

Memorandum on joint data controller responsibilities between the Boundary Commission for England and the Cabinet Office

The Boundary Commission for England ('BCE') collects, holds and uses personal data in discharging its responsibilities. This data can relate to members of the public (e.g. from consultation responses or general correspondence), and to staff members. Because the BCE uses Cabinet Office IT systems, all of its personal data is held by the Cabinet Office, a separate data controller. The BCE 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 the BCE that they are acting as joint data controllers in relation to all personal data processed by the BCE.

Both the Cabinet Office and the BCE 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 the BCE (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 the BCE

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

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



Cabinet Office

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

| For the Cabinet Office | |
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| Signature | |
| Date | 28/1/19 |
| Print Name and Title | SIMON JAMES, DEPUTY DIRECTOR |

| For the BCE | |
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| Signature | |
| Date | TONY BELLINGER 28/1/19 |
| Print Name and Title | ↓ , ACTING SECRETARY TO THE COMMISSION |