and what kind of
212 information needs to be included.[57]

213 To support researchers preparing for the informed consent process of a neonatal trial a
214 checklist of points to consider was developed, which summarises key information from
215 this article. (Table 1)

Table 1 Check list of points to consider when talking to parents about the possible inclusion of a neonate into a clinical trial

Points to consider during informed consent process	Done	Delayed	Not applicable	Comments
<i>Informed consent setting</i>				
Consider approaching parents prior to delivery[33]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Both parents should be present[15]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Both parents should be asked for consent[15]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Offer the possibility to have the responsible nurse and/ or doctor, trusted friend and/ or family member or a parent from a NICU association joining the conversation[49]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Introduce the investigator/ HCP who will be seeking consent during routine contacts with the parents[45,46]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Ensure parents are comfortable and trust the investigator/ HCP seeking consent[49]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In multinational trials local beliefs, customs and traditions should be taken into consideration[55]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<i>Consent information</i>				
Information needs to be clear and well-structured[58,59]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Information should be provided in the parent’s native language[15]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Pause for questions – don’t rush[28]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Provide written information where parents can find additional, independent information and NICU parent organisations[48]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Reassure that their decision to participate or not will not change the level of care[52]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Clarify that parents can always change their mind and that this does not have any consequences for the routine treatment of their child[52]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Be prepared to re-explain and reconsult[49,67]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Adapt communication to what the parents can take in at the time[23,68]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
If parents are struggling with the decision-making process, acknowledge that it is difficult[49,52]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
If parents are anxious provide more support and ask how you can help them, reassure them that they should take their time to decide[49,52]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<i>Benefits study treatment</i>				
Don’t exaggerate benefits[49]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Explain how the study will benefit the child[52]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Explain how the study will benefit neonates with the same condition[52]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<i>Risks of study treatment</i>				
Be upfront about potential risks of the study treatment and the comparator[48, 49]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Explain how study related risks will be minimised[52]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Address concerns about pain and discomfort proactively[69]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<i>Study procedures</i>				
Explain whether and how the study will interfere with routine clinical care[52]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Be clear about additional procedures and follow up – other than what is normally done[63]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Explain how additional follow up (other than routine) will be organised and address any questions about reimbursement of costs for transport and additional child care[63]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

HCP, Health care professional; NICU, Neonatal Intensive Care Unit.

217 **CONCLUSIONS**

218 Obtaining informed consent for neonatal research is challenging. This was confirmed in a
219 survey of paediatric researchers in the context of the PedCRIN project. Therefore, a tool
220 was developed which is described in this paper. The tool is providing background
221 information on specific aspects of consent for neonatal trials. A check list of points to
222 consider was developed which may be used by researchers preparing for informed
223 consent. Future research may examine how this tool performs and how it can be
224 improved. Finally, involving parents at all stages of neonatal research including the
225 development of the informed consent form and the process of obtaining consent should
226 be considered standard practice.

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241 **Disclaimer**

242 The views expressed are those of the authors and not necessarily those of the organisations for which the
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251 REFERENCES

1. Mulugeta YL, Zajicek A, Barrett J, *et al.* Development of Drug Therapies for Newborns and Children: The Scientific and Regulatory Imperatives. *Pediatr Clin North Am* 2017;64(6):1185-1196. doi:10.1016/j.pcl.2017.08.015.
2. Jobe AH. Off-Label Drugs in Neonatology: Analyses Using Large Data Bases. *J Pediatr* 2019;208:9-11. doi:10.1016/j.jpeds.2019.01.038.
3. Yackey K, Stukus K, Cohen D, *et al.* Off-label Medication Prescribing Patterns in Pediatrics: An Update. *Hosp Pediatr* 2019;9(3):186-193. doi:10.1542/hpeds.2018-0168.
4. Nir-Neuman H, Abu-Kishk I, Toledano M, *et al.* Unlicensed and Off-Label Medication Use in Pediatric and Neonatal Intensive Care Units: No Change Over a Decade. *Adv Ther* 2018;35(7):1122-1132. doi:10.1007/s12325-018-0732-y.
5. Knight M. Adverse drug reactions in neonates. *J Clin Pharmacol* 1994;34(2):128-135. doi:10.1002/j.1552-4604.1994.tb03976.x.
6. Conroy S. Association between licence status and medication errors. *Arch Dis Child* 2011;96(3):305-306. doi:10.1136/adc.2010.191940
7. Bellis JR, Kirkham JJ, Thiesen S, *et al.* Adverse drug reactions and off-label and unlicensed medicines in children: a nested case-control study of inpatients in a pediatric hospital. *BMC Med* 2013;11:238. doi:10.1186/1741-7015-11-238.
8. European Commission (EC). Regulation (EC) No 1901/2006 of the European Parliament and of the Council of 12 December 2006 on medicinal products for paediatric use and amending Regulation (EEC) No 1768/92, Directive 2001/20/EC, Directive 2001/83/EC and Regulation (EC) No 726/2004. *Official Journal of the European Union*, 27.12.2006; L 378/1. Available: https://ec.europa.eu/health/sites/health/files/files/eudralex/vol-1/reg_2006_1901/reg_2006_1901_en.pdf [Accessed 17 September 2019].
9. European Commission (EC). Regulation (EC) No 1902/2006 of the European Parliament and of the Council of 20 December 2006 amending Regulation 1901/2006 on medicinal products for paediatric use. *Official Journal of the European Union*, 27.12.2006; L 378/20. Available: https://ec.europa.eu/health/sites/health/files/files/eudralex/vol1/reg_2006_1902/reg_2006_1902_en.pdf [Accessed 17 September 2019].
10. European Commission (EC). Medicines for Children. Available: https://ec.europa.eu/health/human-use/paediatric-medicines_en [Accessed 3 June 2020].
11. Paediatric Clinical Research Infrastructure Network (PedCRIN). Overview. Available: <https://www.ecrin.org/projects/pedcrin> [Accessed 29 May 2020].
12. Ruggieri L, Bartoloni F, Ceci A, *et al.* Deliverable 3.1: Survey on infrastructure and service needs for paediatric and neonatal trials. *PedCRIN* 2019. Available: https://ecrin.org/sites/default/files/PedCRIN/PedCRIN%20Deliverables/WP3%20D3.1_%20Survey%20Report%20on%20infrastructure%20and%20service%20needs%20for%20paediatric%20and%20neonatal%20trials%20FV_28082017.pdf. [Accessed 15 October 2020].
13. Legrand F, Boulkedid R, Elie V, *et al.* A Delphi process to optimize quality and performance of drug evaluation in neonates. *PLoS One* 2014 Sep 11;9(9):e104976. doi:10.1371/journal.pone.0104976.
14. Aurich B, Elie V, Evelyne Jacqz-Aigrain E, *et al.* Deliverable D3.5: Procedures for setup of neonatal trials. *PedCRIN* 2017. Available: https://ecrin.org/sites/default/files/PedCRIN/PedCRIN%20Deliverables/WP3%20D3.5_Procedures%20for%20the%20set%20up%20of%20neonatal%20clinical%20trials_FV_28022019.pdf. [Accessed 15 October 2020].
15. Neyro V, Elie V, Thiele N, *et al.* Clinical trials in neonates: How to optimise informed consent and decision making? A European Delphi survey of parent representatives and clinicians. *PLoS One* 2018;13(6):e0198097. doi: 10.1371/journal.pone.0198097.
16. Megone C, Wilman E, Oliver S, *et al.* The ethical issues regarding consent to clinical trials with pre-term or sick neonates: a systematic review (framework synthesis) of the analytical (theoretical/philosophical) research. *Trials* 2016;17(1):443. doi: 10.1186/s13063-016-1562-3.
17. Allmark P, Mason S. Improving the quality of consent to randomised controlled trials by using continuous consent and clinician training in the consent process. *J Med Ethics* 2006;32(8):439-43. doi: 10.1136/jme.2005.013722.
18. Gupta UC. Informed consent in clinical research: Revisiting few concepts and areas. *Perspect Clin Res* 2013;4(1):26-32. doi: 10.4103/2229-3485.106373.
19. Vermeulen E, Jansen-van der Weide M, Karsenberg K, *et al.* Deliverable D5.13 Report on patient engagement and perspective integration. *PedCRIN* 2017. Available: <https://ecrin.org/sites/default/files/PedCRIN/PedCRIN%20Deliverables/WP5%20D5.13%20Patient%20engagement%20and%20perspective%20integration%20.pdf>. [Accessed 15 October 2020].
20. Wilman E, Megone C, Oliver S, *et al.* The ethical issues regarding consent to clinical trials with pre-term or sick neonates: a systematic review (framework synthesis) of the empirical research. *Trials* 2015;16:502. doi:10.1186/s13063-015-0957-x.
21. Meinich Petersen S, Zoffmann V, Kjærgaard J, *et al.* Disappointment and adherence among parents of newborns allocated to the control group: a qualitative study of a randomized clinical trial. *Trials* 2014;15:126. doi: 10.1186/1745-6215-15-126.
22. Lawton J, Hollowell N, Snowdon C, *et al.* Written versus verbal consent: a qualitative study of stakeholder views of consent procedures used at the time of recruitment into a peripartum trial conducted in an emergency setting. *BMC Med Ethics* 2017;18(1):36. doi:10.1186/s12910-017-0196-7.
23. Jollye S. An exploratory study to determine how parents decide whether to enroll their infants into neonatal clinical trials. *J Neonatal Nurs* 2009;15(1):18-24. doi: 10/1016/j.jnn.2008.07.012.

24. Vecchi Brumatti L, Montico M, Russian S, *et al.* Analysis of motivations that lead women to participate (or not) in a newborn cohort study. *BMC Pediatr* 2013;13:53. doi: 10.1186/1471-2431-13-53.
25. Pritchard VE, Montgomery-Hönger A. A comparison of parent and staff perceptions of setting-specific and everyday stressors encountered by parents with very preterm infants experiencing neonatal intensive care. *Early Hum Dev* 2014;90(10):549-55. doi: 10.1016/j.earlhumdev.2014.07.006.
26. Latour JM, Duivenvoorden HJ, Hazelzet JA, *et al.* Development and validation of a neonatal intensive care parent satisfaction instrument. *Pediatr Crit Care Med* 2012;13(5):554-9. doi: 10.1097/PCC.0b013e318238b80a.
27. Cartwright K, Mahoney L, Ayers S, *et al.* Parents' perceptions of their infants' participation in randomized controlled trials. *J Obstet Gynecol Neonatal Nurs* 2011;40(5):555-65. doi: 10.1111/j.1552-6909.2011.01276.x.
28. Snowdon C, Elbourne D, Garcia J. "It was a snap decision": parental and professional perspectives on the speed of decisions about participation in perinatal randomised controlled trials. *Soc Sci Med* 2006;62(9):2279-90. doi: 10.1016/j.socscimed.2005.10.008.
29. Ward FR. Chaos, vulnerability and control: parental beliefs about neonatal clinical trials. *J Perinatol* 2009;29(2):156-62. doi: 10.1038/jp.2008.139.
30. Manning DJ. Presumed consent in emergency neonatal research. *J Med Ethics* 2000;26(4):249-53. doi: 10.1136/jme.26.4.249.
31. Thomas M, Menon K. Consenting to pediatric critical care research: understanding the perspective of parents. *Dynamics* 2013;24(3):18-24.
32. Morley CJ, Lau R, Davis PG, *et al.* What do parents think about enrolling their premature babies in several research studies? *Arch Dis Child Fetal Neonatal Ed* 2005;90(3):F225-8. doi: 10.1136/adc.2004.061986.
33. McCarthy KN, Ryan NC, O'Shea DT, *et al.* Parental opinion of consent in neonatal research. *Arch Dis Child Fetal Neonatal Ed* 2019;104(4):F409-F414. doi: 10.1136/archdischild-2018-315289.
34. Ayers S, Sawyer A, Düring C, *et al.* Parents report positive experiences about enrolling babies in a cord-related clinical trial before birth. *Acta Paediatr* 2015;104(4):e164-e170. doi:10.1111/apa.12922.
35. Kenyon S, Dixon-Woods M, Jackson CJ, *et al.* Participating in a trial in a critical situation: a qualitative study in pregnancy. *Qual Saf Health Care* 2006;15(2):98-101. doi:10.1136/qshc.2005.015636.
36. Nieuwenhuijze MJ, Korstjens I, de Jonge A, *et al.* On speaking terms: a Delphi study on shared decision-making in maternity care. *BMC Pregnancy Childbirth* 2014;14:223. Published 2014 Jul 9. doi:10.1186/1471-2393-14-223.
37. Goldberg H. Informed decision making in maternity care. *J Perinat Educ* 2009;18(1):32-40. doi: 10.1624/105812409X396219.
38. Flory J, Emanuel E. Interventions to improve research participants' understanding in informed consent for research: a systematic review. *JAMA* 2004;292(13):1593-601. doi: 10.1001/jama.292.13.1593.
39. Clinical Trials Transformation Initiative (CTTI). CTTI Recommendations: Informed consent, November 2015. Available: <https://www.ctti-clinicaltrials.org/sites/www.ctti-clinicaltrials.org/files/CTTI-InformedConsent-Recs.pdf> [Accessed 17 September 2019].
40. Jansen-van der Weide MC, Caldwell PH, Young B, *et al.* Clinical Trial Decisions in Difficult Circumstances: Parental Consent Under Time Pressure. *Pediatrics* 2015;136(4):e983-92. doi: 10.1542/peds.2014-3402.
41. den Boer MC, Houtlosser M, Foglia EE, *et al.* Deferred consent for the enrolment of neonates in delivery room studies: strengthening the approach. *Arch Dis Child Fetal Neonatal Ed* 2019;104(4):F348-F352. doi:10.1136/archdischild-2018-316461
42. Lepola P, Needham A, Mendum J, *et al.* Informed consent for paediatric clinical trials in Europe. *Arch Dis Child* 2016;101(11):1017-1025. doi: 10.1136/archdischild-2015-310001.
43. Medical Research Council (MRC). Consent and Participant Information Guidance, 2019. Available: <http://www.hrdecisiontools.org.uk/consent/links.html> [Accessed 17 September 2019].
44. Marc-Aurele KL, Steinman SL, Ransom KM, *et al.* Evaluation of the content and process of informed consent discussions for neonatal research. *J Empir Res Hum Ethics* 2012;7(3):78-83. doi:10.1525/JER.2012.7.3.78.
45. Dekking SA, van der Graaf R, van Delden JJ. Strengths and weaknesses of guideline approaches to safeguard voluntary informed consent of patients within a dependent relationship. *BMC Med* 2014;12:52. doi: 10.1186/1741-7015-12-52.
46. Dekking SA, van der Graaf R, Kars MC, *et al.* Balancing research interests and patient interests: a qualitative study into the intertwinement of care and research in paediatric oncology. *Pediatr Blood Cancer* 2015;62(5):816-22. doi: 10.1002/pbc.25444.
47. Black L, Batist G, Avar D, *et al.* Physician recruitment of patients to non-therapeutic oncology clinical trials: ethics revisited. *Front Pharmacol* 2013;4:25. doi: 10.3389/fphar.2013.00025. eCollection 2013.
48. McCarthy M. US researchers failed to disclose risks of newborn study, finds government office. *BMJ* 2013;346:f2367. doi: 10.1136/bmj.f2367.
49. DeMauro SB, Cairnie J, D'Ilario J, *et al.* Honesty, trust, and respect during consent discussions in neonatal clinical trials. *Pediatrics* 2014;134(1):e1-3. doi: 10.1542/peds.2013-3720.
50. Mundy CA. Assessment of family needs in neonatal intensive care units. *Am J Crit Care* 2010;19(2):156-63. doi: 10.4037/ajcc2010130.

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60
51. European Commission (EC). Ethical considerations for clinical trials on medicinal products conducted with minors - Recommendations of the expert group on clinical trials for the implementation of Regulation (EU) No 536/2014 on clinical trials on medicinal products for human use, Revision 1, 18 September 2017. Available: https://ec.europa.eu/health/sites/health/files/files/eudralex/vol-10/2017_09_18_ethical_considerations_en.pdf [Accessed 17 September 2019].
 52. Hoberman A, Shaikh N, Bhatnagar S, *et al.* Factors that influence parental decisions to participate in clinical research: consenters vs non consenters. *JAMA Pediatr* 2013;167(6):561-6. doi: 10.1001/jamapediatrics.2013.1050.
 53. Eiser C, Eiser JR, Mayhew AG, *et al.* Parenting the premature infant: balancing vulnerability and quality of life. *J Child Psychol Psychiatry* 2005;46(11):1169-77. doi: 10.1111/j.1469-7610.2005.00415.x.
 54. Simon CM, Kodish ED. Step into my zapatos, doc: understanding and reducing communication disparities in the multicultural informed consent setting. *Perspect Biol Med* 2005;48(1 Suppl):S123-38. doi: 10.1353/pbm.2005.0030.
 55. Natale JE, Lebet R, Joseph JG, *et al.* Racial and Ethnic Disparities in Parental Refusal of Consent in a Large, Multisite Pediatric Critical Care Clinical Trial. *J Pediatr* 2017;184:204-208.e1. doi: 10.1016/j.jpeds.2017.02.006.
 56. Lentz J, Kennett M, Perlmutter J, *et al.* Paving the way to a more effective informed consent process: Recommendations from the Clinical Trials Transformation Initiative. *Contemp Clin Trials* 2016;49:65-9. doi: 10.1016/j.cct.2016.06.005.
 57. Koyfman SA, Reddy CA, Hizlan S, *et al.* Phase I Informed Consent (POIC) Research Team. Informed consent conversations and documents: A quantitative comparison. *Cancer*. 2016;122(3):464-9. doi: 10.1002/cncr.29759.
 58. Simonds VW, Garrouette EM, Buchwald D. Health Literacy and Informed Consent Materials: Designed for Documentation, Not Comprehension of Health Research. *J Health Commun* 2017;22(8):682-691. doi: 10.1080/10810730.2017.1341565.
 59. Wang LW, Miller MJ, Schmitt MR, *et al.* Assessing readability formula differences with written health information materials: application, results, and recommendations. *Res Social Adm Pharm* 2013;9(5), 503-516. doi: 10.1016/j.sapharm.2012.05.009.
 60. Boote J, Julious S, Horspool M, *et al.* PPI in the PLEASANT trial: involving children with asthma and their parents in designing an intervention for a randomised controlled trial based within primary care. *Prim Health Care Res Dev* 2016;17(6):536-548. doi: 10.1017/S1463423616000025.
 61. Bate J, Ranasinghe N, Ling R, *et al.* Public and patient involvement in paediatric research. *Arch Dis Child Educ Pract Ed* 2016;101(3):158-61. doi: 10.1136/archdischild-2015-309500.
 62. Bakhbakhi D, Siassakos D, Storey C, *et al.* PARENTS 2 study protocol: pilot of Parents' Active Role and ENGagement in the review of Their Stillbirth/perinatal death. *BMJ Open* 2018;8(1):e020164. doi: 10.1136/bmjopen-2017-020164.
 63. Harvey M, Nongena P, Edwards D, *et al.* We knew it was a totally at random thing': parents' experiences of being part of a neonatal trial. *Trials* 2017;18(1):361. doi: 10.1186/s13063-017-2112-3.
 64. European Commission (EC). Ethical considerations for clinical trials on medicinal products conducted with the paediatric population - Recommendations of the ad hoc group for the development of implementing guidelines for Directive 2001/20/EC relating to good clinical practice in the conduct of clinical trials on medicinal products for human use, 2008. Available: https://ec.europa.eu/health/sites/health/files/files/eudralex/vol-10/ethical_considerations_en.pdf [Accessed 17 September 2019].
 65. Babies born premature or sick (BLISS). Research Investigator Guidelines - Public Involvement Role Description Template. Available: <https://www.bliss.org.uk/research-campaigns/research/involving-parents-in-research>. [Accessed 15 October 2020].
 66. Flory J, Emanuel E. Interventions to improve research participants' understanding in informed consent for research: a systematic review. *JAMA* 2004 Oct 6;292(13):1593-601. doi: 10.1001/jama.292.13.1593.
 67. Miller VA, Ittenbach RF, Harris D, *et al.* The decision making control instrument to assess voluntary consent. *Med Decis Making* 2011;31(5):730-41. doi: 10.1177/0272989X11398666.
 68. Freer Y, McIntosh N, Teunisse S, *et al.* More information, less understanding: a randomized study on consent issues in neonatal research. *Pediatrics* 2009;123(5):1301-5. doi: 10.1542/peds.2007-3860.
 69. Franck LS, Cox S, Allen A, *et al.* Parental concern and distress about infant pain. *Arch Dis Child Fetal Neonatal Ed* 2004;89(1):F71-5. doi: 10.1136/fn.89.1.f71.

1 Narrative review of informed consent for neonatal trials –

2 Practical points to consider and a check list

3 Beate Aurich, Eric Vermeulen, Valéry Elie, Mariette HE Driessens, Christine Kubiak,
4 Donato Bonifazi, Evelyne Jacqz-Aigrain

5 Supplemental material

6 PedCRIN Survey^[12]

7 Questions

8 Instructions were: “Please indicate, for which of the following activities do you think a
9 research infrastructure for paediatric clinical research should provide support to?” and
10 “Please choose the appropriate response for each item.” A Likert scale ranging from 0 to
11 4 was used (0= “No need at all”; 1 = “Slightly needed;” 2 = “Moderately needed”; 3 = “Very
12 needed”; 4 = “Extremely needed”). Other questions in the survey concerned demographic
13 information (e.g. personal information, professional experience, country, paediatric
14 specialty).

Table S1 PedCRIN Survey questions (verbatim wording)

Topic group/ Survey questions (for which a level of importance between 0 and 4 had to be chosen)

Scientific and methodological expertise

- Design protocols for paediatric interventional clinical trials (PK, PK/PD, efficacy and/or safety, other)
- Design protocols for paediatric non-interventional clinical studies
- Identification of the target population (age subsets, inclusion/exclusion criteria)
- Statistical methodology for paediatric clinical trials
- Application of innovative study design (e.g. modelling & simulation and extrapolation tools/ approaches) from adults to children and from older children to neonates

Collaboration and support for clinical trials start-up

- Identification of relevant network/scientific societies to help the selection of clinical trial sites
- Establishing contacts with Young Patients Advisory Groups/Patients Advisory Boards/Patients Associations
- Identification of relevant calls for funding paediatric trials at Eu/international level and support for project application
- Involvement of parties and subcontractors to define the distribution of all the responsibilities and tasks related to clinical trials (including CROs, insurance companies, etc)
- Preparation of standard models agreements for the implementation of clinical trials
- Definition of a budget model based on standard costs for general activities, investigation (per patient), services, etc

Regulatory expertise

- Database of national regulatory and ethical requirements for paediatric trial authorisation
- Preparing and submitting documents to Ethics Committees/Competent Authorities for the approval/authorisation of paediatric clinical trials
- Preparing consent and assent models + Patient information sheet, including clinical trials involving special patients populations (PICU, NICU, neonates, neurological impairment, etc)
- Preparing the Investigator’s Brochure for submission
- Interaction with national/European regulatory agencies

Paediatric pharmacovigilance

- Methods for identifying and communicating ADRs in paediatric patients
- Age-adapted scales for severity and causality assessment in paediatric patients
- Targeted Serious Adverse Events notification forms, age-adjusted
- Certification of pharmacovigilance expertise

Paediatric clinical trials conduct according to GCP and paediatric guidelines/ recommendations

- Design Case Report Forms for paediatric studies
- Managing paediatric clinical trial data (data-management) (collection, integration, validation and analysis of clinical trial data)
- Managing paediatric IMPs (drug management) (packaging, labelling, delivering, storing, administering, accountability, disposal)
- Managing paediatric clinical trial technical aspects & logistics (e.g. shipping agent, operative instructions, laboratory procedures, biobank samples management, etc.)
- Preparation of monitoring plans, also based on risk-based approach
- On-site and remote monitoring visits and reporting

Training

- Training regarding Good Clinical Practices, including responsibilities of principal investigators, co-investigators and study nurses involved in paediatric clinical trials
- Training course(s) designed for specific paediatric/neonatal trials
- Training on drug safety and toxicity stratified by age

Box for free text to answer the following question:

Please list any other activity for which do you think that it is required support from a research infrastructure

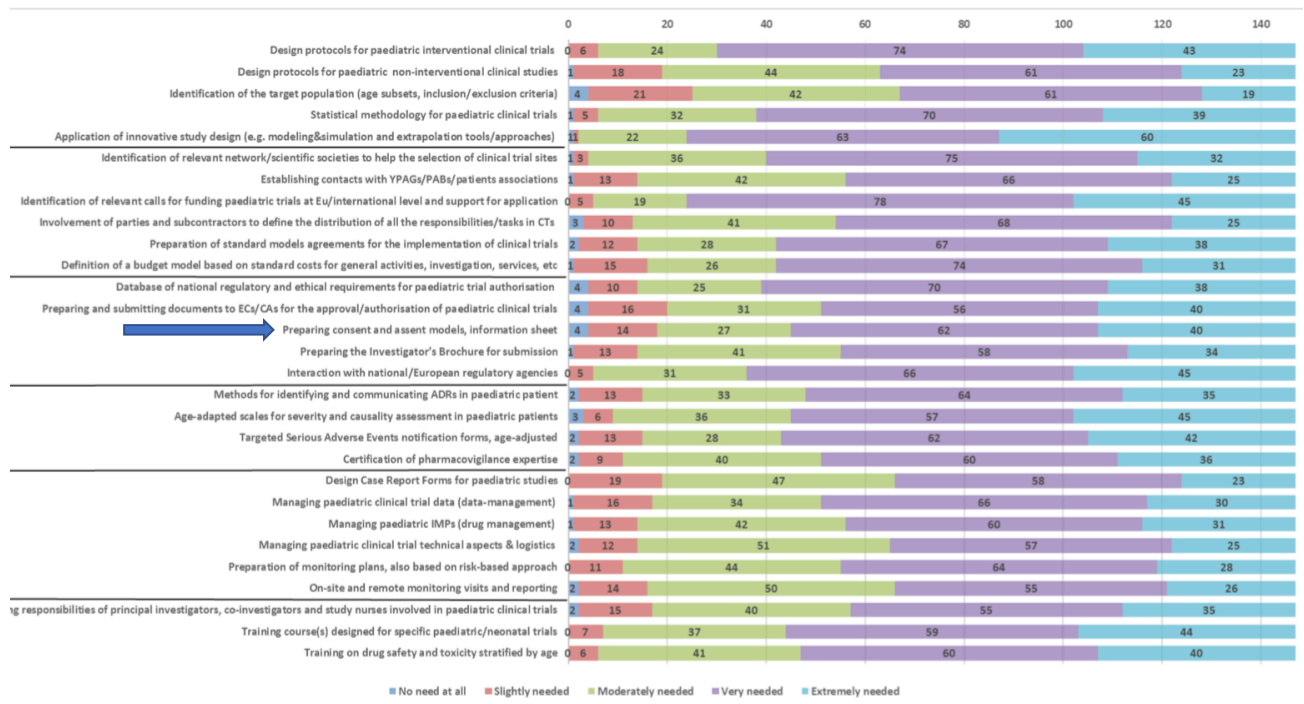
PK, Pharmacokinetic; PD, Pharmacodynamic; CRO, Contract Research Organisation; PICU, Paediatric Intensive Care Unit; NICU, Neonatal Intensive Care Unit; ADR, Adverse Drug reaction; GCP, Good Clinical Practice; IMP, Investigational Medicinal Product.

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18 Summary of survey results

19 Out of the 147 respondents 35 (23.8%) were neonatologists. The results of a separate
20 analysis of their responses did not differ from the overall responses.



21
22 **Figure S1** Summary of PedCRIN survey results – Number of responses for each
23 question by degree of need (all respondents).

24 YPAG, Young Persons' Advisory Group; PAB, Patient Advisory Board; Eu, European Union; CT, Clinical
25 trial; ECs, Ethic committees; CAs, Competent authorities; ADR, Adverse drug reaction; IMP,
26 Investigational Medicinal Product.

27 Free text responses provided more insight into the particular challenges researchers face.
28 These included among others funding, clinical trial set-up and management, networking,
29 involvement of patient/ parent organisations, human resources, the need for more
30 paediatric research (outcome, reference values, treatment standards, formulation
31 development, pharmacokinetics/ pharmacodynamics, non-clinical research), pharmaco-
32 vigilance, interaction with regulatory authorities and ethics boards. Concerning informed
33 consent and the recruitment into paediatric trials the following statements were made:

- 34 • “Strategies to improve the enrolment in clinical trial”
- 35 • ...“Especially in neonatology a lot of centres are needed to recruit patient numbers to trials in
36 a reasonable time period.”...
- 37 • “The EC and the regulatory authorities need to learn that studies in babies and children do take
38 time.”...
- 39 • “The largest problem is that many of the big EU trials in newborns failed to include patients. I
40 think it is time to create infrastructure and clinical trial centres with dedicated young staff and
41 researchers that can include many subjects into trials. 24/7 services need to be set up. A lot of
42 money has been spent but less has come out of it.”
- 43 • “... but we need the power to include patients.”

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Informed consent for neonatal trials – Practical points to consider and a check list

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19 Abstract

20 Obtaining informed consent from parents of critically ill neonates can be challenging. The
21 parental decision-making process is influenced by the severity of the child's condition, the
22 benefit-risk balance, their emotional state and the quality of the relationship with the
23 clinical team. Independent of local legislation, parents may prefer that consent is sought
24 from both. Misconceptions about the absence of risks or unrealistic expectations about
25 benefits should be openly addressed to avoid misunderstandings which may harm the
26 relationship with the clinical team. Continuous consent can be sought where it is unclear
27 whether the free choice of parental consent has been compromised. Obtaining informed
28 consent is a dynamic process building on trusting relationships. It should include open
29 and honest discussions about benefits and risks. Investigators may benefit from training
30 in effective communication. Finally, involving parents in neonatal research including the
31 development of the informed consent form and the process of obtaining consent should
32 be considered standard practice.

33 **Key words:** Neonatal, Clinical trials as topic, Informed consent, Guidance, Ethics

34 Key messages

- 35 ➤ Key factors influencing parental consent decisions are summarised
- 36 ➤ A checklist of points to consider when talking to parents about the possible inclusion of a
37 neonate into a clinical trial has been built
- 38 ➤ The checklist may help researchers to optimise the setting for seeking parental consent

39 BACKGROUND

40 Children, including neonates, have long been excluded from clinical research due to
41 ethical and practical challenges.[1] This has led to a situation where up to 90% of newborn
42 babies admitted to neonatal intensive care units are treated at least once with off-label or
43 unlicensed medicines.[2-4] This is associated with a higher risk of lack of efficacy, serious
44 adverse drug reactions and medication errors.[5-7]

45 In 2007 the European Paediatric Regulation governing the development and
46 authorisation of medicines for children, came into force.[8, 9] In addition, the European
47 Commission (EC) is financing various European projects for the development of a
48 paediatric research infrastructure.[10] In this context the Paediatric Clinical Research
49 Infrastructure Network (PedCRIN), a four-year project, was initiated in January 2017.[11]
50 During the PedCRIN project the expertise of the European Clinical Research
51 Infrastructure Network (ECRIN) and the European Paediatric Clinical Trial Research
52 Infrastructure (EPCT-RI) was combined with the aim of developing points to consider
53 documents (so called "Tools") for researchers to support the set-up and management of
54 non-commercial clinical trials in children.[11]

55 The aim of this article is to summarise the key points researchers may want to consider
56 when preparing for the informed consent discussion for a neonatal trial.

57 SURVEY

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3 58 At the beginning of the PedCRIN project, in 2017, an online survey was conducted (4 April
4 59 to 15 May 2017) among 663 researchers involved in European and international
5 60 paediatric research networks (e.g. ESDPPP, GRiP, INC, ENCePP).[12] The objective was to
6 61 understand what the needs of the research community are with regards to clinical trials
7 62 in children. The response rate was 22.2%. Using a Likert scale of 0 (not needed) to 4
8 63 (extremely needed) the survey grouped topics previously identified into six large themes
9 64 and researchers had the possibility to add a free text comment.[12,13] Based on the
10 65 results of this survey a series of neonatal topics were developed with the aim of
11 66 responding to these questions and developing a set of practical tools for researchers.[14]
12 67 The survey questions are provided in Supplemental material Table S1 and the results are
13 68 summarised in Supplemental material Figure S1.[12]

18 69 One of the topics highlighted by the survey concerned the informed consent process and
19 70 one of the free text comments suggested the development of “Strategies to improve the
20 71 enrolment in clinical trial”. [12] The challenges surrounding neonatal consent have
21 72 previously been highlighted by a Delphi survey.[15] Neyro et al. reported that parents and
22 73 healthcare professionals agreed on 58 items to be included in the informed consent
23 74 information.[15]

24 75 A narrative review of the literature was conducted in PubMed and of regulatory guidance
25 76 documents issued by the European Medicines Agency in February 2019. Reviewing the
26 77 literature no single publication was identified providing a check list for investigators on
27 78 the practical points to consider when preparing for the informed consent discussion with
28 79 parents.

29 80 Team discussions including representatives from a patient organisation (EV and MHED),
30 81 a neonatologist and paediatric pharmacologist (EJA), a paediatrician (BA) and a project
31 82 leader of paediatric clinical research (VE) were held and the following question was
32 83 formulated for the development of a neonatal tool:

33 84 ➤ What are some of the practical points to consider during informed consent discussions
34 85 with parents of neonates to be included into a clinical trial?

35 86 The rationale for this question was that the consent discussion with parents does not
36 87 easily fit into established processes of informed consent. It is often obtained in
37 88 circumstances which may make taking a valid decision challenging.[16-18] The
38 89 understanding and process of parental consent in such extreme circumstances is
39 90 informed by ethics guidelines, trial procedures driven by regulations, behavioural science,
40 91 the needs of parents and feedback from HCPs. For the purpose of developing a tool that
41 92 can be used by investigators these very varied topics had to be included into one single
42 93 tool.

43 94 **Patient and public involvement**

44 95 The involvement of parents and patient representatives is an integral part of the PedCRIN
45 96 project with a dedicated team reflecting on processes to improve their involvement in the
46 97 design, conduct and reporting of paediatric clinical trials.[19] The results of the survey
47 98 were discussed with representatives of a patient organisation involved in PedCRIN. The

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3 99 tool was then codeveloped with them. The representatives of the patient organisation
4 100 suggested to publish the tool. The article was written in collaboration with the aim of
5 101 distributing the tool.
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8 102 **POINTS TO CONSIDER**

9 103 Obtaining informed consent for a clinical study from parents of critically ill neonates can
10 104 be challenging.[16,20-22] In this context it may be helpful to remember that parents
11 105 would have expected to have a healthy baby.[23] Witnessing the severity of their child's
12 106 condition is extremely stressful for parents and the neonatal intensive care unit (NICU)
13 107 setting can be intimidating.[23-25]

14 108 Parents may feel overwhelmed by the large amount of information they receive, time
15 109 pressure and their emotions.[23,26-29] Taking voluntary decisions under such
16 110 circumstances can be very difficult.[23,28,30] The parent's decision-making process is
17 111 influenced by the severity of the child's condition, the perceived benefit-risk balance of
18 112 trial participation, their emotional state, timing of the request and the quality of the
19 113 relationship with the clinical team, amongst others.[28,31] However, most parents will
20 114 respond positively to requests for inclusion into a well-designed clinical trial.[27,32]

21 115 **Informed consent setting**

22 116 Routine antenatal visits are a unique opportunity to provide general information to all
23 117 future parents about neonatal research currently being conducted at the hospital.[33] For
24 118 certain neonatal and maternal conditions these visits can also be an opportunity to
25 119 provide more specific information and discuss with parents the potential inclusion of
26 120 their child into a study.[34] This may provide parents with more time to discuss compared
27 121 to providing this information only at the time of inclusion.[23,28,30,35] The timing of
28 122 detailed discussions will depend on when the diagnosis of the neonatal condition has been
29 123 confirmed, the delivery date and the individual circumstances of the women and their
30 124 family.[36,37] Parental decision making in favour of trial participation is facilitated by
31 125 parents having sufficient time to consider their decision.[38-40] Antenatal discussions
32 126 may also provide an opportunity to introduce the investigator to the family. Deferred
33 127 consent may be used for the recruitment into studies of life-threatening neonatal
34 128 conditions.[41] However, multicentre studies may need to consider differences in local
35 129 practices and the acceptability of deferred consent.[41] Depending on local legislation,
36 130 informed consent needs to be provided either by one or both parents/ legal
37 131 guardians.[42] However, independent of the legislation, parents may prefer that consent
38 132 is sought from both.[15]

39 133 Clinical trial regulations and regulatory documents provide guidance on the informed
40 134 consent process.[43,44] If informed consent is sought by an investigator, who is not the
41 135 treating physician, parents may have difficulties establishing a trusting relationship and
42 136 this should be addressed proactively by the study team.[45,46] On the other hand, if
43 137 informed consent is requested by the treating physician parents may find it difficult to
44 138 decline the request and may create conflicts of interest for the physician.[47] One way of

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3 139 addressing these challenges is to introduce the investigator to the parents during
4 140 standard clinical practice, for example at a routine visit to the clinic or on ward
5 141 rounds.[45,46]

7
8 142 The decision-making process of families during consent is dynamic and will be facilitated
9 143 by building trusting relationships through the provision of transparent and clear
10 144 information on the benefit-risk of available treatment options and ensuring the needs of
11 145 families are addressed proactively.[44,48-52] Attention should be paid to the possible
12 146 misconceptions parents may have about the absence of any risk and unrealistic
13 147 expectations about the benefits of the clinical trial, as this may lead to misunderstandings
14 148 and harm the trust parents have placed in the clinical team.[23]

19 149 **Consent information**

20 150 Awareness of the difficulties some parents may experience may help to ensure that trial
21 151 procedures and communication are optimised to meet their needs.[53] Cultural
22 152 differences should be taken into account and information should be provided in the
23 153 parent's native language.[15,54,55]

24 154 Parental decisions are strongly influenced by how the information is provided, timing and
25 155 content.[28] Whilst, from a legal perspective, the written informed consent form is
26 156 important, many parents feel that the conversation and verbal information provided is
27 157 more important.[56] Having a script or check list which can be gone through together with
28 158 the parents may help ensuring all relevant information is not only provided but also
29 159 understood by the parents/ legal guardians. Written informed consent documents can be
30 160 difficult to read and parents may feel that they are lengthy.[57-59] Understanding the
31 161 perspective of parents on the conduct of neonatal clinical trials is important for successful
32 162 recruitment. Requesting input from parent organisations has been shown to increase
33 163 recruitment numbers and improve the quality of trial protocols and consent forms.[42,
34 164 43,60-64] Involving parent organisations should follow a structured process such as
35 165 described by BLISS, for example.[65]

36 166 A variety of techniques are available to improve the understanding of the information
37 167 provided during the informed consent process.[51,66] Spending more time with parents
38 168 appears to be the most effective measure in obtaining parental consent, whilst time
39 169 pressure may lead to difficulties in having their agreement.[39,40,66] Jansen-van der
40 170 Weide et al. have proposed to adapt the consent process to the time constraints depending
41 171 on the urgency for treatment.[40] However, it is important to remember that parental
42 172 decision making in extremely stressful situations may be difficult and their ability to
43 173 provide voluntary consent may be temporarily impaired.[67] Miller et al. have developed
44 174 a tool to assess the degree of the voluntariness of a parent's decision.[67] Furthermore,
45 175 continuous consent can be sought in trials where it is unclear whether the free choice of
46 176 parental consent has been compromised.[17,18] Continuous consent provides the
47 177 opportunity to initially seek parental assent followed by full consent once parents had the
48 178 opportunity to make a valid informed consent decision.[16] An example would be assent

179 for trial inclusion in an emergency situation, followed by full consent once the neonate is
 180 stabilised.
 181 Finally, it can be challenging to ensure that the informed consent conversation provides
 182 all the relevant information and that the language used is understandable.[57] Sponsors
 183 may consider training investigators on effective communication and what kind of
 184 information needs to be included.[57]
 185 To support researchers preparing for the informed consent process of a neonatal trial a
 186 checklist of points to consider was developed, which summarises key information from
 187 this article. (Table 1)

Table 1 Check list of points to consider when talking to parents about the possible inclusion of a neonate into a clinical trial

Points to consider during informed consent process	Done	Delayed	Not applicable	Comments
<i>Informed consent setting</i>				
Consider approaching parents prior to delivery[33]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Both parents should be present[15]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Both parents should be asked for consent[15]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Offer the possibility to have the responsible nurse and/ or doctor, trusted friend and/ or family member or a parent from a NICU association joining the conversation[49]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Introduce the investigator/ HCP who will be seeking consent during routine contacts with the parents[45,46]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Ensure parents are comfortable and trust the investigator/ HCP seeking consent[49]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In multinational trials local beliefs, customs and traditions should be taken into consideration[55]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<i>Consent information</i>				
Information needs to be clear and well-structured[58,59]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Information should be provided in the parent's native language[15]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Pause for questions – don't rush[28]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Provide written information where parents can find additional, independent information and NICU parent organisations[48]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Reassure that their decision to participate or not will not change the level of care[52]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Clarify that parents can always change their mind and that this does not have any consequences for the routine treatment of their child[52]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Be prepared to re-explain and re-consent[49,67]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Adapt communication to what the parents can take in at the time[23,68]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
If parents are struggling with the decision-making process, acknowledge that it is difficult[49,52]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
If parents are anxious provide more support and ask how you can help them, reassure them that they should take their time to decide[49,52]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<i>Benefits study treatment</i>				
Don't exaggerate benefits[49]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Explain how the study will benefit the child[52]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Explain how the study will benefit neonates with the same condition[52]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<i>Risks of study treatment</i>				

Be upfront about potential risks of the study treatment and the comparator[48, 49]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Explain how study related risks will be minimised[52]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Address concerns about pain and discomfort proactively[69]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Study procedures			
Explain whether and how the study will interfere with routine clinical care[52]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Be clear about additional procedures and follow up – other than what is normally done[63]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Explain how additional follow up (other than routine) will be organised and address any questions about reimbursement of costs for transport and additional child care[63]	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

HCP, Health care professional; NICU, Neonatal Intensive Care Unit.

188

189 CONCLUSIONS

190 Obtaining informed consent for neonatal research is challenging. This was confirmed in a
 191 survey of paediatric researchers in the context of the PedCRIN project. Therefore, a tool
 192 was developed which is described in this paper. The tool is providing background
 193 information on specific aspects of consent for neonatal trials. A check list of points to
 194 consider was developed which may be used by researchers preparing for informed
 195 consent. Future research may examine how this tool performs and how it can be
 196 improved. Finally, involving parents at all stages of neonatal research including the
 197 development of the informed consent form and the process of obtaining consent should
 198 be considered standard practice.

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206 All authors consider not having any competing interests for this systematic review. BA has worked for
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 208 2009 and May 2015 she has worked for Novartis.

209 Contributors

210 CK led the PedCRIN project. DB conducted the survey. BA and VE reviewed the literature. EV, MHED, BA, VE
 211 and EJA developed the question. EV and BA wrote the article. All authors reviewed the manuscript and
 212 contributed with comments.

213 Disclaimer

214 The views expressed are those of the authors and not necessarily those of the organisations for which the
 215 authors work.

216 Patient consent for publication

217 Not required.

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223 REFERENCES

1. Mulugeta YL, Zajicek A, Barrett J, *et al.* Development of Drug Therapies for Newborns and Children: The Scientific and Regulatory Imperatives. *Pediatr Clin North Am* 2017;64(6):1185-1196. doi:10.1016/j.pcl.2017.08.015.
2. Jobe AH. Off-Label Drugs in Neonatology: Analyses Using Large Data Bases. *J Pediatr* 2019;208:9-11. doi:10.1016/j.jpeds.2019.01.038.
3. Yackey K, Stukus K, Cohen D, *et al.* Off-label Medication Prescribing Patterns in Pediatrics: An Update. *Hosp Pediatr* 2019;9(3):186-193. doi:10.1542/hpeds.2018-0168.
4. Nir-Neuman H, Abu-Kishk I, Toledano M, *et al.* Unlicensed and Off-Label Medication Use in Pediatric and Neonatal Intensive Care Units: No Change Over a Decade. *Adv Ther* 2018;35(7):1122-1132. doi:10.1007/s12325-018-0732-y.
5. Knight M. Adverse drug reactions in neonates. *J Clin Pharmacol* 1994;34(2):128-135. doi:10.1002/j.1552-4604.1994.tb03976.x.
6. Conroy S. Association between licence status and medication errors. *Arch Dis Child* 2011;96(3):305-306. doi:10.1136/adc.2010.191940
7. Bellis JR, Kirkham JJ, Thiesen S, *et al.* Adverse drug reactions and off-label and unlicensed medicines in children: a nested case-control study of inpatients in a pediatric hospital. *BMC Med* 2013;11:238. doi:10.1186/1741-7015-11-238.
8. European Commission (EC). Regulation (EC) No 1901/2006 of the European Parliament and of the Council of 12 December 2006 on medicinal products for paediatric use and amending Regulation (EEC) No 1768/92, Directive 2001/20/EC, Directive 2001/83/EC and Regulation (EC) No 726/2004. *Official Journal of the European Union*, 27.12.2006; L 378/1. Available: https://ec.europa.eu/health/sites/health/files/files/eudralex/vol-1/reg_2006_1901/reg_2006_1901_en.pdf [Accessed 17 September 2019].
9. European Commission (EC). Regulation (EC) No 1902/2006 of the European Parliament and of the Council of 20 December 2006 amending Regulation 1901/2006 on medicinal products for paediatric use. *Official Journal of the European Union*, 27.12.2006; L 378/20. Available: https://ec.europa.eu/health/sites/health/files/files/eudralex/vol1/reg_2006_1902/reg_2006_1902_en.pdf [Accessed 17 September 2019].
10. European Commission (EC). Medicines for Children. Available: https://ec.europa.eu/health/human-use/paediatric-medicines_en [Accessed 3 June 2020].
11. Paediatric Clinical Research Infrastructure Network (PedCRIN). Overview. Available: <https://www.ecrin.org/projects/pedcrin> [Accessed 29 May 2020].
12. Ruggieri L, Bartoloni F, Ceci A, *et al.* Deliverable 3.1: Survey on infrastructure and service needs for paediatric and neonatal trials. *PedCRIN* 2019. Available: https://ecrin.org/sites/default/files/PedCRIN/PedCRIN%20Deliverables/WP3%20D3.1_%20Survey%20Report%20on%20infrastructure%20and%20service%20needs%20for%20paediatric%20and%20neonatal%20trials%20FV_28082017.pdf. [Accessed 15 October 2020].
13. Legrand F, Boulkedid R, Elie V, *et al.* A Delphi process to optimize quality and performance of drug evaluation in neonates. *PLoS One* 2014 Sep 11;9(9):e104976. doi:10.1371/journal.pone.0104976.
14. Aurich B, Elie V, Evelyne Jacqz-Aigrain E, *et al.* Deliverable D3.5: Procedures for setup of neonatal trials. *PedCRIN* 2017. Available: https://ecrin.org/sites/default/files/PedCRIN/PedCRIN%20Deliverables/WP3%20D3.5_Procedures%20for%20the%20set%20up%20of%20neonatal%20clinical%20trials_FV_28022019.pdf. [Accessed 15 October 2020].
15. Neyro V, Elie V, Thiele N, *et al.* Clinical trials in neonates: How to optimise informed consent and decision making? A European Delphi survey of parent representatives and clinicians. *PLoS One* 2018;13(6):e0198097. doi: 10.1371/journal.pone.0198097.
16. Megone C, Wilman E, Oliver S, *et al.* The ethical issues regarding consent to clinical trials with pre-term or sick neonates: a systematic review (framework synthesis) of the analytical (theoretical/philosophical) research. *Trials* 2016;17(1):443. doi: 10.1186/s13063-016-1562-3.
17. Allmark P, Mason S. Improving the quality of consent to randomised controlled trials by using continuous consent and clinician training in the consent process. *J Med Ethics* 2006;32(8):439-43. doi: 10.1136/jme.2005.013722.
18. Gupta UC. Informed consent in clinical research: Revisiting few concepts and areas. *Perspect Clin Res* 2013;4(1):26-32. doi: 10.4103/2229-3485.106373.
19. Vermeulen E, Jansen-van der Weide M, Karsenberg K, *et al.* Deliverable D5.13 Report on patient engagement and perspective integration. *PedCRIN* 2017. Available: <https://ecrin.org/sites/default/files/PedCRIN/PedCRIN%20Deliverables/WP5%20D5.13%20Patient%20engagement%20and%20perspective%20integration%20.pdf>. [Accessed 15 October 2020].
20. Wilman E, Megone C, Oliver S, *et al.* The ethical issues regarding consent to clinical trials with pre-term or sick neonates: a systematic review (framework synthesis) of the empirical research. *Trials* 2015;16:502. doi:10.1186/s13063-015-0957-x.
21. Meinich Petersen S, Zoffmann V, Kjærgaard J, *et al.* Disappointment and adherence among parents of newborns allocated to the control group: a qualitative study of a randomized clinical trial. *Trials* 2014;15:126. doi: 10.1186/1745-6215-15-126.
22. Lawton J, Hollowell N, Snowdon C, *et al.* Written versus verbal consent: a qualitative study of stakeholder views of consent procedures used at the time of recruitment into a peripartum trial conducted in an emergency setting. *BMC Med Ethics* 2017;18(1):36. doi:10.1186/s12910-017-0196-7.
23. Jollye S. An exploratory study to determine how parents decide whether to enroll their infants into neonatal clinical trials. *J Neonatal Nurs* 2009;15(1):18-24. doi: 10/1016/j.jnn.2008.07.012.

24. Vecchi Brumatti L, Montico M, Russian S, *et al.* Analysis of motivations that lead women to participate (or not) in a newborn cohort study. *BMC Pediatr* 2013;13:53. doi: 10.1186/1471-2431-13-53.
25. Pritchard VE, Montgomery-Hönger A. A comparison of parent and staff perceptions of setting-specific and everyday stressors encountered by parents with very preterm infants experiencing neonatal intensive care. *Early Hum Dev* 2014;90(10):549-55. doi: 10.1016/j.earlhumdev.2014.07.006.
26. Latour JM, Duivenvoorden HJ, Hazelzet JA, *et al.* Development and validation of a neonatal intensive care parent satisfaction instrument. *Pediatr Crit Care Med* 2012;13(5):554-9. doi: 10.1097/PCC.0b013e318238b80a.
27. Cartwright K, Mahoney L, Ayers S, *et al.* Parents' perceptions of their infants' participation in randomized controlled trials. *J Obstet Gynecol Neonatal Nurs* 2011;40(5):555-65. doi: 10.1111/j.1552-6909.2011.01276.x.
28. Snowdon C, Elbourne D, Garcia J. "It was a snap decision": parental and professional perspectives on the speed of decisions about participation in perinatal randomised controlled trials. *Soc Sci Med* 2006;62(9):2279-90. doi: 10.1016/j.socscimed.2005.10.008.
29. Ward FR. Chaos, vulnerability and control: parental beliefs about neonatal clinical trials. *J Perinatol* 2009;29(2):156-62. doi: 10.1038/jp.2008.139.
30. Manning DJ. Presumed consent in emergency neonatal research. *J Med Ethics* 2000;26(4):249-53. doi: 10.1136/jme.26.4.249.
31. Thomas M, Menon K. Consenting to pediatric critical care research: understanding the perspective of parents. *Dynamics* 2013;24(3):18-24.
32. Morley CJ, Lau R, Davis PG, *et al.* What do parents think about enrolling their premature babies in several research studies? *Arch Dis Child Fetal Neonatal Ed* 2005;90(3):F225-8. doi: 10.1136/adc.2004.061986.
33. McCarthy KN, Ryan NC, O'Shea DT, *et al.* Parental opinion of consent in neonatal research. *Arch Dis Child Fetal Neonatal Ed* 2019;104(4):F409-F414. doi: 10.1136/archdischild-2018-315289.
34. Ayers S, Sawyer A, Düring C, *et al.* Parents report positive experiences about enrolling babies in a cord-related clinical trial before birth. *Acta Paediatr* 2015;104(4):e164-e170. doi:10.1111/apa.12922.
35. Kenyon S, Dixon-Woods M, Jackson CJ, *et al.* Participating in a trial in a critical situation: a qualitative study in pregnancy. *Qual Saf Health Care* 2006;15(2):98-101. doi:10.1136/qshc.2005.015636.
36. Nieuwenhuijze MJ, Korstjens I, de Jonge A, *et al.* On speaking terms: a Delphi study on shared decision-making in maternity care. *BMC Pregnancy Childbirth* 2014;14:223. Published 2014 Jul 9. doi:10.1186/1471-2393-14-223.
37. Goldberg H. Informed decision making in maternity care. *J Perinat Educ* 2009;18(1):32-40. doi: 10.1624/105812409X396219.
38. Flory J, Emanuel E. Interventions to improve research participants' understanding in informed consent for research: a systematic review. *JAMA* 2004;292(13):1593-601. doi: 10.1001/jama.292.13.1593.
39. Clinical Trials Transformation Initiative (CTTI). CTTI Recommendations: Informed consent, November 2015. Available: <https://www.ctti-clinicaltrials.org/sites/www.ctti-clinicaltrials.org/files/CTTI-InformedConsent-Recs.pdf> [Accessed 17 September 2019].
40. Jansen-van der Weide MC, Caldwell PH, Young B, *et al.* Clinical Trial Decisions in Difficult Circumstances: Parental Consent Under Time Pressure. *Pediatrics* 2015;136(4):e983-92. doi: 10.1542/peds.2014-3402.
41. den Boer MC, Houtlosser M, Foglia EE, *et al.* Deferred consent for the enrolment of neonates in delivery room studies: strengthening the approach. *Arch Dis Child Fetal Neonatal Ed* 2019;104(4):F348-F352. doi:10.1136/archdischild-2018-316461
42. Lepola P, Needham A, Mendum J, *et al.* Informed consent for paediatric clinical trials in Europe. *Arch Dis Child* 2016;101(11):1017-1025. doi: 10.1136/archdischild-2015-310001.
43. Medical Research Council (MRC). Consent and Participant Information Guidance, 2019. Available: <http://www.hrdecisiontools.org.uk/consent/links.html> [Accessed 17 September 2019].
44. Marc-Aurele KL, Steinman SL, Ransom KM, *et al.* Evaluation of the content and process of informed consent discussions for neonatal research. *J Empir Res Hum Ethics* 2012;7(3):78-83. doi:10.1525/JER.2012.7.3.78.
45. Dekking SA, van der Graaf R, van Delden JJ. Strengths and weaknesses of guideline approaches to safeguard voluntary informed consent of patients within a dependent relationship. *BMC Med* 2014;12:52. doi: 10.1186/1741-7015-12-52.
46. Dekking SA, van der Graaf R, Kars MC, *et al.* Balancing research interests and patient interests: a qualitative study into the intertwinement of care and research in paediatric oncology. *Pediatr Blood Cancer* 2015;62(5):816-22. doi: 10.1002/pbc.25444.
47. Black L, Batist G, Avar D, *et al.* Physician recruitment of patients to non-therapeutic oncology clinical trials: ethics revisited. *Front Pharmacol* 2013;4:25. doi: 10.3389/fphar.2013.00025. eCollection 2013.
48. McCarthy M. US researchers failed to disclose risks of newborn study, finds government office. *BMJ* 2013;346:f2367. doi: 10.1136/bmj.f2367.
49. DeMauro SB, Cairnie J, D'Ilario J, *et al.* Honesty, trust, and respect during consent discussions in neonatal clinical trials. *Pediatrics* 2014;134(1):e1-3. doi: 10.1542/peds.2013-3720.
50. Mundy CA. Assessment of family needs in neonatal intensive care units. *Am J Crit Care* 2010;19(2):156-63. doi: 10.4037/ajcc2010130.

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51. European Commission (EC). Ethical considerations for clinical trials on medicinal products conducted with minors - Recommendations of the expert group on clinical trials for the implementation of Regulation (EU) No 536/2014 on clinical trials on medicinal products for human use, Revision 1, 18 September 2017. Available: https://ec.europa.eu/health/sites/health/files/files/eudralex/vol-10/2017_09_18_ethical_considerations_en.pdf [Accessed 17 September 2019].
 52. Hoberman A, Shaikh N, Bhatnagar S, *et al.* Factors that influence parental decisions to participate in clinical research: consenters vs non consenters. *JAMA Pediatr* 2013;167(6):561-6. doi: 10.1001/jamapediatrics.2013.1050.
 53. Eiser C, Eiser JR, Mayhew AG, *et al.* Parenting the premature infant: balancing vulnerability and quality of life. *J Child Psychol Psychiatry* 2005;46(11):1169-77. doi: 10.1111/j.1469-7610.2005.00415.x.
 54. Simon CM, Kodish ED. Step into my zapatos, doc: understanding and reducing communication disparities in the multicultural informed consent setting. *Perspect Biol Med* 2005;48(1 Suppl):S123-38. doi: 10.1353/pbm.2005.0030.
 55. Natale JE, Lebet R, Joseph JG, *et al.* Racial and Ethnic Disparities in Parental Refusal of Consent in a Large, Multisite Pediatric Critical Care Clinical Trial. *J Pediatr* 2017;184:204-208.e1. doi: 10.1016/j.jpeds.2017.02.006.
 56. Lentz J, Kennett M, Perlmutter J, *et al.* Paving the way to a more effective informed consent process: Recommendations from the Clinical Trials Transformation Initiative. *Contemp Clin Trials* 2016;49:65-9. doi: 10.1016/j.cct.2016.06.005.
 57. Koyfman SA, Reddy CA, Hizlan S, *et al.* Phase I Informed Consent (POIC) Research Team. Informed consent conversations and documents: A quantitative comparison. *Cancer*. 2016;122(3):464-9. doi: 10.1002/cncr.29759.
 58. Simonds VW, Garrouette EM, Buchwald D. Health Literacy and Informed Consent Materials: Designed for Documentation, Not Comprehension of Health Research. *J Health Commun* 2017;22(8):682-691. doi: 10.1080/10810730.2017.1341565.
 59. Wang LW, Miller MJ, Schmitt MR, *et al.* Assessing readability formula differences with written health information materials: application, results, and recommendations. *Res Social Adm Pharm* 2013;9(5), 503-516. doi: 10.1016/j.sapharm.2012.05.009.
 60. Boote J, Julious S, Horspool M, *et al.* PPI in the PLEASANT trial: involving children with asthma and their parents in designing an intervention for a randomised controlled trial based within primary care. *Prim Health Care Res Dev* 2016;17(6):536-548. doi: 10.1017/S1463423616000025.
 61. Bate J, Ranasinghe N, Ling R, *et al.* Public and patient involvement in paediatric research. *Arch Dis Child Educ Pract Ed* 2016;101(3):158-61. doi: 10.1136/archdischild-2015-309500.
 62. Bakhbakhi D, Siassakos D, Storey C, *et al.* PARENTS 2 study protocol: pilot of Parents' Active Role and ENGagement in the review of Their Stillbirth/perinatal death. *BMJ Open* 2018;8(1):e020164. doi: 10.1136/bmjopen-2017-020164.
 63. Harvey M, Nongena P, Edwards D, *et al.* We knew it was a totally at random thing': parents' experiences of being part of a neonatal trial. *Trials* 2017;18(1):361. doi: 10.1186/s13063-017-2112-3.
 64. European Commission (EC). Ethical considerations for clinical trials on medicinal products conducted with the paediatric population - Recommendations of the ad hoc group for the development of implementing guidelines for Directive 2001/20/EC relating to good clinical practice in the conduct of clinical trials on medicinal products for human use, 2008. Available: https://ec.europa.eu/health/sites/health/files/files/eudralex/vol-10/ethical_considerations_en.pdf [Accessed 17 September 2019].
 65. Babies born premature or sick (BLISS). Research Investigator Guidelines - Public Involvement Role Description Template. Available: <https://www.bliss.org.uk/research-campaigns/research/involving-parents-in-research>. [Accessed 15 October 2020].
 66. Flory J, Emanuel E. Interventions to improve research participants' understanding in informed consent for research: a systematic review. *JAMA* 2004 Oct 6;292(13):1593-601. doi: 10.1001/jama.292.13.1593.
 67. Miller VA, Ittenbach RF, Harris D, *et al.* The decision making control instrument to assess voluntary consent. *Med Decis Making* 2011;31(5):730-41. doi: 10.1177/0272989X11398666.
 68. Freer Y, McIntosh N, Teunisse S, *et al.* More information, less understanding: a randomized study on consent issues in neonatal research. *Pediatrics* 2009;123(5):1301-5. doi: 10.1542/peds.2007-3860.
 69. Franck LS, Cox S, Allen A, *et al.* Parental concern and distress about infant pain. *Arch Dis Child Fetal Neonatal Ed* 2004;89(1):F71-5. doi: 10.1136/fn.89.1.f71.

1 Informed consent for neonatal trials – Practical points to 2 consider and a check list

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4 Donato Bonifazi, Evelyne Jacqz-Aigrain

5 Supplemental material

6 PedCRIN Survey^[12]

7 Questions

8 Instructions were: “Please indicate, for which of the following activities do you think a
9 research infrastructure for paediatric clinical research should provide support to?” and
10 “Please choose the appropriate response for each item.” A Likert scale ranging from 0 to
11 4 was used (0= “No need at all”; 1 = “Slightly needed;” 2 = “Moderately needed”; 3 = “Very
12 needed”; 4 = “Extremely needed”). Other questions in the survey concerned demographic
13 information (e.g. personal information, professional experience, country, paediatric
14 specialty).

Table S1 PedCRIN Survey questions (verbatim wording)

Topic group/ Survey questions (for which a level of importance between 0 and 4 had to be chosen)

Scientific and methodological expertise

- Design protocols for paediatric interventional clinical trials (PK, PK/PD, efficacy and/or safety, other)
- Design protocols for paediatric non-interventional clinical studies
- Identification of the target population (age subsets, inclusion/exclusion criteria)
- Statistical methodology for paediatric clinical trials
- Application of innovative study design (e.g. modelling & simulation and extrapolation tools/ approaches) from adults to children and from older children to neonates

Collaboration and support for clinical trials start-up

- Identification of relevant network/scientific societies to help the selection of clinical trial sites
- Establishing contacts with Young Patients Advisory Groups/Patients Advisory Boards/Patients Associations
- Identification of relevant calls for funding paediatric trials at Eu/international level and support for project application
- Involvement of parties and subcontractors to define the distribution of all the responsibilities and tasks related to clinical trials (including CROs, insurance companies, etc)
- Preparation of standard models agreements for the implementation of clinical trials
- Definition of a budget model based on standard costs for general activities, investigation (per patient), services, etc

Regulatory expertise

- Database of national regulatory and ethical requirements for paediatric trial authorisation
- Preparing and submitting documents to Ethics Committees/Competent Authorities for the approval/authorisation of paediatric clinical trials
- Preparing consent and assent models + Patient information sheet, including clinical trials involving special patients populations (PICU, NICU, neonates, neurological impairment, etc)
- Preparing the Investigator’s Brochure for submission
- Interaction with national/European regulatory agencies

Paediatric pharmacovigilance

- Methods for identifying and communicating ADRs in paediatric patients
- Age-adapted scales for severity and causality assessment in paediatric patients
- Targeted Serious Adverse Events notification forms, age-adjusted
- Certification of pharmacovigilance expertise

Paediatric clinical trials conduct according to GCP and paediatric guidelines/ recommendations

- Design Case Report Forms for paediatric studies
- Managing paediatric clinical trial data (data-management) (collection, integration, validation and analysis of clinical trial data)
- Managing paediatric IMPs (drug management) (packaging, labelling, delivering, storing, administering, accountability, disposal)
- Managing paediatric clinical trial technical aspects & logistics (e.g. shipping agent, operative instructions, laboratory procedures, biobank samples management, etc.)
- Preparation of monitoring plans, also based on risk-based approach
- On-site and remote monitoring visits and reporting

Training

- Training regarding Good Clinical Practices, including responsibilities of principal investigators, co-investigators and study nurses involved in paediatric clinical trials
- Training course(s) designed for specific paediatric/neonatal trials
- Training on drug safety and toxicity stratified by age

Box for free text to answer the following question:

Please list any other activity for which do you think that it is required support from a research infrastructure

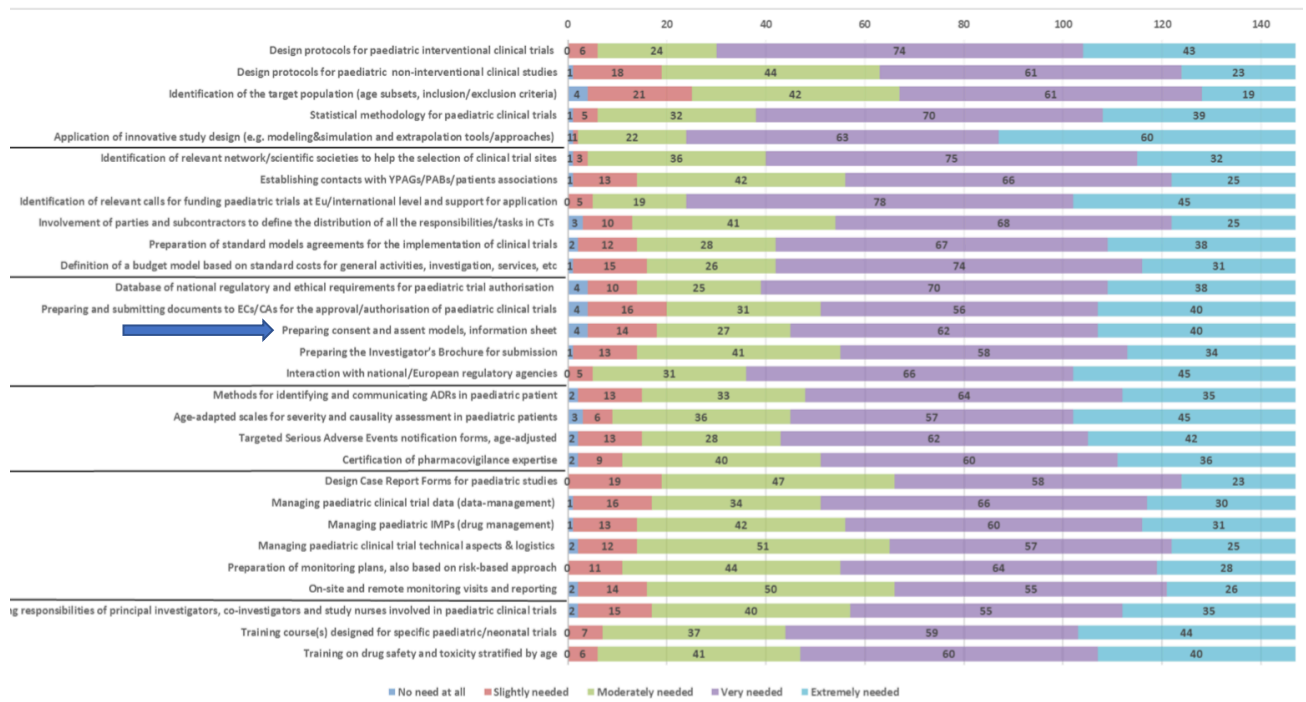
PK, Pharmacokinetic; PD, Pharmacodynamic; CRO, Contract Research Organisation; PICU, Paediatric Intensive Care Unit; NICU, Neonatal Intensive Care Unit; ADR, Adverse Drug reaction; GCP, Good Clinical Practice; IMP, Investigational Medicinal Product.

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18 Summary of survey results

19 Out of the 147 respondents 35 (23.8%) were neonatologists. The results of a separate
20 analysis of their responses did not differ from the overall responses.



21
22 **Figure S1** Summary of PedCRIN survey results – Number of responses for each
23 question by degree of need (all respondents).

24 YPAG, Young Persons' Advisory Group; PAB, Patient Advisory Board; Eu, European Union; CT, Clinical
25 trial; ECs, Ethic committees; CAs, Competent authorities; ADR, Adverse drug reaction; IMP,
26 Investigational Medicinal Product.

27 Free text responses provided more insight into the particular challenges researchers face.
28 These included among others funding, clinical trial set-up and management, networking,
29 involvement of patient/ parent organisations, human resources, the need for more
30 paediatric research (outcome, reference values, treatment standards, formulation
31 development, pharmacokinetics/ pharmacodynamics, non-clinical research), pharmaco-
32 vigilance, interaction with regulatory authorities and ethics boards. Concerning informed
33 consent and the recruitment into paediatric trials the following statements were made:

- 34 • “Strategies to improve the enrolment in clinical trial”
- 35 • ...“Especially in neonatology a lot of centres are needed to recruit patient numbers to trials in
36 a reasonable time period.”...
- 37 • “The EC and the regulatory authorities need to learn that studies in babies and children do take
38 time.”...
- 39 • “The largest problem is that many of the big EU trials in newborns failed to include patients. I
40 think it is time to create infrastructure and clinical trial centres with dedicated young staff and
41 researchers that can include many subjects into trials. 24/7 services need to be set up. A lot of
42 money has been spent but less has come out of it.”
- 43 • “... but we need the power to include patients.”