

CANADIAN PARTNERSHIP FOR TOMORROW PROJECT (CPTP)

ACCESS POLICY

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1. PRELIMINARY CHAPTER

a. Canadian Partnership for Tomorrow Project: Overview

The Canadian Partnership for Tomorrow Project (CPTP) – the largest study of its kind ever undertaken in Canada – has enrolled more than 300,000 Canadians who have agreed to be followed for their adult lifetime, in order to allow researchers to explore how genetics, environment, lifestyle and behaviour interact and contribute to the development of cancer and other chronic diseases.

Currently, this pan-Canadian project has five participating cohorts, each under the governance of their respective institutions (“Contributing Institutions”), as listed below:

THE ATLANTIC PARTNERSHIP FOR TOMORROW’S HEALTH – the Atlantic Provinces of New Brunswick, Nova Scotia, Newfoundland and Labrador, and Prince Edward Island (<http://atlanticpath.ca/>), DALHOUSIE UNIVERSITY

CARTaGENE – Québec (<http://www.cartagene.qc.ca>), CENTRE HOSPITALIER UNIVERSITAIRE SAINTE-JUSTINE

ONTARIO HEALTH STUDY – Ontario (<https://ontariohealthstudy.ca/>), ONTARIO INSTITUTE FOR CANCER RESEARCH

ALBERTA’S TOMORROW PROJECT – Alberta (<http://www.in4tomorrow.ca/>), ALBERTA HEALTH SERVICES

BC GENERATIONS PROJECT – British Columbia (<http://www.bcgenerationsproject.ca/>), BRITISH COLUMBIA CANCER AGENCY BRANCH

The Contributing Institutions are collaborating to create a national infrastructure. They are working together under a common policy framework which, while recognizing the specificity of each Contributing Institution, allows them to be part of a collective endeavour. To achieve this, the Contributing Institutions have invested significant resources in order to harmonize approaches, tools and data, resulting in a pan-Canadian dataset and a suite of biosamples, the CPTP Research Data and/or Biosamples, referred to as Material in the *Data and Material Sharing Agreement*.

The Contributing Institutions have collected health, lifestyle and environmental information from Research Participants covering several decades, including biosamples, as well as physical measurements such as weight and height. The information contributed by Research Participants over time will provide the basis to explore the reasons why some individuals develop cancer and other chronic diseases while others do not.

Each Contributing Institution remains the custodian of the data and biosamples obtained from their respective Contributing Institution’s participants but have entered into an agreement with the Canadian Partnership against Cancer (“the Partnership”) to support data and biosample sharing with the scientific community through a centralized access system governed by this *Access Policy*.

The Governing Body of the CPTP (as defined below) is responsible for ensuring that the CPTP’s Vision, Mission, Values and Access Guiding Principles are upheld.

The CPTP's operational and scientific activities are guided by a committee of the Contributing Institutions' scientific directors, as well as the leads of key committees. This Steering Committee, also referred to as the CPTP Operational Steering Committee in the *Data and Material Access Agreement*, reports on its activities to the Governing Body of the CPTP.

The Access Office (as defined below) will report on its activities to both the Steering Committee and the Governing Body of the CPTP.

The Access Office and the Contributing Institutions will share information about general and specific queries and access requests they receive to ensure the appropriate coordination and integration of access activities.

For more information, please visit the CPTP's official website:
<http://www.partnershipfortomorrow.ca>.

b. Objectives

The **Vision** of the CPTP is to improve population health through a better understanding of the causes of cancer and other chronic diseases.

The **Mission** of the CPTP is to create and sustain a pan-Canadian population health platform that promotes and supports high quality, innovative population and translational health research.

The **Values** espoused by the CPTP are those of: Collaboration, Integration, Scientific Integrity, Transparency, Accountability, and Stewardship.

Its long-term goals include:

- Performing active and passive follow-up of Research Participants for 25-50 years;
- Ongoing enrichment of its data and biosample repositories; and
- Facilitating studies on prevention, health promotion, and health services.

This *Access Policy* (hereafter "*Policy*") is guided by the Principles in the *Framework for Responsible Sharing of Genomic and Health-Related Data* (<http://bit.ly/1ZMdu0d>) of the Global Alliance for Genomics and Health. It covers all *Access Applications* from researchers seeking access to CPTP Research Data and/or CPTP Research Biosamples (see Section 4 b). This *Policy* will be publicly available on the CPTP Portal, along with the *Publications Policy* and the *Intellectual Property Policy*.

2. GUIDING PRINCIPLES

In alignment with its Mission and Values, and as further described in Section 4, the CPTP seeks to share its resource with both national and international scientific communities by:

- **Promoting the common good** by maximizing collaborative research for the benefit of all;
- Ensuring the **generation of high quality research**;
- Making CPTP Research Data and/or Biosamples available to the research community **to**

advance scientific knowledge;

- **Respecting the legal rights and legitimate interests** of all stakeholders involved (e.g. families, populations, researchers and funders);
- **Protecting the privacy** of its Research Participants and the **confidentiality** of their data;
- Promoting **transparency, responsibility, interoperability** and **fairness**;
- **Ensuring accountability and oversight**;
- **Enriching the content of the CPTP database**, including through the **return of quality derived data** by researchers; and
- Managing access to CPTP biosamples to **balance current and future needs**.

3. DEFINITIONS

Access Committee (AC): the independent committee that reviews and makes decisions on applications for access to CPTP Research Data and/or Biosamples. Its composition and purpose are set out in its terms of reference, as amended from time to time.

Access Office: the office that receives *Data and Material Access Application Forms* from national and international researchers seeking to access CPTP Research Data from the harmonized dataset and CPTP Biosamples. Members of the Access Office include the Access Officer, the National Access Coordinator, the National Data Curator and the National Biosamples Coordinator.

Access Officer (AO): the officer responsible for the assessment of the *Access Application Forms* and associated documentation from national and international researchers for administrative completeness, for the coordination of the activities of the Access Office and for activities related to legal documents and obligations. The AO is a member of the Access Office and the roles and responsibilities of this function are further defined in its terms of reference.

Access Policy: the policy governing access to CPTP Research Data and/or Biosamples, which, together with the *Intellectual Property Policy*, *Publications Policy* and *Data and Material Access Agreement* (“*Access Agreement*”), outline CPTP’s access requirements and the obligations of the Approved User and Approved Institution(s). It forms an integral part of the *Access Agreement*.

Applicant: a researcher applying for access to CPTP Research Data and/or Biosamples. All Applicants must be affiliated with an institution (public or private).

Approved Institution: the institution (legal entity), public or private (e.g. university, foundation, industry, etc.), under which the Approved User is conducting the Approved Research Project or otherwise contractually binding the Approved User.

Approved Research Project: the project for which access to CPTP Research Data and/or Biosamples has been granted by the AC. It will be listed on the publicly available CPTP Access Registry along with a lay summary of the project.

Approved User: an Applicant granted access to CPTP Research Data and/or Biosamples by the AC.

Canadian Partnership Against Cancer Corporation (“the Partnership”): a not-for-profit corporation funded by the Government of Canada to accelerate action on cancer control for Canadians and to implement Canada’s cancer control strategy. The Partnership Board has oversight over access and as described in this *Policy*, acts on behalf of the Contributing Institutions in providing access to CPTP Research Data and/or Biosamples.

Coded Data and Biosamples: data and biosamples, also referred to as materials in the *Access Agreement*, for which identifiers have been removed and replaced by a code.

CPTP Access Registry: a public registry providing a lay summary of CPTP Approved Research Projects.

CPTP Controlled Access Process: the process governed by the *Access Policy* and implemented through the Access Office, AC and approved operating procedures.

CPTP Data and Material Access Agreement (“Access Agreement”): a signed agreement between and among the Approved User, the Approved Institution(s) and the Canadian Partnership Against Cancer Corporation (“the Partnership”) that sets out the terms and conditions of access to CPTP Research Data and/or Biosamples. The *Access Agreement* legally binds its signatories in conformity with this *Policy*. The Partnership acts on behalf of the Contributing Institutions.

CPTP Data and Material Access Application Form (“Access Application Form”): the form submitted to the Access Office by the Applicant (via the CPTP Portal) to request access to CPTP Research Data and/or Biosamples (also referred to as material in the *Access Agreement*). It includes, among other things, a description of the Applicant’s research project and research team.

CPTP Governing Body: CPTP is governed by the Board of the Canadian Partnership Against Cancer (“the Partnership”) that receives advice from the Strategic Advisory Council (SAC), a committee of the CPTP funders, sponsors and contributing institutions. The CPTP Governing Body receives advice on scientific matters from its International Scientific Advisory Board (ISAB). The CPTP Steering Committee, the committee of the Contributing Institutions’ scientific directors or principal investigators as well as the leads of key committees that guides the operational and scientific activities of the CPTP, provides recommendations to, and reports on its activities to the CPTP Governing Body.

CPTP Research Biosamples: the coded biosamples made available to researchers through the CPTP Controlled Access Process.

CPTP Research Data: the coded data made available to researchers through the CPTP Controlled Access Process.

National Access Coordinator (NAC): the coordinator responsible for responding to queries submitted prior to the *Access Application*, providing relevant support during the application process and, providing an assessment of the *Access Application* (as further outlined in Section 8.) to the AC. The NAC is a member of the Access Office. The NAC's roles and responsibilities are further defined in its terms of reference.

National Biosamples Coordinator (NBC): the coordinator responsible for providing and presenting the consolidated biosample assessment for all received *Access Application Forms* involving biosamples. The NBC will also assist, where necessary, the NAC regarding biosample queries. The NBC is a member of the Access Office. The NBC's roles and responsibilities are further defined in its terms of reference.

National Data Curator (NDC): the curator responsible for managing CPTP Research Data and generating datasets. The NDC is a member of the Access Office. The NDC's roles and responsibilities are further defined in its terms of reference.

Research: the research to be conducted by the Approved User at the Approved Institution using the CPTP Research Data and/or Biosamples pursuant to the *Access Application Form*, the protocol and ethics review for which has been reviewed and approved by the AC.

Research Staff: those individuals who are listed in the *Access Application Form*, who are approved by the AC to have access to the CPTP Research Data and/or Biosamples for the purpose of conducting Research.

Re-Identification: the process of linking Coded Data and/or Biosamples to a Research Participants.

Research Participants: individuals who have donated their data and biosamples to the CPTP Contributing Institutions.

4. ACCESS POLICY: OBJECTIVES AND SCOPE

a. Objectives

Large interoperable datasets promote the efficient, economic and ethical study of the role of genes, lifestyle and the environment in health and disease. CPTP recognizes the importance of data and biosamples sharing, publications, and presentations at scientific meetings.

The *Access Policy* has been developed and implemented in order to enable informed and efficient collaboration; encourage fair, timely and transparent access to CPTP Research Data and/or Biosamples for high-quality research; and, ensure that CPTP Research Data and/or Biosamples are used in a scientific and ethical manner. The *Policy* is implemented through approved CPTP access procedures.

CPTP is committed to sharing CPTP Research Data and/or Biosamples and knowledge with both the national and international scientific communities in conformity with the informed consents provided by its Research Participants. The principles of data and biosamples access and sharing

guide and enable high-quality scientific research (see Section 2 – Guiding Principles). Scientific data and knowledge are common goods and should be shared within an appropriate framework. CPTP’s biosamples constitute a finite resource and the project has created procedures to ensure that this resource is optimally used, according to its long-term research goals of CPTP.

CPTP neither discriminates between Applicants based in Canada or abroad nor between Applicants based in public or private institutions. Moreover, no exclusive or preferential access will be given to any Applicant(s) or Approved Users(s).

CPTP recognizes the need for and importance of providing access to its CPTP Research Data to the CPTP Contributing Institutions and committee scientists for the purpose of quality assurance and cohort description.

b. Scope

This *Policy* highlights the various requirements for accessing CPTP Research Data and/or Biosamples. The CPTP Research Data include, but are not limited to, data generated from self-administered and interviewer-assisted questionnaires, physical measures, socio-demographic data and environmental data, and data derived from environmental samples, biosamples and their derivatives. The CPTP Biosamples include, but are not limited to, serum, whole blood, plasma, and urine.

Access to CPTP Research Data and/or Biosamples is granted for an agreed period. This period is set out in the *Access Agreement*. Upon expiration, Applicants can ask for renewal under the *Access Renewal Form*. Only Coded Data and/or Biosamples will be released to Approved Users.

5. ACCESS LIMITATIONS

The data and biosamples collected or generated by CPTP will be made available to researchers employed within or otherwise contractually bound to public and private institutions that conduct scientific research and that meet the requirements of this *Policy*. Requests to access CPTP Research Data and/or Biosamples by law enforcement bodies or governmental agencies, for purposes other than research projects aligned with CPTP Guiding Principles, will be resisted within the limits of the law. Approved Users will be given access to CPTP Research Data and/or Biosamples for the period agreed upon in the *Access Agreement*, with the possibility of subsequent renewals.

The CPTP Research Data and/or Biosamples may not be used to address any questions other than the one(s) approved in Schedule A of the *Access Agreement*.

Access to CPTP Research Data and/or Biosamples is limited to the Approved Users, who have signed the *Access Agreement* and Research Staff members named in the *Access Agreement*, along with the Approved Institution, all of whom are bound by its the terms and conditions.

6. PRIVACY OF PARTICIPANTS

The potential risk of individual re-identification requires safeguarding the privacy of the Research Participants and the confidentiality of their data and biosamples, while respecting their consent to participate in high-quality research by facilitating access and collaboration.

Approved Users must comply with the security practices and procedures outlined in the *Access Application Form*.

Approved Users must also store, manage, and use CPTP Research Data and/or Biosamples, while using all reasonable efforts to maintain the security and confidentiality of the accessed data (including any copies thereof) and biosamples.

Approved Users must not attempt to re-identify any individual Research Participant by any means, unless consented to by Research Participant. If the Approved User involuntarily identifies a Research Participant, the Access Office must immediately be informed by phone or in writing and this identifying information must be destroyed.

7. ACCESS DOCUMENTS

a. CPTP Data and Material Access Application Form

In order to access CPTP Research Data and/or Biosamples, an Applicant must complete and submit the *CPTP Data and Material Access Application Form* along with the submission of the required documents:

- Research protocol (having received ethics approval)
- Proof of scientific peer-review of Research protocol (if applicable)
- Approval by a Research Ethics Board
- 2-Page CV of the principal Applicant

This application will be received by the Access Office.

b. CPTP Data and Material Access Agreement

CPTP Research Data and/or Biosamples will be released to the Approved User after the Approved User and the Approved Institution(s) have signed the *Access Agreement*. This *Access Agreement* legally binds its signatories.

c. Access Renewal Form

Approved Users who successfully applied for access to CPTP Research Data and/or Biosamples, but whose *Access Agreement* has expired, can submit an *Access Renewal Form*.

8. REVIEW OF APPLICATIONS

a. General Procedure

CPTP General and Feasibility Queries

All initial queries should be submitted to access@partnershipfortomorrow.ca. The Access Office will interact directly with researchers to provide information and responses to any queries submitted prior to the *Access Application Form*. These queries can include discussing the requirements for preparing the application with an Applicant, where requested, as well as establishing the conformity of a potential *Access Application* with the Guiding Principles of the CPTP and if the proposed project is likely to qualify for access to CPTP Research Data and/or Biosamples.

The Access Office will continue to interact with the Applicant throughout the process. The Access Office will also consider requests from researchers who are applying for funding and seek letters of support from CPTP.

CPTP Access Application Process

Applications for CPTP Research Data and/or Biosamples will be completed online by the Applicant (via the CPTP Portal). The Applicant must register as a user and provide all required forms and information to the Access Office.

The *Access Application Form* and other required documentation will initially be reviewed to verify administrative completeness. If the application is incomplete, it will be returned to the Applicant. The complete *Access Application Form* and other required documentation will then be assessed for key operational and scientific aspects, including: the availability of, and feasibility of providing, the requested data and/or biosamples; whether the Access Application Form provides sufficient details on how the requested data/biosamples are to be used; whether the research objectives are clearly stated and achievable with the proposed methods and timelines; and whether the applicants have demonstrated they have the required resources to complete the proposed research.

This assessment will be performed by the Access Office. All Scientific Directors will be offered the opportunity to take part in the assessment within a given timeframe. Additional scientific experts may be called upon, if required (see Section 9. Confidentiality of Application). If it is deemed that modifications are needed to the *Access Application Form*, the Access Office will contact the Applicant.

The Access Office will, through the work of its AO, NAC, NDC and NBC, prepare a summary of its assessment and provide it to the AC along with the application. The AC will make a decision on whether to approve, conditionally approve or reject access to CPTP Research Data and/or Biosamples based on the criteria set forth below (section 8.b.). In the case of a conditional approval or a rejection, the Applicant will be so notified with an explanatory document outlining the reasons for the decision. Rejected *Access Application Forms* will have to be resubmitted (see Section 8 c for more information).

Follow-up with the Applicant, both before and after approvals, will be ensured by the Access Office. The CPTP Access Registry will be created and published on the CPTP website containing the lay summaries of all the CPTP Approved Research Projects.

Upon approval, the Approved User will be notified and required, along with the Approved Institution(s), to sign the *Access Agreement*. The *Access Agreement*, a legally binding agreement that specifies the requirements for access to CPTP Research Data and/or Biosamples, and any other project-specific requirements.

b. Criteria for Review for the AC

All completed *Access Application Forms*, associated documentation and Access Office assessment will be forwarded to the AC. The AC applies the following criteria in making the final decision on the access request:

- The Applicant is a *bona fide* researcher (i.e. evidence that the researcher has relevant experience and qualifications);
- The research study is in conformity with both the Guiding Principles of CPTP and the informed consents signed by the Research Participants (see Section 1 b of this *Policy*);
- The Access Office has provided proof of administrative completeness and availability of CPTP Research Data and/or Biosamples;
- The Access Office assessment has established that the *Access Application Form* meets the following requirements:
 - The research project has been deemed scientifically sound;
 - The existence of adequate resources to effectively complete the research project has been established (e.g. funding, collaborators and staff);
 - Sufficient justification for the need for the data and/or biosamples requested has been provided; and
 - The provision of the requested biosamples is justified based on the assessment of the value of returned data, the scientific contribution of the research project, the potential impact of providing the samples on future needs for the biosamples and the risk of sample depletion.

All criteria must be met.

c. Resubmission Process

The Applicant can resubmit the *Access Application Form*, addressing the initial reasons for refusal, for a second review.

The appeal of a decision by the AC is possible following a second refusal to an Appeal Committee created for such purpose.

9. CONFIDENTIALITY OF APPLICATIONS

All information on research projects submitted to CPTP will be kept strictly confidential within the Access Office. Once access is granted, the following information will be added to the CPTP Access Registry, a publicly available registry accessible via the CPTP website:

- Title of the Approved Research Project accepted;
- Name(s) of the Approved User and Research Staff involved, their status, and credentials;
- Name(s) of the Approved Institution(s) involved; and
- A lay summary of the scientific abstract submitted by the Applicant.

Information related to queries and/or access requests may be shared, under confidentiality, with those providing additional support and/or scientific expertise to the Access Office.

Upon completion of the Approved Research Project, a lay summary of the results submitted by the Approved User will also be added to CPTP Access Registry as per the *Access Agreement* and potentially used in other communications materials to promote CPTP.

10. PUBLICATIONS POLICY

The *Publications Policy* reflects the Guiding Principles outlined in Section 2 of the *Access Policy*. This *Publication Policy* will be publicly available on the CPTP Portal.

11. INTELLECTUAL PROPERTY POLICY

The *Intellectual Property Policy* reflects the Guiding Principles outlined in Section 2 of the *Access Policy*. This *Intellectual Property Policy* will be publicly available on the CPTP Portal.

12. POSTING OF DERIVED DATA

CPTP recognizes the importance of enriching its database. Approved Users obtaining access to CPTP Research Data and/or Biosamples will be required to provide a copy of their derived data back to CPTP as per the *Access Agreement*.

The exact nature of the derived data and the timeframe in which they must be provided will be determined during the review process and will be included as part of the *Access Agreement*. Such data will become an integral part of the CPTP Research Data and will be made available to other Approved Users. This will allow future investigators access to such enriched data and enable them to build upon previous research.

The need to protect intellectual property (e.g. patents) or pre-publication results may result in corresponding constraints on public disclosure of derived data. In such a situation, and where the provided timeframe before public disclosure is insufficient, the Approved User may apply for an extension through the Access Office and as agreed upon in the *Access Agreement*.

13. DESTRUCTION OF DATA AND BIOSAMPLES

After the Approved Research Project is completed and the results are submitted for publication, the Approved User will be permitted to archive the transferred data for the period of time required by the nature of the Approved Research Project (with use limited to the purposes for which access was originally granted), for peer review, and for audit purposes.

The timeframe in which the CPTP Research Data and/or Biosamples ought to be destroyed (or not) will be determined during the review process and will be included as part of the *Access Agreement* while respecting the informed consents provided by Research Participants. The Approved User shall certify that the transferred Research Data (and all copies thereof) and/ or Biosamples have been destroyed and submit a form to that effect to the Access Office.

14. REPORTING

The Access Office requires the following reports from the Approved User: 1) an Annual Progress Report for research projects lasting more than one year; 2) a Final Research Report; 3) an Unanticipated Event/Change Report for any and all changes to the Approved Research Project; and 4) a Destruction of CPTP Research Data and/or Biosamples Form.

a. Annual Progress Report

Approved Users for whom access has been granted for more than one year must complete an Annual Progress Report. The latter aims to keep the Access Office up-to-date with ongoing research projects using CPTP Research Data and/or Biosamples (general status of the project, complications encountered, etc.).

The Annual Progress Report must be submitted within 12 months of the date of the initial access as per the *Access Agreement*. An Annual Progress Report template will be available on the CPTP Portal or upon request to the Access Office.

b. Final Research Report

Once an Approved Research Project has ended, Approved Users must submit a Final Research Report to the Access Office. This Report will contain a summary of the research findings and any resulting benefits for the public, as well as comments and suggestions from Approved Users in order to improve CPTP's access procedure. More specifically, it should contain the following elements:

- Title and the lay summary of the Approved Research Project;
- Name(s), status, and credentials of the Approved User and Research Staff involved;
- Name(s) of the Approved Institution(s) involved;
- List of publications, abstracts, presentations and other relevant output; and
- Lay summary of the results of the Approved Research Project. The lay summary will be published on the CPTP's Public Access Registry.

A Final Research Report template will be available on the CPTP Portal or upon request to the Access Office.

c. Unanticipated Event/Change Report/Addendum Form

As set out in further detail in the *Access Agreement*, the Approved User must inform the Access Office of any changes to the Approved Research Project or the status of the Approved User or Approved Institution for continued approval. Moreover, if a new member of the Research Staff is named either in addition to or in replacement of the Approved User, the latter must notify the Access Office via an *Addendum Form* and he/she must be approved by the Access Office and enter into an *Access Agreement* with the Canadian Partnership Against Cancer Corporation.

This report must be completed and submitted to the Access Office in the case of unanticipated events and/or changes during an Approved Research Project that may affect the ability of the Approved User to achieve his/her research goals, or change the information initially provided in the *Access Application Form*. Any perceived or real threat or changes to the security, integrity, or confidentiality of the CPTP Research Data and/or Biosamples, however, must immediately be reported to the Access Office, in compliance with the *Access Agreement*.

In order to facilitate this reporting process, the Access Office will fast track the evaluation of the report and appropriate review.

Changes to an Approved Research Project will be included in a modifications log and substantial changes will be distributed to all members of the AC during their meetings.

Examples of unanticipated events and/or changes include, but are not limited to, the following:

- Impossibility to complete the Approved Research Project (e.g. loss of funding; lapse of the Research Ethics Board's approval; loss or change of scientific direction);
- Changes to the information provided by the Approved User in the *Access Application Form*; or
- Any other changes that render full compliance with this *Access Policy* or the signed *Access Agreement* impossible.

d) Destruction of CPTP Research Data and/or Biosamples Form

Upon request of the Access Office and as stipulated in the *Access Agreement*, the Approved User must submit a Destruction of CPTP Research Data and/or Biosamples Form to the Access Office. This Report will certify that the transferred CPTP Research Data and all copies thereof have been destroyed and send a letter to that effect to the Access Office

15. FINANCIAL CONDITIONS

The Approved User shall reimburse CPTP for any reasonable costs that may be incurred in preparing and sending the CPTP Research Data and/or Biosamples to the Approved User. This amount will be determined by the Access Office and serve as a condition for access through the *Access Agreement*.

16. AMENDMENTS TO THIS ACCESS POLICY

This *Access Policy* may be amended from time to time. Changes to this *Access Policy* may be submitted by any member of the Access Office, the AC, or the governing bodies associated with the CPTP. Proposed changes will be reviewed by the Steering Committee and where required, will be approved by the Scientific Advisory Committee. Any amendments to this *Access Policy* will be made publicly available on the CPTP Portal. Approved Users will remain bound by the terms and conditions of the *Access Agreement* signed.

This *Access Policy*, along with the *Intellectual Property* and *Publications Policies*, will be conditionally approved for one year, after which time it will be reassessed.