

## 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.

Comments

Yes. When having done some data linkage between SWS & Health & Education previously, the process of getting approval to link the data was extremely cumbersome. **The national development of data linkage will help the process locally for linking data re. smaller areas than Scotland.** Data linkage will be widely accepted, expected and there will be a wealth of good practice and experience in this area that will filter down to a local level and will encourage & facilitate local data linkage.

Official statistics could also be enriched by using the longitudinal element in data sources for information on flows. E.g. for migration the CHI gives current and previous address. If these addresses are linked to housing tenure data, then it would be possible to obtain information on inter-tenure flows.

### 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.

Comments

1. The cost associated with improving data quality in preparation for data matching (perhaps that is part of challenge

2. Methods to link data are inevitably going to be less than perfect, resulting in mismatches or failures to match. What is the impact of this on the ability of these methods to give accurate counts? This is a particular concern, as it is suggested that this will generate Census type information, potentially replacing the Census. How accurate are the counts from these methods, as compared with counts from a conventional Census?

3. The Census gives information on demographic and labour market information. To obtain a link of population data with employment data could require the involvement of a large number of private sector organisations. This will give rise to difficulties to organise this, get agreement and then obtain a complete and consistent set of data.

**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

These are thorough and comprehensive. The difficulty will be in ensuring the principles are adhered to.

SWS service users are asked for consent to share their data however this consent would not apply to data linkage – there are upwards of 50,000 of these and it would clearly be impractical to get all previous/existing service users to update their consent, however point 23. addresses this.

Under Clinical Trials (34 to 36) there is a need to contact individuals. There is a slight concern this need may arise in other applications beyond health/clinical trials.

**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 would hope that this service could be used for local linkage projects.

**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

The Council would be interested to know what the role of these institutions (PAS and NDLC) in relation to data sharing by private sector organisations.

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

Yes  No