



# Opportunities through data sharing

Andrew Freeman  
Head of Medical Policy  
GSK

## Disclosures and Potential Conflicts of Interest

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I am a full time employee of GSK and hold stocks and stock options

The views presented in these slides are my own and not necessarily those of GSK

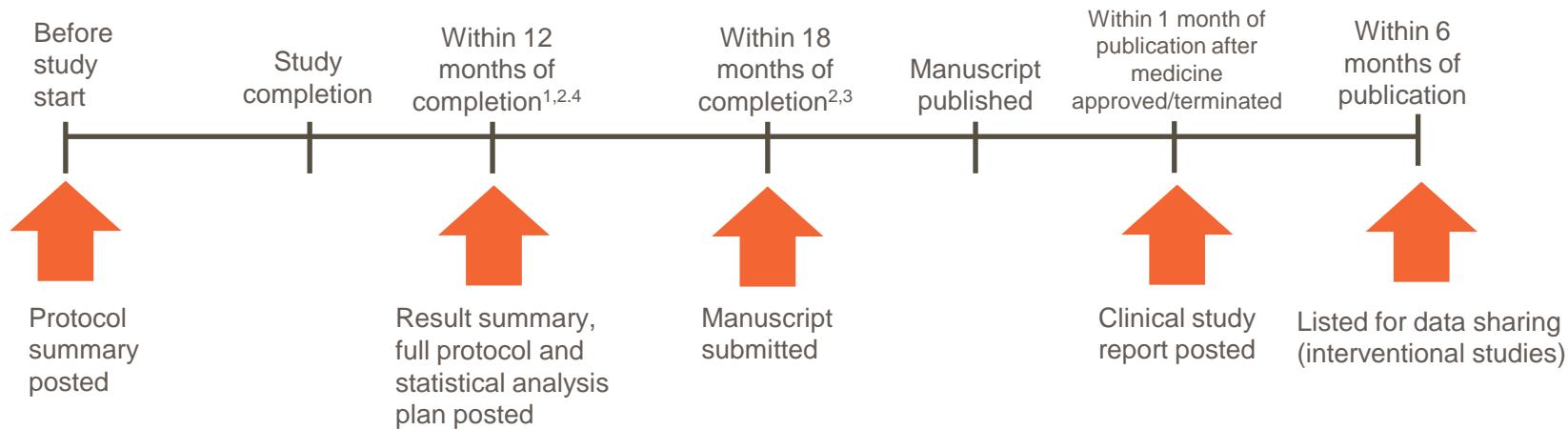
# What I'm going to talk about...

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- I'm old ---I'll say a little bit about the history of clinical trial data sharing at GSK
- I'll show you some data on re-use of clinical trial data and some examples
- Along the way I'll discuss some of the issues and opportunities
  - Fragmentation
  - Impact
  - Using different types of data

# What is our disclosure Policy for clinical studies on our products?



<sup>1</sup> From primary completion date for interventional studies.

<sup>2</sup> From completion of analysis for non-interventional studies.

<sup>3</sup> From last subject last visit for interventional studies

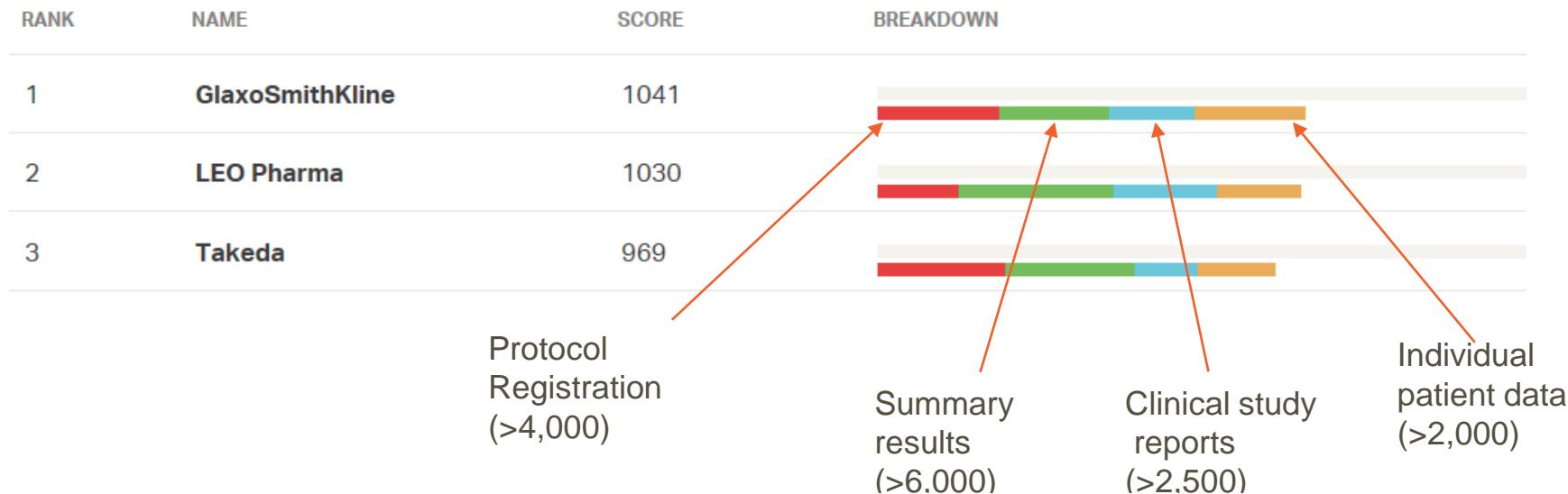
<sup>4</sup> Or earlier if required by regulation

<sup>4</sup> Disclosure of clinical studies that evaluate the clinical efficacy, safety, or effectiveness of a product in humans. Additional analyses and other types of human subject research, where results provide important scientific knowledge or are relevant for patient care are submitted for manuscript publication or, where manuscript publication is not practical, submitted for a citable abstract publication or a results summary is posted

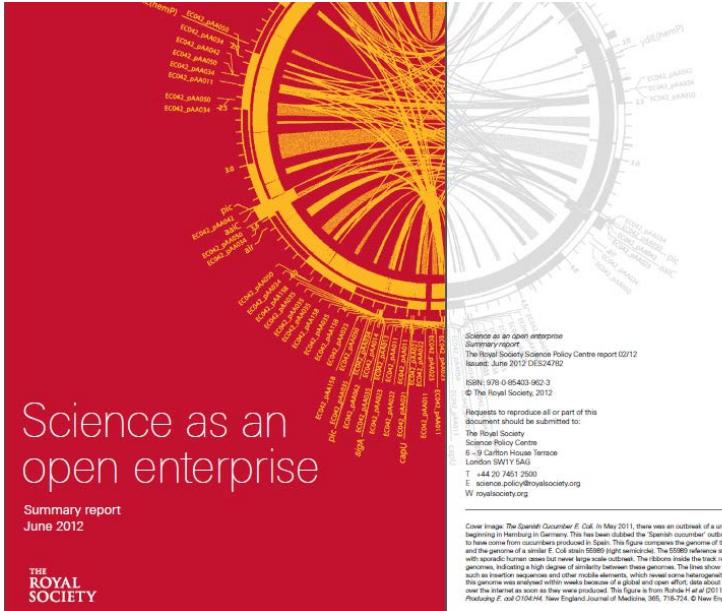
# All Trials Transparency Index



## Company ranking



# UK Royal Society 2012



# Science as an open enterprise

Summary report  
June 2012

THE  
ROYAL  
SOCIETY

Scientists should communicate the data they collect and the models they create, to allow free and open access, and in ways that are intelligible, assessable and usable for other specialists in the same or linked fields wherever they are in the world. ”

# Benefits and risks



## MAIN BENEFITS

- ✓ Verify publications/  
enhances reproducibility
- ✓ Ask new research questions
- ✓ Helps avoid waste
- ✓ Helps ensure the data provided by  
research participants are used to  
maximum effect in the creation of  
knowledge and understanding.

## MAIN RISKS

- ❖ Protecting the privacy of research  
participants.
- ❖ Ensuring the data are used for valid  
scientific investigation.
- ❖ Ensuring the data are usable.

# Senior management endorsement

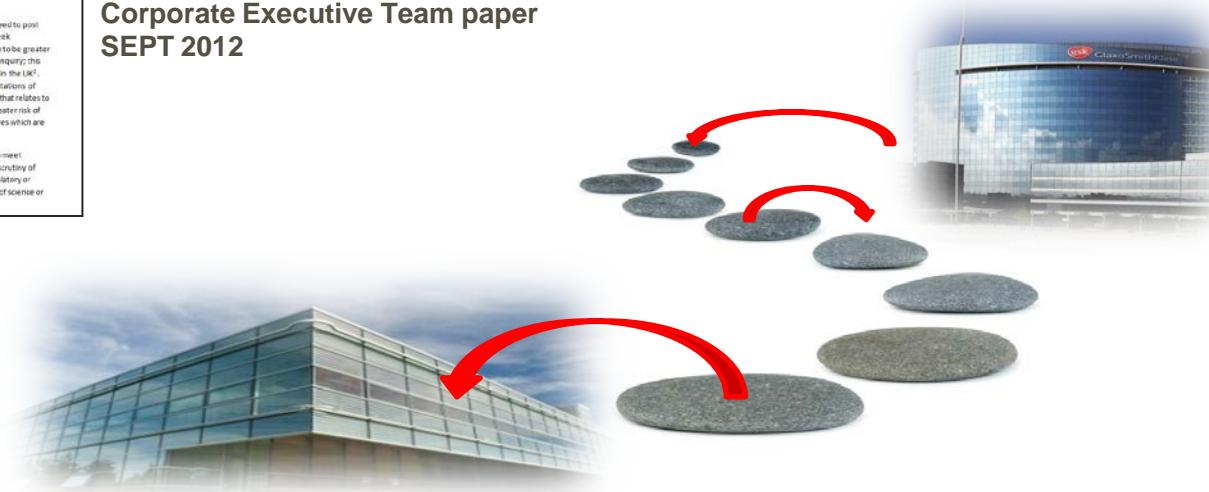
**Sharing Patient Level Data from GSK Sponsored Clinical Trials**

**1. Background**

Clinical trial disclosure requirements have evolved over the last ten years to include the need to post protocol and result summaries of our studies on internet registers and commitments to seek publication of studies in the scientific literature. However there are ongoing calls for there to be greater access to underlying (or patient level) data to verify findings and re-use data for scientific inquiry; this view has support from European regulators<sup>1</sup> and other groups including the Royal Society in the UK.<sup>2</sup> There is also a risk that third parties may seek greater access to the data given the limitations of analysis based on published results and the perceived need for greater openness of data that relates to the efficacy and safety of medicines.<sup>3</sup> Nonetheless, access to these data may result in a greater risk of litigation and there are risks that third parties may access the data with nefarious objectives which are not in the best interests of science or patients.<sup>4</sup>

Proposed disclosure of patient level data may become necessary to meet external expectations, build trust and provide assurance that industry data can stand the scrutiny of independent scientific review. There is also a likelihood that there may be legislative, regulatory or external policy requirements in this area and a risk these may result in the best interests of science or the development of medicines for patients.

## Corporate Executive Team paper SEPT 2012



"It is proposed that the ultimate objective is a model where data from all research sponsors (including industry and academe) is made available for research (STEP 2), however the first step would be for GSK to adopt a leadership role to demonstrate our commitment and the feasibility of the approach (STEP 1)."



# Public commitment

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Press Release Oct 2012

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Expanding further on its commitments to openness and transparency, GSK also announced today that the company will create a system that will enable researchers to access the detailed anonymised patient-level data that sit behind the results of clinical trials of its approved medicines and discontinued investigational medicines.

This initiative is a step towards the ultimate aim of the clinical research community developing a broader system where researchers will be able to access data from clinical trials conducted by different sponsors. GSK hopes the experience gained through this initiative will be of value in developing and catalysing this wider approach.

## GSK outlines plan to share patient data online



GlaxoSmithKline opens the door on clinical data sharing

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BUSINESS DAY

### *Glaxo Opens Door to Data on Research*

By KATIE THOMAS OCT. 11, 2012

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Health

## GlaxoSmithKline opens door on data

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Business Report

### **Big Pharma Opens Up Its Big Data**

News

**GlaxoSmithKline grants researchers access to clinical trial data**

*BMJ* 2012 ;345 doi: <https://doi.org/10.1136/bmj.e6909> (Published 12 October 2012)

Cite this as: *BMJ* 2012;345:e6909



# GSK request site – May 2013



GlaxoSmithKline

Create an account or log-in

Provide feedback here

Home

Step by step

My requests

Log-in or create an account

Approved requests

Contact GSK

## About

### This site

Access to the underlying (patient level) data collected in clinical trials provides opportunity for further research that can help advance medicine and improve patient care. This helps ensure that the data used by research participants are used to the maximum to create new knowledge and understanding.

Researchers can use this site to request anonymised patient level data from our clinical trials to conduct further research.

### How it works

#### Submission of requests

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

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

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

#### Review of requests

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

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

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

#### Access to data

### Get started

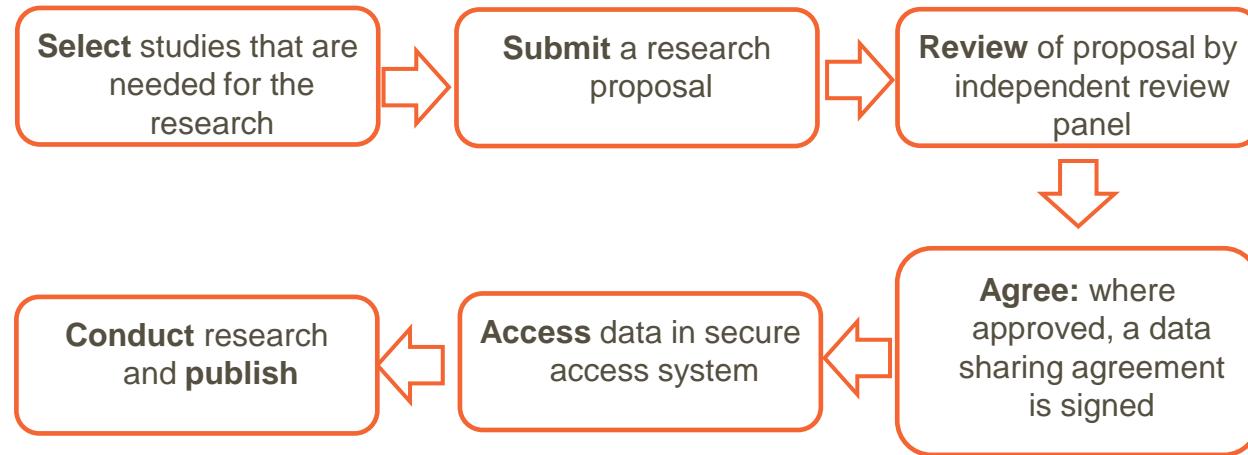
#### View

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

#### View and submit

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

# How it works...



**Study Sponsor:** GSK

**Study Title**

A single-blinded randomized, placebo-controlled, staggered-parallel, escalating-dose study to investigate the safety, tolerability, pharmacokinetics and pharmacodynamics of subcutaneous injections of GSK 716155 in Subjects with type 2 Diabetes Mellitus

**Medicine or Vaccine (generic name)**

albiglutide

**Sponsor Identification Number**

GLP106073

**Trial Registry Identification Number(#'s)**

NCT00354536

**Medical Condition**

Diabetes Mellitus, Type 2

**Phase**

Phase 2

**Link to study details on the GSK Clinical Study Register**

<http://www.gsk-clinicalstudyregister.com/study/GLP106073>

**Link to study details on other Trial Registries (if available)**

<http://clinicaltrials.gov/show/NCT00354536>

**Datasets and Documents Available for this Study**

- |  |   |  |   |
|--|---|--|---|
| <input checked="" type="checkbox"/> Analysis-ready dataset     | <input checked="" type="checkbox"/> Reporting and analysis plan | <input checked="" type="checkbox"/> Clinical study report        | <input checked="" type="checkbox"/> Raw dataset |
| <input checked="" type="checkbox"/> Annotated case report form | <input checked="" type="checkbox"/> Dataset specifications      | <input checked="" type="checkbox"/> Protocol with any amendments |   |

**Additional information about the data and documents available for this study**

**Date Added to this Site**

June 2014

# ...some significant things happened



Industry commitment July 2013

## Institute of Medicine guiding principles 2015

DISCUSSION FRAMEWORK FOR CLINICAL TRIAL DATA SHARING  
GUIDING PRINCIPLES, ELEMENTS, AND ACTIVITIES

Recommendation 1: Stakeholders in clinical trials should **foster a culture in which data sharing is the expected norm**, and should commit to responsible strategies aimed at maximizing the benefits, minimizing the risks, and overcoming the challenges of sharing clinical trial data for all parties.

Journal editors' proposal April 2016



# Collaboration - Site reconfigured and owned/used by multiple sponsors



BILL & MELINDA  
GATES foundation



# The challenge of fragmentation..

Secure access  
system used by  
Data provider 1



Secure access  
system used by  
Data provider 2



Secure access  
system used by  
Data provider 3



Combining data from different systems and using  
software not provided in these systems  
is problematic

# The challenge of fragmentation..

## Perspective

### Data Sharing at a Crossroads

Frank Rockhold, Ph.D., Perry Nisen, M.D., Ph.D., and Andrew Freeman, B.Sc.

September 22, 2016

N Engl J Med 2016; 375:1115-1117

DOI: 10.1056/NEJMmp1608086

of data availability and expertise in using data from clinical trials compromising independence. The Wellcome Trust agreed to accom-

*Our vision of a simple single system may be challenging to achieve. But there's a risk that if myriad systems emerge, the benefits will be limited by the complexity of obtaining data.*

in pooled and meta-analyses are likely to increase use. Since the modulate this approach to enable more sponsors to share data

# This is not a theoretical issue...



The screenshot shows the homepage of ClinicalStudyDataRequest.com. At the top, there's a navigation bar with links for "Browse ALL STUDIES", "Get Started: Search Studies", "Keyword Search", "Follow" (with an LinkedIn icon), and "Login / Create Account". Below the navigation is a horizontal menu with links for "Home", "About Us", "Mission", "Sponsors/Funders", "How It Works", "Independent Review Panel", "Metrics", "FAQs", "News", and "Help/Contact Us". The main content area features a large image of a doctor in a white coat and stethoscope talking to a patient. Overlaid on this image is the text "Welcome to ClinicalStudyDataRequest.com". In the bottom left corner of the main image, there's a smaller box containing the ClinicalStudyDataRequest.com logo.



The screenshot shows the homepage of Vivli, described as "A global clinical research data sharing platform". The Vivli logo, featuring a stylized globe icon and the word "Vivli" in blue, is prominently displayed. Below the logo, the text "CENTER FOR GLOBAL CLINICAL RESEARCH DATA" is visible. The page has a dark blue background with a globe graphic. At the top right, there's a navigation bar with links for "Home", "About", "Members", "News & Events", "Resources", "Find Studies", and "MY ACCOUNT", along with social media icons for Twitter, Facebook, and LinkedIn. A central text block states: "The Vivli team is dedicated to helping researchers share and access data from clinical trials to advance science." At the bottom, there's a yellow button with the text "BEGIN SEARCHING FOR STUDIES".

## An alternative model – the researcher provides the secure access system



Secure download by  
Data Provider 1



Secure download by  
Data Provider 2



Secure download by  
Data Provider 3



- Contractual IT and data governance requirements
- Subject to audit
- Accreditation of researchers?



# Has our data sharing enabled more science?

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**3145** Studies Listed for Data Sharing

**543** Proposals Submitted

**266** Proposals with Data Access Provided

**53** Proposals Published

# Has our data sharing enabled more science?



**3145** Studies Listed for Data Sharing

**543** Proposals Submitted

**266** Proposals with Data Access Provided

**53** Proposals Published

Number of Research Proposals submitted up to **30 September 2019** 543

Requirements check	In process	32
	Withdrawn by the requestor	49
	No response received	24
	Did not meet requirements ( <a href="#">further details</a> )	23
	Potential conflict of interest or an actual or potential competitive risk	0
	Met requirements	415

# Has our data sharing enabled more science?



**3145** Studies Listed for Data Sharing

**543** Proposals Submitted

**266** Proposals with Data Access Provided

**53** Proposals Published



IRP review	In process	6
	Withdrawn by the requestor	4
	No response received	2
	Rejected or advised to re-submit	60
	Approved or approved with conditions	343

# Has our data sharing enabled more science?



**3145** Studies Listed for Data Sharing

**543** Proposals Submitted

**266** Proposals with Data Access Provided

**53** Proposals Published



Data Sharing Agreement	In process	36
	Withdrawn by the requestor	18
	No response received	10
	Not agreed by requestor	1
	Agreed (signed) <a href="#">View details of these Research Proposals</a>	277

# Has our data sharing enabled more science?



**3145** Studies Listed for Data Sharing

**543** Proposals Submitted

**266** Proposals with Data Access Provided

**53** Proposals Published



Data Access	Access provided	142
	Withdrawn by the requestor	2
	Access closed	122
Publication	Publication anticipated	35
	Published <a href="#">View details of these Research Proposals</a>	53
	Withdrawn by requestor	13
	No response received	20
	Publication not received after 18 months of Access Closed	9



# Examples of published research

ClinicalStudy  
DataRequest.com

Get Started: Search Studies Keyword Search

Browse All Studies

>Login / Create Account

Home About Us Mission Sponsors/Funders How It Works Independent Review Panel Metrics FAQs News Help/Contact Us

## Metrics

Metrics Overview

Did Not Meet Requirements

Agreed Proposals

Published Proposals

### Published Proposals

Access to clinical trial data provides opportunities to conduct further research that can help advance medical science or improve patient care. This helps ensure the data provided by research participants are used to maximum effect in the creation of knowledge and understanding.

Proposal number	Sponsor/Funder	Title	Lead researcher	
631	GSK	Predictors of BPH Progression	Dr. Stephen Freedland, MD	<a href="#">Further Details</a>
647	GSK	Assessing and Reporting Heterogeneity of Treatment Effect in Randomized Clinical Trials	David M. Kent, MD, MSc	<a href="#">Further Details</a>



# What has been the impact?

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## Data Sharing — Is the Juice Worth the Squeeze?

Brian L. Strom, M.D., M.P.H., Marc E. Buyse, Sc.D., John Hughes, B.Sc., and Bartha M. Knoppers, Ph.D.

Making trial data broadly available is ethically imperative and scientifically justified and has the potential to increase public understanding of and support for clinical research. But it seems critical to find ways to improve the use and output of data-sharing projects before the clinical research community invests the substantial effort and resources required to broaden the effort to include academic and other noncommercial investigators.

October 27, 2016

N Engl J Med 2016; 375:1608-1609  
DOI: 10.1056/NEJMp161033



# Awareness and expertise may limit use...

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FIRST OPINION

## Sharing clinical trial data: lessons from the YODA Project

By JOSEPH S. ROSS, JOANNE WALDSTREICHER, and HARLAN M. KRUMHOLZ  
/ NOVEMBER 18, 2019

But the largest challenges to achieving the promise of data sharing are broadening awareness of data availability and fostering expertise in using data from clinical trials. The skills needed for analyzing clinical trial data, particularly for meta-analysis, are considerable. The primary reason that requests for data that have been approved by the YODA Project do not result in a completed project is external investigators' realization that their expertise was insufficient to perform the proposed analyses.

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[https://www.statnews.com/2019/11/18/data-sharing-clinical-trials-lessons-yoda-project/?utm\\_source=STAT+Newsletters&utm\\_campaign=ff05bd5e58-Pharmalot&utm\\_medium=email&utm\\_term=0\\_8cab1d7961-ff05bd5e58-135106209](https://www.statnews.com/2019/11/18/data-sharing-clinical-trials-lessons-yoda-project/?utm_source=STAT+Newsletters&utm_campaign=ff05bd5e58-Pharmalot&utm_medium=email&utm_term=0_8cab1d7961-ff05bd5e58-135106209)

# Can we do more to enable use of different types of data...?



## Sex and BMI Alter the Benefits and Risks of Sulfonylureas and Thiazolidinediones in Type 2 Diabetes: A Framework for Evaluating Stratification Using Routine Clinical and Individual Trial Data

John M. Dennis<sup>1</sup>, William E. Henley<sup>1</sup>, Michael N. Weedon<sup>2</sup>, Mike Lonergan<sup>3</sup>, Lauren R. Rodgers<sup>1</sup>, Angus G. Jones<sup>4,5</sup>, William T. Hamilton<sup>2</sup>, Naveed Sattar<sup>6</sup>, Salim Janmohamed<sup>7</sup>, Rury R. Holman<sup>8,9</sup>, Ewan R. Pearson<sup>3</sup>, Beverley M. Shields<sup>4,†</sup> and Andrew T. Hattersley<sup>4,5,†</sup>, on behalf of the MASTERMIND Consortium<sup>‡</sup>

Corresponding authors: Beverley M. Shields, [b.shields@exeter.ac.uk](mailto:b.shields@exeter.ac.uk), and Andrew T. Hattersley, [a.t.hattersley@exeter.ac.uk](mailto:a.t.hattersley@exeter.ac.uk).

Author Affiliations

Diabetes Care 2018 Sep; 41(9): 1844-1853.  
<https://doi.org/10.2337/dc18-0344>

**CONCLUSIONS** Patient subgroups defined by sex and BMI have different patterns of benefits and risks on thiazolidinedione and sulfonylurea therapy. Subgroup-specific estimates can inform discussion about the choice of therapy after metformin for an individual patient. Our approach using routine and shared trial data provides a framework for future stratification research in type 2 diabetes.

# Can we do more to enable the use of AI and machine learning...?



## Predicting corticosteroid-free endoscopic remission with vedolizumab in ulcerative colitis

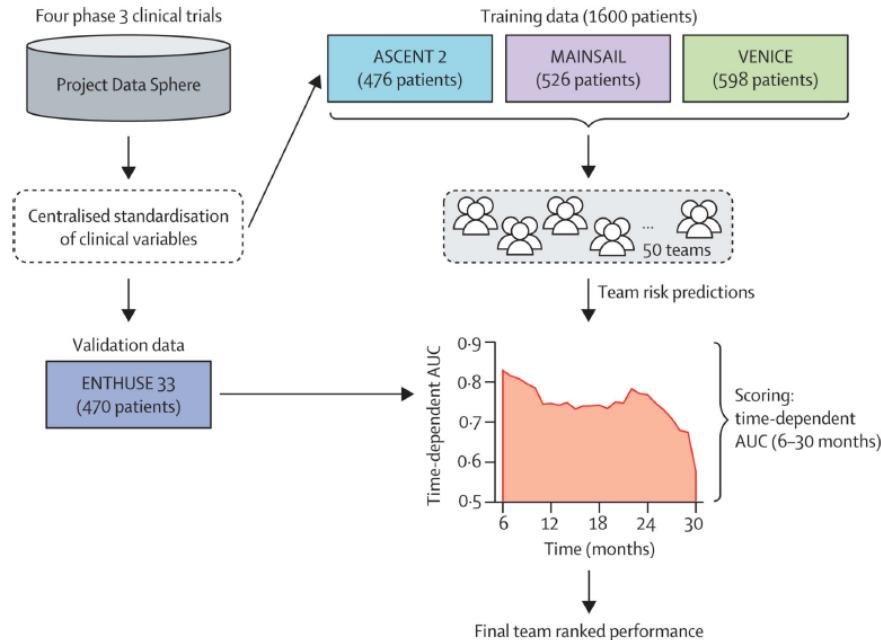
A. K. Waljee<sup>1,2</sup> | B. Liu<sup>3</sup> | K. Sauder<sup>2</sup> | J. Zhu<sup>3</sup> | S. M. Govani<sup>2</sup> |

R. W. Stidham<sup>2</sup> | P. D. R. Higgins<sup>2</sup>

Aliment Pharmacol Ther. 2018;47:763–772.

**Conclusions:** A machine learning algorithm using laboratory data through week 6 of vedolizumab therapy was able to accurately identify which UC patients would achieve corticosteroid-free endoscopic remission on vedolizumab at week 52. Application of this algorithm could have significant implications for clinical decisions on whom to continue on this costly medication when the benefits of the vedolizumab are not clinically apparent in the first 6 weeks of therapy.

# Can we incentivise data re-use with Challenges? Prostate Cancer Challenge



## Study design

Data were acquired from Project Data Sphere and curated centrally by the organising team to provide a harmonised dataset across the four studies. Three studies were provided as training data (ASCENT2, MAINSAIL, and VENICE) and the fourth (ENTHUSE 33) was the validation dataset. Teams submitted risk scores for ENTHUSE 33, then their predictions were scored and ranked using an integrated time-dependent area under the curve (AUC) metric.



# Summary

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- We have been sharing anonymised patient level data from our clinical trials since 2013
- These data are used in further research
- The use of centralised secure data repositories could limit use of these data
- Lack of awareness/capabilities may limit use
- Can we do more to enable use of these data using machine learning or with other types of data?
- Are data challenges a good way to encourage use?