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?

   It is worrying that the UCRN may now be passed out to such a large number of bodies even if the intention is that it is only used at “high level”. Firstly, this requires each of the bodies to comply with what may turn out to be barely enforceable data sharing agreements stating that the UCRN won't be used “lower down”. Secondly, it is unnecessary – each organisation can be issued with their version of a unique identifier which the myaccount system alone relates back to a UCRN and potentially to identifiers “issued” to other bodies. So a body can be told that person X is the same as person Y within their own body's records, but couldn't consult with another body independently of myaccount to confirm that person X/Y is the same as person Z in the other body's systems. The ability to achieve this outside of the controlled myaccount environment where it can be more properly regulated does increase the likelihood of misuse and mistrust.

   It is unclear why e.g. Edinburgh Leisure would require access but say Sport Aberdeen or Active Stirling would not. For operations such as these where over time similar bodies may be set up in other locations, or services transferred to another body, would it not make more sense for, e.g., the local authority, to be the named body in the Schedule with oversight of the requirements for the organisations from whom it has commissioned services?

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.

The proposals are presumably only part of the approach; it does seem to be an indication that it is suspected that certain individuals may choose to mis-represent their residence for tax purposes, but it’s unclear how these individuals can be identified without doubt on the basis of the information being exchanged. Presumably there would be extensive use of third party datasets as well.