

## 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.

1. Data held by individual local authorities is of inconsistent quality and may need to be cleansed prior to linkage. There will be a cost associated with this which might prevent smaller authorities from being able to participate.

2. Should the new system become established, it is likely that participation would in time become mandatory and that local authorities would be required to raise data standards or collect more information than had previously been the case. Again, there would be a cost associated with this which could be a barrier to smaller authorities.

3. Some of Orkney's statistical output contains numbers which are too small to be published without risk of identifying individuals, and national tables therefore often contain gaps for Orkney's data, rendering them useless for our purposes. It is not clear whether this situation would be improved by data linkage, or whether the small numbers issue would still apply, reducing the benefit that Orkney would gain from participation in the scheme.

**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.

We are unclear why this consultation is not asking us whether we need to create a Privacy Advisory Service in the first place, rather than about its objectives. There are already data protection officers in every relevant organisation, the NHS has Caldicott Guardians and all organisations in Scotland have recourse to the Information Commissioner for Scotland. Rather than create a new body it would make more sense for the Information Commissioner's Office to take on this task.

**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.

As above, we question whether enough thought has been given to the need to create a new body when there may be existing organisations which could provide this service.

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

Yes  No