

## Memorandum on joint data controller responsibilities between the Committee on Standards in Public Life and the Cabinet Office

The Committee on Standards in Public Life (CSPL) collects, holds and uses personal data in discharging its responsibilities. This data can relate to members of the public (e.g. from the collection of evidence in support of reviews undertaken by the Committee, or from general correspondence), and to fee-paid Committee members and staff members. Because CSPL uses Cabinet Office IT systems, all of its personal data is held by the Cabinet Office, a separate data controller. CSPL also relies upon the Cabinet Office for HR, finance and other corporate services, which requires sending personal data to the Cabinet Office.

It is the view of CSPL and the Cabinet Office that they are acting as joint data controllers in relation to the processing of personal data by CSPL.

Both the Cabinet Office and CSPL will:

- comply with the data protection principles, and with all relevant data protection legislation
- properly involve their Data Protection Officer in a timely manner in issues that relate to data protection
- ensure an appropriate level of technical and organisational security for the personal data
- publish this memorandum.

The Cabinet Office will be the responsible lead data controller for processing of staff personal data pursuant to carrying out corporate services functions provided to CSPL (e.g. HR, finance, accommodation, IT). These responsibilities include:

- the provision of Privacy Notices to staff about how their personal data are being handled
- the maintenance of processing records under Article 30 UK GDPR
- reporting data breaches that relate to the processing of staff data
- carrying out any Data Protection Impact Assessments required by law
- responding to data subject requests relating to staff data
- manage any contracts of data processors as part of the Cabinet Office's provision of corporate services to CSPL.

CSPL will be the responsible lead data controller for processing of personal data pursuant to delivering its duties (including in relation to FoI requests and general correspondence).

These responsibilities include:

- the provision of Privacy Notices to data subjects setting out how CSPL uses their personal data
- the maintenance of processing records under Article 30 UK GDPR relating to how CSPL uses personal data to carry out its duties

- reporting data breaches which occur as a result of the actions of CSPL, including usage of the IT systems provided to it
- carrying out any Data Protection Impact Assessments required by law for activities of CSPL
- responding to data subject requests that relate to the carrying out of the duties of CSPL. The Cabinet Office will provide reasonable required assistance to CSPL in responding the data subject requests
- managing any data processor contracts in relation to additional IT services procured by CSPL