

REFORM OF THE ANNUAL ELECTORAL REGISTRATION CANVASS

Data Protection Impact Assessment (DPIA)

1. Introduction

The purpose of this document is to report on and assess against any potential data protection impacts as a result of the implementation of reforms to the annual electoral registration canvass process.

Document metadata

2. Reform of the annual electoral registration canvass process

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- 2.2 Date of report: January 2020
- 2.3 Name of Information Asset Owner (IAO) of relevant business unit: Penny Curtis
- 2.4 Date for review of DPIA: January 2021

Review date	Details of update	Completion date	Approval Date

3. Description of the project

3.1 Description of the work:

The current legislative framework requires Electoral Registration Officers (EROs) to follow a set of prescribed processes to complete the **annual electoral household canvass process**. This process is the same regardless of the characteristics of their area (high/low churn, urban/rural, young/student/elderly population). It is a largely paper-based process and does not encourage the adoption of more innovative and cost effective approaches.

The Government's aim when considering reform of the canvass process was to ensure that any new process proposed allows the ERO, using their local knowledge, to exercise greater discretion to direct resources more appropriate to their local circumstances and challenges. A series of pilots were conducted by Cabinet Office in 2016 and 2017 where different methods of conducting the canvass process were conducted. Responsibility for electoral registration in relation to devolved elections was transferred to Scottish Ministers on 18 May 2017, so any work prior to this date was the responsibility of the UK Government.

A number of pilots were run in 2016 and 2017 to test more cost effective ways of conducting the annual canvass process. As a result of these pilot projects, the Canvass Reform Project is revising the annual canvass to incorporate a **data step** at the beginning of the process to help EROs identify households that have matched against local and national data, and can therefore be subject to a light touch canvass, and those that have not matched and need a more thorough canvass to be conducted at their property.

Essentially EROs will send data (see section 3.12) to DWP for matching to see if DWP (and other agencies feeding in to that dataset, such as Her Majesty's Revenue and Customs tax and National Insurance data) have a current record of the individual still being at that address. Only DWP will have access to the data provided by EROs. If there is a strong match, that will indicate that the likelihood is that the electoral registration position will not have changed, i.e. the person(s) registered at that property at the previous annual canvass is still resident there, and EROs can direct resources to other addresses where change is more likely to have occurred. According to pilots delivered in 2017, the vast majority of households (53% to 83% in the pilot areas) do not change composition each year.

The DWP data share is necessary for the national data matching step where personal identifiers held by the ERO for individuals on their register will be matched against the Customer Information System (CIS) database (similar to what was done for Confirmation Live Run for Individual Electoral Registration (IER) in 2014).

The data will be used to inform the ERO whether an individual's data has been matched against the data that DWP holds for them. We know from pilots in 2012 that DWP data is 95% accurate where it matches against the electoral register. On the basis of this the ERO can then decide if that particular property needs a light-touch canvass process or a more thorough canvass process. This will enable EROs to allocate their resources efficiently and run their canvass in a more cost effective way as not every household will need the thorough canvass process.

A DPIA is required because the process will involve sending personal data through the electoral management systems of Local Authorities to DWP to be matched. This process matches the process which is already in place for checking the information provided by applicants for entry on the electoral register. Local Authorities will also have the ability to use local data in addition to DWP data to arrive at a final match rate. We are planning to test the data matching step using existing data provided by EROs in spring 2020 and this testing will inform planning for the autumn 2020 full launch. This document covers relevant details for both the 2020 testing and the envisaged full service in 2020.

3.2 Personal data to be processed.

Variable	Data Source
First Name	ERO's Electoral Management system
Middle Name(s)	ERO's Electoral Management system
Surname	ERO's Electoral Management system
Maiden Name (if held by the ERO)	ERO's Electoral Management system
Date of Birth (if held by the ERO)	ERO's Electoral Management system
UPRN (Unique Property Reference Number) (If present)	ERO's Electoral Management system
Address lines 1 to 5 (string address)	ERO's Electoral Management system
Unique elector reference (unique for this transaction within the Local Authority Election Office)	ERO's Electoral Management system
Government Statistical Service (GSS) code, code identifying the Local Authority sending the data	ERO's Electoral Management system

3.3 Describe how this data will be processed:

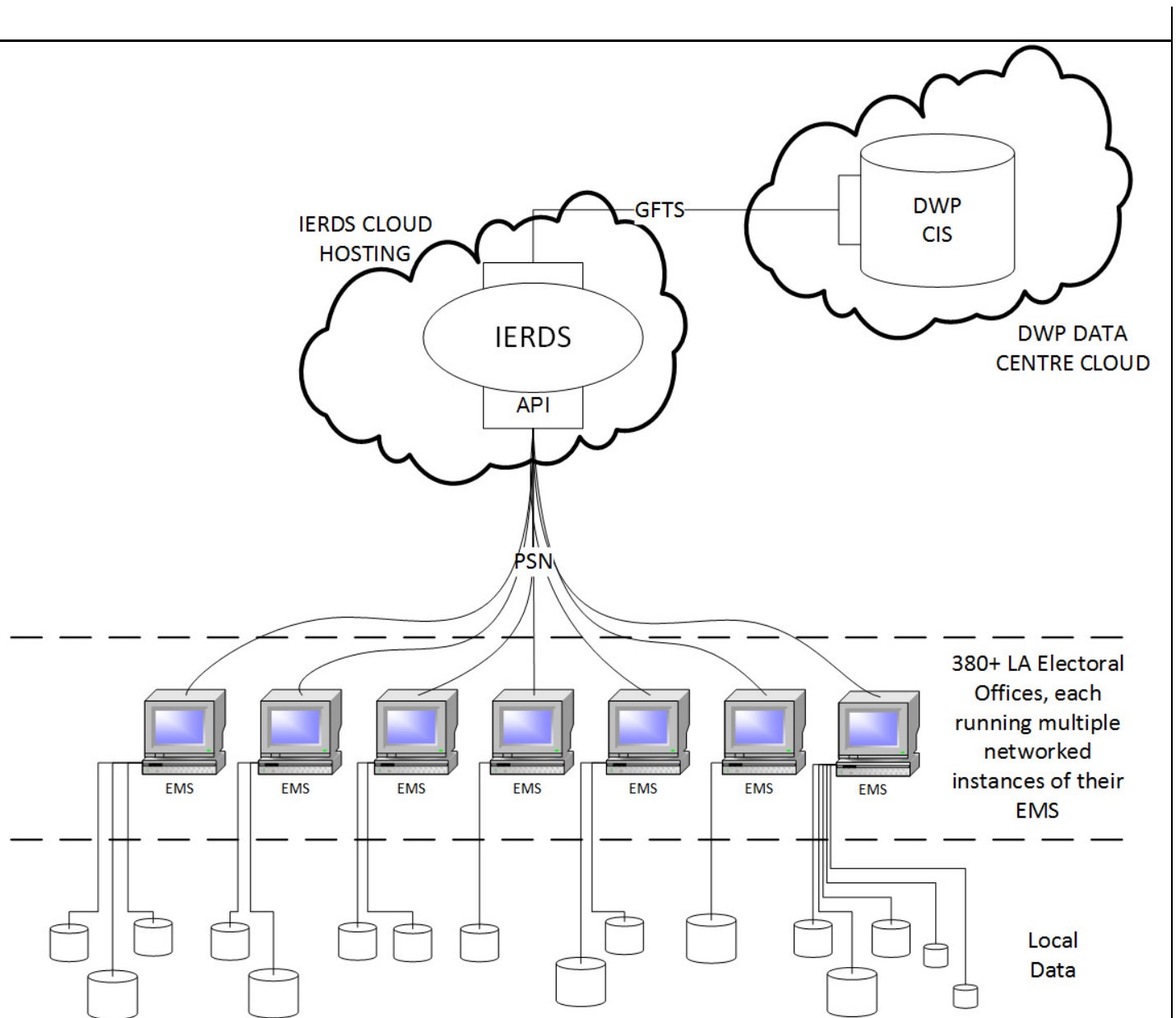
DWP will run the data supplied by EROs against their CIS data and return a 'match score' indicating on a sliding scale of accuracy how well the data supplied matched CIS, with the highest score being a perfect match of all names (first name, middle name and surname), Date of Birth (DoB) and address (UPRN & string address) . This is the same approach as used with IER and we will work with DWP colleagues to fully define it.

The end recipient of the match scores is the Electoral Registration Officer (ERO). While the data matching with DWP will take place at an individual level, matching a person's name, DOB and address (UPRN and/or string address), Individual level matches will be amalgamated by address within each ERO's Electoral Management Software (EMS) systems, to get household level match rates. This will allow EROs to identify which households are likely to report a change during the annual canvass and which are unlikely to. In this way the data matching will determine which properties go through a less expensive and less resource intensive process (Route 1), and which properties go through a full canvass process (Route 2). The data will be transported between DWP and the ERO by the IER Digital Service (IER DS) operated by the Cabinet Office. Security steps are outlined below.

Once the data matching with the DWP is complete, EROs will also have the discretion to match their electoral register against locally held datasets, which EROs already have access to, such as council tax and housing benefit data or education authority data. Unlike the national data matching exercise, the ERO will have to complete local data matching themselves internally, using their own IT systems.

In the case of 14 and 15 year olds, their data will not be matched using the IER DS as DWP and other central government bodies will not normally hold information on young persons. 14 and 15 year olds will only be matched directly by the ERO using local data bases, mainly Local Authority education data. Further information on specific data handling for 14 and 15 year olds can be found in the annex to this DPIA. Although EROs already process data in relation to 14 and 15 year olds, a further proposed change to the law will see all 14 year olds being invited to register to vote on attaining the age of 14 (only older 14 year olds are asked to do so at present). This change is to be put to Parliament for consideration in the Government's proposed Scottish Elections (Reform) Bill.

The following is the proposed basic architecture, it matches that currently in place for Verification and the architecture used for Confirmation Live Run in 2014.



Whilst we are still at a relatively early stage and yet to carry out a detailed technical design, the process is likely to be the same, or very similar, to that already used for IER:

1. The data as listed above (elector name and address etc.), taken from the Electoral Register and EMS, will be sent over the Public Secure Network ('PSN') to the IER DS, where it will be batched up and sent securely via the PSN to DWP for overnight processing.
2. DWP will import the data into their secure CIS environment and match against their CIS data. They will send the results file back to the IER DS. The results file will contain rows of data pairs; the unique elector reference and the matching result, a numeric value representing the strength of the match. Upon confirmation that the IER DS has successfully received the results file, DWP will delete the data received from the IER DS in line with their data retention and destruction policies. DWP will not retain any data after this point – or use it for any other purpose.
3. The results data will be made available by the IER DS for the Local Authority's EMS to pull down. Once the EMS has successfully retrieved the results data it is deleted from the IER DS. The IER DS does not retain processing data.

4. The EMS will use the results data to determine, on a property by property basis, whether a property should receive a route 1 canvass process or route 2 canvass process. The EMS can also, optionally, perform a similar matching exercise against locally available data to supplement the results from DWP.

GB wide, approximately 45 million electors' data will be sent through this service over a period of 8 weeks, from early July to early Sep each year. Elector data (name, address etc.) will persist in the IER DS for 24 hours and no longer than 48 hours. For DWP it should be the same. Approximately 4.5 million electors' data will be processed from Scotland.

3.4 Explain the legal basis for the sharing with internal or external partners:

The processing of personal data is considered necessary for the performance of a task carried out in the public interest and in the exercise of official authority in terms of Article 6(1)(e) of the General Data Protection Regulation.

The duty of the ERO to maintain an accurate and complete electoral register is established in the Representation of the People Act 1983:

“9.-(1) It is every registration officer's duty to prepare and publish in each year- (a) a register of parliamentary electors for each constituency or part of a constituency in the area for which he acts; and (b) a register of local government electors for the local government areas or parts of local government areas included in the area for which he acts. (3) A registration officer's general duty to prepare and publish registers of electors in conformity with this Act includes the duty to take reasonable steps to obtain information required by him for that purpose (without prejudice to any specific requirement of this Act or regulations under it).”

The Electoral Registration and Administration Act 2013 which introduced the system of Individual Electoral Registration, requires the ERO to make further checks regarding an application to register to vote. It inserted a new paragraph into Schedule 2 of the Representation of the People Act that enables secondary legislation to require a person applying to register to vote to provide evidence that he or she is the person named in the application and that he or she is entitled to be registered. The required evidence is set out in regulations 26, 26A and 26B of the Representation of the People (Scotland) Regulations 2001, and includes a person's date of birth and national insurance number. Citizens registering to vote therefore have a legal obligation to provide data on their name, DOB and National Insurance number.

Combined with their duty to maintain an accurate register outlined above, Schedule 2 (Sharing and checking information etc.) of the Electoral Registration and Administration Act 2013 authorises or requires a person to disclose information to another person for the purpose of assisting a registration officer in Great Britain to verify information about persons named in an application for registration. Again EROs have a requirement to share this data for the verification of applications to register. The system of Individual Electoral Registration has been built in such a way that this information is shared specifically to verify applications to register against the CIS database held at the DWP. Data used for normal IER DS operations is necessary for the performance of a task carried out in the public interest and in the exercise of official authority. It facilitates online applications to register to vote in order to improve democratic engagement. (see:

<https://www.registertovote.service.gov.uk/register-to-vote/privacy>)

In reforming the annual canvass we will be expanding these legal obligations through secondary legislation. This includes, as outlined previously, requiring EROs to data match registered electors

for the purposes of identifying where household changes are more likely ahead of the annual canvass.

We understand that transparency in how we process data and remaining in line with the GDPR is key. The purpose for which EROs collected the data was, as outlined in our privacy notice, 'to facilitate online applications to register to vote in order to improve democratic engagement'. In using data from other agencies such as the DWP for the annual canvass, we will be using those other agencies data for a new purpose. Under GDPR A.5 (1) (b), we cannot process data for a purpose that is incompatible with the purpose for which it was collected. In our view, the proposed new purpose is not incompatible with the original purpose.

Under A.13 (3) and A.14 (4), if we are processing data for a new purpose that is compatible, then we must first provide a Privacy Notice to the affected individuals. In relation to IER DS normally, a Privacy Notice is provided at the point at which people register online, or on the back of the paper forms sent to them by EROs. As part of these reforms we will amend the existing IER DS Privacy Notices – online and on forms to account for the new purpose that we will be using personal data.

The legal basis for processing personal data at every stage is public task.

Secondary legislation will create a legal power, rather than legal duty, to allow testing. This is planned to be laid in 2019, and the test will take place in February 2020. This secondary legislation will also establish the legal obligation for the proposed reformed annual canvass, which includes the data match step described above.

The legislation will allow data to be transferred between the systems as required. The technical specification of how this process will work will be designed specifically for these purposes only.

All data will be handled in accordance to legislation, individuals will not be given any information about the results of the test. It is for the ERO to determine what type of canvass process is required for each household as a result of the data match results.

4. Stakeholder analysis and consultation

4.1 List all the groups involved in the project, and state their interest.

Group	Interest
Cabinet Office	Operates the IER Digital Service (IER DS), and is the main data controller.
Kainos (A software company headquartered in Belfast, Northern Ireland that develops information technology solutions)	Both support the existing IER DS and will be the developers for this proposed change. They already have access to data as part of their existing support duties and it is envisaged this will continue. They are our data processor.
Election Offices at Local Authorities throughout England, Scotland and Wales	Maintain the Electoral Register and administer elections. The EROs are all separate data controllers, and there are data sharing agreements in place with the EROs and Cabinet Office. The EROs use Electoral Management Systems ('EMS') to carry out their work. The EMS holds a digital version of the Electoral Register along with other relevant elector information. The EMS Providers are data processors for the EROs.

Suppliers of the software ('EMS') used by the Election Offices at Local Authorities	may have access to live data as part of their support duties to their customers, it is envisaged that this process will continue
DWP	Own the CIS database will be sent the data held in the EMS to be checked against their CIS database. They already have access to data as part of their existing duties. DWP are joint data controllers with Cabinet Office and a Memorandum of Understanding is in place between DWP and Cabinet Office.

4.2 Method used to consult with these groups when making the DPIA.

Interested stakeholders were consulted through direct discussions with individuals and their relevant representative bodies in addition to a formal public consultation.

4.3 Method used to communicate the outcomes of the DPIA.

The DPIA will be published on the Scottish Government website.

5. Questions to identify privacy issues

5.1 Involvement of multiple organisations

See paragraph 4.1 above.

5.2 Anonymity and pseudonymity

Not applicable.

5.3 Technology

No new systems will be created, existing systems will be utilised as necessary.

5.4 Identification methods

Existing unique identifiers such as the Unique Property Reference Number, Unique Elector Reference and GSS code will be used.

5.5 Sensitive/Special Category personal data

No.

5.6 Changes to data handling procedures

There will be no new or changed data collection policies or practices that may be unclear or intrusive.

There will be no changes to data quality assurance or processes and standards that may be unclear or unsatisfactory.

There will be no new or changed data security access or disclosure arrangements that may be unclear or extensive.

There will be no new or changed data retention arrangements that may be unclear or extensive.

There will be no changes to the medium of disclosure for publicly available information in such a way that the data becomes more readily accessible than before.

5.7 Statutory exemptions/protection

We are not aware of any exemptions from the Data Protection Act which would apply to this project.

5.8 Justification

None.

6.9 Other risks

None.

6. General Data Protection Regulation (GDPR) Principles

Principle	Compliant – Yes/No	Description of how you have complied
6.1 Principle 1 – fair and lawful, and meeting the conditions for processing	Yes	<p>The minimum data required to comply with the statutory requirement to maintain the electoral register will continue to be collected.</p> <p>This information is already collected under the existing annual canvass arrangements and no additional data collection will be required.</p>
6.2 Principle 2 – purpose limitation	Yes	Data processed and gathered during the annual canvass will only be used for the same purposes for which it was gathered, i.e. confirming the accuracy of the electoral register.
6.3 Principle 3 – adequacy, relevance and data minimisation	Yes	Only the data required to ensure the accuracy of the electoral register will be subject to checking and collection.
6.4 Principle 4 – accurate, kept up to date, deletion	Yes	<p>Data gathered for the purposes of electoral registration will be subject to existing internal quality control processes to ensure its accuracy.</p> <p>EROs are under a statutory requirement to maintain the accuracy of the electoral register, and by implication the data behind it. Elector data is subject to an annual check, the annual canvas, to ensure accuracy.</p>
6.5 Principle 5 – kept for no longer than necessary, anonymization	Yes	<p>The bare minimum data for matching is transmitted, string format address are not used, only UPRN's. As soon as this data has been used it is destroyed. The returned results data is anonymised in that it doesn't contain personal data, only a reference from the LA for an individual and a numeric value for the strength that individual matched at.</p> <p>Elector data (name, address etc.) will persist in the IER DS for 24 hours and no longer than 48 hours. For DWP it should be the same.</p>

6.6 GDPR Articles 12-22 – data subject rights	Yes	The sharing or processing of personal data as a result of the project will be done in accordance with the rights of data subjects.
6.7 Principle 6 - security	Yes	The bodies which hold the relevant personal data are already required to have appropriate technical and organizational measures in place to prevent unauthorized or unlawful processing of personal data or its accidental loss, destruction or damage.
6.8 GDPR Article 44 - Personal data shall not be transferred to a country or territory outside the European Economic Area.	Yes	No personal data will be transferred or held outside the EU. All data will be retained within the UK.

7. Risks identified and appropriate solutions or mitigation actions proposed

Is the risk eliminated, reduced or accepted?

Risk	Ref	Solution or mitigation	Result
There is a very low possibility that a data breach could occur - approximately 45 million records (GB wide) would be transmitted between environments and systems.	1	The bare minimum data for matching is transmitted, string format address are not used, only UPRN's. As soon as this data has been used it is destroyed. The returned results data is anonymised in that it doesn't contain personal data, only a reference from the LA for an individual and a numeric value for the strength that individual matched at. The Cabinet Office runs the IER DS	Accept. The likelihood of harm to an individual is low as this risk has a low likelihood of occurring and the impact on an individual of the data concerned (first name, middle name, surname, UPRN) being leaked is minimal
Risks to children's (attainer) data when using new forms of canvass communication at <u>route 1</u>	2	EROs are currently only allowed to contact 14/15 year olds directly in writing or by email, in respect of Invitations to Register – we are not allowed to visit the property to encourage them to register if they have failed to respond to an Invitation to Register. At present EROs are obliged to send an Annual Canvass Form to “each residential address in the area” – Regulation 32ZA (4). They tend to send a household communication to “The Occupier”, though this is not prescribed. If no response is received to that paper communication and a further two reminders they are simply required to visit the address in order to obtain the information (Regulation 32ZB (3)). In theory when we visit the property they could come into contact with a 14 or 15 year old at that stage.	Eliminated by the proposed canvass regulations

		<p>However under the new canvass regulations where EROs match everyone in a property we must send Canvass Communication A to the address or where we hold contact details for one or more people aged 18 or over (aged 16 or over in Scotland) we can send an e communication. In essence under “Route 1” the communications either goes just to the address, in the same way as the current canvass form, or by e-communications to a named individual over 16, so there will be no direct communications with 14/15 year olds Regulation 32ZBE (3). If we only have a 14/15 year old registered then EROs are not permitted to use “Route 1”.</p>	
<p>Risks to children’s (attainer) data when using new forms of canvass communication at <u>route 2</u></p>	3	<p>For “Route 2” properties – Regulation 32ZBD. The requirement is different in particular 32ZBD (1) requires us to make contact <u>“with a person who is , or maybe eligible to be, registered</u>by (a) sending a paper communication to the address or by visiting the address”.</p> <p>If no information is received, then a further attempt is made to contact at least one person at the address. Risk if this is interpreted by the ERO as contacting the eligible person.</p>	<p>Eliminated though guidance which will clarify that requirements to visit a person at the address is not the same as a requirement to visit the person eligible to register if they are under 16 (i.e. a 14 or 15 year old attainer). And reinforce the general point that direct contact with attainers is to be avoided.</p>
<p>Risks to children’s (attainer) data when using new forms of canvass communication at <u>route 3</u></p>	4	<p>For “Route 3” properties – Regulation 32ZBF – 14 or 15 year olds do not meet the definition of “responsible person” as defined at (8) and therefore no issue arises. In terms of supported accommodation e.g. units with children in care looked after by support workers, EROs would put these down “Route 3” Regulation 32zbf (2) (a) and ask the Council or Charity running them to provide the information.</p>	<p>Eliminated</p>
<p>Risks to children’s (attainer) data of power to allow EROs to carry out data matching.</p>	5	<p>EROs already hold the local data sets and these are subject to a National Data Sharing Agreement between EROs and also to ones between local EROs and the local Education Authorities. These DSAs set out safeguards as to how the data will be used, stored and retained. We will of course need to review these to make sure that they cover the use of the data</p>	<p>Reduced – the local data matching under the proposed reforms direct contact with attainers unnecessary.</p>

		<p>as part of the annual canvass process but in essence the data is supplied to us on the basis of us carrying out a Public Task and the legal gateway is Regulation 23 of RPR (S) 2001.</p> <p>14 & 15 year olds will not be covered by the national data match and so local data matching will be necessary. The effect of local data matching means that the household will receive the appropriate level of contact from the ERO, if no local data matching was possible then all households would go down "Route 2" which means potentially more contact from the ERO, which is not in the electors interest. Route 2 also includes a requirement to make personal contact at some stage if no response has been received. Thus there may be more chance of a personal contact with a 14/15 year old if local data matching does not take place.</p>	
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8. Incorporating Privacy Risks into planning

Explain how the risks and solutions or mitigation actions will be incorporated into the project/business plan, and how they will be monitored. There must be a named official responsible for addressing and monitoring each risk.

Risk	Ref	How risk will be incorporated into planning	Owner
Data breach	1		Cabinet Office
Risks to children's (attainer) data when using new forms of canvass communication at <u>route 1</u>	2	The risk is eliminated however Electoral Commission guidance exists on data handling, including handling the data of under 16s. New EC guidance will be developed to support the delivery of canvass reforms – SG will feed into the consultation on this risk.	Kenny Pentland – Elections Team, SG
Risks to children's (attainer) data when using new forms of canvass communication at <u>route 2</u>	3	The risk will be eliminated through ERO guidance.	Kenny Pentland – Elections Team
Risks to children's (attainer) data when using new forms of canvass communication at <u>route 3</u>	4	The risk is eliminated through legislation however will be further mitigated against through guidance to EROs.	Kenny Pentland – Elections Team

Risks to children's (attainer) data of power to allow EROs to carry out data matching	5	EROs already process data in relation to 14 and 15 year olds. Local data matching means that the household will receive the appropriate level of contact from the ERO, if no local data matching was possible then all households would go down "Route 2" which means potentially more contact from the ERO. Guidance to EROs will reinforce this point.	Kenny Pentland – Elections Team
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9. Data Protection Officer (DPO)

The DPO may give additional advice, please indicate how this has been actioned.

Advice from DPO	Action

10. Authorisation and publication

The DPIA report should be signed by your Information Asset Owner (IAO). The IAO will be the Deputy Director or Head of Division.

Before signing the DPIA report, an IAO should ensure that she/he is satisfied that the impact assessment is robust, has addressed all the relevant issues and that appropriate actions have been taken.

By signing the DPIA report, the IAO is confirming that the impact of applying the policy has been sufficiently assessed against the individuals' right to privacy.

The results of the impact assessment must be published in the eRDM with the phrase "DPIA report" and the name of the project or initiative in the title.

Details of any relevant information asset must be added to the Information Asset Register, with a note that a DPIA has been conducted.

I confirm that the impact of (undertaking the project/applying the policy – add appropriate wording) has been sufficiently assessed against the needs of the privacy duty:

Name and job title of a IAO or equivalent	Date each version authorised
Penny Curtis, Deputy Director, Elections and FOI Division	January 2020

Annex to the Data Protection Impact Assessment (DPIA) on Reform of the Annual Electoral Registration Canvass

Processing of data on 14 and 15 year olds

A fuller explanation on the processing of data relating to 14 and 15 year olds in relation to electoral registration can be found in the Privacy impact Assessment (PIA) prepared in connection with the Scottish Elections (Reduction of Voting Age) Act 2015. The PIA was agreed with the ICO during the preparation of that Bill. Extracts of the relevant parts of that PIA which apply to the annual canvass are set out below

Description of the project

The annual canvass will be in two stages from now on [Note: autumn 2015], with the issuing of a Household Enquiry Form (HEF - the new annual canvass form) to collect information on all individuals living in a household, followed by an Invitation to Register (ITR) which will be sent to anyone not already on the register identified through that process. The HEF will be modified in Scotland to collect information on those aged 14 and over, making it clear that 16 and 17 year olds will only be entitled to vote in Scottish Parliament and local government elections. That will ensure that EROs have information on all those eligible to vote in Scottish Parliament and local government elections as soon as they attain the age of 16.

How will it (*information*) be gathered?

Information will be gathered through the annual household enquiry exercise. Each household in Scotland will receive a Household Enquiry Form (HEF) which should be returned by post or completed on-line. Electoral Registration Officers (EROs) will follow up the HEF with an Invitation to Register (ITR) to any new electors identified. This will therefore include all 14 and 15 year olds as they will not have been registered before.

[Note: the intention is that the revised canvas will still collect exactly the same information on 14 and 15 year olds as is currently collected using the HEF, the only difference will be the form of communication. The HEF will be replaced by a revised, and hopefully simpler form, and the option of gathering information by telephone will be included.]

Who will have access?

Information on older 14 year olds and 15 year olds gathered through the exercise outlined above (i.e. those who will turn 16 during the currency of the current register) will be held in the electronic databases that are used to hold the local government register, along with the information that is currently kept on those databases on 16 and 17 year olds and all those aged 18 and over who are eligible to register (and have done so). Only EROs and their staff will be able to have access to and use the data on under 16s. EROs are required to undergo basic Disclosure and are part of the Public Service Network Scheme. However, the data may be disclosed to the individual themselves or for the purposes of a criminal investigation or criminal proceedings relating to an electoral offence under any enactment relating to the registration of electors or the conduct of elections.

How will it (*information*) be stored, and disposed of when no longer needed?

Information on 14 year olds and on 15 year olds will be held in the electronic databases that are used to hold the local government register, along with the information that is currently kept on

those databases on 16 and 17 year olds and all those aged 18 and over who are eligible to register.

How will the data be checked for accuracy and kept up to date?

The information provided on the ITR in relation to 14 and 15 year olds will be verified by the relevant ERO against Local Authority education data, or, if such data are not sufficient to satisfy the ERO as to the applicant's identity and entitlement to register, then the individual could be asked to provide personal verification, such as a copy of their passport. If they cannot provide this, their application to register can be attested by an appropriate person. Data will also be checked and updated via the annual household enquiry exercise.

Will the project involve the linkage of personal data with data in other collections, or any significant change to existing data links or holdings?

EROs will be able to access local authority data to verify the details of those aged under 16, as they currently are able to do for older electors. Verification is required under UK electoral law and is part of a framework designed to prevent electoral fraud.

Risks identified and appropriate solutions or mitigation actions proposed

Is the risk eliminated, reduced or accepted?

Risk	Ref	Solution or mitigation	Result
Details of 14 and 15 year olds accidentally being made publicly available.		Electoral Management software arrangements and data handling by EROs and their suppliers is already designed to be secure for voters of all ages. Additional protections are being put in place for data relating to 14 and 15 year olds. Electoral Commission guidance exists on data handling, including handling the data of under 16s. New EC guidance will be developed to support the delivery of canvass reforms – SG will feed into the consultation on this risk.	Reduced
Personal data of 14 and 15 year olds will be collected by third parties.		Use of controller-processor agreements.	Eliminated
Ability of the registration officer to protect the data of 14 and 15 year olds.		Existing systems already have safeguards in place for voters of all ages. An enhanced level of protection is established by the Bill for data of 14 and 15 year olds.	Reduced

