

AllTrials report to the House of Commons Science and Technology Committee inquiry into Research integrity: Clinical trial transparency.

Update on compliance of UK University and NHS trust compliance with
obligations to report clinical trial results

SILE LANE

All trials registered All results reported

+ AllTrials

Clinical trials on medicinal products for human use run in the UK are registered onto the EU's Clinical Trial Register. This means they are captured under the EU's reporting rules which mandate that all clinical trials on the register since 2004 need to report results there within a year of the end of the trial (or within 6 months of the end of the trial for paediatric trials). Therefore all registered UK trials which ended a year or more ago should have reported results onto the EU register. This legal obligation on UK clinical trialists is in addition to the overriding global ethical obligations to report results set out in the World Medical Association's Declaration of Helsinki and by the World Health Organisation.

This report into progress made by UK publicly funded institutes' reporting is based on data collected and displayed on the EUTrialsTracker. The Tracker tool relies on data from the EU Clinical Trials Register (EUCTR) which is far from perfect. There are trials on the EUCTR that never started and which are unfairly marked as overdue reporting. There are trials still marked as 'ongoing' which are certain to have completed and should be marked as overdue. There is further detail on the context and quality of the data in this report in appendix 1.

Since January this year university clinical trial sponsors and NHS trust sponsors have shown an overall improvement in reporting results. More are achieving 100% reporting and many more are close to that, which shows it is achievable. If an organization has anything other than 100% compliance on the EUTrialsTracker the reasons for this are either:

- the tracker is wrong because the organisation has left its own important registry data inaccurate,
- the tracker is wrong because the European Medicines Agency or MHRA has left important registry data inaccurate,
- or the organisation has not reported the results from all of the trials it should have.

Changes in UK university and NHS trust-sponsored clinical trial reporting rates January – October 2019

Reporting rates for both UK university-sponsored and NHS trust-sponsored clinical trials increased between January and October 2019. In January 59.7% of trials sponsored by UK universities that were due to have results on the EUCTR had reported. In October 2019 72.1% of UK university-sponsored due trials had reported. In February 2019 only 35.4% of NHS trust-sponsored due trials had reported results onto the register and in October 56.3% had. The overall reporting rate for all due UK university- and NHS trust-sponsored trials rose from 48.1% in January to 63.9% in October 2019. This of course means that over a third of these trials (36.1%) are still going unreported.

Trials sponsored by	Number of trials due to report		Number of due trials reported		Reporting %	
	Jan/Feb 2019	Oct 2019	Jan/Feb 2019	Oct 2019	Jan/Feb 2019	Oct 2019
UK Universities	290	646	173	466	59.7	72.1
NHS trusts	263	703	93	396	35.4	56.3

Overall reporting rate for combined UK university & NHS Trust sponsored due trials	48.1	63.9
Reporting rate for all trials on the EUCTR	53.6	61.8

For comparison, across all trials with at least one UK sponsor the current reporting rate is 70.8%. Across all non-commercial sponsors on the EUCTR reporting currently stands at just 30.5%. This rate is bolstered considerably by the increase in reporting for UK non-commercial sponsors. If only non-commercial trials without a UK sponsor are considered, reporting throughout the rest of the EU is at just 12.7%.

The full data set on reporting numbers and rates for UK university and NHS trust clinical trial sponsors from January/February 2019 and October 2019 is in appendix 2. We have pulled out some data points that may be of interest to the Committee, below.

Some organisations seem to have achieved impressive progress

Two university sponsors progressed from 0% of their due trials being reported to 100% reported: University of East Anglia and University of Surrey. In October 2019 four universities showed 100% reporting: Keele University; Queen Mary, University of London; University of East Anglia and University of Surrey. Seventeen university sponsors achieved an increase in their reporting rate of 15% or more between January and October. These sponsors are listed below and are shown alongside the total number of clinical trials and the total of due trials on the EU register for that sponsor.

University sponsors which show the greatest increase in reporting rate

University	No. trials on EUCTR		Due Trials			
	Jan 2019	Oct 2019	Jan 2019	Oct 2019		
Queen Mary, University of London	38%	100%	56	57	16	29
University of East Anglia	0%	100%	3	3	2	3
University of Surrey	0%	100%	9	8	2	6
University of Dundee	82%	98%	83	71	66	64
University of Nottingham	41%	92%	58	60	17	51
London School of Hygiene & Tropical Medicine	0%	80%	9	9	1	5
Cardiff University	40%	78%	41	43	10	32
University of Bristol	33%	75%	17	18	3	12
Queen's University Belfast	0%	75%	7	7	1	4
University of Warwick	33%	60%	10	9	3	5
University of Edinburgh	25%	55%	42	43	8	20
Bangor University	0%	50%	2	2	1	2

University of Birmingham	15%	49%
University of Liverpool	0%	47%
University of Glasgow	17%	36%
University of Leicester	0%	33%
University of Manchester	0%	25%

90	99
40	41
40	29
11	19
18	20

13	39
2	15
6	11
2	6
3	12

Three NHS Trust sponsors progressed from having 0% of their due trials reporting to 100% reporting: South Tees Hospitals NHS Trust, York Teaching Hospital NHS Foundation Trust and North Tees and Hartlepool NHS Foundation Trust. In October 2019 five NHS trust sponsors seem to have achieved 100% reporting of due trials: Essex Partnership University NHS Foundation Trust; King's College Hospital NHS Foundation Trust; South Tees Hospitals NHS Trust; York Teaching Hospital NHS Foundation Trust and North Tees and Hartlepool NHS Foundation Trust.

Thirty-four NHS trust sponsors achieved an increase in their reporting rate of 15% or more between January and October. These sponsors are listed below and are shown alongside the total number of clinical trials and the total of due trials on the EU register for that sponsor.

NHS Trust sponsors which show the greatest increase in reporting rate

NHS Trust	No. trials on EUCTR		Due Trials			
	Feb 2019	Oct 2019	Feb 2019	Oct 2019	Feb 2019	Oct 2019
King’s College Hospital NHS Foundation Trust	83%	100%	36	41	12	25
South Tees Hospitals NHS Foundation Trust	0%	100%	7	8	1	4
York Teaching Hospital NHS Foundation Trust	0%	100%	6	7	1	4
North Tees and Hartlepool NHS Foundation Trust	0%	100%	2	2	2	2
University Hospitals of Leicester NHS Trust	0%	89%	55	54	13	27
Bart's Health NHS Trust	29%	88%	53	51	14	34
Moorfields Eye Hospital NHS Foundation Trust	18%	83%	29	30	11	23
The Newcastle Upon Tyne Hospitals NHS Foundation Trust	47%	79%	64	64	17	38
The Royal Wolverhampton NHS Trust	0%	75%	8	8	2	4
Sheffield Teaching Hospitals NHS Foundation Trust	30%	74%	39	43	10	23
University Hospitals Plymouth NHS Trust	0%	69%	16	16	5	13
The Royal Marsden NHS Foundation Trust	33%	67%	54	57	6	18
Alder Hey Children’s NHS Foundation Trust	0%	67%	8	8	1	3

Birmingham Women's and Children's NHS Foundation Trust	0%	67%	6	6	2	3
East and North Herts NHS Trust	0%	67%	3	4	1	3
University College London Hospitals NHS Foundation Trust	33%	63%	12	11	3	8
Hull and East Yorkshire Hospitals NHS Trust	15%	55%	40	40	13	31
Oxford University Hospitals NHS Foundation Trust	33%	50%	23	25	6	16
University Hospitals Coventry and Warwickshire NHS Trusts	25%	50%	7	6	4	4
The Christie NHS Foundation Trust	0%	50%	25	26	6	20
North Bristol NHS Trust	0%	50%	22	22	4	14
Epsom & St Helier University Hospitals NHS Trust	0%	50%	5	5	1	2
Gateshead Health NHS Foundation Trust	0%	50%	3	3	2	2
Wrightington, Wigan And Leigh NHS Foundation Trust	0%	50%	2	2	1	2
Royal Papworth Hospital NHS Foundation Trust	0%	40%	10	10	2	5
Manchester University NHS Foundation Trust	0%	34%	55	63	14	47
Royal Liverpool And Broadgreen University Hospitals NHS Trust	0%	33%	26	26	3	15
Salford Royal NHS Foundation Trust	0%	33%	9	10	1	6
Heart Of England NHS Foundation Trust	0%	29%	12	12	3	7
Royal Devon And Exeter NHS Foundation Trust	0%	25%	11	11	1	8
Gloucestershire Hospitals NHS Foundation Trust	0%	25%	3	4	1	4
Great Ormond Street Hospital for Children NHS Foundation Trust	0%	20%	12	14	1	5
The Walton Centre NHS Foundation Trust	0%	20%	8	8	1	5
Portsmouth Hospitals NHS Trust	0%	17%	9	9	1	6

Some organisations did not seem to make any progress, or made very little

Twelve NHS Trust sponsors and three university that were at 0% reported on the EUTrialsTracker in early 2019 remained at 0% reported in October. These organisations were and continue to be in breach of the European reporting rules. In total in October 33 NHS Trusts and six university sponsors have 0% of their due trials reported.

NHS Trust and university sponsors that remained at 0% reported on the EUTrialsTracker

No. trials on
EUCTR

Due Trials

NHS Trust	Feb 2019	Oct 2019	Feb 2019	Oct 2019	Feb 2019	Oct 2019
Brighton and Sussex University Hospitals NHS Trust	0%	0%	9	10	2	5
Norfolk And Norwich University Hospitals NHS Foundation Trust	0%	0%	7	7	1	3
London North West University Healthcare NHS Trust	0%	0%	6	6	1	3
St George's University Hospitals NHS Foundation Trust	0%	0%	6	6	1	3
Greater Manchester Mental Health NHS Foundation Trust	0%	0%	4	4	2	3
Sheffield Children's NHS Foundation Trust	0%	0%	4	4	1	2
Chelsea And Westminster Hospital NHS Foundation Trust	0%	0%	3	3	1	2
Whittington Health NHS Trust	0%	0%	3	3	1	2
Frimley Health NHS Foundation Trust	0%	0%	2	2	2	2
Pennine Acute Hospitals NHS Trust	0%	0%	2	2	1	1
Mid Cheshire Hospitals NHS Foundation Trust	0%	0%	1	1	1	1
Southport And Ormskirk Hospital NHS Trust	0%	0%	1	1	1	1
University	Jan 2019	Oct 2019	Jan 2019	Oct 2019	Jan 2019	Oct 2019
St George's, University of London	0%	0%	15	16	7	11
Aston University	0%	0%	2	2	1	1
University of Sheffield	0%	0%	4	4	1	3

Correspondence with universities and trusts

Dozens of universities and NHS trusts wrote to AllTrials (Sense about Science and the EBMDDataLab) between January and October 2019 in response to our outreach to them. In these letters, representatives from the organisation generally:

- asked for clarifications on the reporting data we had for their organisation;
- asked for practical help and guidance on how to report results onto the EU register;
- let us know about problems they were facing when attempting to report results; or
- shared and asked for advice on new processes or policies they were implementing to ensure better compliance with clinical trial reporting rules.

Requests for practical help and guidance

At AllTrials we were already aware that clinical trial researchers are very rarely trained in how to use the EU clinical trial results reporting interface. The letters we received in the last nine months confirmed this. As well as the lack of formal training, researches and university staff could not find understandable and accessible guides to how to upload results onto the EU register. AllTrials

produced a basic step-by-step guide¹ to how to update entries and up-load results on the EUCTR and the US's ClinicalTrials.gov. We disseminated it to every organisation we wrote to. Several research groups that have used it told us that it was valuable to them. Researchers also seem to be generally unaware of the relevant EU guidelines or were confused about their obligations to report results onto the European register and to keep the entries on their clinical trials up-to-date and accurate. We would suggest that our step-by-step guide, or something like it, and information on researchers' legal and ethical obligations to report, be disseminated to all UK clinical trial researchers and university staff.

Problems raised about reporting results

The most common issues noted by sponsors were:

1. Technical and usability issues with the European database, and
2. Frustrations about delays between making changes and those being reflected on the public register.

Researchers and trial personnel described difficulties using EudraCT (the backend database of the EUCTR). Many reported that common organisational IT issues such as difficulties keeping track of log in information and passwords were slowing them down. Many also told us about problems with the EudraCT helpline and email address for support. Requests for help were not answered. Some staff at sponsors were informed there would be a wait of up to several months for a response to their request. Some sponsors reported that answers they did receive were insufficient. We understand at least some of the problems with the support system were caused by interruptions to the normal operations of the European Medicines Agency (EMA) during its move from London to Amsterdam earlier this year.

We heard that researchers had experienced difficulties filling in the EudraCT results form. Researchers described the interface as non-user friendly and non-intuitive. A number of researchers found it not flexible enough to include some types of statistical results. Researchers told us that filling in some of the required fields introduced large amounts of extra work for them. An example raised was the requirement that all adverse events be coded in a particular way – a cumbersome and time-consuming process which the researcher may not need to do for any other reason. Of course, it should be noted that adverse event information is particularly important to record and is often underreported in other modes of dissemination.

The problems listed above are not insurmountable. The majority could probably be resolved with a focus from the EMA on improving the usability of the database, better training for those interacting with EudraCT and organisational processes such as having a member of the research governance staff in every institute well versed in, and responsible for all interactions with, the EudraCT system.

However, there are technical aspects of EudraCT that currently may make it impossible for some sponsors to achieve 100% compliance according to the European rules.

¹ <http://www.alltrials.net/news/how-to-upload-results-and-update-entries-on-clinical-trial-registers-2/>

- The database does not seem to allow researchers to properly upload summary results from some specific types of clinical trials, for example results from single arm trials.
- Trials that were registered in EudraCT (ie trials that went through the application process and were given approval to proceed) but which never actually started are impossible to mark as such. They can be categorised as 'ongoing' which would obviously be inaccurate, or 'prematurely ended' or even 'completed' but under the EU rules these terminated trials that enrolled participants must supply results. This means that trials that never even began and which never produced any results show up on the register as overdue to report results.

Researchers also reported frustrations at delays in getting changes made to register entries about their trials. Updates to EUCR register entries must first be filed by the sponsor with the national competent authority in member states (this is the Medicines and Healthcare products Regulatory Agency (MHRA) in the UK) before being passed by the authority to the centralised database. This information is then made public in the EU Clinical Trials Register. Researchers cannot directly change the information in register entries even for trials they are the designated responsible party for. Delays at the MHRA or at the EMA in validating or uploading information can make sponsors' performance appear worse than it actually is.

The new EU clinical trial portal, when launched, may have improved functionality. Still, the current EUCR will remain an important public repository for the results of clinical trials regardless of the new trial portal or the UK's future relationship with the EMA.

Other problems researchers and sponsors reported

The EU's reporting rules allow trials completed before July 2013 to submit a PDF containing appropriate and complete results information rather than tabular results. A small number of institutes told us that they were concerned about the copyright status of journal papers they wanted to upload. EU guidelines specify that the sponsor must have appropriate copyright permission to post results onto the EUCR and at least one sponsor has been told by a publisher that they did not have this permission for their journal paper. If publishing companies are not allowing researchers to do this, for research that was not published in an open access format, this will remain an issue for researchers. Still, the option to report results in the tabular format on the register remains open to these researchers.

We also heard a lot from researchers around the lack of time and funds to report their trial results. We heard issues related to the fact that the EUCR reporting requirements apply retrospectively and that institutes sometimes encountered problems when a trial principal investigator had passed away, moved institutes or refused to cooperate. These are all issues that could and should have been planned for by the sponsor institute, which remains legally responsible for reporting the results. Commercial sponsors manage it to a much higher level of compliance. This is probably because responsibility for reporting results according to the rules is centralised and it is part of these companies' standard operating procedures. It's just as much part of the research project as running the research itself, therefore plans include the time and resource to do it. Large global non-commercial funders are now increasingly saying they expect the same from their funded researchers no matter who conducts the study.

Correspondence with researchers from the Committee, the Health Research Authority (HRA) and AllTrials made researchers and institutes aware, perhaps for the first time, that in many cases the information on the register about their trial was incorrect or out of date. These inaccuracies can lead to both false positive and false negative identification of due trials. We also heard a number of instances of clinical trials incorrectly assigned to a sponsor. To correct inaccuracies like the above, sponsors contacted the MHRA. The MHRA seemed to be experiencing a back-log in dealing with requests for amendments and researchers were frustrated that incorrect information remained on the register months after they had requested corrections to register information.

New processes within institutions

A number of institutes informed us that they are putting in place new processes to ensure all clinical trials they are responsible for are properly reported. For example, Norfolk and Norwich Universities Hospitals NHS Foundation Trust is updating the standard operating procedures for all their researchers. North Bristol NHS Trust is exploring a system of reminders, possibly automatic, to help researchers adhere to their obligations. Newcastle upon Tyne Hospitals has written to the principal investigator of every sponsored clinical trial to remind them of their obligations to report past trials. Institutions such as the University of Dundee that brought in processes like these a number of years ago are now achieving a high level of compliance.

Misunderstandings and misapprehensions

We identified misunderstandings in the correspondence from research institutes.

We heard that researchers did not want to upload results onto a publicly accessible register before they submitted a paper based on the results to a journal as they worried reporting to the register would be viewed as 'prior publication' and mean the paper would be rejected. The International Committee of Medical Journal Editors has said that it does not consider reporting of results on the US's ClinicalTrials.gov register as prior publication. It would be useful for them to add the EUCTR to this policy.

Several institutions wrote to say they assumed that because a journal paper including results from a clinical trial had been published, that this should mean the trial is characterised as 'reported.' The EU rules are clear that results must be posted directly onto the EUCTR, in a standard format. This is with good reason. Reporting on a register has several advantages over academic journal publication: it is much easier to locate results; it is much easier to track compliance; and registers mandate important information that must be included in the results report. By contrast, there is extensive evidence to show that results reports in academic journals are incomplete, of poorer quality than registry reports, and less complete on important issues such as adverse events data.

A number of institutions queried whether the EU reporting rules even applied to their trials. The rule came into force in 2014 and was fully implemented and applied to all trials by December 2016. Some institutions incorrectly assumed therefore that it applied to clinical trials carried out in 2014 or 2016 or later. The EU reporting rules are clear and simple – they mandate that all trials registered on the EUCTR since 2004 must have results reported there within 12 months of the trial completion date (or within 6 months for paediatric trials) and sponsors had considerable time to

bring old trials into compliance prior to the full implementation of the guidelines. The new EU regulation 536/2014 from 2020 will make this a legal requirement and empowers member states to implement sanctions, including fines, for breaches of the law. The UK government has committed to bringing in laws to match the requirements in the EU Clinical Trials Regulation if it comes into force across the EU after the UK leaves the EU.

Background to this report

In October 2018 the House of Commons Science and Technology Select Committee's report on Clinical trials transparency highlighted the poor reporting of results from clinical trials sponsored by UK universities and NHS Trusts. In January 2019 the Committee announced that public UK clinical trial sponsors in the UK (universities and NHS trusts) were being put 'on notice' that their progress on reporting clinical trial results would be monitored over the coming six months. The AllTrials campaign supplied data on the number of clinical trials each institution was responsible for alongside the number of due and reported trials on the EU Clinical Trials Register, according to the EUTrialsTracker². The Committee wrote to the heads of the 38 universities and 108 NHS trusts that were sponsor or co-sponsor of at least one clinical trial on the EU register. The Committee notes that in six months they would monitor progress in reporting rates and may choose to question the heads of any institutes that had not made progress. AllTrials also wrote to the organisations with information on specific unreported trials and offering practical help to researchers on how to upload results and update their register entries.

This memo was prepared for the House of Commons Science and Technology Committee by the AllTrials campaign for clinical trial transparency. It was written by Síle Lane and Laura Baggaley, Sense about Science, and Nicholas J. DeVito, EBMDDataLab, University of Oxford. The preparation was supported by Cochrane, Sense about Science and EBMDDataLab. AllTrials is the global movement for all clinical trials to be registered and results from them reported. It has been joined by 750 organisations and 95,000 people worldwide.

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² <https://www.bmj.com/content/362/bmj.k3218>

Appendix 1 Note on the data included in this update report

EUCTR Data: Context and Updates since January 2019

All data presented in this report are derived from the AllTrials EU TrialsTracker maintained by the DataLab at the University of Oxford. The EU TrialsTracker³ scrapes the EU Clinical Trials Register each month and assesses which trials are required to report results under EU guidelines, and if results have been made available. Each trial is assigned to a sponsor through a manual normalisation of free-text sponsor names from the EUCTR and presented publicly at eu.trialstracker.net. The most recent data was scraped from the EUCTR starting on 1 October 2019. Comparison data for universities is from a scrape on 10 January 2019 and comparison data for NHS Trusts is from a scrape on 1 February 2019.

The EU TrialsTracker relies on the EUCTR dataset as the canonical source of data for all assessments of which trials are due to report and whether they have reported. However, the data quality and functionality of the EUCTR limit a complete assessment. The following issues are known or have been identified:

1. The EUCTR FAQ notes that data from the launch of the register (May 2004) to March 2011 are often incomplete or contain inconsistencies.
2. Some trials registered on the EUCTR never began nor enrolled any participants and therefore have no results to report. Currently it is impossible to differentiate these trials from trials that did enrol participants but terminated prior to full completion and are therefore required to report. This is frustrating both for maintaining the EU TrialsTracker and for sponsors. Following outreach, the EMA indicated that there are plans to flag these trials that never began but no timeline was provided for implementation. Sponsors are advised to inform the MHRA about trials that never began. Some sponsors have found workarounds to upload documentation for older trials (pre-July 2013 trials are allowed to upload a PDF of results rather than fill in the tabular results form) and hence making the trial seem reported, but newer trials have no good options.
3. For any given sponsor, the number of trials that are actually “Due” to report results may be much higher than identified on the EU TrialsTracker. It is common for trials to have inconsistent data that makes them impossible to assess with confidence. This can be due to issues with data provided by UK sponsors, issues with data provided by co-sponsors in other countries in multi-national trials, poor data validation at a national competent authority, or limitation of data presented on the EUCTR (for instance, trials taking place outside the EU that appear on the EUCTR). Additionally, many trials currently identified as “ongoing” on the EU TrialsTracker are very old and have very likely completed but have not yet been updated to reflect their completed status. Sponsors are responsible to ensure the information on the registry is accurate and kept up to date.

³ <https://www.bmj.com/content/362/bmj.k3218>

The process under discussion in this report and AllTrials's work more broadly has made many sponsors, both commercial and non-commercial, suddenly aware of these inaccuracies and start the process of addressing these issues. More detail is provided in the report on the feedback received from sponsors regarding the technical difficulties and limitations of the EUCTR.

Additionally, we are aware that there was a large administrative backlog of trial information was not being updated by the MHRA. An analysis by the DataLab showed that around mid-2016 new UK trials added to the EUCTR had dropped considerably. Following outreach, the MHRA acknowledged the issue and indicated it was actively being resolved and should be rectified by the end of Q2 2019. Recent data from the TrialsTracker indicates that this issue has been resolved leading to a marked increase of UK trials either appearing on the EUCTR or having their information updated. This likely explains the large increase in due UK trials seen from January 2018 to October 2018. Questions on details of additional reporting statistics for the EUCTR, or additional bespoke data requests should be directed to the DataLab.

Appendix 2 UK university and NHS Trust sponsored trials – full data set as of 3rd October 2019

	Trials on EUCTR (sponsored or co-sponsored)		Due Trials		Reported Trials		Reporting %	
	Feb 2019	Oct 2019	Feb 2019	Oct 2019	Feb 2019	Oct 2019	Feb 2019	Oct 2019
NHS Trusts that had trials due to report in Feb 2019								
Guy's and St Thomas' NHS Foundation Trust	67	75	25	43	25	40	100%	93%
South London And Maudsley NHS Foundation Trust	18	14	3	8	3	7	100%	88%
Nottingham University Hospitals NHS Trust	18	21	2	13	2	8	100%	62%
University Hospitals of North Midlands NHS Trust	9	10	2	5	2	4	100%	80%
Queen Victoria Hospital NHS Foundation Trust	3	3	1	2	1	1	100%	50%
Royal United Hospitals Bath NHS Foundation Trust	3	3	1	2	1	1	100%	50%
Essex Partnership University NHS Foundation Trust	1	1	1	1	1	1	100%	100%
Cambridge University Hospitals NHS Foundation Trust	72	43	14	32	12	27	86%	84%
King's College Hospital NHS Foundation Trust	36	41	12	25	10	25	83%	100%
The Leeds Teaching Hospitals NHS Trust	31	32	6	15	5	11	83%	73%
University Hospitals Bristol NHS Foundation Trust	34	36	3	18	2	6	66%	33%
University Hospitals of Derby and Burton NHS Foundation Trust (Derby Teaching Hospitals)	9	10	3	10	2	4	66%	40%
Imperial College Healthcare NHS Trust	24	17	2	6	1	2	50%	33%

The Newcastle Upon Tyne Hospitals NHS Foundation Trust	64	64	17	38	8	30	47%	79%
The Royal Marsden NHS Foundation Trust	54	57	6	18	2	12	33%	67%
Oxford University Hospitals NHS Foundation Trust	23	25	6	16	2	8	33%	50%
University College London Hospitals NHS Foundation Trust	12	11	3	8	1	5	33%	63%
Sheffield Teaching Hospitals NHS Foundation Trust	39	43	10	23	3	17	30%	74%
Bart's Health NHS Trust	53	51	14	34	4	30	29%	88%
University Hospitals Coventry and Warwickshire NHS Trusts	7	6	4	4	1	2	25%	50%
Moorfields Eye Hospital NHS Foundation Trust	29	30	11	23	2	19	18%	83%
Hull and East Yorkshire Hospitals NHS Trust	40	40	13	31	2	17	15%	55%
University Hospital Southampton NHS Foundation Trust	41	44	8	15	1	2	13%	13%
Manchester University NHS Foundation Trust	55	63	14	47	0	16	0%	34%
University Hospitals Of Leicester NHS Trust	55	54	13	27	0	24	0%	89%
University Hospitals Birmingham NHS Foundation Trust	30	32	2	16	0	1	0%	6%
Royal Liverpool And Broadgreen University Hospitals NHS Trust	26	26	3	15	0	5	0%	33%
The Christie NHS Foundation Trust	25	26	6	20	0	10	0%	50%
North Bristol NHS Trust	22	22	4	14	0	7	0%	50%
Royal Brompton & Harefield NHS Foundation Trust	16	16	6	10	0	1	0%	10%
University Hospitals Plymouth NHS Trust	16	16	5	13	0	9	0%	69%

Heart Of England NHS Foundation Trust	12	12	3	7	0	2	0%	29%
Great Ormond Street Hospital For Children NHS Foundation Trust	12	14	1	5	0	1	0%	20%
Royal Devon And Exeter NHS Foundation Trust	11	11	1	8	0	2	0%	25%
Royal Papworth Hospital NHS Foundation Trust	10	10	2	5	0	2	0%	40%
Brighton and Sussex University Hospitals NHS Trust	9	10	2	5	0	0	0%	0%
Portsmouth Hospitals NHS Trust	9	9	2	6	0	1	0%	17%
Salford Royal NHS Foundation Trust	9	10	1	6	0	2	0%	33%
The Royal Wolverhampton NHS Trust	8	8	2	4	0	3	0%	75%
Alder Hey Children's NHS Foundation Trust	8	8	1	3	0	2	0%	67%
The Walton Centre NHS Foundation Trust	8	8	1	5	0	1	0%	20%
Liverpool Women's NHS Foundation Trust	7	7	2	7	0	1	0%	14%
Norfolk And Norwich University Hospitals NHS Foundation Trust	7	7	1	3	0	0	0%	0%
South Tees Hospitals NHS Foundation Trust	7	8	1	4	0	4	0%	100%
Birmingham Women's and Children's NHS Foundation Trust	6	6	2	3	0	2	0%	67%
London North West University Healthcare NHS Trust	6	6	1	3	0	0	0%	0%
St George's University Hospitals NHS Foundation Trust	6	6	1	3	0	0	0%	0%
York Teaching Hospital NHS Foundation Trust	6	7	1	4	0	4	0%	100%

Epsom & St Helier University Hospitals NHS Trust	5	5	1	2	0	1	0%	50%
Greater Manchester Mental Health NHS Foundation Trust	4	4	2	3	0	0	0%	0%
Sheffield Children's NHS Foundation Trust	4	4	1	2	0	0	0%	0%
Gateshead Health NHS Foundation Trust	3	3	2	2	0	1	0%	50%
Chelsea And Westminster Hospital NHS Foundation Trust	3	3	1	2	0	0	0%	0%
East and North Herts NHS Trust	3	4	1	3	0	2	0%	67%
Gloucestershire Hospitals NHS Foundation Trust	3	4	1	4	0	1	0%	25%
Whittington Health NHS Trust	3	3	1	2	0	0	0%	0%
Frimley Health NHS Foundation Trust	2	2	2	2	0	0	0%	0%
North Tees And Hartlepool NHS Foundation Trust	2	2	2	2	0	2	0%	100%
Pennine Acute Hospitals NHS Trust	2	2	1	1	0	0	0%	0%
Wrightington, Wigan And Leigh NHS Foundation Trust	2	2	1	2	0	1	0%	50%
Mid Cheshire Hospitals NHS Foundation Trust	1	1	1	1	0	0	0%	0%
Southport And Ormskirk Hospital NHS Trust	1	1	1	1	0	0	0%	0%
Totals for NHS Trusts that had trials due to report in Feb 2019	1111	1119	263	662	93	387		
%							35.40%	58.5%
NHS Trusts that did not have trials due to report in Feb 2019								
Velindre NHS Trust	9	8	0	2	0	2	N/A	100%

Liverpool Heart And Chest Hospital NHS Foundation Trust	8	8	0	2	0	0	N/A	0
Sandwell And West Birmingham Hospitals NHS Trust	7	7	0	2	0	1	N/A	50%
Aintree University Hospital NHS Foundation Trust	6	6	0	3	0	1	N/A	33%
The Clatterbridge Cancer Centre NHS Foundation Trust	6	8	0	1	0	1	N/A	100%
Barnsley Hospital NHS Foundation Trust	4	4	0	1	0	0	N/A	0
Bradford Teaching Hospitals NHS Foundation Trust	4	4	0	3	0	0	N/A	0
The Royal Bournemouth And Christchurch Hospitals NHS Foundation Trust	4	4	0	1	0	0	N/A	0
Great Western Hospitals NHS Foundation Trust	3	3	0	2	0	0	N/A	0
Royal Free London NHS Foundation Trust	3	3	0	3	0	0	N/A	0
West Hertfordshire Hospitals NHS Trust	3	3	0	2	0	0	N/A	0
Ashford And St Peter's Hospitals NHS Foundation Trust	2	2	0	0	0	0	N/A	N/A
Buckinghamshire Healthcare NHS Trust	2	2	0	0	0	0	N/A	N/A
Central And North West London NHS Foundation Trust	2	3	0	3	0	3	N/A	100%
East Kent Hospitals University NHS Foundation Trust	2	2	0	2	0	0	N/A	0%
Royal Surrey County Hospital NHS Foundation Trust	2	2	0	1	0	0	N/A	0%
The Princess Alexandra Hospital NHS Trust	2	2	0	0	0	0	N/A	N/A
Birmingham Community Healthcare NHS Foundation Trust	1	1	0	1	0	0	N/A	0%

Blackpool Teaching Hospitals NHS Foundation Trust	1	1	0	0	0	0	N/A	N/A
Derbyshire Healthcare NHS Foundation Trust	1		0		0		N/A	
Dorset County Hospital NHS Foundation Trust	1	1	0	1	0	0	N/A	0%
East Sussex Healthcare NHS Trust	1	1	0	0	0	0	N/A	N/A
Hampshire Hospitals NHS Foundation Trust	1	1	0	1	0	0	N/A	0%
Hertfordshire Partnership University NHS Foundation Trust	1	1	0	1	0	1	N/A	100%
Luton And Dunstable University Hospital NHS Foundation Trust	1	1	0	1	0	0	N/A	0%
Medway NHS Foundation Trust	1	1	0	0	0	0	N/A	N/A
Norfolk And Suffolk NHS Foundation Trust	1	1	0	0	0	0	N/A	N/A
North Staffordshire Combined Healthcare NHS Trust	1	1	0	0	0	0	N/A	N/A
North West Anglia NHS Foundation Trust	1	1	0	0	0	0	N/A	N/A
Northern Lincolnshire And Goole NHS Foundation Trust	1	1	0	1	0	0	N/A	0%
Northumberland, Tyne And Wear NHS Foundation Trust	1	1	0	1	0	0	N/A	0%
Northumbria Healthcare NHS Foundation Trust	1	1	0	0	0	0	N/A	N/A
Poole Hospital NHS Foundation Trust	1	1	0	1	0	0	N/A	0%
Royal Berkshire NHS Foundation Trust	1	1	0	1	0	0	N/A	0%
Royal Cornwall Hospitals NHS Trust	1	1	0	1	0	0	N/A	0%

Sherwood Forest Hospitals NHS Foundation Trust	1	1	0	0	0	0	N/A	N/A
Shrewsbury And Telford Hospital NHS Trust	1	1	0	1	0	0	N/A	0%
South Warwickshire NHS Foundation Trust	1	1	0	0	0	0	N/A	N/A
St Helens And Knowsley Hospital Services NHS Trust	1	1	0	0	0	0	N/A	N/A
Tameside And Glossop Integrated Care NHS Foundation Trust	1	1	0	1	0	0	N/A	0%
Taunton And Somerset NHS Foundation Trust	1	1	0	0	0	0	N/A	N/A
The Dudley Group NHS Foundation Trust	1	1	0	1	0	0	N/A	0%
The Robert Jones And Agnes Hunt Orthopaedic Hospital NHS Foundation Trust	1	1	0	0	0	0	N/A	N/A
Torbay And South Devon NHS Foundation Trust	1	1	0	0	0	0	N/A	N/A
United Lincolnshire Hospitals NHS Trust	1	1	0	0	0	0	N/A	N/A
Wirral University Teaching Hospital NHS Foundation Trust	1	1	0	0	0	0	N/A	N/A
Totals for NHS Trusts without a due trial in Feb 2019	98	99	0	41	0	9		
%								22%

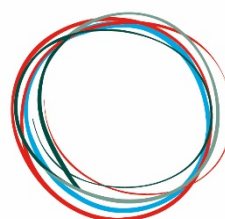
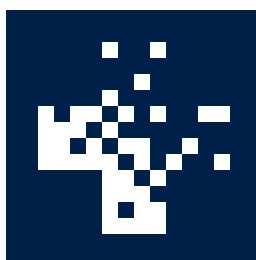
Totals for all NHS Trusts	1209	1218	263	703	93	396		
%								56.3%

	Trials on EUCTR (sponsored or co-sponsored)		Due Trials		Reported Trials		Reporting %	
	Jan 2019	Oct 2019	Jan 2019	Oct 2019	Jan 2019	Oct 2019	Jan 2019	Oct 2019
Universities that had trials due to report results in Jan 2019								
Keele University	6	7	3	5	3	5	100%	100%
University of Aberdeen	17	17	1	12	1	8	100%	67%
King's College London	97	97	29	58	28	55	97%	95%
University of Oxford	110	127	26	59	23	49	89%	83%
University of Cambridge	32	5	7	4	6	2	86%	50%
University of Dundee	83	71	66	64	54	63	82%	98%
University College London (UCL)	134	137	24	61	18	49	75%	80%
University of Leeds	62	65	14	40	8	25	57%	63%
University of Nottingham	58	60	17	51	7	47	41%	92%
Cardiff University	41	43	10	32	4	25	40%	78%
Imperial College London	129	134	21	60	8	27	38%	45%
Queen Mary, University of London	56	57	16	29	6	29	38%	100%
University of Bristol	17	18	3	12	1	9	33%	75%
University of Warwick	10	9	3	5	1	3	33%	60%
University of Edinburgh	42	43	8	20	2	11	25%	55%
University of Glasgow	40	29	6	11	1	4	17%	36%
University of Birmingham	90	99	13	39	2	19	15%	49%
St George's, University of London	15	16	7	11	0	0	0%	0%

University of Manchester	18	20	3	12	0	3	0%	25%
University of East Anglia	3	3	2	3	0	3	0%	100%
University of Leicester	11	19	2	6	0	2	0%	33%
University of Liverpool	40	41	2	15	0	7	0%	47%
University of Surrey	9	8	2	6	0	6	0%	100%
Aston University	2	2	1	1	0	0	0%	0%
Bangor University	2	2	1	2	0	1	0%	50%
London School of Hygiene and Tropical Medicine	9	9	1	5	0	4	0%	80%
Queen's University Belfast	7	7	1	4	0	3	0%	75%
University of Sheffield	4	4	1	3	0	0	0%	0%
Totals for universities that had trials due to report results in Jan 2019								
	1144	1149	290	630	173	459		
%							59.70% 72.90%	
Universities that did not any trials due to report in Jan 2019								
University of Exeter	4	4	0	2	0	0	N/A	0%
University of Hertfordshire	3	3	0	2	0	2	N/A	100%
University of Hull	3	3	0	1	0	0	N/A	0%
City, University of London	1	1	0	0	0	0	N/A	N/A
Institute of Cancer Research	26	27	0	3	0	2	N/A	67%
Newcastle University	1	1	0	0	0	0	N/A	N/A
Oxford Brookes University	1	1	0	0	0	0	N/A	N/A

University of Plymouth	1	1	0	0	0	0	N/A	N/A
University of Portsmouth	1	1	0	0	0	0	N/A	N/A
University of Southampton	13	14	0	4	0	1	N/A	25%
Swansea University	1		0		0		N/A	
University of Wales (effectively merged with University of Wales, Trinity Saint David)	2	2	0	1	0	0	N/A	0%
University of York	3	3	0	3	0	2	N/A	67%
University of Brighton	1	1	0	0	0	0	N/A	N/A
Totals for universities that did not any trials due to report in Jan 2019	61	62	0	16	0	7		
%								43.75%
Totals for all universities	1205	1211	290	646	173	466		
%							59.70%	72.10%

This memo was prepared for the House of Commons Science and Technology Committee by the AllTrials campaign for clinical trial transparency. It was written by Síle Lane and Laura Baggaley, Sense about Science, and Nicholas J. DeVito, , University of Oxford. The preparation was supported by Cochrane, Sense about Science and EBMDaLab. AllTrials is the global movement for all clinical trials to be registered and results from them reported. It has been joined by 750 organisations and 95,000 people worldwide.



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