



Memorandum on joint data controller responsibilities between the Office of the Registrar of Consultant Lobbyists and the Cabinet Office

The Office of the Registrar of Consultant Lobbyists ('ORCL') collects, holds and uses personal data in discharging its responsibilities. This data can relate to members of the public (e.g. from information actively collected by ORCL in relation to the Registrar's statutory duties, or from general correspondence), and to staff members. Because ORCL uses Cabinet Office IT systems, all of its personal data is held by the Cabinet Office, a separate data controller. ORCL also relies upon Cabinet Office for HR, finance and other corporate services, which requires sending personal data to the Cabinet Office.

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

Both the Cabinet Office and ORCL 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 ORCL (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 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 ORCL

ORCL will be the responsible lead data controller for processing of personal data pursuant to delivering the statutory duties of the Registrar (including in relation to FoI requests and general correspondence). These responsibilities include:


- the provision of Privacy Notices to data subjects setting out how ORCL uses their personal data


Office of the Registrar of Consultant Lobbyists



Cabinet Office

- the maintenance of processing records under Article 30 GDPR relating to how ORCL uses personal data to carry out the Registrar's duties
- reporting data breaches which occur as a result of the actions of ORCL, including usage of the IT systems provided to it
- carrying out any Data Protection Impact Assessments required by law for activities of ORCL
- responding to data subject requests that relate to the carrying out of the duties of the Registrar. The Cabinet Office will provide reasonable required assistance to ORCL in responding to data subject requests
- managing any data processor contracts in relation to additional IT services procured by ORCL

For the Cabinet Office	
Signature	
Date	31/01/19
Print Name and Title	Ellen Atkinson

For ORCL	
Signature	
Date	31/1/19
Print Name and Title	TONY BELLINGER, HEAD of OFFICE