

## 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. N/A

Comments: The Council welcomes the development of data linkage for statistical and research purposes, which will make better use of existing data, increase the availability of data sets, and provide consistent identification tools and access to longitudinal research opportunities.

### 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. N/A

Comments: The Council recognises the challenges identified, some of which we have experienced when undertaking data matching exercises relating to outcomes for looked after children, school leavers and deprivation, including issues in producing high quality data sets, difficulty in linking data sets due to a lack of consistent unique identifiers and limited resource availability in terms of relevant analytical expertise.

**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.

Comments: The draft set of guiding principles would appear comprehensive in respect information governance, including data use, access, security, storage, sharing and linkage practice.

**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.

Comments: The Council recognises the benefits of being able to access consistent and considered advice/support and expertise in respect of data linkages and associated ethical, legal social issues. In addition, a Privacy Advisory Service would provide opportunities to share good practice with other public and private sector organisations across Scotland.

**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.

Comments: It would be useful to receive further detail and clarification in respect of the functions that will be led by of the National Data Linkage Centre, which would allow a more informed response.

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

Yes ✓ No