

[REDACTED]

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**From:** FOI  
**Sent:** 17 August 2022 15:45  
**To:** [REDACTED]  
**Subject:** FOI 063-22 - Response

Dear [REDACTED],

**Our Ref: FOI-063-22**

Thank you for your email to the Electoral Commission dated 15 August 2022.

The Commission aims to respond to requests for information promptly and has done so within the statutory timeframe of twenty working days.

Your request is shown below followed by our response.

*It has come to my attention that some EROs have been requiring the use of the Google Recaptcha as a necessary precondition of online registration updates. That system involves the transfer of data to the US. I am also aware that some EROs, including Buckinghamshire have not retained or held Transfer Risk Assessments for such transfers as required by the ERC guidance.*

*Further I know that Buckinghamshire's ERO uses Recaptcha whereas South Lakeland does not. As such the imposition of the completion of Recapthca requests and the transfer of data resulting from that cannot be a necessary restriction on the ability to exercise electoral rights. I have been told by Buckinghamshire's ERO that it relies on a third party Civica which imposes the transfer of data requirement. This is done through the [www.householdresponse.com](http://www.householdresponse.com) website.*

*Please let me know, by way of FOI request:*

- 1) As of 1 August 2022 which EROs require the use of Recaptcha for the completion of online updating or correction of electoral register information.*
- 2) As of 1 August 2022 which EROs do not require the use of Recaptcha for the completion of online updating or correction of electoral register information.*
- 3) As of 1 August 2022 which EROs use Civica and/or Civica Election Services services in connection with their systems for for the completion of online updating or correction of electoral register information.*

**Our response is as follows:**

We do not hold the information you have requested.

The software used for the management of electoral registration processes is the decision of each Electoral Registration Officer (ERO). We do not collect or hold information about the systems they use to support their processes.

In order to obtain this information you would need to contact each ERO individually. A list of all the local councils in the UK can be found on the [Local Government Association](http://www.local.gov.uk) website.

The Commission strives to be an open, transparent authority. If you are not satisfied with this response, please note that the Commission operates a review procedure, details of which can be found on the Commission website at: <https://www.electoralcommission.org.uk/freedom-information/make-a-freedom-information-request>.

Please also note that if you have exhausted all internal Commission review procedures and you are still not satisfied you have the right to appeal to the Information Commissioner. Details of this procedure can be found on the ICO website: <https://ico.org.uk/>.

Yours sincerely

Information Officer

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**The Electoral Commission**

[electoralcommission.org.uk](https://www.electoralcommission.org.uk)