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.

   If people perceive the confidentiality of their data may be at risk it could impact on the trust they place in health services and therefore their engagement with the services. We do not feel the approach as laid out in paragraphs 9-11 is appropriate.

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?

   Regarding the tracing of children: We believe that there is already legislation to ensure all children are registered at birth. Children not placed in the education system should lead to an appropriate response by the Local Authority and there are already powers to ensure this happens. Health Visitors should not be expected to take on this role without resource as they are under pressure at the moment to provide all the health services necessary for under-5s.

   Regarding charging for NHS treatment: Any patient who requires to pay for treatment should be charged at the time of incurring any charge. Once the patient has gone out of the country it would be almost impossible to retrieve the money even if the person can be located.

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?

   We are concerned that this is an attempt to unify a whole range of databases, some of which are often incomplete and poorly-functioning. We cannot see how this would be effective.

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 College believes it is inappropriate for tax authorities to access health information. Health data
should remain private and confidential. There are risks that this would impact on people’s engagement with health services and would be damaging to the doctor/patient relationship. We also have concerns about the home addresses of professionals being accessible. Doctors are all bound by Caldicott principles and we believe the proposed use of health data would clearly be contravening those principles.