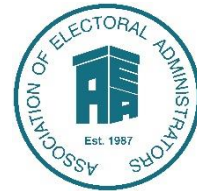


The Association of Electoral Administrators



Response to the ICO consultation on the draft framework code of practice for the use of personal data in political campaigning

Organisation:

Association of Electoral Administrators (AEA).

Summary of Organisation:

The Association of Electoral Administrators (AEA) was founded in 1987 and is the professional body representing the interests of electoral administrators in the United Kingdom. It is a non-governmental and non-partisan body and has just under 2,000 members, the majority of whom are employed by local authorities to provide electoral registration and election services. There are eleven regional branches of the Association covering the United Kingdom.

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Questions

Having reviewed the consultation questions the majority are not relevant to the AEA, as a result outlined below are our responses to questions 3 and 4.

Q3 Does the draft framework code contain the right level of detail?

No

Q4 If no, in what areas should there be more detail within the draft framework code?

Whilst the draft framework code outlines use of the electoral register and makes reference to Electoral Commission guidance (under '*Further reading – for more information on your obligations under electoral law visit the Electoral Commission's [website](#)*'), it does not make specific reference to the Electoral Commission guidance.

Guidance is available for candidates and agents for all types of polls and we would recommend that the ICO includes more detailed reference to the Electoral Commission guidance. As well as other useful information, the Electoral Commission guidance outlines usage restrictions in more detail, including the disposal of the electoral register. We believe this addition and reference to the Electoral Commission guidance would make the ICO draft framework code more robust.

By way of example, an extract from [Electoral Commission guidance](#) is provided below:

1.10 The electoral register and lists of absent voters contain people's personal data and so their use is very carefully controlled.

The Association of Electoral Administrators



1.11 You can use them to:

- *complete your nomination form*
- *help you campaign*
- *check that donations are permissible*

1.12 You must not release to any person any details that appear only in the electoral register and not on the open register which is available for general sale. You must not use the electoral register and lists of absent voters for any other purpose not listed above.

1.13 If you have supplied a copy of the electoral register or lists of absent voters to campaign workers, they must also comply with the requirements above.

1.14 You must ensure that you keep the electoral register secure and list of absent voters secure. Once you no longer need the register and lists of absent voters for any electoral purpose, you should securely destroy any copies supplied to you as a candidate in accordance with the Information Commissioner's guidelines.

Angela Holden
Policy Manager on behalf of the AEA

2 October 2019