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Overview of safety reporting in clinical trials of medical devices

Reporting according to ClinO-MD (KlinV-Mep, OClin-Dim, OSRUm-Dmed) in clinical trials of medical devices, i.e. clinical investigations of medical devices and performance studies of in-vitro diagnostic medical devices

To ensure reporting is not delayed, the sponsor and investigator may provisionally submit an incomplete report.

Category A clinical trials

Includes post-market clinical investigations (medical devices), post-market performance studies (IVD), pre-market non-interventional performance studies with surgically invasive sample taking or additional invasive or burdensome procedures (IVD)

Reporting by	Reporting to	Applies to	Type	Reportable events (consult the list of abbreviations at the end of the document)	ClinO-MD	Timeframe
Investigator	Sponsor*	All cat. A clinical trials	ongoing duty	All measures taken to prevent health hazards. All SAEs and DDs with SAE potential. Other AEs and DDs according to the CIP/CPSP.	Art. 32	According to CIP/CPSP
	Supplier of CE-marked device**	Post-market clinical trials with CE marked devices	ongoing duty	Vigilance cases (mandatory user reports to suppliers of devices).	Art. 66 para 4 MedDO Art. 59 IvDO	2, 10 or 15 days depending on risk
Sponsor	(Lead-) EC***	Performance studies category A2	ongoing duty	SAEs (possible, probable, or causal relationship to the device to be investigated, the comparator or the investigation procedure). DDs with SAE potential.	Art. 33 para. 1	Without delay
		Clinical investigations category A1 and A2, Performance studies category A1	ongoing duty	SAEs (causal relationship to the test procedure used in the clinical trial).	Art. 33 para. 6	Without delay

		All cat. A clinical trials	ongoing duty	Safety and protective measures	Art. 34 and 36	≤ 2 days, 24 hours in case of study interruption or premature study end
		All cat. A clinical trials	ongoing duty	Annual Safety Report	Art. 35	annually
		All cat. A clinical trials	on request by the (Lead-) EC	All SAEs and DDs with SAE potential. Other AEs and DDs according to the CIP/CPSP.	Art. 32	as requested
	Swissmedic****	All post-market cat. A clinical trials (CE marked devices)	ongoing duty	Vigilance reports	Art. 33 para. 7	2, 10 or 15 days depending on risk

* Reporting to the sponsor is normally performed with the event form of the CRF.

** In hospitals, the hospital's vigilance contact person for medical devices can be contacted.

*** Reporting to the (Lead-) Ethics Committee: Reporting is to be performed via the BASEC web portal using the Safety Form associated to the Project Form. The exact process is described in the FAQ 'safety notification' in the FAQ section in BASEC. Direct link to the FAQ here.
According to Article 10 ClinO-MD, the investigator may submit the application instead of the sponsor. In this case, the investigator assumes the sponsor's obligations under Articles 14 and 15 as well as the notification and reporting obligations vis-à-vis the competent ethics committee. Note: Article 10 does not apply to the notification and reporting obligations vis-à-vis Swissmedic.

**** For reporting to Swissmedic, please refer to section 7.1 of the Swissmedic information sheet BW600_00_015e_MB (for medical devices) and BW600_00_016e_MB (for IVD). Reporting to Swissmedic is mandatory only if vigilance reporting criteria are fulfilled.

Category C clinical trials

Includes all pre-market trials (devices without CE-marking, off-label use of devices, prohibited devices)

Reporting by	Reporting to	Type	Reportable events (consult the list of abbreviations at the end of the document)	ClinO-MD	Timeframe
Investigator	Sponsor	ongoing duty	All measures taken to prevent health hazards. All SAEs and DDs with SAE potential. Other AEs and DDs according to the CIP/CPSP.	Art. 34 Art. 32	according to CIP but not later than 3 days***
Sponsor	(Lead-) EC* and Swissmedic***	ongoing duty	SAE with possible, probable, or causal relationship to the device or procedure and DDs with SAE potential occurring in Switzerland and abroad.	Art. 33 para. 1	without delay***
		ongoing duty	Safety and protective measures taken in Switzerland and abroad.	Art. 34, 36, 38	≤ 2 days, 24 hours in case of study interruption or premature study end
		ongoing duty	Annual Safety Report****	Art. 35 and 38	annually
		on request by the (Lead-) EC or by Swissmedic	All SAEs and DDs with SAE potential, other AEs and DDs according to the CIP/CPSP, occurring in Switzerland and abroad.	Art. 32	as requested

* Reporting to the (Lead-) Ethics Committee: Reporting is to be performed via the BASEC web portal using the Safety Form associated to the Project Form. The exact process is described in the FAQ 'safety notification' in the FAQ section in BASEC. Direct link to the FAQ here.
According to Article 10 ClinO-MD, the investigator may submit the application instead of the sponsor. In this case, the investigator assumes the sponsor's obligations under Articles 14 and 15 as well as the notification and reporting obligations vis-à-vis the competent ethics committee. Note: Article 10 does not apply to the notification and reporting obligations vis-à-vis Swissmedic.

** In hospitals, the hospital's vigilance contact person for medical devices can be contacted.

*** For reporting to Swissmedic please refer to section 7.2 of the Swissmedic information sheet BW600_00_015e_MB (for medical devices) and BW600_00_016e_MB (for IVD). For SAEs and DDs, reporting deadlines to the sponsor normally vary between 24h to 3d, depending of stage of development and severity of possible consequences. Seven days are foreseen for the reporting of the sponsor to the (Lead-) EC and Swissmedic. The timeline is reduced to 2 calendar days for events which indicate an imminent risk of death, serious injury, or serious illness and that requires prompt remedial action for other patients/subjects. You can find information on reporting and the corresponding template in the European guidance document MDCG 2020-10/1 and /2.

**** Additional information is required for category C clinical trials, see section 7.2.4 of the Swissmedic information sheet BW600_00_015e_MB (for medical devices) and BW600_00_016e_MB (for IVD).

Abbreviations and definitions (in alphabetical order)

The definitions of adverse events and device deficiencies are those in:

a. for devices according to MedDO: according to article 2 numbers 57-59 EU-MDR, and ISO 14155
b. for devices according to IvDO: according to article 2 numbers 60-62 EU-IVDR, and ISO 20916.

ADE = Adverse Device Effect (ADE)

MD: Adverse event possibly, probably or causally related to the use of an investigational device or procedures (ISO 14155).

IVD device: Adverse event related to the use of an IVD medical device under investigation (ISO 20916)

Note: This includes any adverse event resulting from insufficient or inadequate instructions for use, deployment, implantation, installation, operation, or any malfunction of the MD under investigation. It includes any event that is a result of a use error or intentional misuse, and it includes 'comparator' if the comparator is a medical device.

AE = Adverse Event

MD (Art. 2(57) MDR):

Any untoward medical occurrence, unintended disease or injury or any untoward clinical signs, including an abnormal laboratory finding, in subjects, users or other persons, in the context of a clinical investigation, whether or not related to the investigational device.

Note: This includes events related to the MD under investigation or the comparator and to the procedures involved. For users or other persons this is restricted to events related to the MD.

IVD device (Art. 2(60) IVDR):

Any untoward medical occurrence, inappropriate patient management decision, unintended disease or injury or any untoward clinical signs, including an abnormal laboratory finding, in subjects, users or other persons, in the context of a performance study, whether or not related to the device for performance study.

Note: This includes events related to the IVD under investigation or the comparator and to the procedures involved. For users or other persons this is restricted to events related to the IVD.

CIP = Clinical Investigation Plan

CPSP = Clinical performance study plan - IVD clinical performance (evaluation) studies and post-market clinical follow-up (PMCF)

DD = Device Deficiency (Art. 2(59) MDR; Art. 2(62) IVDR)

Inadequacy of a device related to its identity, quality, durability, reliability, safety or performance, of an investigational device, resp. of a device for performance study, including malfunction, user errors and inadequate information supplied by the manufacturer.

Note according to ISO 14155 and 20916: The definition includes deficiencies related to the investigational device or the comparator.

Malfunction = Failure of an IVD medical device under investigation to perform in accordance with its intended use when used in accordance with the instructions for use or CPSP (ISO 20916)

SADE = Adverse Device Effect (ADE) that has resulted in any of the consequences characteristic of a serious adverse event (ISO 14155, IS O20916).

SAE = Serious Adverse Event (SAE)

MD (Art. 2(58) MDR):

Any adverse event that led to any of the following:

(a) death,
(b) serious deterioration in the health of the subject that resulted in any of the following:
  (i) life-threatening illness or injury,
  (ii) permanent impairment of a body structure or a body function,
  (iii) hospitalisation or prolongation of patient hospitalisation,
  (iv) medical or surgical intervention to prevent life-threatening illness or injury or permanent impairment to a body structure or a body function,
  (v) chronic disease,
(c) foetal distress, foetal death or a congenital physical or mental impairment or birth defect.

Note: planned hospitalization for pre-existing condition, or a procedure required by the CIP, without a serious deterioration of the health status of the subject, is not considered an SAE.

IVD device (Art. 2(61) IVDR):

Any adverse event that led to any of the following:

(a) a patient management decision resulting in death or an imminent life-threatening situation for the individual being tested, or in the death of the individual's offspring,
(b) death,
(c) serious deterioration in the health of the individual being tested or the recipient of tested donations or materials, that resulted in any of the following:
  (i) life-threatening illness or injury,
  (ii) permanent impairment of a body structure or a body function,
  (iii) hospitalisation or prolongation of patient hospitalisation,
  (iv) medical or surgical intervention to prevent life-threatening illness or injury or permanent impairment to a body structure or a body function,
  (v) chronic disease,