

Mr Andrew Stedman
Data Protection Officer
The Conservative and Unionist Party
4 Matthew Parker Street
London
SW1H 9HQ

By email only to: Andrew.Stedman@conservatives.com
CC: dataprotection@conservatives.com

12 June 2024

Dear Mr Stedman

Case Reference Number: IC/0161/2024

Thank you for providing the Conservative Party's response to my questions on 9 May 2024 in respect of the case referenced above. Specifically, this case concerns the Conservative Party's use of cookies on the Tax Cut Calculator webpage.

I write to inform you that the ICO has now completed its consideration of this matter and based on the information provided, we have decided not to pursue this case further.

This case has been considered under the United Kingdom General Data Protection Regulation (UK GDPR) due to the nature of the processing involved.

Our consideration of this case

In summary, on 22 November 2023 the Conservative Party launched a Tax Cut Calculator webpage. A consent banner enabling users accessing this webpage to decide whether to consent to the use of cookies was initially omitted, however this was added when a new version of the webpage was implemented on 10 January 2024. You do not believe non-essential cookies were placed during this time or that personal data was processed in relation to the use of cookies.

You reported that procedural shortcomings relating to the cookie banner meant that it had not been scanning the website for new cookies, which may have led to some non-essential cookies being placed without consent. However, I understand you have assessed that these were minimally intrusive and that this issue has been resolved.

We welcome the remedial actions taken by the Conservative Party in light of this matter, including improving the format of the cookie consent banner, organising a training session for relevant staff and re-implementing a checklist that requires the Data Protection Officer to sign-off all new sites.

Therefore, after careful consideration and based on the information provided, we have decided not to pursue this matter further.

Further Action Recommended

The Commissioner advises that the Conservative Party should consider taking certain steps to improve its compliance with the UK GDPR and the Privacy and Electronic Communications Regulations (PECR). In particular:

1. Ensure that data protection is considered during the design of new products, including new and updated webpages, and that any changes to your cookie consent mechanism and privacy notice are made prior to/in conjunction with changes to your processing activities.
2. Please review guidance on the ICO website in relation to cookies and similar technologies, including how the regulations apply to anonymous data: [Cookies and similar technologies](#)
3. Please review guidance on the ICO website in relation to the use of cookies in political campaigning and PECR: [Political campaigning in the online world](#)

Please be aware, if further information relating to this matter comes to light, or if any further matters which concern the Conservative Party's data protection compliance are reported to us, we may revisit this matter.

Further information about compliance with the UK GDPR can be found at the following [link](#).

Thank you for your co-operation and assistance during this case.

We now consider the matter closed.

Yours sincerely

FOIA s.40(2) - Personal data that doesn't fall

Investigation Officer
Civil Investigations
Regulatory Supervision Service
Information Commissioner's Office

FOIA s.40(2) - Personal data that doesn't fall under s.40(1)

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