



Mr Victor Rushton
DCA
Electoral Policy Division

6th October 2005

Dear Mr Rushton

I write on behalf of the National Council on Archives in response to the consultation document CP(L) 21/05. The Council is an organisation which brings together representatives of other organisations with an interest in archives in the UK. The purpose of the Council is to seek consensus concerning policy affecting archives and their users, and to advocate on behalf of the archival sector nationally.

The Council welcome the opportunity to comment on the proposed changes to the regulations. Electoral registers are a valuable resource for historical and sociological research as well as research in other disciplines. Within the need for data protection, and the provisions for national and individuals' security, we favour the widest possible dissemination of the data held in the electoral registers for the purposes of *bona fide* research. We recognise that the spirit of the regulations and of the proposed changes is to pursue this dissemination. We hope that the following specific comments are helpful to you in arriving at the best way forward towards this goal.

Questionnaire

6. Do you have any comments on providing for the National Library of Wales to be supplied with the full electoral register?

The Council welcomes the provision of a set of registers in the National Library of Wales as recognition of their value as a research tool. However, we wonder why the British Library receives hard copy and electronic but the National Library of Wales only hard copy. The Council sees this as symptomatic of unclear (or unexplained) reasoning on whether to supply hard copy or electronic to libraries and archives; the British Library receives both, the National Library of Wales receives hard copy, and the default position for libraries and archives is electronic. We are not sure why this should be the case.

7. Do you have any comments on allowing public libraries and local authority archives services to be supplied with copies of the full electoral register?

The Council strongly welcomes the proposal to allow public libraries and local authority archives services to be supplied with copies of the full electoral register. We are concerned that the register should be supplied free of charge to already under resourced services, in the format most appropriate to them and their users, acknowledging that what is most appropriate may change over time. Will libraries and archives be allowed to request both formats?

The Council also requests that clarification regarding the provision of historical data sets be given. The value for research is often in the change of data between datasets over a time period. If superseded sets are not to be available, any such value to research of the provision of later data sets will be nullified and the full benefit of any expenditure laid out on any provision will be vastly reduced.

The Council is also concerned that the format of any electronic provision will be compatible with any existing data sets, and with the majority of systems used in public libraries and local authority archives services. This is particularly pertinent to the supervision of use – *please see further comments below in sections 8 and 9.*

The Council would also like to express concern about the digital preservation of the datasets so that the primary copies can be easily accessed by future generations.

8. Do you have any comments on the proposal to allow users of public libraries and archives services to view the registers subject to restrictions for an initial period?

The Council strongly welcomes the proposal to allow users of public libraries and archives services to view registers subject to restrictions. We recognise that the supervision of the registers will be different in kind to the invigilation carried out in libraries and archives at present and would welcome clarification of the DCA's intended standards for this. The Council is especially keen to ensure that the burden of obeying the law will lie with the user (after reasonable provision by the library or archive) including the signing of declarations of the purpose of research. Without these precautions, we fear many small libraries and archives will not have the capacity in resources, human or technological, to provide access to the registers in a way acceptable to them and to the DCA.

9. Are the proposed restrictions on registers held by public libraries and archives offices sufficient to prevent the electoral register being used for direct marketing purposes?

The Council considers that the proposed restrictions (10 year embargo, the taking of only handwritten notes) will be adequate to make the electoral registers useless for direct marketing purposes in most cases. However, we are concerned that users, especially users with disabilities, should not be disadvantaged by the requirement only to take handwritten notes. We feel that the spirit of the regulations wishes to prevent the taking of mass data sets. The taking of handwritten notes *or equivalent* for example, by tape recorder or entered into a separate, non-connected laptop computer should be allowed to ensure equality of access.

10. Do you consider it reasonable to relax the restrictions on access to electoral registers held by public libraries and archives offices after 10 years where they are to be used for research purposes? Should this period be shorter or longer, and if so why?

The Council feels that 10 years is a reasonable period of time for the restrictions.

We have no further comments on any of the other questions.

Yours sincerely,
Ruth Savage (Miss)

About you

Please use this section to tell us about yourself

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Job title or capacity in which you are responding to this consultation exercise	Policy and Development Officer
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If you would like us to acknowledge receipt of your response, please tick this box	Yes please