

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.

There is pressure on local authorities (and, presumably, other organisations) for increasingly intelligent targeting of resources; data linkage has the potential to facilitate this, but only if data is available at appropriate geographical scales.

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.

Are there cultural barriers to data sharing that should be considered / highlighted?

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.

The guiding principles appear to be both sufficient and appropriate. However, it would be helpful if the guiding principles were accompanied by additional explanation or clarification, for example relating to roles; description of who controls the ethics etc.

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.

The Privacy Advisory Service will be particularly useful if the service is available to all sectors and organisations, as appears to be suggested.

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.

It may be that the functions are appropriate. However, the emphasis appears to be on particular projects and at the national scale. It therefore seems probable that this would have limited relevance to anything carried out at local authority or CPP level, which is where our main interest would lie.

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

Yes No

Additional comments:

The work that has gone into this consultation document, and the proposed development of data linkage as an approach to enhancing statistics is to be welcomed.

Intentionally or otherwise, the consultation document comes across as being more applicable to users of Scotland-level statistics than at any of its smaller, constituent geographies.

While it is evident that inputs are expected from local authorities (even if these are continuations of well established data flows) it is less clear what level of information local authorities will get back.

Page 13 of the consultation document suggests that 'this framework will allow the statistical system in Scotland to be enhanced and in so doing, make advances on the evidence base... that will allow for more informed spending on public services and early interventions that save money in the long run'. Clearly these benefits will apply to Scotland; will they also apply at smaller geographies?

There is pressure on local authorities (and, presumably, other organisations) for increasingly intelligent targeting of resources; data linkage has the potential to enable this, but only if data is available at appropriate geographical scales.

Benefit 2 highlights the work that NRS are carrying out in its Beyond 2011 project. Any alternative to the census would need to be able to produce small area statistics to provide comparable data.