The EFGCP Report on
The Procedure for the Ethical Review of Protocols
for Clinical Research Projects in Europe
(Update: April 2012)

Greece

**Question 1:** What laws or regulations apply to an application for conducting a clinical trial in Greece?

The Greek legislation concerning interventional clinical trials on investigational medicinal products (CTIMPs) was published in the Greek Republic Gazette No 1973 of 31 December 2003. It refers to the Minister of Health’s decision DYG 3/89292, which describes the law under which the Directive 2001/20/EC was adopted in Greece. The law has no title, as all laws in Greece are referred to by number.


Circular-Decision of CA (EOF) 10301/11-2-2010: Obligations of responsible entities for the conduct of clinical trials of medicinal products, according to the Good Clinical Practice principles, 11-Feb-2010.

Circular of CA (EOF) 88148/23-12-2010: Detailed Guidelines on the Granting of an Authorization for an Interventional Clinical Trial, on the Procedures for the Notification of Substantial Amendments and for the Declaration of the End of a Clinical Trial, 23-Dec-2010. (Harmonization of the Greek legislation to the corresponding Community one in compliance with Directive 2010/C 82/01 “CT-1”).

Standard Operating Procedures for the National Ethics Committee (NEC) were published in the Greek Republic Gazette No 1503 of 7 October 2004, referring to the Minister of Health’s decision DYG 3(A) 69150.
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Communication/Decision of CA (EOF) 47150/9-7-2007: Document
Clarification/Amendment: Initiation of the Approval Procedure of Clinical Trials by
National Ethics Committee, (EOF protocol no 47398/1-8-2005).

Communication of NEC 83125/7-12-2010: File construction for clinical trials which
are submitted for approval to the National Ethics Committee.

NB The above legislation is published in Greek.

The above legislation covers all interventional clinical trials including trials involving
 genetic and other biomedical research.

Medical Devices are covered by circular 33523/17-05-2008, as amended by the
Communication from EOF 29695/5-5-2010, describing the documentation and the
application forms required.

All non-interventional trials are still covered by the earlier legislation, A6/10983/1 of
1984, which covered all clinical research. Circular 55480/6-09-2006 describes the
documentation and the application forms required.

Circular of EOF 17079/4-3-2011: Clarifications regarding the definition of non
interventional clinical trials and their approval procedure.

**Question 2:** Which government, legal or authoritative body or bodies is or are responsible for the establishment and/or accreditation of (research) ethics committees for IMPs, and for their supervision and quality? Are there different (research) ethics committees reviewing other projects?

The National Ethics Committee (NEC) was established by a ministerial decision, the
Chairman and Vice-Chairman of the NEC are appointed by the Minister of Health.
Ethics committees historically established by all the institutions in Greece still
survive, but all clinical trials are now the responsibility of the NEC as established in
the legislation published in December 2003 (see 1 above).

**Question 3:** What is the process for achieving clinical trial authorisation from the competent authority in Greece?

**Question 4:** What is the process for obtaining ethical review of a clinical trial protocol by a competent (research) ethics committee in Greece?

NB For Greece these two questions are most appropriately answered together.

In order to conduct a clinical trial in Greece the application must be submitted to the
Competent Authority (EOF) and a separate application must also be submitted to the
National Ethics Committee (NEC). EOF issues an authorisation for the conduct of the
clinical trial, provided that NEC has given a positive opinion.

The website of the Greek Competent Authority (EOF) is at http://www.eof.gr.
**Question 5:** Is there a single organisation to which to apply for ethical review of a clinical trial for an investigational medicinal product, regardless of whether this is for a single site or multiple sites?

Yes, the National Ethics Committee (NEC).

**Question 6:** What is the website for the organisation that issues guidelines on the ethical review of a clinical trial for an investigational medicinal product?

Not applicable. Relevant email address: eed@eof.gr.

**Question 7:** Is there a procedural interaction between the national or local competent authority and the (research) ethics committee during the approval process?

The opinion of the National Ethics Committee (NEC) is communicated in writing to the EOF, when issued.

**Question 8:** Does the application to the REC and to the competent authority have to be submitted in parallel, or, if not, in which order?

It can be submitted in parallel or in the order preferred by the applicant.

**Question 9:** How many (research) ethics committees are there in Greece?

There is one central (National Ethics Committee) and one in each hospital (Local Ethics Committee/Institutional Review Board).

**Question 10:** How are RECs funded in Greece? Do they charge fees? If yes, what is their scale of fees?

The NEC is funded by Ministerial Decision. No fees are charged.

**Question 11:** Who is responsible for submitting the request for ethical review to the competent (research) ethics committee for single-site and for multi-site clinical trials?

The applicant can be the sponsor/designee or in case of non-sponsored trials by the investigator.

**Question 12:** How is a “single opinion” achieved for multi-site studies?

From the Greek NEC.
**Question 13:** How many members serve on a REC?

Nine.

**Question 14:** How many members constitute a quorum?

Five, as set out in the legislation.

**Question 15:** How are REC members appointed?

By the Minister of Health. Vacancies are not advertised.

**Question 16:** How is the independence of members ensured?

The members, once appointed, shall be required to declare all relationships they may have with potential bodies that have involvement or interest in Clinical Studies.

**Question 17:** How are conflicts of interest of REC members avoided?

Members are obliged to declare any conflicts of interest before each meeting. If such conflicts arise for a given member, the member takes not part in deliberations on the application(s) for which the conflict applies and may be substituted.

**Question 18:** What backgrounds and/or qualifications of members are actively sought?

Six are scientists in the health sector, one is a lawyer, one is a priest and one is a sociologist.

**Question 19:** How do RECs obtain specialist expertise?

By agreeing on suitable experts usually in government and university employment, who are also independent of the trial study. Health Scientists Experts should have clinical research experience and actively involved in patient treatment. The experts are not announced to the applicant and may participate in the meeting only as non-voting members.

**Question 20:** What are the training requirements for members of RECs?

None defined apart from their professions. Their curricula vitae should be published and updated yearly.

**Question 21:** What training programmes are available for REC members in Greece?

None.
**Question 22:** What are the timelines for the assessment of single- and multi-site studies?

60 days, in accordance with the legislation (see 1 above) in both cases.

**Question 23:** How are substantial amendments submitted during the review process dealt with?

They are reviewed within 35 days, in accordance with the legislation (see 1 above).

**Question 24:** How does a REC assess the suitability of investigators and of sites?

The local EC from each hospital is requested to raise any objections to the NEC, within 30 days of notification of the trial, in writing by the Investigator. The SOPs of October 2004 (see 1 above) allow the NEC to ask the EOF to conduct a site visit accompanied by a member of the NEC. The NEC can also request any information it wants (undefined) from an investigator.

**Question 25:** How are the requirements for (research) ethics committees to review the contractual or financial arrangements in clinical trials for both investigators and hospitals handled?

One of the documents requested by the NEC is the study budget for each site, which must be notified to the Regional Health Authority or to the Special Account of the relevant University. This authority is responsible to review and approve the budget.

**Question 26:** How are the requirements for (research) ethics committees to review the compensation arrangements for study subjects handled?

There is not any provision by the law for such compensation.

**Question 27:** Is there an ongoing quality assurance process (e.g. audits, inspections, internal SOP) for (research) ethics committees in Greece?

No.

**Question 28:** Is there an appeal mechanism?

No.

**Question 29:** How do RECs deal with SUSAR reports and Annual Safety Reports?

The sponsor submits to the central ethics committee – NEC – and the investigator to the hospital ethics committees all relevant information about a suspected unexpected
serious adverse reaction (SUSAR) which is fatal or life-threatening not later than seven days after the sponsor is first aware of the reaction. All other suspected unexpected serious adverse reactions (SUSARs) which are not fatal or life-threatening are reported within 15 days after the sponsor is first aware of the reaction.

The Annual Safety report is submitted by the sponsor to the NEC and by the investigator to the hospital EC within 60 days from the data lock point.

**Question 30: How are ‘substantial amendments’ defined?**

These are defined (in Greek) in the Circular of CA (EOF) 88148/23-12-2010 (see 1 above).

**Question 31: What are the indemnity insurance requirements for research projects?**

An insurance policy is required and a copy of the insurance certificate must be submitted to the NEC.

Insurance contract for the whole duration of the clinical trial by an insurer that is established within the EU and provides services in Greece to cover the liability of the investigator and sponsor. The amount should cover any injury or disability resulting from participation in the clinical trial and in case of death or permanent incapacity to work to be at least 200,000 € per patient.

**Question 32: What are the indemnity insurance requirements for (research) ethics committee members themselves?**

Not applicable.

**Question 33: How is informed consent obtained from vulnerable subjects who are potentially to be involved in a clinical trial?**

This is specifically covered in the legislation (in Greek) (see 1 above).

**Question 34: How do RECs assess the progress and outcome of research projects that they have approved?**

This is covered in the SOPs of October 2004.

**Question 35: How does the REC ensure reception of the Annual Safety Report and the Summary of the Final Report of a research project that it has approved?**

A protocol number is given upon submission as a receipt.
**Question 36:** Do national regulations in Greece allow research on healthy volunteer children (subjects under 16)?

No, only on children having a medical condition relevant to the study, or of such nature that it is applied only to children. Strict regulations apply on research on children.

**Question 37:** Do national regulations in Greece allow payment, (other than expenses), to children taking part in research?

No, it is not allowed.

**Question 38:** Do RECs invite or allow a) applicants or b) observers to attend committee meetings?

No. Only members are allowed to attend the committee meetings.

**Question 39:** Are the minutes of (research) ethics committee meetings made public?

No.

**Question 40:** Is there any scope for Chairman’s actions in between meetings?

The Chairman between meetings signs the approvals regarding the issues that were discussed during the previous meeting.

**Question 41:** Do (research) ethics committees ever appoint subcommittees for any specific purpose?

No.

**Question 42:** Is there a national policy on the registration of clinical trials before they start?

There is no national policy, but clinical trials which are conducted in Greece are gradually published online in the EU Clinical Trials Register: https://www.clinicaltrialsregister.eu/

**Question 43:** If the answer to Question 42 is ‘yes’, do (research) ethics committees have any role to play in reviewing such registration?

N/A
**Question 44:** If the answer to Question 42 is ‘yes’, is this register of clinical trials made available to the public?

N/A

**Question 45:** With regard to Clinical Trial Insurance, do research ethics committees in Greece work to a set template of requirements?

Yes

**Question 46:** If the answer to Q45 is ‘yes’, how are these requirements

a) Decided upon?

By the National Ethical Committee (EED)

b) Cross referenced to statutory requirements?

Mainly these requirements are based on the common ministerial degree ΑΥΤ3/89292/31.12.2003. Additionally it is requested to provide extension of the insurance coverage to the foetus and/or the new born if health problems appear, which are due to the intake of the clinical trial drug by the study subject (even if the pregnancy is accidental and all protocol restrictions concerning contraception had been considered).

c) Updated?

Not specified.

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