

## Privacy Policy – Electoral Registration

This privacy notice explains how the Electoral Officer and Returning Officer (the ‘Controller’) will use any personal information we collect about you when you use our services.

It has been written to give you a clear explanation of our data processing practices to safeguard you and your personal information

### What information do we collect about you?

#### Electors and Potential Electors

- Name, Address, DOB, and contact details, proof of EU Citizenship
- Previous or redirected addresses
- Signatures for absent vote checking
- Names and nationality of other occupants of your home
- Age (If you are over 76 or under 18 years of age)
- Nationality, National Insurance Number
- Bank Details (if you are receiving payment for election duties)
- Photo (recent) – electronic (online) or hard copy
- Cookie / behavioural tracking data
- Birth, marriage, civil partnership or adoption certificate (if you cannot provide a NINO) {Only if required for Voter Authority Certification Application Evidence – VAC}
- Bail decision record (if you cannot provide a NINO) (if you cannot provide a NINO) {Only if required for Voter Authority Certification Application Evidence – VAC}
- Mortgage or pension statement, utility bill , Council Tax statement or demand, (if you cannot provide a NINO) {Only if required for Voter Authority Certification Application Evidence – VAC}
- Current or previous employee P45 or P60 (if you cannot provide a NINO) {Only if required for Voter Authority Certification Application Evidence – VAC}
- Benefits or entitlement statements (if you cannot provide a NINO) {Only if required for Voter Authority Certification Application Evidence – VAC}

Additionally, to verify your identity, the data you provide will be processed by the Individual Electoral Registration Digital Service managed by the Cabinet Office. As part of this process your data will be shared with the Department of Work and Pensions and the Cabinet Office suppliers that are data processors for the Individual Electoral Registration Digital Service. You can find more information about this here: <https://www.register-to-vote.service.gov.uk/register-to-vote/privacy>

#### Candidates and Potential Candidates (and their agents) at Elections

- Name, Address, DOB, and contact details. (Local Councillors have their details published, unless requested otherwise)
- Previous or redirected addresses
- Membership of a Political Party
- Declarations of results
- Register of Interests
- Bank Details (if you are receiving payment for election duties)
- Acceptance of Office forms

#### Staff employed at elections or for the canvass

- Name, Address, DOB, and contact details-
- Tax Code
- Bank Details
- Eligibility to work in the U.K

## **Suppliers of any service for which payment is required**

We collect the following information so that we may make arrangements for supply of goods or services in relation to the administration of elections. I.e. the owner or caretaker of a building used as a polling station or count venue. The suppliers of mobile polling stations etc.

- Name, Address and contact details
- Bank Details (for payment)

## **How will we use the information about you?**

The information that the Council will collect varies depending on how you use the Council's Services. We are using the information provided in this case because we have a Legal obligation Article 6(1)(e); "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;" in this case; under the Elections Act 2022, Local Government Act 1972, Local Government Act 2000, Representation of the Peoples Act 1983, Representation of the Peoples Regulations 2001, Electoral Administration Act 2006, Electoral Registration and Administration Act 2013, Localism Act 2011 and the Immigration Act 2016. The Council also has a lawful basis under GDPR Article 6 (1) (a) "Data subject has given consent to processing".

We are collecting personal information so that we can;

- Maintain the Electoral Register. The Electoral Register is a public document which can be viewed by appointment only under strict control.
- To administer canvassing, elections and referenda
- Employ casual staff to assist in the administration of electoral registration and elections / referenda
- Processing Voter Authority Certificate (VAC) applications
- Processing Online Absent Vote applications
- Overseas and EU Elector processing

## **Special Categories of Data**

If you are providing us with special category personal information (such as details about your health), we will be processing this under Article. 9(2) and Article 10.

- Membership of a Political Party
- Health Data pertaining to why a photo cannot be provided (VAC only)
- Disability Data (VAC Only)
- Religious Affiliation (VAC Only)

Processing of Special Category Data is carried out specifically under the following;

Article 6(1) (c) – processing is necessary for compliance with a legal obligation to which the controller is subject

Article 9(2) (a) – the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject;

Article 9(2) (d) - processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects;

Article 9(2)(g) - processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject;

Article 10 - Processing of personal data relating to criminal convictions and offences, bail decision notices

### **Sharing / Recipients**

Below is a list of who we may share the information (recipients) for the purposes of carrying out the functions (listed above);

- The electoral register is a public register and can be inspected by the public
- The edited version of the electoral register can be sold to third parties
- Internal (Anti-Fraud) or external law enforcement agencies (prevention and detection of crime)
- Internal Departments (Housing , Finance for RTB, Environmental Health (Track & Trace) all others for FOI, DPA and EIR)
- Internal Departments (Council Tax, Parking, Housing and Payroll) – Annual Canvass Data Matching.
- Other local authorities
- Electoral Commission
- Boundary Commission for England
- Jury Summoning Bureau
- IER (Managed by the Cabinet Office)
- Department of Levelling Up Housing and Communities (DLUHC) (Owners of Voter Authority Certificate, Online Absent Vote, Overseas and EU Electors.)
- Elected Members and MP's (as your representative)
- Political Parties
- Office of National Statistics
- Candidates standing for elections
- Parish and Community Councils
- Credit Reference Agencies
- National Fraud Initiative
- Electoral Registration and Returning Officers
- When employed to work at an election your information may be shared with anyone you are directly working with e.g. Presiding Officers
- Contracted electoral management software providers (maintenance of registration and election databases)
- Contracted printers (printing of poll cards, postal voting packs and other election material)

### **How long will we keep this information?**

We will destroy this personal information in accordance with our [Retention Policy](#). To determine how long we should keep information, we consider what the legislation states and what is good practice. This means we will securely destroy the information once we no longer need it. If you would like to know the specific period of time that relates to your personal information, please contact [foi@dacorum.gov.uk](mailto:foi@dacorum.gov.uk)

### **Security and Location of Data**

We will ensure that all personal information is kept securely on servers hosted in the United Kingdom.

Access to all our user information is restricted. Only employees who need the information to perform a specific job are granted access to personally identifiable information.

The servers on which we store personally identifiable information are kept in a secure environment that is continually monitored and tested.

### **Accuracy of Personal Data (Article 5(1) (d))**

“Personal data must be accurate and, where necessary kept up to date; every reasonable step must be taken to ensure that Personal Data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.”

You have a right to request information about you be corrected. Please contact the Electoral Registration Department on [er@dacorum.gov.uk](mailto:er@dacorum.gov.uk), who will validate the information and update the information in our systems accordingly.

### **Individuals' Rights**

You have a right to request a copy of the personal information that we hold about you. If you would like a copy of some or all of your information, please contact [foi@dacorum.gov.uk](mailto:foi@dacorum.gov.uk) in the first instance or visit <http://www.dacorum.gov.uk/home/open-data/personal-information>

You may have a right to request erasure of Special Category information (where the lawful basis is consent (information has been freely provided by you in support of an application), and the council do not have a legal obligation to process this information. The Council will consult with the relevant agency; i.e. Police, Health Organisations, Trusts, County Council, Safeguarding Teams, to validate your request prior to consideration of the request to remove.

You have a right to request erasure, rectification or restriction where you have provided the Council information under on the lawful basis of consent (Article 6(1) (a)). You may also withdraw your consent to the Council processing the information you have provided to us under this lawful basis. Please contact [foi@dacorum.gov.uk](mailto:foi@dacorum.gov.uk) in the first instance.

### **Minimisation of Data (VAC)**

The digital application, Portal and VAC printing functionalities have been developed with capture and processing of the mandatory data elements required to provide a Voter Authority Certificate and be able to communicate with the elector via email / phone and post as required. No additional data is captured for any other purpose

Only PI data required to validate the elector will be reviewed from any 'criminal' artefacts like the bail decision record

### **Accuracy (VAC)**

DWP will match the data provided by DLUHC against information held in the DWP live system.

The data held by DWP is live and updated via several sources, primarily data from HMRC and the DWP maintains that this is typically accurate. If a service user believes there is an inaccuracy in the data held by DWP for the purposes of this match this must only be addressed through the DWP NINo advice line.

If a match is not found DLUHC have a mitigation in place for services users to provide alternative documentary evidence to the relevant ERO in order to satisfy the confirmation of their identity for the purposes of using this service. The Date of Death data held by DWP is received from a number of sources. As this is the case, the record will hold a verification level against it to indicate its accuracy, from not verified to fully verified. This verification level is based on supported evidence and the level, not the evidence, will be visible. DLUHC will be able to assess the level upon receipt of the data set via the API match.

Once the data has passed checks required to approve the application it will be saved but will not be kept up to date.

### **Security**

Digital applications will be collected and held securely in an encrypted SQL database called IER DS until such time it is pulled down into the 'ERO Portal'

The 'ERO Portal' is hosted on AWS and requires user credentials with 2 factor authentication to be accessed. Authority staff will need to sign an Access Use Policy before they are given access to the Portal to review the data that belongs to them.

The environment on which the Portal is hosted has undergone an external IT security health check to validate it is secure to required standards.

The print data is transferred in encrypted manner over SFTP to the central print supplier (HH Global) and they hold it securely for producing the VAC. The Print supplier also runs an annual ITHC and abides by a Security Management Plan.

### **Security (DHLUC)**

All Systems and Suppliers involved in EIP/EUVCR programmes have been subject to the DLUHC Cyber Security Assurance Framework. This includes the Voter Authority Certificate Service, OAVA and OE websites, the ERO Portal and EUVCR Website (AWS hosted), Softcat, Softwire, HH Global (VAC only), Integrity and A1.

The DLUHC Cyber Security Assurance processes include various tools and techniques ranging from Threat Modelling, Supplier Questionnaires, System Defence in Depth reviews for control review and Information Technology Health Checks (ITHC). The specific tools and techniques for each system and supplier are tailored depending on the risk profile, however all aligned with industry best practice, NCSC Guidance and HMG publications such as Government Functional Standard GovS 007: Security.

For further clarity, DLUHC Cyber Security have confirmed that all suppliers have been reviewed in relation to their governance structures and frameworks to determine their suitability to design and develop DLUHC systems and/or store, process and manage DLUHC data. Further to this, the control reviews in relation to the citizen facing application services, middle tier and ERO Portal include a defence in depth methodology across the Data, Application, Infrastructure and Network tiers. Control categories across these tiers include a full holistic approach to assessment, including but not limited to: encryption of data at rest, encryption of data in transit, backups, patching and vulnerability management, secure configuration, authentication and authorisation, secure administration architecture, anti-malware, separation of networks and environments, secure boundary services and logging and monitoring.

### **Automated Decision Making (VAC)**

There will be human intervention in assessment of applications for Voter Authority Certificates

#### **Notification of changes**

From time to time, it will be necessary to update this Privacy Policy. This is in order to ensure our users are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

If at any point, we decide to use personally identifiable information in a manner different from that stated at the time it was collected, we will notify users. Users will have a choice as to whether or not we use their information in this different manner. We will use information in accordance with the privacy policy in force at the time the information was collected.

### **Cookies**

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to make your use of the internet better. For further information on how we use these and how you can control it, please visit <http://www.dacorum.gov.uk/home/cookies-policy>

### **Our Data Protection Policy**

We have a General Data Protection Regulation (GDPR) Policy in place and this can be found [here](#):

### **Data Protection Officer**

Our Data Protection Officer for the purposes of Articles 37 to 39 of the General Data Protection Regulation is the Information Security Manager (Legal Governance). You can contact them by emailing [foi@dacorum.gov.uk](mailto:foi@dacorum.gov.uk) or calling 01442 228538.

**Policy Version**

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