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.

I am concerned that the cross-checking of data that is suggested in para. 11 violates privacy considerations for individuals. The accessibility of data to a wide range of individuals brings with it concerns about ‘leaky’ data. For example in the case of domestic violence and the use of ‘safe houses’ - such individuals will often make use of medical services in their new location for themselves and/or for their children, and sharing and cross-checking such data will make them more vulnerable to an abusive individual who may be able to trace them, especially given the large number of bodies in the public and semi-private sector who are to be given access to such data. I am not reassured that such wide-ranging sharing and cross-checking of data will be safe.

Rather than creating a national identity database (which is what this is: a proposal for a system that will give every citizen a unique reference number linked to a central database that will be linked to a card scheme that will share information across Government and control access to public services IS a national identity database) on the basis of consultation such as this, the government should engage in a fuller public debate that allows the fundamental issue of the change in the relationship between the people and the state to be properly addressed. Therefore, the approach that should be taken is a wholesale rejection of this process in favour of a more democratic debate at Holyrood of the fundamental issues, rather than a discussion about the nuance of the four measures mentioned here, that PRESUME the national identity database will happen.

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?

I think these are two separate issues, and should be dealt with separately.

Para. 12 – although I oppose the creation of a national identity database (see above), I can see that in the event of objections to this scheme being ignored, it could be used in the way suggested in this paragraph.

Para. 13 – there is no need for a national identity database of this nature to be used for this purpose. It is instructive to examine other countries’ practices in this regard who do not have a national database, and yet successfully maintain medical funds.

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?
No, and the framing of this question is problematic in itself – I oppose many of these institutions having access to the data, and certainly do not wish to add more. I can see no plausible reason to give any of the bodies in Parts 7 and 9 access to the national identity database, for example.

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.

   HMRC already has residency data for Scottish tax payers, since all tax payers currently pay tax centrally to HMRC. The task of filtering tax payer addresses by location (even just by postcode) is a task that HMRC is perfectly capable of doing without a Scottish national database being created and integrated with HMRC, and I vehemently oppose such an exchange of data. Medical records should not be misused for tax purposes.