

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

1. Enable cost-effective data retrieval, analysis and comparison for local (community-level) decision support. At present, there is for example no aggregated census-type or other data available in Scotland at the Community Council district level. Communities cannot therefore compare themselves with others, understand themselves in the national context, or make sensible cases for or against specific matters in their locality. The cost of acquiring, maintaining and aggregating data at this level is prohibitive for individual communities, and even when performed 'ad hoc' cannot be compared / contrasted confidently with other communities. Data linkage as described could support these activities cost-effectively without compromising credibility.

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. inconsistency of data definition. The Framework makes no reference to the impact on the meaning of the results of data linkage of inconsistencies in data

definition, but clearly the use of one term with several meanings, or of different terms with the same meaning, across the constituents of a linked dataset can lead to results which can be seriously misconstrued.

2. Inconsistency of approach to association of time and place with other data. The most significant inconsistencies relate to differences in definition of 'period' (is year X a calendar year or a 'reporting' year) and 'location' (regional boundaries of each set of Scottish quangoes varies from all the others, e.g. SESplan and SEStran, even when their names are identical and their remit overlap). If these inconsistencies are not recognised and resolved, it is unlikely that linked datasets will ever be accurate to a meaningful extent.

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

1. If the intention is, in due course, to replace the 10-year census, is not the implication that what we understand today as 'census data' will eventually become a linked dataset? If this is true, then it would indicate that the blanket prohibition (see Q&A C3) of long-lived linked datasets is inappropriate, and that a more thoughtful approach needs to be taken to (a) the definition of "linked dataset" and (b) principles for determining the appropriate 'life' for a linked dataset

2. Principle 30: Surely data recipients in this context should normally have no access to anything other than fully anonymised data, and most usually to aggregated anonymised data? While the existence of the occasional exception is recognised, would it not be better to articulate a principle that the results of data linkage should be provided in a form which enables their disclosure to the public (i.e. removing any requirement for special qualification of the data recipient), and then identify the manner in which exceptions should be identified and managed (as in Principles 34-36)?

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.

It is difficult to understand from the information given why a new Advisory Service is required: should this not be a function of the Scottish Information Commissioner?

As a member of the public, I believe that if this is to be a NEW Advisory Service, then further public consultation is required to justify not only the additional expense but also the additional layer of bureaucracy and therefore source of potential conflict and delay such a Service could become to the delivery of the benefits set out in this consultation.

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

I do not take issue with the functions defined, but would seek to add a function: that of both proactively setting out definitions to encourage data consistency among potential data sources and of specifically addressing data consistency issues when linkages are proposed

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

Yes No