Consultation on proposed amendments to the National Health Service Central Register (Scotland) Regulations 2006
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Covering Note

CONSULTATION ON PROPOSED AMENDMENTS TO THE NATIONAL HEALTH SERVICE CENTRAL REGISTER (SCOTLAND) REGULATIONS 2006

Responding to this consultation paper
We are inviting written responses to this consultation paper by 25th February 2015. We would be grateful if you would use the consultation questionnaire provided (Annex C) It is requested that responses are provided electronically where possible. Please note late responses will not be considered.

If you are providing your response in hard copy and are using a separate piece of paper, we would appreciate if you could clearly indicate which questions you are responding to as this will aid the analysis of the responses received.

Please send the completed Consultation Questionnaire and Respondent Information Form (see "Handling your Response" below) to:

NHSCRConsultation@scotland.gsi.gov.uk

or

NHSCR Consultation
National Records of Scotland
1/2/9 Ladywell House
Ladywell Road
Edinburgh
EH12 7TF

If you have any queries contact Graham Bissell on 0131 314 4581.

This consultation, and all other Scottish Government consultation exercises, can be viewed online on the consultation web pages of the Scottish Government website at http://www.scotland.gov.uk/consultations.

The Scottish Government has an email alert system for consultations, http://register.scotland.gov.uk. This system allows stakeholder individuals and organisations to register and receive a weekly email containing details of all new consultations (including web links). It complements, but in no way replaces SG distribution lists, and is designed to allow stakeholders to keep up to date with all SG consultation activity, and therefore be alerted at the earliest opportunity to those of most interest. We would encourage you to register.

Handling your response
We need to know how you wish your response to be handled and, in particular, whether you are happy for your response to be made public. Please complete and return the Respondent Information Form (Annex D) which forms part of this consultation paper as this will ensure that we treat your response appropriately. If
you ask for your response not to be published we will regard it as confidential, and we will treat it accordingly.

All respondents should be aware that the Scottish Government are subject to the provisions of the Freedom of Information (Scotland) Act 2002 and would therefore have to consider any request made to it under the Act for information relating to responses made to this consultation exercise.

**Completing the Respondent Information Form(RIF)**

If completing the RIF electronically, please ensure that any box which requires to be ‘ticked’ is completed. This can be achieved by double-clicking on the box and selecting the Default Value as ‘Checked’.

In the Permissions section of the form, there is the option to respond as either an individual or an organisation. Please note whichever ‘route’ is selected – individual or group/organisation – only one column (questions (a) and (b) for individuals or question (c) for organisations) requires to be completed. Question (d) should be completed by all respondents whether replying as an individuals or on behalf of an organisation.

**Next steps in the process**

Where respondents have given permission for their response to be made public and after we have checked that they contain no potentially defamatory material, responses will be made available to the public in the Scottish Government Library (see the attached Respondent Information Form), these will be made available to the public in the Scottish Government Library by 13th March 2015. You can make arrangements to view responses by contacting the SG Library on 0131 244 4552. Responses can be copied and sent to you, but a charge may be made for this service.

**What happens next ?**

Following the closing date, all responses will be analysed and considered along with any other available evidence to help us reach a decision on amending the National Health Service Central Register (Scotland) Regulations 2006. We aim to issue a report on this consultation process by 8th April 2015 and make changes to the regulations by 9th June 2015.

**Comments and complaints**

If you have any comments about how this consultation exercise has been conducted, please send them to the contact details above.
Introduction

1. The Scottish Government and National Records of Scotland (“NRS”) are undertaking a joint consultation on the proposed amendments to the National Health Service Central Register (Scotland) Regulations 2006. The proposals are to enable certain data contained on the National Health Service Central Register (“the NHSCR”) to be shared with certain named bodies and for the NHSCR to hold additional postcode data.

2. In summary, the proposed amendments will:
   i. Improve the quality of the data held within the NHSCR
   ii. Assist the tracing of certain persons, for example, children who are missing within the education system and foreign individuals who received NHS treatment in Scotland and left the country with outstanding bills
   iii. Enable the approach to secure and easy access to online services (myaccount) to extend beyond services of Scottish local authorities and health boards to a wider range of public services
   iv. Enable the identification of Scottish tax payers to ensure the accurate allocation of tax receipts to Scotland associated with the Scottish Rate of Income Tax.

The proposed changes are explained in detail below and set out in amended draft Schedule 2 (Annex A) and new draft Schedule 3 (Annex B).

Further details on the consultation process can be found at Annex C.

Background

The Local Electoral Administration and Registration Services Scotland Act 2006

3. Section 57 of the Local Electoral Administration and Registration Services (Scotland) Act 2006 (the LEARS Act) provides the Registrar General with a wide power to make regulations prescribing what information should be included on the NHSCR (section 57(2)(f) and 57(3)(i)) and to whom the information should be provided (sections 57(4) and 57(6)). The purposes for which the information may be provided, are not limited to helping the efficient running of the NHS and local authorities in Scotland (section 57(5)). The National Health Service Central Register (Scotland) Regulations 2006 (“the principal Regulations”) is a product of these powers. The Regulations prescribe the information that can be held on the NHSCR and with whom the Registrar General for Scotland may share this information.

4. This document sets out proposals to amend the principal Regulations to include additional postcode data (or reference code indicating address) on the NHSCR and to specify additional bodies with whom the Registrar General may share information held on the NHSCR. Amendment to the principal Regulations would
be by way of subordinate legislation. The National Health Service Central Register (Scotland) (Amendment) Regulations 2014 (‘the proposed instrument’) would make amendments to the existing Schedule 2 of the principal Regulations and introduce a new Schedule 3. The proposed instrument would not make any amendments to the LEARS Act.

The National Health Service Central Register

5. The NHSCR is an electronic database held and maintained by NRS. It holds the basic demographic details of everyone who is born, who has died or is (or has been) on the list of a General Medical Practitioner in Scotland¹. The NHSCR’s primary purpose is to permit the efficient movement of the medical records of Scottish patients who move in, out or between Scottish Health Boards and the rest of the UK. It does not hold medical records. The manner in which this efficient movement is supported is set out at paragraph 7 below.

6. The NHSCR is considered to be the most complete and authoritative record of individuals in Scotland. Access to the information held in the NHSCR is strictly controlled, making it a trusted and reliable source of information. There is a need to ensure that the information held in the NHSCR is of the highest quality. At present, the sharing of data within the NHSCR is limited, to Scottish local authorities and health boards. Data sharing processes are in place to ensure this is undertaken in line with data protection requirements.

7. The way data is held in the NHSCR ensures the accurate identification of individuals. Each individual in the NHSCR is given a unique citizen reference number (UCRN). The UCRN is an anonymous number created by NRS for each individual on behalf of whom information is contained in the NHSCR. The number contains no personal or identifiable information. The attachment of the UCRN to a person’s data ensures that only a single record is held for each person. Where any information from the NHSCR is shared it ensures that there can be no mistake as to whom the information relates to. Use of the UCRN is undertaken in line with the Scottish Government Identity Management and Privacy Principles².

Digital Public Services

8. Scotland’s Digital Future: Delivery of Public Services³ sets out the Scottish Government’s vision for Scotland which uses digital technologies to design and deliver public services which meet the needs of users. For those who choose to access public services online we will provide services which are easily accessible, this is explained further in paragraph 14. Alternative means will continue to be available for those who do not wish to use online services and we will provide assistance to those who need it.

¹ Further information on the NHSCR can be found at http://www.nrscotland.gov.uk/statistics-and-data/nhs-central-register/about-the-register
² http://www.scotland.gov.uk/Privacyprinciples
³ http://www.scotland.gov.uk/Publications/2012/09/6272
Proposed Amendments

Data Quality

9. The NHSCR is considered to be the most complete and authoritative record of individuals in Scotland. There is therefore a need to ensure that the information within the record is of the highest quality. At present the NHSCR holds address information for approximately 30% of the population. This information is added to the NHSCR when individuals consent to their local authority sharing this information with NRS. More comprehensive address information would assist NRS in the development of population statistics, including census, household estimates and population estimates, as well as helping to improve the quality of academic research supported by NRS, both of which contribute to informing the development of public policy and planning delivery of public services.

10. NRS has access to postcode information provided by health boards (known as the CHI (Community Health Index) Postcode but it is not currently permitted to hold this information in the NHSCR. It is proposed to add this information to the NHSCR to improve the accuracy of the address information held, and to ensure it is up to date. Individuals will typically notify their local health board of changes of address, this would allow these changes to be updated in the NHSCR.

11. It is also proposed to allow the address postcode and unique property reference number (UPRN) already held in the NHSCR to be shared with local authorities and health boards. This would provide equivalent information for matching and checking, allowing service deliverers to hold more accurate information and to improve delivery of services to individuals.

Tracing of Persons

12. There is already provision in legislation to support the tracing of persons by enabling charities involved in the tracing of missing persons or solicitors wishing to trace legatees to notify NRS of the names and dates of birth of people who they wish to trace. NRS can then check the NHSCR and if the individual appears on the NHSCR the local health board is informed and will contact the individual to ask if they wish to share their address with the charity or solicitor. The NHSCR could also be used to help locate children who go missing whilst in education. In Scotland Local authorities have responsibility for education and can make use of the NHSCR for this purpose. To further support this it is proposed to allow the UK Department for Education and local education authorities in England and Wales to be able to ask NRS to check the NHSCR for those missing individuals. In addition to providing name and date of birth it is also proposed to allow charities and solicitors involved in the tracing of missing persons to be able provide a postcode as an alternative piece of information to support in the finding of the individual on the NHSCR.

13. Where the NHS in Scotland provides treatment to non-Scottish residents it is entitled to recover the cost of the treatment. This is currently not possible when the individual leaves Scotland. To enable this to happen it is proposed that NRS
should be able to share data on the individual with the UK Visas and Immigration department, to enable them to locate and bill the individual.

Sign-In to online public services

14. The Scottish Government has set out its policy and mechanism (named myaccount) for secure and easy sign-in by citizens accessing online public services. myaccount provides a consistent means for citizens to access online public services and undertake transactions. The policy can be read in full here. A Privacy Impact Assessment of this approach was carried out. myaccount is already in use in parts of local government and the health service but current regulations do not permit the necessary sharing of data between NRS and other providers of public services.

15. The myaccount operator (the Improvement Service) must be able to verify an individual’s identity before issuing credentials (a username and password) which allow an individual to be authenticated when they make use of online services. Basic personal data are provided by the individual when they register for a myaccount and verified against the NHSCR, at which point the Unique Citizen Reference Number (UCRN) is attached to that personal data. This avoids the creation of duplicate myaccounts. Individuals can see the data held in their myaccount. Where an individual is authenticated by using their credentials, myaccount confirms identity to the service provider by giving the service provider the UCRN, or sufficient information to allow the service provider to know the individual is the person in their own records. This approach is set out in more detail here.

16. To ensure that all Scottish organisations delivering devolved public services can offer use of myaccount it is proposed to amend the legislation to include the bodies identified in annex B draft Schedule 3. The bodies listed in draft Schedule 3 would have the ability, where they hold information on an individual, to have access to the UCRN and to be provided with data from the NHSCR. This would mean that individuals will be able to use myaccount to sign in to services provided by the bodies listed in draft Schedule 3.

Sharing of data from the NHSCR

17. In each of the proposed amendments outlined above the minimum amount of data would be shared for the specific purposes outlined. The organisation will provide information on the individual they wish to identify and will receive equivalent information from the NHSCR and the principal reference number which is the UCRN. Where an organisation wishes to take advantage of this legislation it will also require to have in place data sharing agreements to ensure that appropriate processes are put in place and followed and that the data is used for the specific purpose identified. This will ensure that we continue to protect

4 http://www.scotland.gov.uk/Topics/Economy/digital/digitalservices/Sign-intoOnlineServices
5 http://www.scotland.gov.uk/Topics/Economy/digital/digitalservices/Sign-intoOnlineServices/myaccountPolicyPIA
6 http://www.scotland.gov.uk/Topics/Economy/digital/digitalservices/Sign-intoOnlineServices
and control the use of the information within the NHSCR. Sharing of information from the NHSCR will continue to be at the discretion of the Registrar General.

Identifying Scottish residents

18. The Scottish Rate of Income Tax (SRIT) will come into effect from April 2016. The Scottish Parliament will set the rate of tax and Her Majesty’s Revenue and Customs (HMRC) will collect the tax on behalf of the Scottish Parliament. HMRC will also be responsible for identifying Scottish taxpayers correctly. By identifying Scottish taxpayers correctly, SRIT can be levied accurately and the Scottish budget will receive the full allocation of tax receipts due to it. To help this process the Scottish Government is seeking the ability to share data with HMRC to ensure that the process for identifying Scottish taxpayers is robust, and thereby aid HMRC in collecting the correct share of the tax revenue, which will be used to fund public services in Scotland. Previously there has been no need to identify Scottish tax payers separately to UK tax payers, so there is currently no mechanism in place to do so. NHSCR is the most accurate register of individuals in Scotland. It is therefore proposed that NRS should have the ability to provide certain information - name, date of birth, postcode and gender - from the NHSCR to HMRC for the purpose of identifying that the individual resides within Scotland. Making use of the NHSCR for this purpose would mean there is no need to establish a separate register for the purpose of identifying Scottish tax payers. This data will be shared with HMRC solely for the purposes of identifying Scottish taxpayers and a data sharing agreement will be drawn up to this effect.
## SCHEDULE 2

Information which may be provided from the register and persons to whom it may be provided

<table>
<thead>
<tr>
<th>Column (1) — information which may be provided by the Registrar General under section 57(6)of the Act</th>
<th>Column (2) — persons, or descriptions of persons, to whom the Registrar General may, under section 57(4) and (6)of the Act, provide the relative information</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Any entry information.</td>
<td>The Common Services Agency; a Health Board; a Special Health Board. [Healthcare Improvement Scotland; ]</td>
</tr>
<tr>
<td>2. Any entry information, except postcode and reference code indicating address.</td>
<td>Any— (a) “English NHS body”, “Welsh NHS body” or “cross-border SHA” within the meaning of Part 2 of the Health and Social Care (Community Health and Standards) Act 2003; (b) Health and Social Services Board established under article 16 of the Health and Personal Social Services (Northern Ireland) Order 1972.</td>
</tr>
<tr>
<td>3. Any entry information, except postcode and reference code indicating address.</td>
<td>The [Statistics Board, the] [Health and Social Care Information Centre established under section 252 of the Health and Social Care Act 2012] and the Northern Ireland Central Services Agency for the Health and Social Services.</td>
</tr>
<tr>
<td>4. Any entry information.</td>
<td>A researcher conducting a medical research project.</td>
</tr>
<tr>
<td>5. For an individual in relation to whom information has been provided by the local authority— (a) the principal reference number on the register which relates uniquely to the individual as the Registrar General has determined under section 57(3)(h) of the Act; (b) the unique patient number determined by the Common Services Agency; and (c) any other entry information, except postcode and reference code indicating address, which is equivalent to the information that has been provided by the local authority but does not match that information.</td>
<td>The local authority which has provided the information referred to in column 1.</td>
</tr>
</tbody>
</table>
6. Postcode and reference code indicating address.

Such reference numbers on the register as the Registrar General has determined under section 57(3)(h) of the Act which relate uniquely to—

(a) those who serve or have served in the naval, military or air forces of the Crown; or
(b) dependents of those individuals.

7. Any entry information requested in relation to the prevention or detection of serious crime (within the meaning of section 93(4)(a) or (b) of the Police Act 1997), to the apprehension or prosecution of those suspected of having committed such crime or to national security, except the entry information described in entries 4 and 5 in Schedule 1.

7. Any entry information requested in relation to the prevention or detection of serious crime (within the meaning of section 93(4)(a) or (b) of the Police Act 1997), to the apprehension or prosecution of those suspected of having committed such crime or to national security, except the entry information described in entries 4 and 5 in Schedule 1.

8. The fact that an individual’s information is contained on the register, or the fact and date of death or a postcode and reference code indicating address.

Any—

(a) practising solicitor; or
(b) body which may refer to itself as a “charity” in Scotland.

9. For an individual in relation to whom information has been provided by a body or person specified in Schedule 3—

(a) the principal reference number on the register which relates uniquely to the individual as the Registrar General has determined under section 57(3)(h) of the Act;
(b) any other entry information which is equivalent to the information that has been provided by a body or person specified in Schedule 3 but does not match that information.

UK Visas and Immigration
Department for Education
A body or person specified in Schedule 3

10. Forename, middle name, surname, date of birth, gender and postcode and reference code indicating address.

Her Majesty’s Revenue and Customs
Annex B: Schedule 3 – Proposed new schedule

SCHEDULE 3
(introduced by entry 9 in column 2 of Schedule 2)

SCOTTISH PUBLIC AUTHORITIES

PART 1
MINISTERS, THE PARLIAMENT

2. The Scottish Ministers.

PART 2
NON MINISTERIAL OFFICE HOLDERS IN THE SCOTTISH ADMINISTRATION

4. The Office of the Scottish Charity Regulator.
5. The Scottish Court Service.
6. The National Records of Scotland.
7. The Registers of Scotland.
8. The Scottish Housing Regulator.
9. The Queens Printer for Scotland.
11. Her Majesty’s Chief Inspector for Prisons in Scotland.
12. The Drinking Water Quality Regulator for Scotland.
13. The Food Standards Agency in or as regards Scotland.
14. The Forestry Commission in or as regards Scotland.
15. Revenue Scotland.
16. The Scottish Housing Regulator.

PART 3
LOCAL GOVERNMENT

PART 4
THE NATIONAL HEALTH SERVICE

18. A person providing primary medical services under a general medical services contract (within the meaning of the National Health Service (Scotland) Act 1978) or general dental services, general ophthalmic services or pharmaceutical services under Part II of that Act, but only in respect of information relating to the provision of those services.

19. A person providing primary medical services or personal dental services under arrangements made under section 17C of the National Health Service (Scotland) Act 1978, but only in respect of information relating to the provision of those services.

PART 5
EDUCATIONAL INSTITUTIONS


PART 6
POLICE


22. A joint police board constituted by an amalgamation scheme made or approved under the Police (Scotland) Act 1967 (c.77).

23. The Scottish Police Services Authority, but only in respect of information relating to the provision of the police support services within the meaning of section 3(2) of the Police, Public Order and Criminal Justice (Scotland) Act 2006.


PART 7
PUBLIC CORPORATIONS

25. Caledonian Maritime Assets Ltd. (registered number SC001854).

26. David MacBrayne Ltd. (registered number SC015304).

27. Glasgow Prestwick Airport. (registered number SC135362).

28. Highlands and Islands Airports Ltd. (registered number SC097647).

29. Scottish Futures Trust Ltd (registered number SC348382).


31. Scottish Water (registered number SC207004).
PART 8
TRIBUNALS

32. Additional Support Needs Tribunals for Scotland.
33. Lands Tribunal for Scotland.
34. Mental Health Tribunal for Scotland.
35. Parole Board for Scotland.
36. Private Rented Housing Panel.
37. Scottish Charity Appeals Panel.

PART 9
OTHERS

38. The Board of Trustees of the Royal Botanic Garden, Edinburgh.
40. Scottish Local Authorities Remuneration Committee.
41. Scottish Public Services Ombudsman.
42. National Library of Scotland.
43. VisitScotland.
44. Water Industry Commission for Scotland.
45. The Standards Commission for Scotland.
46. The Scottish Social Services Council.
47. Children’s Hearings Scotland.
49. Scottish Road Works Commissioner.
50. The Scottish Qualifications Authority.
51. Scottish Natural Heritage.
52. The Scottish Legal Complaints Commission.
53. The Scottish Legal Aid Board.
54. The Scottish Law Commission.
55. The Scottish Fire and Rescue Service.
56. The Scottish Environment Protection Agency.
57. Scottish Enterprise.
60. The Scottish Children’s Reporter Administration.
61. The Scottish Agricultural Wages Board.
62. The Royal Commission on the Ancient and Historical Monuments of Scotland.
63. The Risk Management Authority.
64. The Parole Board for Scotland.
65. A National Park authority, established by virtue of schedule 1 to the National Parks (Scotland) Act 2000 (asp 10).
66. Mobility and Access Committee Scotland.
68. The Local Government Boundary Commission for Scotland.
69. Justices of the Peace Advisory Committees.
70. The Judicial Appointments Board for Scotland.
71. Highlands and Islands Enterprise.
72. Her Majesty’s Chief Inspector of Prosecution in Scotland.
73. The Crofters Commission.
74. Creative Scotland.
75. A “registered social landlord” registered with the Scottish Housing Regulator in terms of the Housing (Scotland) Act 2001.
76. A “local authority landlord” as defined in section 11(3) of the Housing (Scotland) Act 2001.
77. The Commissioner for Children and Young People in Scotland.
78. Commissioner for Ethical Standards in Public Life in Scotland.
79. The Board of Trustees for the National Museums of Scotland.
80. The Board of Trustees for the National Galleries of Scotland.
81. Audit Scotland.
82. The Accounts Commission for Scotland.
83. Architecture and Design Scotland.
84. Cairngorms National Park Authority.
85. The Care Inspectorate.
86. Loch Lomond and The Trossachs National Park Authority.
87. The Scottish Environment Protection Agency.
88. The Scottish Further and Higher Education Funding Council.
89. Sport Scotland.
90. Court of the Lord Lyon.
91. James Hutton Institute.
92. Moredun Research Institute.
93. Scottish Canals.
94. Visiting committees (appointed under section 19(3) of the Prisons (Scotland) Act 1989 (c.45) or constituted by rules made under section 39 (as read with section 8(1)) of that Act).
95. Edinburgh Leisure (registered charity number SC027450).
96. Young Scot (registered charity number SC029757)
97. Glasgow City Council Access LLP (registered company number SC283700).
98. SEEMiS LLP (registered company number SO302336)
Annex C: The Scottish Government Consultation Process

Consultation is an essential and important aspect of Scottish Government working methods. Given the wide-ranging areas of work of the Scottish Government, there are many varied types of consultation. However, in general, Scottish Government consultation exercises aim to provide opportunities for all those who wish to express their opinions on a proposed area of work to do so in ways which will inform and enhance that work.

The Scottish Government encourages consultation that is thorough, effective and appropriate to the issue under consideration and the nature of the target audience. Consultation exercises take account of a wide range of factors, and no two exercises are likely to be the same.

Typically Scottish Government consultations involve a written paper inviting answers to specific questions or more general views about the material presented. Written papers are distributed to organisations and individuals with an interest in the issue, and they are also placed on the Scottish Government web site enabling a wider audience to access the paper and submit their responses. Consultation exercises may also involve seeking views in a number of different ways, such as through public meetings, focus groups or questionnaire exercises. Copies of all the written responses received to a consultation exercise (except those where the individual or organisation requested confidentiality) are placed in the Scottish Government library at Saughton House, Edinburgh (K Spur, Saughton House, Broomhouse Drive, Edinburgh, EH11 3XD, telephone 0131 244 4565).

All Scottish Government consultation papers and related publications (eg, analysis of response reports) can be accessed at: Scottish Government consultations (http://www.scotland.gov.uk/consultations)

The views and suggestions detailed in consultation responses are analysed and used as part of the decision making process, along with a range of other available information and evidence. Depending on the nature of the consultation exercise the responses received may:

- indicate the need for policy development or review
- inform the development of a particular policy
- help decisions to be made between alternative policy proposals
- be used to finalise legislation before it is implemented

Final decisions on the issues under consideration will also take account of a range of other factors, including other available information and research evidence.

While details of particular circumstances described in a response to a consultation exercise may usefully inform the policy process, consultation exercises cannot address individual concerns and comments, which should be directed to the relevant public body.

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7 http://www.scotland.gov.uk/consultations
Annex D: Respondent Information Form

Consultation on proposed amendments to the National Health Service Central Register (Scotland) Regulations 2006

RESPONDENT INFORMATION FORM

Please Note this form must be returned with your response to ensure that we handle your response appropriately

1. Name/Organisation

Organisation Name

Title  Mr  Ms  Mrs  Miss  Dr  Please tick as appropriate

Surname

Forename

2. Postal Address

Postcode  Phone  Email

3. Permissions - I am responding as…

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate  Yes  No

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

(c) The name and address of your organisation will be made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your response to be made available?
Please tick ONE of the following boxes

- Yes, make my response, name and address all available
- Yes, make my response available, but not my name and address
- Yes, make my response and name available, but not my address

Please tick as appropriate

☐ Yes  ☐ No

(d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate

☐ Yes  ☐ No
Annex E: Consultation Questions

The consultation sets out a number of proposed amendments. Views are invited on the following:

1) Where data relating to a citizen is held it should be accurate. Do you agree that the approach suggested at paragraphs 9-11 is an effective approach to achieving this?

Yes ☐ No ☐

If No, please describe the approach you feel should be taken.

Comments

2) We propose to extend the current ability to trace persons a) who go missing whilst in education and b) who should pay for treatment provided by the NHS. Do you agree with these proposal set out in paragraphs 12-13?

Yes ☐ No ☐

If No please explain why not?

Comments

3) In order to allow citizens to make use myaccount for a wider group of services (beyond health and local government), as set out in paragraphs 14-16, we propose to provide access to the bodies named in draft Schedule 3 (Annex B). Are there any additional service providers who you feel should be included?

Comments

4) Do you consider that the proposals set out in paragraph 18 are an effective method to identify Scottish Tax payers?

Yes ☐ No ☐

If No please describe the approach you feel should be taken.

Comments
Annex F: Equality Statement

The Scottish Government is committed to considering equality in policy if you consider there to be any potential equality issues in relation to the proposed amendments to the National Health Service Central Register (Scotland) Regulations 2006 please make known your views by responding to the consultation.