

## Razmjena podataka: nova urednička inicijativa Međunarodnog odbora urednika medicinskih časopisa. Posljedice za mrežu urednika

### Data Sharing: A New Editorial Initiative of the International Committee of Medical Journal Editors. Implications for the Editors' Network

**Fernando Alfonso**<sup>\*1</sup>,  
**Karlen Adamyan**<sup>2</sup>,  
**Jean-Yves Artigou**<sup>3</sup>,  
**Michael Aschermann**<sup>4</sup>,  
**Michael Boehm**<sup>5</sup>,  
**Alfonso Buendia**<sup>6</sup>,  
**Pao-Hsien Chu**<sup>7</sup>,  
**Ariel Cohen**<sup>8</sup>,  
**Livio Dei Cas**<sup>9</sup>,  
**Mirza Dilić**<sup>10</sup>,  
**Anton Doubell**<sup>11</sup>,  
**Dario Echeverri**<sup>12</sup>,  
**Nuray Enç**<sup>13</sup>,  
**Ignacio Ferreira-González**<sup>14</sup>,  
**Krzysztof J. Filipiak**<sup>15</sup>,  
**Andreas Flammer**<sup>16</sup>,  
**Eckart Fleck**<sup>17</sup>,  
**Plamen Gatzov**<sup>18</sup>,  
**Carmen Ginhina**<sup>19</sup>,  
**Lino Goncalves**<sup>20</sup>,  
**Habib Haouala**<sup>21</sup>,  
**Mahmoud Hassanein**<sup>22</sup>,  
**Gerd Heusch**<sup>23</sup>,  
**Kurt Huber**<sup>24</sup>,  
**Ivan Hulín**<sup>25</sup>,  
**Mario Ivanuša**<sup>26</sup>,  
**Rungroj Krittayaphong**<sup>27</sup>,  
**Chu-Pak Lau**<sup>28</sup>,  
**Germanas Marinkis**<sup>29</sup>,  
**François Mach**<sup>30</sup>,  
**Luiz Felipe Moreira**<sup>31</sup>,  
**Tuomo Nieminen**<sup>32</sup>,  
**Latifa Oukerraj**<sup>33</sup>,  
**Stefan Perings**<sup>34</sup>,  
**Luc Pierard**<sup>35</sup>,  
**Tatjana Potpara**<sup>36</sup>,  
**Walter Reyes-Caorsi**<sup>37</sup>,  
**Se-Joong Rim**<sup>38</sup>,  
**Olaf Rødevand**<sup>39</sup>,  
**Georges Saade**<sup>40</sup>,  
**Mikael Sander**<sup>41</sup>,  
**Evgeny Shlyakhto**<sup>42</sup>,  
**Bilgin Timuralp**<sup>43</sup>,

**Dimitris Tousoulis**<sup>44</sup>,  
**Dilek Ural**<sup>45</sup>,  
**J. J. Piek**<sup>46</sup>,  
**Albert Varga**<sup>47</sup>,  
**Thomas F. Lüscher**<sup>48</sup>  
**on behalf of the Editors' Network European Society of Cardiology Task Force**

<sup>1</sup>Chairman *Editors' Network*

<sup>2</sup>Editor in Chief *Armenian Journal of Cardiology*

<sup>3</sup>Editor in Chief *Archives des maladies du cœur et des vaisseaux Pratique*

<sup>4</sup>Editor in Chief *Cor et Vasa*

<sup>5</sup>Editor in Chief *Clinical Research in Cardiology*

<sup>6</sup>Editor in Chief *Archivos de Cardiología de México*

<sup>7</sup>Editor in Chief *Acta Cardiologica Sinica*

<sup>8</sup>Editor in Chief *Archives of Cardiovascular Diseases*

<sup>9</sup>Editor in Chief *Journal of Cardiovascular Medicine*

<sup>10</sup>Editor in Chief *Medicinski žurnal*

<sup>11</sup>Editor in Chief *SAHeart*

<sup>12</sup>Editor in Chief *Revista Colombiana de Cardiología*

<sup>13</sup>Editor in Chief *Kardiyovaskuler Hemsirelik Dergisi*

<sup>14</sup>Editor in Chief *Revista Española de Cardiología*

<sup>15</sup>Editor in Chief *Kardiologia Polska*

<sup>16</sup>Editor in Chief *Cardiovascular Medicine*

<sup>17</sup>Editor in Chief *Cardio News*

<sup>18</sup>Editor in Chief *Bulgarian Journal of Cardiology*

<sup>19</sup>Editor in Chief *Romanian Journal of Cardiology*

<sup>20</sup>Editor in Chief *Revista Portuguesa de Cardiologia*

<sup>21</sup>Editor in Chief *Cardiologie Tunisienne*

<sup>22</sup>Editor in Chief *The Egyptian Heart Journal*

<sup>23</sup>Editor in Chief *Basic Research in Cardiology*

<sup>24</sup>Editor in Chief *Austrian Journal of Cardiology*

<sup>25</sup>Editor in Chief *Cardiology Letters*

<sup>26</sup>Editor in Chief *Cardiologia Croatica*

<sup>27</sup>Editor in Chief *Thai Heart Journal*

<sup>28</sup>Editor in Chief *Journal of the Hong Kong College of Cardiology*

<sup>29</sup>Editor in Chief *Seminars in Cardiovascular Medicine*

<sup>30</sup>Editor in Chief *Journal of Cardiovascular Medicine*

<sup>31</sup>Editor in Chief *Arquivos Brasileiros de Cardiologia*

<sup>32</sup>Editor in Chief *Sydänääni (Heart Beat)*

<sup>33</sup>Editor in Chief *La Revue Marocaine de Cardiologie*

<sup>34</sup>Editor in Chief *Der Kardiologie*

<sup>35</sup>Editor in Chief *Acta Cardiologica*

<sup>36</sup>Editor in Chief *Heart and Blood Vessels*

<sup>37</sup>Editor in Chief *Revista Uruguaya de Cardiologia*

<sup>38</sup>Editor in Chief *Korean Circulation Journal*

<sup>39</sup>Editor in Chief *Hjerteforum*

<sup>40</sup>Editor in Chief *Heart News*

<sup>41</sup>Editor in Chief *Cardiologisk Forum*

<sup>42</sup>Editor in Chief *Russian Journal of Cardiology*

<sup>43</sup>Editor in Chief *Anatolian Journal of Cardiology*

<sup>44</sup>Editor in Chief *Hellenic Journal of Cardiology*

<sup>45</sup>Editor in Chief *Archives of the Turkish Society of Cardiology*

<sup>46</sup>Editor in Chief *Netherlands Heart Journal*

<sup>47</sup>Editor in Chief *Cardiologia Hungarica*

<sup>48</sup>Editor in Chief *European Heart Journal*

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**SAŽETAK:** Međunarodni odbor urednika medicinskih časopisa izdao je preporuke za poboljšanje uredničkih standarda i znanstvene kvalitete biomedicinskih časopisa. Te se preporuke kreću od ujednačenih tehničkih zahtjeva do složenijih i manje jasnih uredničkih pitanja kao što su etički aspekti znanstvenoga procesa. Nedavno su predloženi registracija kliničkih ispitivanja, priopćivanje konflikta interesa te novi kriteriji autorstva – s naglaskom na važnost dužnosti i odgovornosti. Prošle je godine pokrenuta nova urednička inicijativa kojom se želi potaknuti razmjena podataka kliničkih ispitivanja. U ovome se preglednom članku raspravlja o toj, novoj inicijativi sa svrhom osvješćivanja čitatelja, znanstvenika, autora i urednika koji su dio Mreže urednika nacionalnih časopisa Europskoga kardiološkog društva.

**SUMMARY:** The International Committee of Medical Journal Editors (ICMJE) provides recommendations to improve the editorial standards and scientific quality of biomedical journals. These recommendations range from uniform technical requirements to more complex and elusive editorial issues including ethical aspects of the scientific process. Recently, registration of clinical trials, conflicts of interest disclosure, and new criteria for authorship – emphasizing the importance of responsibility and accountability, have been proposed. Last year, a new editorial initiative to foster sharing of clinical trial data was launched. This review discusses this novel initiative with the aim of increasing awareness among readers, investigators, authors and editors belonging to the Editors' Network of the European Society of Cardiology.

**KLJUČNE RIJEČI:** urednička etika, znanstveni proces, razmjena podataka, klinička ispitivanja, registracija kliničkih ispitivanja, autorstvo.

**KEYWORDS:** editorial ethics, scientific process, data sharing, clinical trial, trial registration, authorship.

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**\*ADDRESS FOR CORRESPONDENCE:** Fernando Alfonso, Department of Cardiology, Hospital Universitario de La Princesa, Instituto de Investigación sanitaria IIS-IP, Universidad Autónoma de Madrid, C/ Diego de León 62, Madrid 28006, Spain. / E-mail: [falf@hotmail.com](mailto:falf@hotmail.com)

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Mreža urednika Europskoga kardiološkog društva (ESC) predana je cilju promoviranja uvođenja visokokvalitetnih uredničkih standarda među nacionalnim kardiološkim časopisima (NSCJ) ESC-a<sup>1-4</sup>. NSCJ-i imaju veliku ulogu u širenju visokokvalitetnoga znanstvenog istraživanja. Imaju i važnu ulogu u edukaciji i usklađivanju kliničke prakse<sup>3</sup>. Većina časopisa NSCJ-a objavljuje se na lokalnim jezicima, no mnogi imaju izdanja na engleskom jeziku te su međunarodno priznati u znanstvenoj zajednici<sup>1-4</sup>. NSCJ dobro dopunjuju službene časopise ESC-a te zajedno čine učinkovit alat za širenje europskih kardioloških istraživanja. U globaliziranom i vrlo natjecateljski nastrojenom svijetu uredništva, promoviranje visokokvalitetnih uredničkih standarda od ključne je važnosti za povećanje znanstvenog prestiža NSCJ<sup>1-4</sup>. Od samog početka Mreža je urednika snažno promicala pridržavanje ujednačenih preporuka Međunarodnog odbora urednika medicinskih časopisa (ICMJE)<sup>1</sup>. U dokumentu o svojim zadaćama Mreža urednika izražava predanost prilagođivanju NSCJ-u kako bi se pratile te opće uredničke preporuke<sup>1</sup>. Ipak, NSCJ-i su i u opsegu i u sadržaju vrlo heterogeni časopisi pa te, nove preporuke treba primijeniti postupno, uzimajući u obzir postojeću uredničku politiku i uredničku slobodu NSCJ-a<sup>1-4</sup>.

Etička pitanja imaju sve veću ulogu u osiguravanju vjerodostojnosti znanstvenoga procesa<sup>5-13</sup>. Biomedicinska istraživanja ovise o povjerenju. Međutim, transparentnost je također jedno od vodećih načela znanstvenoga procesa<sup>5-8</sup>. Ovaj će pregledni rad raspravljati o novim uredničkim preporukama o razmjeni podataka, koje je izdao ICMJE<sup>14</sup>. Kada ih se prvi put iznese, nove preporuke ICMJE-a uvijek izgledaju provokativno te često pretjerano ambiciozno. Uvođenje uredničkih promjena također je poprilično zahtjevno s tehničkog i logističkog gledišta. Prilagođivanje novim uredničkim inicijativama izazov je ne samo za urednike nego i za cijelu znanstvenu zajednicu. Stoga je prirodno da su mnogi urednici skloni izbjegavati učiniti prvi

The Editors' Network of the European Society of Cardiology (ESC) is committed to promoting the implementation of high-quality editorial standards among ESC National Societies Cardiovascular Journals (NSCJ)<sup>1-4</sup>. NSCJ play a major role in disseminating high-quality scientific research. However, they also play a relevant role in education and harmonization of clinical practice<sup>3</sup>. Most NSCJ are published in local languages, but many have English editions and have gained international scientific recognition<sup>1-4</sup>. NSCJ well complements official ESC journals and, altogether, provide an effective means to disseminate European cardiovascular research. In a globalized and highly competitive editorial environment, promoting high quality editorial standards remains of paramount importance to increase the scientific prestige of NSCJ<sup>1-4</sup>. From its conception, the Editors' Network strongly advocated for the adherence to the uniform recommendations of the International Committee of Medical Journal Editors (ICMJE)<sup>1</sup>. In its mission statement document the Editors' Network committed to adapt NSCJ to follow these general editorial recommendations<sup>1</sup>. However, NSCJ are highly heterogeneous in scope and contents and these new recommendations should be embraced progressively, considering currently existing editorial policies and the editorial freedom of the NSCJ<sup>1-4</sup>.

Ethical issues play a growing role in ensuring the credibility of the scientific process<sup>5-13</sup>. Biomedical research relies on trust. However, transparency also represents a major tenet in the scientific process<sup>5-8</sup>. This review will discuss the new editorial recommendations on data sharing issued by the ICMJE<sup>14</sup>. Novel ICMJE recommendations always appear as provocative, and often as too ambitious, when initially presented. Moreover, implementation of editorial changes is rather demanding from a technical and logistical viewpoint. Adherence to novel editorial initiatives is challenging not only for editors, but also for the entire scientific community. There-

korak i prednjačiti u novim „uredničkim pokusima“ te da obično radije ostaju u svojoj „sigurnosnoj zoni“ dok novouvedene promjene ne „sazru“<sup>1-4</sup>. Međutim, iskustvo nas uči da sve uredničke inicijative koje je razvio ICMJE s vremenom prevladaju te da su imale ključnu ulogu u održavanju vjerodostojnosti znanstvenoga procesa<sup>9-13</sup>. Vrlo uspješni nedavni primjeri takvih inicijative, među ostalima, jesu registracija kliničkih ispitivanja, inicijativa vezana za sukob interesa te novi uvjeti autorstva<sup>9-13</sup>.

Novim ICMJE-ovim preporukama o razmjeni podataka<sup>14</sup> ovdje se pristupa s didaktičkoga gledišta, sa svrhom da se ponude novi urednički uvidi te da ih NSCJ-i, nadajmo se, postupu prihvate i implementiraju.

## Razmjena podataka iz kliničkih ispitivanja: novi prijedlog Međunarodnog odbora urednika medicinskih časopisa

ICMJE smatra da je moralna obvezna odgovorno dijeliti podatke dobivene u kliničkim ispitivanjima<sup>14</sup>. Ideja na kojoj se temelji ovaj globalni pothvat jest da pacijenti preuzimaju rizik time što prihvaćaju sudjelovanje u kliničkom ispitivanju. Stoga je javno objavljivanje prikupljenih podataka odgovorna inicijativa za olakšanje napretka znanosti. Razmjena bi podataka povećala povjerenje u rezultate neovisnih istraživanja<sup>14</sup>. Usto, različite skupine istraživača mogu istraživati nove hipoteze. Ova bi inicijativa mogla potaknuti uporabu podataka za odgovaranje na različita istraživačka pitanja koja nisu bila uzeta u obzir u originalnoj studiji. Ako znanost postane „otvoreni“ proces, mnogi će istraživači imati koristi od uporabe pouzdanih podataka prikupljenih negdje drugdje. Stoga se razmjena podataka pokazala kao najbolji način osiguranja da sve informacije prikupljene u kliničkim ispitivanjima budu slobodno i široko raspoložive kako bi se mogle lako iskoristiti za unaprjeđivanje istraživačkog znanja<sup>14</sup>. Uporaba prethodno prikupljenih podataka kako bi se postigao daljnji razvoj znanosti koncept je koji nije lako kritizirati. Kao što smo spomenuli, to također odaje počast dobrovoljnoj suradnji pacijenata koji su se prijavili i pristali sudjelovati u kliničkom ispitivanju.

Vlade, agencije za financiranje, znanstvene udruge, industrija te čak i laici sve više zahtijevaju razmjenu podataka iz kliničkih ispitivanja. Stoga ICMJE predlaže da urednici pomognu pri ispunjavanju te etičke obveze razvijanjem novih uredničkih politika koje se izravno odnose na to pitanje<sup>14</sup>. Zagovornici „otvorene znanosti“ trebali bi biti zadovoljni ovim, novim uredničkim zahtjevom za razmjenu podataka iz kliničkih ispitivanja<sup>14</sup>.

Prvi je korak razjasniti što je točno kliničko ispitivanje. Prema definiciji ICMJE-a, kliničko je ispitivanje studija koja ljudima prospektivno dodjeljuje intervenciju kako bi se procijenio uzročno-posljedični odnos između te intervencije i zdravstvenog ishoda koji slijedi<sup>5</sup>.

ICMJE smatra da dijeljenje anonimiziranih podataka o pojedinim pacijentima treba postati dio publikacijskoga procesa kliničkih ispitivanja<sup>14</sup>. Tom se strategijom štiti pravo pacijenata na povjerljivost njihovih podataka. No taj je uvjet ograničen na podatke o pojedinačnom pacijentu za rezultate prikazane u objavljenom članku. Važno je da se jasan plan o razmjeni podataka predoči pri prvoj registraciji kliničkog ispitivanja te opet pri predaji rukopisa. Ovaj prijedlog traži od istraživača da u kliničkom ispitivanju iskažu da će javno objaviti svoje podatke kao preduvjet za publikaciju ispitivanja<sup>14</sup>. Trebali bi obećati da će slobodno objaviti prikupljene neobrađene podatke kada predaju rukopis na razmatranje.

fore, many Editors have a natural tendency to avoid stepping ahead as early adopters of new “editorial experiments” and usually prefer to keep moving within their comfort zone until the “sea change” has matured<sup>1-4</sup>. However, experience has taught us that all editorial initiatives developed by the ICMJE eventually prevailed and played a critical role in maintaining the credibility of the scientific process<sup>9-13</sup>. Highly successful recent examples include trial registration, a conflicts of interest initiative and the new requirements for authorship<sup>9-13</sup>.

The novel ICMJE recommendations on data sharing<sup>14</sup> are discussed herein from a didactic perspective with the aim to provide new editorial insights and, hopefully, to be progressively adopted and implemented by the NSCJ.

## Sharing Clinical Trial Data: The New ICMJE Proposal

The ICMJE considers that there is a moral obligation to responsibly share the data generated by clinical trials<sup>14</sup>. The rationale underlying this global endeavor is that patients have assumed a risk by accepting to participate in a trial. Accordingly, making the obtained data publicly available represents a responsible initiative to facilitate the advancement of science. Sharing the data would increase trust in the conclusions reached by trials. Indeed, data sharing allows confirmation of the results by independent research<sup>14</sup>. Furthermore, new hypotheses may be pursued by different groups of investigators. This initiative may foster the leveraging of data to answer different research questions not contemplated in the original study. If science becomes an open process, then many researchers would benefit by taking advantage of reliable data generated somewhere else. Therefore, data sharing emerges as the best way to ensure that all the information gathered by trials is made freely and widely available, so that it can be readily used to advance scientific knowledge<sup>14</sup>. The use of previously collected data to further advance science is difficult to criticize. As discussed, this honours the volunteerism of the patients who signed up and consented to participate in a trial.

Governments, funding agencies, scientific societies, the industry and even the lay society growingly demand sharing clinical trial data. Therefore, the ICMJE suggests that editors should help to meet this ethical obligation by devising new editorial policies specifically addressing this issue<sup>14</sup>. Proponents of “open science” should be pleased by this new editorial requirement of sharing clinical trial data<sup>14</sup>.

The first consideration is to clarify what a clinical trial is exactly. According to the ICMJE definition, a clinical trial is a study that prospectively assigns people to an intervention in order to assess the cause-and-effect relationship between that intervention and the ensuing health outcome<sup>5</sup>.

The ICMJE considers that sharing “*de-identified*” individual patient data should become part of the publication process of clinical trials<sup>14</sup>. This strategy protects patient’s confidentiality rights. The requirement, however, is restricted to the individual-patient data underpinning the results presented in the published article. Importantly, a clear plan for data sharing should be disclosed at the time of initial trial registration and should be also presented at the time of manuscript submission. The proposal requires clinical trialists to declare that they will share their data publicly as a prerequisite for publishing the trial<sup>14</sup>. They

Važno je imati na umu da je registracija kliničkih ispitivanja bila jedna od prethodnih uredničkih inicijativa ICMJE-a sa svrhom rješavanja problema vezanih za publikacijski otklon (selektivno publiciranje ispitivanja s pozitivnim rezultatima), nedosljednost u ishodima i nepotrebna ponovljena istraživanja.<sup>9,10</sup> Javni bi repozitoriji mogli pružiti optimalni alat ne samo za inicijalnu registraciju kliničkih ispitivanja nego i za razmjenu podataka o pojedinačnim pacijentima. Od sada nadalje plan za razmjenu podataka bio bi važan korak u inicijativi za registraciju kliničkih ispitivanja<sup>9,10,14</sup>. Treba predočiti i detalje o tome hoće li podatci biti slobodno raspoloživi na svaki zahtjev ili samo nakon formalne aplikacije koja će biti odobrena nakon postizanja dogovora o uvjetima korištenja podacima. Također je i predloženo da podatci trebaju postati javni ne kasnije od šest mjeseci nakon objave originalnog istraživanja u časopisu<sup>9,10,14</sup>. *Clinicaltrials.com*, najveći neprofitni znanstveni registar<sup>9,10</sup>, već je prilagodio svoju registracijsku platformu kako bi se pri registraciji kliničkog ispitivanja razjasnili planovi za razmjenu podataka.

Očito je da bi ova urednička inicijativa mogla imati dalekosežne posljedice za planiranje, provođenje i izvještavanje o kliničkim ispitivanjima te bi zapravo mogla imati dubinski utjecaj na strategije znanstvenog istraživanja i publikacije<sup>14</sup>. Stoga je ideja da se ovaj zahtjev primijeni na svako kliničko ispitivanje koje započne s upisom pacijenata jednu godinu nakon službenog prihvaćanja te uredničke politike u pripadajućem časopisu<sup>14</sup>. Inicijativa će također imati bitne posljedice za urednički proces. Dapače, urednici bi trebali nadzirati postupak razmjene podataka te s vremenom početi rješavati moguće nepravilnosti. To može uključivati upućivanje zahtjeva za razjašnjenjem autorima, obavještanje akademskih ustanova, publiciranje objava o zabrinutosti oko nekih studija ili čak povlačenje publikacija.

Konačno, ICMJE prihvaća da prava istraživača i sponzora moraju biti zaštićena<sup>14</sup>. Dapače, zasluga za izvornu objavu trebala bi imati i jedinstvenu oznaku podatkovnog niza. Ističe se da uvijek treba dati zahvalu izvornim istraživačima koji su objavili podatke nakon publikacije svojeg istraživanja. Nadalje, kasniji istraživači koji se koriste tim bazama podataka trebali bi zatražiti suradnju istraživača koji su prvi skupili podatke kako bi se osigurali ispravna interpretacija, upravljanje i analiza podataka.

## Izazovi uvođenja razmjene podataka

Iako se čini jasnim da će ova inicijativa ostvariti daljnji napredak u transparentnosti i općem integritetu znanstvene literature, ostaju neka pitanja koja treba razriješiti. Postoji prirodni otpor prihvaćanju inicijativa za otvorenu znanost kod nekih akademskih ustanova ili istraživača koji brane ideju iskorištavanja „vlastitih“ podataka<sup>15,16</sup>. Dosad se kliničke istraživače odvrćalo od rada s podacima iz kliničkih ispitivanja koje nisu sami proizveli<sup>15,16</sup>. Istraživači u kliničkim ispitivanjima također su često smatrali podatke iz svojih istraživanja osobnim vlasništvom te bi redovito odbijali zahtjeve za razmjenu podataka. Dapače, sve nedavno većina se znanstvenika i farmaceutskih industrijskih skupina protivila tomu da se neobrađeni podatci stave na raspolaganje nakon objave rezultata kliničkog ispitivanja. No ta se praksa razlikuje od one u drugim disciplinama (npr. u genetici ili ekonomiji), gdje je razmjena podataka već odavno uobičajena<sup>15,16</sup>.

Dobivanje pouzdanih, visokokvalitetnih originalnih podataka zahtijeva znatan istraživački napor. Dopuštanjem postojanja dovoljnog razdoblja između objave članka i obveze za stavljanjem neobrađenih podataka na raspolaganje dalo bi se originalnim istraživačima mogućnost da publiciraju dodatne analize

should promise to freely release individual patient raw data at the time they submit the manuscript for consideration.

It is important to keep in mind that clinical trial registration was a previous ICMJE editorial initiative aimed to address problems related to publication bias (selective publication of positive trials), endpoints inconsistency and redundant research<sup>9,10</sup>. Potentially, public repositories provide an optimal tool not only for initial trial registration but also for individual-patient data sharing. From now on the plan for data-sharing would be an important step of the clinical trial registration initiative<sup>9,10,14</sup>. Details on whether the data would be freely available upon request, or only after a formal application that eventually will be approved after an agreement is reached on data use conditions, should be presented. Finally, it has been proposed that the data should be made public no more than 6 months after publication of the original study in the journal<sup>9,10,14</sup>. *Clinicaltrials.com*, a widely used non-for-profit scientific repository<sup>9,10</sup>, has already adapted its registration platform to specifically clarify data-sharing plans at the time of clinical trial registration.

Obviously, this editorial initiative may have profound consequences on the planning, conduction and reporting of clinical trials and, in fact, may deeply influence research and publication strategies<sup>14</sup>. As a result, the idea is to implement this requirement for any clinical trial that begins to enroll patients 1 year after the official adoption of this editorial policy by the corresponding journal<sup>14</sup>. The initiative will also have major implications for the editorial process. Indeed, Editors are supposed to monitor the data sharing process and, eventually, address potential irregularities. These might include requests of clarification to the authors, notification to academic institutions, publication of expressions of concern or even retractions.

Finally, the ICJME acknowledges that the rights of the investigators and sponsors should be protected<sup>14</sup>. Moreover, credit to the original report should be granted by including a unique identifier of the data set. It is emphasized that credit should be always given to the original investigators that posted the data after publication of their research. Furthermore, additional investigators using these databases should request collaboration of the investigators that originally collected the data to ensure adequate data interpretation, management and analysis.

## Challenges of Data Sharing

Although it appears clear that this initiative will further improve transparency and the overall integrity of the scientific literature, some remaining issues need to be addressed. There is inherent resistance to embrace open science initiatives from some academic institutions or investigators that defend the idea of exploiting their “own” data<sup>15,16</sup>. Until now clinical researchers were discouraged from working with clinical trial data they did not generate themselves<sup>15,16</sup>. Likewise, trialists tended to see trial data as their personal property and would routinely refuse requests for data sharing. In fact, until very recently most researchers and pharmaceutical industry groups were opposed to making raw data available after trial publication. This practice, however, differs from other disciplines (as genomics or economics) where data sharing has been common place for a long time<sup>15,16</sup>.

Obtaining reliable, high-quality original data requires a major research effort. Allowing a sufficient period of time from



podskupina na temelju svojih vlastitih podataka<sup>14</sup>. No ovaj, novi prijedlog o razmjeni podataka također će povećati pritisak na akademske istraživače koji često nemaju dovoljno sredstava da publiciraju naknadne analize i trebaju vremena da bi pripremili nove rukopise<sup>14</sup>. Važno je i to što većina znanstvenika nema nikakva iskustva s postupkom izdavanja ili rada s javno dostupnim podacima. Nadalje, napor i sredstva koji su potrebni za organizaciju neobrađenih podataka u oblik koji je razumljiv drugim istraživačima i dalje je velik problem<sup>14</sup>. To bi zahtijevalo tehničku podršku i primjerena novčana sredstva.

Davanje podataka na uvid znanstvenicima koji nisu dio kliničkog ispitivanja može razotkriti probleme koje nisu prepoznali originalni istraživači. Iako to povećava transparentnost i stoga i povjerenje u rezultate ispitivanja, može također uzrokovati zbrku i nepotrebne znanstvene prijemore. Teško je zamisliti kako bi novi znanstvenici stekli potrebno detaljno znanje o kompliciranim podatkovnim nizovima koje je bilo na raspolaganju originalnim istraživačima u kliničkom ispitivanju<sup>14</sup>. Pouzdana procjena podataka traži dubinsko znanje o pozadini studije kako bi se moglo ispravno pristupiti mnogim nijansama i praktičkim pitanjima. Ona uključuju precizne informacije o načinu na koji su bile definirane varijable, kako su podatci prikupljeni i kako su rezultati na kraju kodirani i uneseni u bazu podataka. Ova inicijativa može naići na mnogobrojne probleme vezane za neispravne analize koje dovode do netočnih rezultata i pogrešnih interpretacija, potencijalno nanoseći štetu znanosti općenito<sup>14</sup>.

Konačno, urednici, već zatrpáni poslom, morat će provjeravati da su svi ti neobrađeni podatci iz publiciranih članaka doista i objavljeni kako je obećano. Različiti rezultati mogu proizaći iz pogrešnih viđenja o tome koje podatke treba analizirati kako bi se odgovorilo na pojedina pitanja<sup>14</sup>. Ako postoje razlike u rezultatima, bit će teško odlučiti koja analiza nudi najtočniji odraz podataka. To može izazvati nepotrebnu znanstvenu buku s oprečnim rezultatima i ispravcima, što može stvoriti zbrku i dovesti do frustracija u znanstvenoj zajednici. Konačno, spomenuta inicijativa također može potaknuti istodobnu publikaciju oprečnih rezultata utemeljenih na istoj bazi podataka u nekoliko časopisa različitih skupina<sup>14</sup>.

Budući da treba razjasniti još mnoga pitanja, ICMJE je zatražio povratne informacije o svojemu preliminarnom prijedlogu o razmjeni podataka iz kliničkih ispitivanja<sup>14</sup>. Naravno, ta će inicijativa postići potrebnu zrelost samo kroz iskustva stečena u njezinu uvođenju i primjeni.

## Prethodne inicijative za razmjenu podataka

Nekoliko vodećih akademskih entiteta već je radilo na ovom području. Časopis *British Medical Journal* bio je predvodnik u uvođenju uredničke inicijative za razmjenu podataka<sup>17</sup>. U 2012. godini ta se politika počela provoditi samo za klinička ispitivanja lijekova i medicinskih proizvoda, no do 2015. uvjet je da se podatci razmjenjuju „na zahtjev” proširen na sva klinička ispitivanja poslana u časopis<sup>17</sup>. Rečeno je i da bi podatci o pojedinačnim pacijentima također mogli biti od velike vrijednosti tijekom postupka recenzije jer bi omogućili neovisnu provjeru rezultata prije krajnje publikacije<sup>18</sup>. Iako bi inicijativa mogla imati potencijalnu vrijednost, većina je recenzenata već pretrpana poslom, pa bi ovaj, dodatni posao mogao stvoriti dodatni umor i dovesti do fenomena „izgaranja”. Usto, mnogi dobri klinički recenzenti ne posjeduju stručnost potrebnu za upravljanje podacima i provođenje potvrdnih statističkih analiza<sup>18</sup>. Neki časopisi, primjerice JAMA, razvili su neke uredničke inicijative vezane za ovu temu,

the time of article publication to the need to share the raw data would give original investigators the possibility of publishing additional subgroup analyses from their own data<sup>14</sup>. This new proposal will further increase the pressure on academic investigators that frequently do not have the required resources to publish their subsequent analyses and require time to prepare the new the manuscripts<sup>14</sup>. Notably, most researchers have no experience with the process of releasing or dealing with public data. Furthermore, the effort and resources required to organize the raw data in a way that would be comprehensible to other investigators remain a cause of major concern<sup>14</sup>. This would require technical support and adequate funding.

Data-access to non-trial researchers may disclose problems not recognized by the initial investigators. Although this will increase transparency and, therefore, trust in trial results, it might also generate confusion and undue scientific controversies. It is difficult to envision how the new researchers will gain the required detailed knowledge of the complicated datasets enjoyed by the original trial investigators<sup>14</sup>. A reliable assessment of the data requires a deep knowledge on the study background and to be able to properly address many nuances and practical considerations. These include precise information on the way variables were defined, how data was collected and how results were finally coded and entered into the database. The initiative might be fraught with problems related to incorrect analysis resulting in inaccurate results and erroneous interpretations, potentially damaging science<sup>14</sup>.

Finally, Editors, already deluged with work, will need to check that all of the raw data of the published articles eventually has been released as promised. Different results may emerge from misconceptions regarding what data should be analysed to answer specific questions<sup>14</sup>. If there are differences in results, it will be difficult to decide which analysis provides the most accurate reflection of the data. This could generate undue “scientific noise”, with contradictory results and rectifications, which may generate confusion and frustration in the scientific community. Finally, this may also promote the simultaneous publication in several journals of conflicting results from the same database by different groups<sup>14</sup>.

As many issues still should be clarified, the ICMJE asked for feedback on its preliminary editorial proposal on clinical trial data sharing<sup>14</sup>. Obviously, the initiative will only gain the required maturity from the experience gained during its adoption and implementation.

## Previous initiatives on Data Sharing

Several leading academic entities previously have worked in this field. The British Medical Journal pioneered an editorial initiative of data sharing<sup>17</sup>. In 2012 this policy took effect only for trials on drugs and devices but, in 2015, the requirement of data sharing “on request” was extended to all submitted clinical trials<sup>17</sup>. It has been proposed that individual patient data may also be of major value during the “peer review” process by permitting independent verification of the results before final publication<sup>18</sup>. Although this initiative might be of potential value most reviewers are already deluged with work and this extra task could generate fatigue and burn out phenomena. In addition, many good clinical reviewers do not have the expertise required to manage data and to perform confirma-

uključujući i zahtjev za sva industrijski sponzorirana klinička ispitivanja, pri čemu bi neovisnu statističku analizu provodio statističar iz akademske ustanove<sup>19</sup>.

Svjetska zdravstvena organizacija (SZO) i Institut za medicinu (IOM) u prošlosti su izdali važne proglase o transparentnosti kliničkih ispitivanja. U tom je smislu IOM objavio posebne smjernice za razmjenu podataka u kliničkim ispitivanjima<sup>20</sup>. SZO je prvo predstavio izjavu o javnoj objavi rezultata kliničkih ispitivanja, a zatim poticala razmjenu podatkovnih nizova iz istraživanja kad god je to primjereno<sup>21-23</sup>. SZO je Nakon toga SZO je razvio globalna pravila za razmjenu podatka i rezultata tijekom izvanrednih javnozdravstvenih stanja, koja su osobito usredotočena na kliničke, epidemiološke i genske osobine novih zaraznih bolesti te na eksperimentalne lijekove i cjepiva. U izvanrednim se situacijama podatci moraju razmjenjivati brzo, prije no što su te informacije formalno objavljene<sup>23</sup>.

*National Health, Lung and Blood Institute* (NHLBI) predstavio je detaljne postupke razmjene podataka koji omogućuju javni pristup neobrađenim podacima iz kliničkih ispitivanja i razvio repozitorij za podatke koji trenutačno uključuju više od pola milijuna pacijenata iz više od 100 ispitivanja i opservacijskih studija<sup>24</sup>. NHLBI je 2015. objavio svoju namjeru da digitalne podatke iz kliničkih ispitivanja koje financira učini javno dostupnima<sup>24</sup>.

## Platforme i repozitoriji

U svijetu se svake godine provodi do 30 000 kliničkih ispitivanja, stvarajući golemi volumen neobrađenih podataka na razini pojedinačnog pacijenta<sup>25</sup>. Ipak, trenutačno postojeći portali za razmjenu podataka još nisu zadovoljavajući. Kod većine je nužno predati zahtjev čija priprema oduzima mnogo vremena, a treba uključivati detaljan prijedlog istraživanja s ustrojem studije, glavnim završnim točkama i statistički plan<sup>25</sup>. Taj prijedlog zatim recenzira neovisno istraživačko vijeće koje odlučuje hoće li odobriti zahtjev za podacima<sup>21,25,26</sup>. Trenutačno taj postupak traje predugo, a, kad podatci napokon i postanu dostupni, često nisu odmah spremni za uporabu<sup>25</sup>. S druge strane, uvođenje načina za olakšavanje prijenosa podataka od onih koji ih posjeduju do istraživača može biti nezgrapno i izazovan postupak. Neki sustavi nude elektronički obrazac ili predložak<sup>21</sup>. No, ako to nije na raspolaganju, treba izraditi de novo prijedlog koji opisuje svrhu istraživanja, plan statističke analize, istraživački tim i moguće sukobe interesa. Proces recenzije može doći iz internog ili vanjskog recenzijskog vijeća koje je izabrao posjednik podataka ili neka treća stranka<sup>25-27</sup>. Konačno, podatci se mogu razmjenjivati preko javne mrežne stranice ili izravnom komunikacijom između posjednika podataka i istraživača. U većini je slučajeva ipak potreban kontrolirani pristup. Ostaje ključno pregledati svu priloženu dokumentaciju kako bi se istraživaču pomoglo da ispravno razumije originalno kliničko ispitivanje i primijenjenu metodologiju prije no što započne analizu podataka. Nadalje, posjednik podataka mogao bi zatražiti zakonski obvezujući ugovor o razmjeni podataka te bi trebao biti na raspolaganju da pruži potrebnu podršku ako se pojave neka pitanja<sup>27</sup>.

Treba pažljivo voditi brigu o sprječavanju opasnosti koje mogu ugroziti vrijednost razmjene podataka<sup>14</sup>. Podacima iz kliničkih ispitivanja treba se odgovorno koristiti<sup>28</sup>. Nedavna anketa koju je proveo britanski *UK Clinical Trial Units* razotkrila je neke moguće rizike vezane za razmjenu podataka<sup>29</sup>. Ti su se rizici u osnovi sastojali od a) zlorabe podataka, b) netočnih sekundarnih analiza, c) količine potrebnih sredstava i d) identifikacije pacijenata<sup>29,30</sup>. Istraživači su odgovorni za prikazivanje podataka u

tory statistical analyses<sup>18</sup>. Some journals, as JAMA, previously developed some related editorial initiatives including the request for independent statistical analyses by an academic statistician of industry-sponsored trials<sup>19</sup>.

The World Health Organization (WHO) and the Institute of Medicine (IOM) previously made important declarations on clinical trial transparency. In this regard, the IOM issued specific guidelines for trial data sharing<sup>20</sup>. WHO initially presented a statement on public disclosure of clinical trial results and, subsequently, encouraged sharing of research datasets whenever appropriate<sup>21-23</sup>. More recently, the WHO developed global norms for sharing data and results during public health emergencies, with special focus on clinical, epidemiologic, and genetic features of new infectious diseases and experimental therapeutics and vaccines. In emergency situations, data needs to be shared quickly before the information is formally published<sup>23</sup>.

Finally, the National Health, Lung and Blood Institute (NHLBI) presented detailed data-sharing practices allowing public access to trial raw data and developed a data repository currently including over half a million patients from over 100 trials and observational studies<sup>24</sup>. In 2015 the NHLBI discussed its intent to make public the digital data from its funded trials<sup>24</sup>.

## Platforms and Repositories

Up to 30,000 clinical trials are conducted annually worldwide generating a huge volume of patient-level raw data<sup>25</sup>. Currently, however, available portals for data sharing are still not adequate. Most of them require a time consuming request, including a detailed research proposal with the study design, main endpoints and a statistical plan<sup>25</sup>. The submitted proposal is then reviewed by an independent research panel that decides whether to approve the request for data<sup>21,25,26</sup>. Currently, this process takes too long and when eventually the data is obtained oftentimes it is not readily usable<sup>25</sup>. However, the means to facilitate data sharing from the data holder to the researcher may be cumbersome and challenging to implement. Some systems provide an electronic form or template<sup>21</sup>. Nevertheless, when these are not available a "de novo" proposal should be generated outlining the purpose, the statistical analysis plan, the research team, and potential conflicts of interest. The review process may come from an internal or external review panel selected by the data holder or by a third party<sup>25-27</sup>. Finally, data can be shared through a public website or by direct communication between the data holder and the researcher. In most cases, however, controlled access is required. Before any analysis is started reviewing all the accompanying documentation to assist the researcher in the understanding of the original clinical trial and the methodology used, remains critical. Furthermore, the data holder may require a legally binding data sharing agreement and should be available to provide the required support should questions arise<sup>27</sup>.

Major care should be taken to prevent the perils that may undermine the value of data sharing<sup>14</sup>. Data from trials should be responsibly used<sup>28</sup>. A recent survey from UK Clinical Trial Units disclosed some potential risks associated with data sharing<sup>29</sup>. These basically included a) misuse of data, b) incorrect secondary analyses, c) resource requirements and d) identification of

obliku koji je podložan vanjskoj sekundarnoj uporabi. Repozitoriji trebaju biti spremni neobrađene podatke učiniti dostupnima preko standardiziranih platformi na cjeloviti način. Razmjena podataka iz kliničkih ispitivanja s anonimiziranim podatcima na razini pacijenta i s vezanim metapodacima i pratećim informacijama također treba biti stavljena na raspolaganje drugim istraživačima nakon neovisne analize prijedloga istraživanja. Razvijanje i uvođenje standardnih pristupa zaštiti prava pacijenata također su hitno potrebni<sup>14</sup>. Konačno, treba organizirati prikladnu infrastrukturu koja će podržavati učinkovitu razmjenu podataka. U tom je smislu uloga industrije u znatnom porastu, što pokazuju neke zajedničke inicijative kao što je projekt „otvorenih podataka“ *Yale University Open Data (YODA)*<sup>16,31</sup>.

Neka udruženja akademskih istraživačkih organizacija koja su osobito usredotočena na proučavanje kardiovaskularnih bolesti<sup>32</sup> razvila su zanimljive alate za razmjenu podataka. U toj se kardiovaskularnoj inicijativi na mrežnom portalu prilaže standardizirani zahtjev. Prijedloge će analizirati znanstveni odbor, uključujući članove koje je odabralo udruženje, statističara te glavnog istraživača u kliničkom ispitivanju. Ideja je da se osigura primjerena uporaba baze podataka i ispravne statističke analize a da se pritom izbjegne problem da različiti istraživači višestruko prijavljuju istu analizu<sup>32</sup>.

## Statistička pitanja

Statističari imaju ključnu ulogu u razvijanju strategija za razmjenu podataka<sup>19</sup>. Oni trebaju biti uključeni od samog početka kako bi organizirali istraživačku strategiju i potrebne analitičke tehnike<sup>19</sup>. U ovakvom bi se scenariju statističari trebali odmaknuti od svoje klasične uloge „čuvara vrata“ i preuzeti ulogu „podupiratelja“ podataka<sup>19</sup>. U farmaceutskoj i biotehnoškoj industriji i akademskoj zajednici nedavno je stvorena radna skupina o razmjeni podataka koja se sastoji od statističara za medicinska istraživanja. Ideja je bila da se uhvati ukoštac s tehničkim i statističkim izazovima u pristupanju znanstvenim podatcima pri ponovnoj analizi. Potrebno je razviti specifične tehnike kako bi se osigurala primjerena manipulacija podataka kojom se podatci koji su prethodno prikupljeni i upisani u bazu podataka prerađuju u podatke koji su analitički iskoristivi. Pretvaranje neobrađenih podataka u standardizirane formate može biti izazovno. Potrebno je i biti upoznat sa statističkim programskim jezikom koji se primjenjuje. Neovisni bi statističari trebali imati važnu ulogu u vođenju principa ponovne analize zasnovane na zahtjevima istraživača, a istodobno i biti linija obrane od neprikladnih/pogrešnih zaključaka. Trebali bi biti potpuno svjesni da dodatne analize podataka mogu dovesti do različitih rezultata s obzirom na originalne analize. Stoga trebaju biti spremni suočiti se s kritikama, no i istodobno moći otvoreno kritizirati prethodno primjenjivane statističke metode<sup>19</sup>.

Statistički bi savjeti mogli biti potrebni i za primjerenu interpretaciju rezultata ponovnih analiza podataka u kojima su primijenjene različite metode. Osobito je važno držati na umu inherentni rizik od prekomjerne interpretacije rezultata na temelju mnogobrojnih analiza podgrupa<sup>33</sup>. Također su razvijeni i dokumenti koji propisuju najbolju praksu za anonimizaciju podataka<sup>34</sup>. Statističari bi trebali biti upoznati i s tom metodologijom. Rizik za privatnost pacijenata može se umanjiti tehnikama redukcije podataka. Posjednici podataka odgovorni su za stvaranje de-identificiranih podatkovnih nizova koji štite privatnost pacijenata kroz maskiranje ili generalizaciju glavnih identifikatora. Usto, zakonski obvezujući ugovori o razmje-

patients<sup>29,30</sup>. Researchers are responsible for presenting the data in a format amenable for external secondary use. Repositories should be prepared to make raw data available in standardized platforms in a fully comprehensive manner. Data sharing from trials with anonymized patient-level data with associated metadata and supporting information should be made available to other researchers following an independent analysis of the research proposals. Developing and adopting standard approaches to protecting patient privacy are urgently required<sup>14</sup>. Finally, an adequate infrastructure should be organized to support effective data sharing. In this regard, the role of the industry is significantly growing as demonstrated by some joint initiatives, such as the *Yale University Open Data (YODA)* project<sup>16,31</sup>.

Some academic research organization consortiums particularly focussed on the study of cardiovascular diseases<sup>32</sup>, have developed interesting tools for data sharing. This cardiovascular initiative requires presentation of a standardized request in a Web portal. Proposals are to be analyzed by a scientific committee, including members designated by the consortium and a statistician along with the trial's principal investigator. The idea is to ensure an adequate use of the data base and correct statistical analyses, while averting the problem of multiple investigators proposing the same analyses<sup>32</sup>.

## Statistical Issues

Statisticians play a key role in developing data sharing strategies<sup>19</sup>. They should be involved from the very beginning to organize the research strategy and the required analytical techniques<sup>19</sup>. In this scenario statisticians should move from their classical role as data “gate-keepers” to that of data “facilitators”<sup>19</sup>. A data sharing working group of medical research statisticians has been recently created from the pharmaceutical and biotechnological industry and from academia. The idea was to address the technical and statistical challenges of accessing research data for re-analyses. Specific techniques are required to ensure adequate data manipulation to convert the data initially collected and entered in the data base into data that is analytically usable. Converting raw data into standardized formats may be challenging. Moreover, familiarity with the required statistical programming language is necessary. Independent statisticians should play a major role in guiding the principles of re-analysis based on the researchers' request while, at the same time, guarding against misleading conclusions. They should be fully aware that additional analysis may yield different results compared with the original analyses. Accordingly, they should be prepared to face criticism but, at the same time, they should be able to openly challenge previous statistical methods<sup>19</sup>.

Statistical guidance may be required for appropriate interpretation of results from re-analyses where different methods have been utilized. In particular, it is important to keep in mind the inherent risk of over-interpretation of the results from multiple subgroup analyses<sup>33</sup>. Likewise, documents for best practices in data anonymization have been developed<sup>34</sup>. Statisticians should be also familiar with this methodology. Risk to patient privacy can be mitigated by data reduction techniques. Data holders are responsible for generating de-identified datasets to offer protection for patient privacy through masking or generalization of main identifiers. In addition, legally binding data sharing agreements should include a compromise not to attempt to identify patients<sup>34</sup>. In particular, it is recommended



ni podataka trebali bi uključivati i kompromis da se pacijente neće pokušati identificirati<sup>34</sup>. Osobito se preporučuje da ugovore o korištenju podacima potpisuju i vlasnik podataka i istraživači. Samo bi prikladno kvalificirani „imenovani“ istraživači trebali dobiti pristup podacima. Konačno, treba uvesti visoku razinu sigurnosti pri prijenosu podataka. Sredstva, troškovi i trud koji su potrebni da bi se podaci na razini pacijenata učinili dostupnima za druga istraživanja mogu biti znatni pa stoga treba organizirati i prikladna novčana sredstva<sup>34</sup>.

## Zasluge originalnih autora

Jedna od jasnih motivacija znanstvenicima da provode randomizirana klinička ispitivanja jest prilika da objave različite dodatne studije uz glavni rukopis s primarnim završnim točkama istraživanja. Takve, sekundarne analize mogu biti od velike vrijednosti pri izvlačenju novih otkrića iz originalnoga podatkovnog niza.<sup>35,36</sup> Mnogi su predložili da se vrijeme do otvaranja postupka razmjene podataka produži na 2 ili čak 5 godina za probane složene ili velike studije. To bi originalnim istraživačima pružilo dragocjeno vrijeme da dublje prouče i analiziraju svoje vlastite podatke. Budući da je „osljepljenje“ nužno tijekom provedbe kliničkog ispitivanja, kad je studija dovršena, istraživački se timovi usredotoče na što je moguće brže publiciranje primarnih rezultata. Nakon toga obično slijedi niz unaprijed planiranih dodatnih analiza. Takve studije organiziraju suradnički znanstveni timovi iz različitih institucija, no obično uz relativno slabu podršku. Sekundarne su analize također vrlo važne za suradničke istraživače i mlade znanstvenike. Da bi se poštovali ti legitimni interesi, predloženo je produženje razdoblja za pohranu sirovih podataka od 6 mjeseci nakon što su publicirani primarni podatci<sup>35,36</sup>.

Akadska zajednica priznanjima nagrađuje znanstvenike koji svoja otkrića učine javno dostupnima. Trebalo bi priznati zasluge originalnim istraživačima koji stvaraju podatkovne nizove koji su korisni drugim istraživačima<sup>14,15</sup>. U suprotnom bi originalni istraživači mogli biti u iskušenju one koje provode sekundarne analize njihovih podataka smatrati „znanstvenim gotovanima“. Nadalje, potrebni su mehanizmi koji će jamčiti da se sekundarne analize provode pravilno, a ne samo zato da bi obezvrijedila originalna otkrića. Izravna suradnja između primarnih i sekundarnih istraživača stoga je nužna kako bi se osigurala ispravna analiza i interpretacija podataka<sup>14,15</sup>. Originalni istraživači koji su ustrojili i proveli kliničko ispitivanje i pribavili izvore novčanih sredstava zaslužuju primjereno znanstveno priznanje<sup>28</sup>.

## Zaključci

Revolucija transparentnosti podataka neće prestati. Ovo je samo još jedan korak naprijed u kulturu „otvorene znanosti“ te je jasno da smo na pomolu novog doba<sup>37,38</sup>. Nekoliko je europskih nacionalnih društava već razvilo programe za registre u kojima su baze podataka u registrima javno dostupne za uporabu njihovim članovima<sup>39</sup>. Još uvijek treba prebroditi velike izazove i prepreke u prihvaćanju i provođenju novih preporuka ICMJE-a<sup>40</sup>. Iskustvo koje su stekli časopisi koji u tome predvode će s vremenom omogućiti uravnotežen kompromis između interesa originalnih istraživača i znanstvene zajednice kao cjeline. NSCJ bi trebali postupno prilagođivati svoju politiku da povećaju svijest o važnosti razmjene podataka i promoviraju standarde koji povećavaju transparentnost u biomedicinskim istraživanjima.

that data use agreements are signed by the data holder and researchers. Only appropriately qualified “named” researchers should be granted access to the data. Finally, high security levels should be implemented for data transferring. Resources, costs and effort required to make patient-level data available for third party research may be considerable and, therefore, adequate funding should be organized<sup>34</sup>.

## Credit to the Original Authors

A clear motivation for researchers to conduct randomized clinical trials is the opportunity to publish different studies in addition to the main manuscript with the primary endpoint. These secondary analyses may be of major value to unravel new findings from the original dataset<sup>35,36</sup>. Many have proposed that the time to open the process of data sharing should be extended to 2 years, or even to 5 years in selected complex or large studies. This will allow a precious time for original investigators to further scrutinize and analyze in depth their own data. As blinding is necessary during trial execution, once the study is completed the research teams concentrate on publishing the primary findings as soon as possible. Following this, usually there is a series of pre-planned additional analyses. These studies are organized by collaborative research teams from different institutions, but usually with relatively poor support. Secondary analyses are also very important for co-investigators and junior scientists. To respect this legitimate interest an extension from the 6 month-period after the primary data has been published has been advocated<sup>35,36</sup>.

Academia rewards scientists with recognition for making their discoveries public. Credit should be granted to the original researchers that create data sets that other investigators find useful<sup>14,15</sup>. Otherwise, original investigators may be tempted to consider “research parasites”, those performing secondary analyses of their data. Furthermore, mechanisms are required to ensure that the external analyses are conducted adequately and not merely to undermine the original findings. Direct collaboration between primary and secondary researchers is, therefore, necessary to ensure proper data analysis and interpretation<sup>14,15</sup>. The original investigators who designed and conducted the trial and obtained sources of funding deserve to receive the adequate scientific credit<sup>28</sup>.

## Conclusions

The data transparency revolution is here to stay. This is just another step ahead into a culture of “open science” and it is clear that we are at the dawn of a new age<sup>37,38</sup>. Several European National Societies have already developed registry programs in which the registries databases are public for the use of their members<sup>39</sup>. Major challenges and hurdles in the adoption and implementation of the new ICMJE recommendation should still be overcome<sup>40</sup>. Experience gained by leading journals will eventually allow a balanced compromise between the interests of the original researchers and that of the scientific community as a whole. NSCJ should progressively adapt their policies to increase awareness of the importance of data sharing and promote policies designed to enhance transparency in biomedical research.

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