

To whom it may concern,

I would like to make the following submission in regards to the proposals for improving the electoral registration process in Ireland.

1. I would be in favour of there being a single, national electoral register as opposed to the current register per local authority.
2. I also favour it being a continuously updated register.
3. Before ANYTHING changes, I expect that a full Data Protection Impact Assessment (DPIA) will be carried out, be given some form of clearance from the Office of the Data Protection Commission and be made public.
4. I would be completely against the Public Services Card (PSC) being involved in the process, as the PSC will likely be deemed illegal by the Office of the Data Protection Commission and have to be scrapped or reduced to its single use purpose by the Department of Social Protection.
5. I also do not favour using a person's PPS number as a unique identifier on this register. I have seen it said that this would not be recorded on the register itself and would only be verified with the Department of Social Protection. If the PPS number is not associated with a record on the register, then how can you verify that there is no other duplicate records on the register/database? It's simply not plausible. If it does get recorded on the register then it will be discoverable, as the register is a public record.
6. If people chose not to participate in voting, then they have that right. If the PPS number is the single identifier for the electoral register, it wouldn't take much to change the law in future to force everyone to be registered to vote. If everyone was forced to be registered, then will they also be forced on to the "Edited Register"? If so, this would be a breach of their fundamental right to privacy.
7. Other risks to the use of the PPS number is to people who have escaped from domestic violence/abuse situations. Former partners may use the knowledge of their PPS number to make changes to their register entry, or discover where they currently live.
8. Taking the three previous points together, I would favour a separate "electoral register unique identifier" be implemented instead. It would be the best from a data privacy and protection perspective.

Yours Faithfully,

Liam Lynch