



# Health Research Authority

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14 April 2026

Professor Julia Hippisley-Cox  
University of Oxford  
Nuffield Department of Primary Care Health Sciences  
Radcliffe Observatory Quarter  
Woodstock Road  
OX2 6GG

Dear Professor Hippisley-Cox,

**Application title:** QResearch Data Linkage Project  
**CAG reference:** 25/CAG/0147  
**IRAS project ID:** 329187  
**REC reference:** 23/EM/0166

Thank you for your amendment request to the above research application, submitted for support under Regulation 5 of the Health Service (Control of Patient Information) Regulations 2002 to process confidential patient information without consent. Supported applications enable the data controller to provide specified information to the applicant for the purposes of the relevant activity, without being in breach of the common law duty of confidentiality, although other relevant legislative provisions will still be applicable.

The role of the Confidentiality Advisory Group (CAG) is to review applications submitted under these Regulations and to provide advice to the Health Research Authority on whether an application should be supported, and if so, any relevant conditions.

## Health Research Authority decision

The Health Research Authority, having considered the advice from the Confidentiality Advisory Group as set out below, has determined the following:

1. The amendment, to clarify that full date of death will be released to researchers who use the QResearch database, (however any data extracts are accessed by external researchers within QMUL environment, and data is not disclosed outside of QMUL), is supported, subject to compliance with the standard conditions of support.

## Amendment request

The QResearch database from Queen Mary University London is a database of general practice derived data linked to secondary care data for use in medical research. The applicant has 's251' support to allow the disclosure of confidential patient information from Optum and TPP to the IM1 platform, where QMUL will pseudonymise the data at the point of extraction, with the exception of full date of death, which will be included in the database in full format. 's251' support is also in place for NHS England to disclose confidential patient information, including full date of death, to QMUL for inclusion in the

database. It was understood at initial CAG review, that full date of death would not be accessed by researchers who applied for data from the QResearch database, in full format.

This amendment is to seek 's251' support to clarify that full date of death will be released to researchers who use the QResearch database. Any data extracts are accessed by external researchers within QMUL and data is not disclosed outside of QMUL. This is not a change from the original requested design, it is a clarification of a misunderstanding.

### **Confidentiality Advice Team advice**

The amendment requested was considered by Chair's Action. The Alternate Vice Chair recommended support for the amendment.

### **Confidentiality Advice Team conclusion**

In line with the considerations above, the CAG agreed that the minimum criteria under the Regulations appeared to have been met for this amendment and therefore advised recommending support to the Health Research Authority.

### **Specific conditions of support**

1. Confirmation provided from the DSPT Team at NHS England to the CAG that the relevant [Data Security and Protection Toolkit \(DSPT\) submission\(s\)](#) has achieved the 'Standards Met' threshold. **Confirmed:**

The NHS England **24/25** DSPT review for **Optum (EMISWeb) ODS code: 8GW39, The Phoenix Partnership (Leeds) Ltd (TPP) (SystemOne) ODS code: YGM24 & QMUL – Queen Mary University of London – Qresearch – Centre For Primary Care And Public Health, London ODS code: 8HX8** were confirmed as 'Standards Met' on the NHS England DSPT Tracker

2. Confirmation of a favourable opinion from a Research Ethics Committee. **Confirmed as part of original REC FO**

### **Reviewed documents**

<i>Document</i>	<i>Version</i>	<i>Date</i>
CAG Amendment form		01 April 2026

Please do not hesitate to contact me if you have any queries following this letter. I would be grateful if you could quote the above reference number in all future correspondence.

Yours sincerely

Caroline Watchurst  
Confidentiality Advisor  
On behalf of the Health Research Authority

Email: [cag@hra.nhs.uk](mailto:cag@hra.nhs.uk)

Enclosures: Standard conditions of Support

cc. [derby.rec@hra.nhs.uk](mailto:derby.rec@hra.nhs.uk)

### **Standard conditions of support**

Support to process confidential patient information without consent, given by the Health Research Authority, is subject to the following standard conditions of support.

The applicant and those processing the information will ensure that:

1. The specified confidential patient information is only used for the purpose(s) set out in the application.
2. Confidentiality is preserved and there are no disclosures of information in aggregate or patient level form that may inferentially identify a person, nor will any attempt be made to identify individuals, households or organisations in the data.
3. Requirements of the Statistics and Registration Services Act 2007 are adhered to regarding publication when relevant, in addition to other national guidance.
4. All staff with access to confidential patient information have contractual obligations of confidentiality, enforceable through disciplinary procedures.
5. All staff with access to confidential patient information have received appropriate ongoing training to ensure they are aware of their responsibilities.
6. Activities remain consistent with the General Data Protection Regulation and Data Protection Act 2018.
7. Audit of data processing by a designated agent is facilitated and supported.
8. The wishes of patients who have withheld or withdrawn their consent are respected.
9. Any significant changes (for example, people, purpose, data flows, data items, security arrangements) must be supported via formal amendment prior to changes coming into effect.
10. An annual review report is submitted to the CAG every 12 months from the date of the final support letter, for the duration of the support.
11. Any breaches of confidentiality around the supported flows of information should be reported to CAG within 10 working days of the incident, along with remedial actions taken / to be taken. This does not remove the need to follow national/legal requirements for reporting relevant security breaches.