

CONSULTATION QUESTIONS

Are you responding *primarily* as a data custodian, data user or data subject? (We recognise all people are data subjects and many organisations act as data guardians and data users, but please tick only one box)

Data Custodian

Data User (e.g. researcher)

Data Subject (e.g. member of the public or group representing citizens)

1. Are there any benefits of data linkage for statistical and research purposes that are not sufficiently described here?

Yes, there are further benefits No, the benefits are described fully

If you ticked 'yes', please describe the further benefits of data linkage for statistical and research purposes.

The benefits are well described although there is some overlap. We think that the examples could be augmented with statements of how the cited solutions benefited the Scottish population. Also, have the authors considered how the benefits might be ranked in terms of their value to Scotland? This might help make the case for data linkage clearer.

2. Are there challenges or barriers preventing more effective and efficient data linkages for statistical and research purposes taking place that are not sufficiently described here?

Yes, there are further challenges No, the challenges have been identified

If you ticked 'yes', please describe the challenges or barriers.

Poorly understood data could be as much of a challenge as incomplete data.

By effective partnership working with private sector companies, there need not necessarily be a resource gap in the public sector, or at least this gap could be narrowed.

The technology now is mature enough to be an enabler rather than a barrier.

3. Are the guiding principles sufficient and appropriate? Please explain your answer fully and make suggestions for improvement.

Yes, they are sufficient and appropriate No, they are not

Please explain your answer fully and make suggestions for improvement.

Point 6 - where the Sponsor organisation is in the private sector, please provide more information about how the benefits from linking the data should be shared?

Point 16 - what scope is there for keeping data files for longer than required for the original project, for example if requested by a regulatory organisation outside Scotland?

Points 13 and 18 and elsewhere - what is meant by the term "Data Controller"? Does this refer to the role as specified in the Data Protection Act?

Point 20 - it would be useful if there were examples of when explicit consent is and is not required.

General points:

- (a) The term "transparent" is used throughout this section. What does this mean? Is it a synonym for "published"?
- (b) We would like to see reference to service levels enshrined as a principle. For example: "The services of the data providers, the National Linkage Centre and the Privacy Advisory Service should be published and be at a level that satisfies the reasonable requirements of the data users."
- (c) We would like to see a principle that ensures data users are treated equitably regardless of whether they are from private, public or charity sectors.

4a. Are the objectives set out for a Privacy Advisory Service in Section 3c the right ones?

Yes, the objectives are right

No, they are not

Please explain your answer fully and make suggestions for improvement.

Please make it clear who would be eligible to join the PAS?

4b. Do you wish to be consulted on firmer proposals for a Privacy Advisory service as and when they are developed?

Yes No

5a. Are the functions that will be led by the National Data Linkage Centre set out in section 3d the right ones?

Yes, they are the right functions

No, they are not

Please explain your answer fully and make suggestions for improvement.

These are the appropriate functions, but please indicate how these fit with local safe havens such as that in Greater Glasgow and Clyde?

5b. Do you wish to be consulted on firmer proposals for a National Data Linkage Centre as and when they are developed?

Yes No