

Contribution from Max Richens

Hello,

I believe that the Digital Democracy Scrutiny should not be restricted to Parliament but also the the agencies of government.

My concern is to do with the Government cavalier behaviour with regards the patient records in the NHS and the mooted sharing of HMRC records with third parties.

These were given by patients/taxpayers but on the basis that these were confidential even though in certain instances it was mandatory to provide the information.

It is understood that there is benefit in Health records being shared within the NHS or Tax details with Employers (and possibly where Money Laundry / Fraud are concerned). However outside of these paths any sensitive information that ties individuals to data should not be released. Any data for analysis should be correctly anonymised.

This may in certain circumstances be an expensive or time consuming process but should not be missed out just because the data guardian" wants to make a quick profit
As a result any distribution of this information should only be made after confirmation from the data subject that the body has their permission to do so NOT that the data subject has to forbid said use.

As an aside to this - I believe that the description on HMRC Data Protection Register are in fact broader than that which should be allowed

i.e.

Personal information is also processed in order to undertake research. For this reason the information processed may include name, contact details, family details, lifestyle and social circumstances, financial details, goods and services. The sensitive types of information may include physical or mental health details, racial or ethnic origin and religious or other beliefs. This information is about survey respondents. Where necessary or required this information may be shared with customers and clients, agents, service providers, survey and research organisations.

As with the issues when the Water Utilities were privatised - the companies tried to assume consent for distribution of records for third parties rather than the default for the public utilities - that the data was implicitly private. This was a view supported by the then Data Protection Office who warned the newly privatised utilities that their activity was in breach.

April 2014