

Office of the Chief Statistician and Performance
4N-06 St Andrews House
Regent Road
Edinburgh
EH1 3DG

Sent by email to: datalinkageconsultation@scotland.gsi.gov.uk

13 June 2012

Dear Sir,

Data Linkage Framework for Statistics and Research

I write on behalf of The Market Research Society (MRS) in response to the consultation on the aims and guiding principles for a Scotland-wide data linkage framework for statistics and research. MRS welcomes the opportunity to respond to the consultation and we confirm that no part of this response is confidential.

About MRS

MRS is the world's largest association for people and organisations that provide or use market, social and opinion research, business intelligence and customer insight. MRS supports best practice by setting and enforcing industry standards via the MRS Code of Conduct and associated Regulations.

The MRS Code of Conduct is a self-regulatory Code for market social and opinion research which has been in existence since 1954. The MRS Code of Conduct is based on the principles of respondent confidentiality and informed consent for all processing of personal data. The MRS Code, which was last updated in 2010, contains a number of rules which mirror data protection requirements, and there are a number of rules which are more stringent than the Data Protection Act 1998. The Code applies to all MRS members and MRS Company Partners and is supported by robust disciplinary and compliance procedures. Full details on MRS and its activities are available at: <http://www.mrs.org.uk>

The consultation paper

MRS supports the detailed guiding principles set out in section 3 of the consultation paper. In particular we welcome the principles relating to consent (20-23), security (24-28) and Access and Personnel (29-33), which are mirrored by the principles and rules of the MRS Code of Conduct

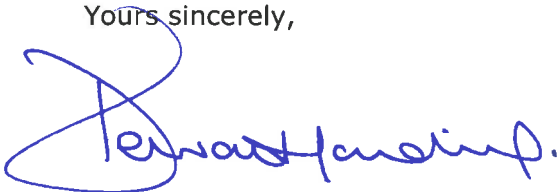
MRS members and Company Partners provide a significant level of research and statistical services to government departments, agencies and other public authorities across the UK. With this in mind, the Data Linkage Framework should

not be applied in a manner which would limit its application to Scottish Government Departments or agencies, or would exclude commercial organisations from participating in the data linkage programme. Rather, the emphasis should be on the use of appropriately regulated and accredited individuals and organisations, such as MRS members and Company Partners, to deliver services in line with the guiding principles.

As is noted on page 14 of the consultation paper, principles are not rules, and are a starting point in agreeing standards by which parties agreed to be bound. The MRS Code of Conduct is however a comprehensive set of rules covering the research process, from initial commissioning and design to the reporting of results. Individuals and companies which agree to be bound the MRS Code provide significant certainty to their clients regarding the ethical and quality standards they apply in their work. MRS therefore recommends that the MRS Code of Conduct be explicitly mentioned in Principle 4 as a relevant standard for the production and dissemination of statistics.

MRS is interested in developments on this topic and would appreciate being involved in any future consultations. Please do not hesitate to contact me if you have any queries regarding this response.

Yours sincerely,



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Chief Operating Officer

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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

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

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

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

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

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

Yes No