

## 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 The concept of data linkage is great. However, it is not clear from the benefits listed which geographies would be allowed when publishing results. Local authorities would need to be able to publish results at a small area geography for planning etc., as would any alternative to the Census.

### 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 Although lack of expertise is highlighted as being a barrier, staff availability will also be an issue for some. There is likely to be limited resources across local authorities in Scotland to carry out such analysis. Staff will require to be released from their other duties to dedicate time to such exercises.

**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 guiding principles need to make clear what a direct identifier could entail. If the ID includes the address/town. Removal of the direct identifier could have implications for mapping.

**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 Although the objectives for the Privacy Advisory Service includes assisting data custodians with privacy implications, the issue of persuading data custodians to actually release their data may be more difficult.

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

Yes  No  At the least informed.

**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 functions listed are general and appear reasonable at this stage.

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

Yes  No  At the least informed.