

2.2. Prohibition of Data Linkage

In order to understand the constraints under which the HCSO can operate and in particular to use administrative data sources it is worth mentioning further articles and paras from the Data Protection Act:

Article 8 para 1: Data shall not be transferred and files shall not be connected unless consented to by data subject or provided for by law. The conditions for data processing shall meet in each case with regard to each personal data.

Article 8 para 2: Connection of files processed by the same controller, as well as those of state organization and self-government shall likewise be governed as in para 1.

As the HCSO belongs to the state organizations it has to comply with para 1, what could make its functioning impossible. In order for the HCSO to surmount the difficulty some "concessions" are coded in the Statistics Act:

Section 19 subsection 2: In case of surveys ... covering a period of over one year, the data-stock shall be given an inner identification code on basis of which the identity of the person concerned cannot be established. The personal identification data of the person shall be managed separately from the data stock.

Section 19 subsection 3: For the time of adding new data to the data-stock and of carrying out a sampling process in order to collect statistical data for the same purpose the personal identification data may be temporarily linked with the data-stock. The rules of data linkage shall be established taking into consideration the standpoint of the Commissioner (Ombudsman) of Data Protection, and be submitted to the National Statistical Council to request the latter's opinion about it.

2.3. Link between the Census Questionnaire and the HCSO Business Register

Referring to the possibility to use an 'inner' code above, the census questionnaire contained a 5-digit box for identifying businesses with over 19 employees and budget institutions (some 30 thousand totally). By using a preprinted manual this code was given by the coder in the coding phase of the questionnaires. In the case of former censuses the manual (with manageable number of pages) covered almost the whole business population, however this possibility ceased to exist because of the proliferation of businesses in the transition period. In certain countries this link can be established in the OCR phase with on-line link to the business register on the basis of names and addresses written by capital block letters.

Any way it was a faltering step and test towards a potential future census when questionnaire and administrative data would be combined. The results of the approach will be analyzed in 4.1.