

10 April 2024

Dear Electoral Commission Northern Ireland,

**Re: Code of Conduct for Campaigners in Northern Ireland**

The ICO welcomes the opportunity to provide feedback on the above Code of Conduct. As you will be aware, the ICO is the UK's independent public authority set up to uphold information rights and enforces and oversees a range of legislation including the Freedom of Information Act (FOIA), the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 (DPA 2018) and the Privacy and Electronic Communications Regulations 2003 (PECR).

The ICO recognises that the Code of Conduct will provide political parties with agreed standards on what is acceptable behaviour both before and during polling day. We believe that this code is strengthened by the inclusion of a section outlining data protection obligations for campaigners. This will serve to retain the trust and confidence of voters in the use of their data, as well as preserving the integrity of elections.

It is important that all organisations involved in political campaigning handle and process [personal data](#) in a way that is compliant with data protection law. We welcome the addition of the link to [ICO guidance](#) within the Code of Conduct as this will provide clarity and practical advice for campaigners who are processing personal data for the purposes of political campaigning. This will help them to demonstrate that their processing is fair and complies with the UK GDPR, the DPA 2018 and PECR.

Yours sincerely,

Information Commissioner's Office, Northern Ireland