



# THE ASSOCIATION OF ELECTORAL ADMINISTRATORS

## **Formal response to the consultation paper on the proposed changes to the edited register**

### **Introduction**

This is a formal response from the Association of Electoral Administrators (AEA) to the above consultation paper issued on 24<sup>th</sup> November 2009.

The AEA's response is restricted largely to its interest in, and concerns about, the use of the electoral register and the impact this has on the wider issues of participation in elections and general democratic engagement. Since 2002, the edited register which contains the details of any elector who has not opted out of this version of the register has been available for general sale.

It is the AEA's policy that the electoral register in any form should only be used for electoral purposes except for purposes relating to national security. The fact that information from the register is used for other purposes and shared with other organisations and individuals acts as a dis-benefit and disincentive to persons wishing to register as an elector. This leads to lack of accuracy and completeness in the register and interferes with the democratic process. This is particularly true in cases where the information is provided to private sector organisations and to individuals, but the same argument can be advanced in terms of data sharing with the public sector.

There are undoubtedly disincentives to register. Citizens who do not register cite various reasons for not so doing ranging from not wanting to receive junk mail to personal security or identity fraud fears. There is little doubt that, if the register is used for non-electoral related purposes which are likely to affect an individual's position, financial or otherwise, many people choose deliberately not to register, e.g. poll tax, council tax single person status, benefits checking exercises etc.

It is stated that several million citizens are not registered who are entitled to be are not. If that is the case, those interested in the democratic process should be very concerned at this franchise deficit. The use of the electoral register for non-electoral purposes and the ease with which it can be obtained has encouraged this state of affairs. If we are to move to a position where those not registered are encouraged so to be and then to participate in elections, it is critical that electoral data is used solely for the purpose of elections so that public confidence in the overall process can be restored.

Finally, the questions posed in this consultation paper need to be seen in the overall context of the likely effect of changing from a system of household registration to individual registration. Anything that jeopardises the smooth and effective transition from one system to another needs to be removed. The use of electoral registration data for other than election purposes is one of those obstacles. The opportunity presented by the recommendation of the Data Sharing Review and this consultation paper should be taken with the eventual effect of the abolition of the edited register.

### **Questions 1-3**

- 1. Were you aware that an edited version of the full electoral register existed?**
- 2. Were you aware of your ability to 'opt out' of inclusion on the Edited Register?**
- 3. Do you have any concerns about how your electoral registration data is used and why?**

The AEA's members are involved in the creation and maintenance of the electoral register and other records relating to registration and elections. All registers and related records are stored as data on i.t. systems. The organisation is therefore well aware of all the issues relating to the edited register. The AEA's policy on the use of the register is stated above. This is based on the fact that the electoral register is compiled for the purposes of conducting elections and the AEA's view is that no secondary use should be made of the register if such use or purpose debars or dissuades citizens from registering or voting. To do otherwise strikes at the heart of the democratic process.

### **Question 4**

***Does the existence of the Edited Register deter you from registering to vote?***

The Association believes that the availability of the edited register for general sale is likely to have an adverse effect on some citizens registering to vote.

### **Question 5**

***Is your preference for abolishing or retaining the Edited Register? Please give reasons for your answer.***

The edited register should be abolished because:

- a) it is a possible reason for citizens not registering to vote;
- b) the use of the data contained in the edited register has no linkage to the primary purpose of the conduct of elections;
- c) of the reasons put forward in the report of the Data Sharing Review in relation to recommendation 19;
- d) of the risks which arise from members of the public not being aware of how their personal data provided for electoral purposes will be used. This often leads to difficulties in persuading citizens to register in the first place and/or to renew registrations if they feel that their personal data is being misused.

## Question 6

***Which options are your most and least preferred? Please give reasons.***

Most preferred – option 1 for the reasons set out in this response.

Least preferred – option 6 as it fails to deal with the fundamental problem of using electoral data for non-electoral purposes.

## Question 7

***Do you have any comments and/or suggestions about how any of the options would work in practice, particularly taking into account the issues and questions raised in this consultation paper?***

As stated in the introduction above, the AEA holds the view that information obtained for a specific purpose should only be used for that purpose where the overall effect of not so doing could be to deny a citizen their democratic right. On that basis, option 1 is the option that should be pursued and, if it is, other secondary questions do not arise.

## Questions 8 and 9

***8. Do you consider that the abolition of the Edited Register would affect you, your organisation, or those you represent positively or negatively?***  
***9. If the Edited Register were abolished, how might you, your organisation, or those you represent adapt to the change?***

The abolition of the edited register would not adversely affect the AEA or its members in any way. It would have the positive effect of freeing up time and resources which could be used to directly benefit the work of electoral administration.

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