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 [x]

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

   The approach is predicated upon a state identity register of all citizens being desirable. The NHSCR and UCRN provide this. NRS and GRoS before it has been seduced by the potential of such a register for many years. I hate the fact I have a UCRN. I wanted a bus pass, not a patronisingly labelled ‘myaccount’ and mandatory sign-up to the sharing of my personal data without my permission. Separate organisations should hold separate registers for their separate purposes. Under the guise of efficiency the state would obtain, under these proposals, control of personal identity and the potential for risk due to access and misuse by third parties. This is achieved through compulsion since for most people the state is effectively a monopoly supplier of various services. Unlike a commercial transaction, where I can choose between alternative suppliers, I cannot realistically choose a different NHS supplier or a different library service.

   The NHSCR can achieve its primary purpose without holding address information. It has done so very successfully for decades. Adding address data converts it into a non-voluntary population register. Instead of adding address data, the 30% of records for which it is currently held should have it removed.

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 proposals set out in paragraphs 12-13?
   
   Yes [x] No [ ]

   If No please explain why not?

   But only insofar as it relates to non-address data currently held on the NHSCR

3) In order to allow citizens to make use of 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?

   What a disgracefully biased question. Most of those listed should be excluded. Has anyone actually thought this out or has a convenient list of many (all?) public bodies just been used without thought as to the desirability or appropriateness of providing these bodies with access to personal data compulsorily obtained from citizens because they want to use public monopoly services? The Queen’s Printer, the Forestry Commission, CalMac, Prestwick Airport, VisitScotland, National Parks, Trustees of the National Gallery - really? This appears to legitimise involuntary data sharing across the entire public sector.
4) Do you consider that the proposals set out in paragraph 18 are an effective method to identify Scottish Taxpayers?
Yes ☐ No ☒

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

Effectiveness is not the only, or even the primary, consideration. There should be a separate register of Scottish taxpayers, compiled and maintained by HMRC. Data security is enhanced by separation and weakened by sharing. Yes, it is less efficient and more troublesome for administrators. But democracy is less efficient and more administratively troublesome than authoritarianism and we do not (yet) propose to replace democracy to improve efficiency.