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.

The proposals are that access to the information in the NHSCR to be extended from Scottish local authorities and health boards to over 100, at times seemingly randomly selected, additional organisations, who will be able to request access to entries on the NHSCR.

I strenuously object to theses proposals

- The NHS will be used to collect basic details which can then be disclosed, using powers that are not fully scrutinised, to any public body.

- It is not clear how local authorities currently obtain consent to share information with the NRS or when people are asked for consent, and is it equally unclear as to how consent to ingather and share data will be obtained in relation to the expanded database people, whether people will be able to withhold consent and what would happen if they did- for instance, would they be denied access to services/benefits?

- Why do organisations such as Edinburgh Leisure, Calmac, national museums, galleries and libraries, and puzzlingly, Quality Meat Scotland, the Forestry Commission and Scottish Canals need access to people’s personal information. Extending access to the NHSRC Database to other organisations and agencies only extends the risk of information security breaches, inappropriate access, and information being shared inappropriately and criminally outside these bodies.

- There are no details of, nor discussion around, how individuals’ personal information will be kept safe and confidential when such a wide, diverse and quite frankly, bizarre, range of bodies will have access to this information and will be able to share and possibly sell it on. The issue of the bodies having access to the Register, then disclosing that information to bodies who do not have access to the Register, is not even considered. People will have no idea who has accessed what, what has been shared, who with and whose hands their personal information ends up in.

- What is a “minimum amount of data” and who decides?
- Organisations can ask for information- what will it be limited to? What is excluded?
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 □  No X If No please explain why not?

The “missing from education” pathway could be used by perpetrators of domestic abuse to find women and children by triggering a search by a local authority or abusers could themselves, or via other people, access this information.

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?
Absolutely not and I do not support the proposal to give any of these bodies access, never mind any additional service providers. Also, there is considerable scope for outside third parties to abuse this system if they access another person’s password.

4) Do you consider that the proposals set out in paragraph 18 are an effective method to identify Scottish Tax payers?
Yes ☐ No X

If No please describe the approach you feel should be taken.
I do not accept for one minute that the HMRC will use this date solely to identify Scottish tax payers for the purpose of collecting the SRIT. It will allow HMRC to pry into people’s affairs. Those who are not registered as a tax payer will be hounded.