I oppose these plans.

Fundamental to safely managing private information is that the access and sharing of information is minimised.

This proposal shares information with a wide range of organisations and the potential for misuse and further invasions of privacy is appalling.

There is no clear or realistic plan for how these organisations will manage their information securely or track abuse.

There is a vague statement that each organisation (in the face of funding cuts) will independently develop plans and policy to secure information but the strict requirements and expectations are not explicit nor is there any discussion of penalties for organisations and individuals that fail to comply.

These plans must be considered properly and transparently by the Scottish Parliament and there must be adequate time for the public to respond; especially giving the far reaching impact of these changes.

ID databases are a threat to civil liberty and must not be introduced by stealth. These are a dangerous temptation and lead to misuse of personal information.

These changes must be consented by the public.

Why does Scotland require a central identity register when this is not required by the approach espoused by the cabinet office in London?

Where is the Privacy Impact Assessment for the NHSCR?

Yours sincerely,
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.

High quality data creates a honey pot attractive to hackers and fraudsters; given the number of organisations with access then abuse and misuse of this information would be inevitable. I for one would not be happy with my information being held in this register and would actively seek to deregister.

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?

No evidence has been provided that suggests the current powers to do this would necessarily be enhanced by the proposal. The only way that this proposal would enable better tracing of people would be by forcibly coercing people to use the register in as many interactions as possible; thereby creating a defacto national identity register.

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?

None – far too many already. The more organisations, the less secure and safe my personal data becomes.

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.

Unnecessary and disproportionate. Scotland already records where people live through their council tax records. What justification is there for further intrusion?