



Democracy Counts GDPR Readiness Statement

Readiness Statement – 06.04.18

Democracy Counts have undertaken our own internal readiness audit in January 2018 and then externally audited in March 2018 in order to provide us with assurance that sensible measures are in place to be compliant and we believe this to be the case. We asked to be audited from the point of view of Democracy Counts as an Employer and Democracy Counts as a Supplier to Government. We hold ISO9001, ISO27001, Cyber Essentials and ISO22301 all of which assist us in our approach to compliance. Our Suppliers (for data hosting and printing) meet our standards and are also ISO27001 accredited.

We believe that you, as the Local Authority User, could operate in a compliant manner without significant software changes and your DPO may have already discussed these with you. We have, none the less, updated our software with a range of functionality in the upcoming Optional Release that you may consider helpful or mandatory depending on the features you use, and on your own point of view. We believe that many of these exceed the provisions of GDPR and are provided to improve the service you provide to your Customers/ Citizens, reduce the time and cost of administering these changes, and provide improved audit and assurance of the processes in operation.

Your Agreement with Us

Some Authorities have been in touch with us to discuss GDPR. As the Data Controller, you normally lead this activity. However, we also have a draft appendix that we can add to your existing contracts with us, if this assists you with the process. We will contact you individually during April to check that you are satisfied with the contractual provisions to ensure that you can implement any contractual changes ahead of the GDPR implementation date (25/5/18).

Data Backups

We have enhanced the DC Backup Utility that we provide, that is currently only used by a small number of Users, in order to make the default option of backing up the data to anonymise it before it is sent to the Democracy Counts SFTP. This means that this you can send anonymised data to Democracy Counts without the support of your ICT team. Anonymising means the removal of personal data such as NiNo, Contact Details, and scrambling of names. We will also be using this utility where possible, if we need to take data backups. We will provide further technical information in the release.

Some Authorities may also consider this useful in providing a backup copy to restore to your training or testing environments and you would be welcome to use this.

We are changing our Support procedures to use anonymised data by default, as we generally do not need live data to replicate Support issues. Should this be necessary, our Support Staff will be required to ask the Support Manager for permission to take a live data backup and records of the back-up, permission and purpose will be recorded. A report on this can be made available to you on request.

Data Audit

Elector8 already supports a feature called Data Protection Audit, which has been in place for more than 8 years and means that sensitive information such as Nino, Bank Details, Anonymous Electors have a "Data Protection" record of when a User, with permissions, reveals details. It can be found via System > Data Protection Audit. This is being extended to include DOB's for Children.

Educ8

Democracy Counts has recently launched a new Learning Management Product. This has global content for Polling Training and Canvasser Training but also includes GDPR. It is fully customisable by you and you may add your own courses, for any purpose. It is being testing during this election at Barnsley. It will work on a stand-alone basis or integrate with the Elector8 Staffing Portal. It is an optional product and costs £2500 per year for Elector8 Users and could be considered to be an election expense. Licenses run from end of May to End of May to cover the full canvass and election cycle and any by-elections. We would like to extend a free 'learner' license to you during May 2018, so you can review the GDPR (and other content). If you would like an account to be created, please contact Support@democracycounts.co.uk

Poll Card & Absent Voting Files

Both of these extracts had previously contained a DOB which Clients have found useful for checking purposes. We will now give you an option to produce this version of the extract but the new "standard" extracts that you share with your Printers, will have the DOB removed and the file layout document will be updated to reflect these changes.

Date of birth of Children

The law is likely to change to consider an Adult (in data terms at least) to be a person who is 13 years of age (as this is the age they can get their own social media account). In Scotland, it is already possible to add 14-year olds to the database, and as the voting age is 16, a polling station register can contain 15 year olds. Colleagues in Scotland are already extremely cautious on how they protect this data and we consider this stance to be correct and so we will be extending the masking of the DOB with the * (asterisk) for anyone below 16 and so exceed the likely protection of Children records under GDPR. If the date of birth of a child is then revealed, this will write a data protection audit record that can be searched to report on any User who has viewed such data.

ElectorReg (Online HEF Service)

You will be given specific new options via Wizard > Canvass Extract Wizard of how you present Children (younger than 16 years) on the ElectorReg Website, giving you definite control.

Privacy Policy / Website Terms and Conditions

We will be updating the Privacy policy pages on our Citizen facing websites to reference our role as Data Processor, to assure them that we do not use the information for anything other than our legitimate business interest of supporting the ERO / RO at the local authority and make no other use of this data.

Channel Preference Opt Out

We have enhanced the “Preferences” tab that is visible on the Elector Details screen. This allows you to record if a Citizen withdraws consent, for example, from sending email. This will be regarded by the bulk send wizard and will exclude these Citizens. Naturally you could remove the email address as an immediate measure, but this additional detail will record a history item for the change and then ignore the e-channels. We are expecting a revision of EC forms shortly, that offers this option on ITR’s and we hope that this is done in a balanced manner that still promotes the collection of e-contact details as this clearly assists you in your duties.

We have also enhanced the existing screen : Electors & Registers > Opt Out, which currently deals with opt outs of the edited register but will now also show a separate tab of Electors who have withdrawn their consent to use e-channels.

Citizen Privacy Management

GDPR tries to support the Data Subjects right to remove their consent as easily as they give it, or create a Subject Access Request (SAR) for the information you hold on the subject which now should be provided free of charge. As much of the information is provided via the Government Digital Service (GDS), we have created a new E-Form for this purpose. This means each authority has a unique URL that can be made available to your communications template, allowing you to add a “privacy setting/opt out option” to your emails. The result will be shown in Electors & Registers > Manage E-Forms and once you process them, this will create a new Person of Interest Record (for SAR) or update the Citizens communications preference. You will have the ability to adjust the wording in the Elector8 Management Portal, www.elector8.co.uk

Elector8Lite

We have implemented a design change to give Elector8 Administrator Users the ability to control what is possible in Elector8Lite. Not all are strictly related to GDPR, but are mentioned here for completeness. Users will now have control of:

- User creation from Elector8 (rather than IIS) meaning this becomes a business rather than a technical function.
- Ability to hide/show contact details and restrict their update
- Ability to restrict person searches
- Ability to create a personal landing page to warn Users of Elector8Lite of your data standards in relation to the electoral registers
- Ability to hide/show DOB’s
- Ability to hide/show non-verified Electors

We welcome your feedback and thank you for your continued support.



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