

Eligible Organisations Policy

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Purpose

This policy establishes the eligibility criteria used to determine the suitability of external organisations with which researchers submitting applications to access the Our Future Health resource are affiliated. It ensures that organisations accessing the resource align with legal, ethical and organisational standards, protecting the integrity and reputation of the programme.

An affiliation is defined as any ongoing association between an individual and an organisation, including, but not limited to, employment, advisory roles, governance positions, consultancy or significant financial interests.

Introduction

This policy establishes clear guidelines for assessing the eligibility of external organisations for which researchers applying to access the Resource are affiliated. Ensuring compliance with this policy helps protect the reputation, integrity and values of the organisation.

Policy

Our Future Health data is available to a wide variety of researchers from organisations who seek to conduct health-related research to improve approaches to the prevention, earlier detection and treatment of disease. These include academic, charity, government and commercial organisations from all over the world.

Our Future Health does, however, need to ensure organisations that use the data provided by our participants align with the objectives and values of Our Future Health. In order to be approved to access the Our Future Health resource, researchers must be affiliated with organisations that meet the criteria outline below.

Key Criteria

1) The organisation is a recognised research organisation that conducts research related to human health

Our Future Health seeks high-quality, impactful research from organisations accessing its data. Eligible organisations should be legally registered, with a commensurate online footprint, and have a demonstrable record of research or innovation in human health. Evidence of this may include academic publications, provision or awarding of research grants as well as commercial outputs such as patents, regulatory submissions, product development achievements, clinical trial activity or other verifiable indicators of capability.

Applications may be submitted by newly established organisations that do not yet have a proven research track record. In such cases, the expertise and experience of the individual researchers within the organisation will be considered in line with the evidence requirements detailed above.

2) The organisation will utilise study findings for the benefit of public health

One of the core values of Our Future Health is to help people live longer, healthier lives. We require studies to have aims that could generate results that will benefit public health (in line with the definition of public benefit defined by the [National Data Guardian](#)).

In summary, public benefit can be assessed in two parts:

Who benefits: The study should be intended to benefit the public, or a defined group within the public, not just private or commercial interests. The size of the group can vary but the intention should be clear and genuine.

What the benefit is: The benefit should be tangible, meaningful, and proportionate to any risks. This could include improved health outcomes, better services, innovation or new knowledge.

3) Affiliation with the organisation will not bring Our Future Health into disrepute or stigmatise any of its participants

The affiliation will be assessed for alignment with our overarching objectives and organisational values with due consideration of how any application may impact public trust, and the reputation and success of the programme. If evidence exists that suggests affiliation with an organisation could bring Our Future Health into disrepute, or that the organisation is involved in work that would intentionally entrench or exacerbate health or societal inequalities, then the organisation will be refused access to Our Future Health data, samples or participants.

Our Future Health will not allow applications from organisations that have been involved in or propose to undertake:

- Illegal or unethical research. For example, research that is intentionally discriminatory or genetic research not aimed at the understanding, prevention or treatment of disease (including eugenics)
- Research conducted to endorse recreational use of substances detrimental to health: for example, tobacco
- Research that has, or is likely to, promote inequality or will disproportionately benefit the programme's participants e.g., unjustified exclusion of certain populations; or use that may disproportionately or unjustifiably harm participants or communities represented
- Malpractice, controversy or legal issues
- Any previous or ongoing information security or data protection breaches that present a material risk to the Our Future Health programme
 - Events of this nature will be reviewed on a case-by-case basis. When reviewing, Our Future Health will determine:
 - Relevance
 - Scope/scale
 - Action taken
 - Time since occurrence
 - Public perception
 - Organisations with possible issues of this nature will be reviewed by a multidisciplinary team consisting of representatives from the access, ethics, public involvement and communications teams

4) The organisation does not operate in countries/territories listed on the UK, EU or USA sanction lists or considered too high risk after review by Our Future Health

Our Future Health data is only available to access in specific [countries and territories](#).

There are certain countries and territories Our Future Health can and cannot grant access to. Countries and territories are categorised as:

Accepted: Researchers or organisations based in these countries and territories can request access to the data Our Future Health holds via the Access Process.

Under review: Our Future Health is currently reviewing this country or territory.

Requires review/not listed: A review has not yet been undertaken. Any countries not listed in the table require further review by Our Future Health to determine whether access can or cannot be granted. If the study requests access to NHS data, this review may include the requirement to submit an amendment to an NHS governing body. This amendment would require approval before access could be granted.

Not accepted: We are unable to issue access to the data Our Future Health holds. Countries/territories listed on the UK, EU and/or USA sanction lists and/or considered too high risk after review by the Our Future Health, cannot be granted access.

Multiple Affiliations

In cases where researchers hold affiliations with multiple organisations, a pragmatic approach will be taken. Affiliations will be reviewed, in line with this policy, individually and as distinct entities. This means that researchers with affiliations to both eligible and ineligible organisations may be approved as a registered researcher. Study applications from that researcher will then be assessed by the identity of the lead organisation for that study. The table below summarises this:

Affiliation	Review Outcome
Research has affiliations to only eligible organisations	Researcher application approved
Research has affiliations to only ineligible organisations	Researcher application rejected
Research has affiliations to both eligible and ineligible organisations	Researcher application approved, study application will be assessed based on eligibility of lead organisation

In instances where a researcher is affiliated with a legally or ethically problematic organisation or one that causes reputational risk, Our Future Health reserves the right to reject the application regardless of the eligibility of other affiliations.

Insurance Companies

Applications directly from or funded by insurance companies for access to Our Future Health data will not be approved. We do, however, acknowledge that in some circumstances, legitimate research organisations can be affiliated to companies which offer insurance plans. In these instances, applications may be eligible if the organisation in question is legally distinct from the insurance division of the company, has a track record of research for public benefit and agrees to sign the Resources Terms and Conditions that limits sharing of data within parent organisations.

Compliance and Monitoring

Additional information may arise concerning an organisation that could influence its ongoing eligibility to access the resource. Consequently, organisations should be subject to continuous review against the criteria outlined in the policy to confirm their continued

adherence to the eligibility criteria set out in this document.

The frequency of review will be dependent on the status of the organisation, defined as follows:

Status	Frequency of review
Organisations with studies active in the Trusted Research Environment (TRE)	Yearly
Organisations with no active studies in the Trusted Research Environment (TRE)	Upon submission of a study application (if > 6 months from organisation approval date)

Organisations may be subject to ad hoc review should any pertinent information arise that may impact their eligibility, either adversely or favourably. If such a review produces findings that cast doubt on an organisation's adherence with the criteria, access may be re-evaluated.

