

Blue Book

J – Managing information and communications

J1: Freedom of information

Background

The Freedom of Information Act 2000 (FOIA) and the Environmental Information Regulations 2004 (EIR) give wide-ranging rights of access to government information to the public. There are exemptions to these rights, but most of the information held by DFID will be disclosable on request to anyone worldwide. Any request for information from a person or organisation outside DFID, which is not publicly available or would not be supplied to the requester in the course of normal business, may be an Freedom of Information (FOI) or EIR request.

Under FOIA, it is a criminal offence to alter, deface, block, erase, destroy or conceal any record held by a public authority (including DFID) with the intention of preventing the disclosure of information to a requester. Compliance with the FOIA and EIR is regulated by the Information Commissioner's Office (ICO) and by the Openness Unit within DFID. The Openness Unit is part of the Corporate Hub.

Compliance Tasks

1. All information requests that mention Freedom of Information (FOI) and/or the Environmental Information Regulations must be sent to Openness Unit immediately upon receipt (there is a 20 working day statutory timescale for responses).

Task assigned to: All Staff

2. Any information request that is likely to be refused, regardless of whether or not it mentions FOI or EIR, must be referred to Openness Unit immediately.

Task assigned to: All Staff

3. All information relevant to a FOI or EIR request must be provided to the Openness Unit for review and in accordance with deadlines set by the Openness Unit.

Task assigned to: All Staff

4. All information requested, regardless of age or format, must be released unless an FOI exemption or EIR exception applies in a particular case.

Task assigned to: All Staff

5. No responses to FOI or EIR requests are to be sent or agreed to be sent to requesters by DFID staff other than by the Openness Unit who will handle the issue under FOI or EIR on behalf of DFID.

Task assigned to: All Staff

6. No refusal to provide information under FOI or EIR may be sent by DFID staff other than the Openness Unit who will handle the issue under FOI or EIR on behalf of DFID.

Task assigned to: All Staff

7. Any complaint about the handling of an information request under FOI or EIR must be forwarded to the Openness Unit.

Task assigned to: All Staff

Risks of non-compliance

- Loss of information or breach of confidence, prosecution and official criticism
- Damage to DFID's reputation for openness and transparency
- Failure in duty of care to staff or others
- Actual harm to personal privacy, commercial confidentiality, international relations, candour of internal discussion, willingness of partners to share information, etc
- Detrimental impact on resources from protracted searches, correspondence or complaint cases
- Legal challenge to DFID for acting incompatibly with the Freedom of Information Act 2000 or the Environmental Information Regulations
- Adverse finding against DFID by the ICO or Information Rights Tribunal

Associated learning and skills

- Half-day FOI course (mandatory for all Quest Information Managers and recommended communication staff).

- Basic FOI awareness component in Corporate Induction and e-learning induction.
- All staff to have read the basic FOI briefing on inSight.
- Basic FOI awareness presentation/briefing for all records staff as part of registry training.

J2: Data Protection Act (1998)

Background

The Data Protection Act 1998 (DPA) implements the European Union Data Protection Directive which requires member states to protect an individual's right to privacy with respect to the processing of personal data.

The DPA applies to paper records as well as those held on computer and covers 'personal data' - that is data about identifiable living individuals. It places restrictions on recording and using personal data and gives rights to individuals ('data subjects') about whom data is held.

Any written request from an individual seeking access to information held about them may be 'Subject Access Request' under the DPA.

DFID is required to notify the Information Commissioner's Office (ICO) of the purposes for which it processes personal data on an annual basis. The ICO regulates compliance with the DPA. The Openness Unit is responsible for ensuring DFID compliance with the DPA, but all staff have responsibilities to process personal data in accordance with the DPA.

Compliance Tasks

1. Personal data must be processed in accordance with DPA. In particular, personal data must be fairly and lawfully processed; processed for limited purposes; adequate, relevant and not excessive in relation to the purpose for which the data is being processed; accurate and, where necessary, up to date; not kept for longer than is necessary; processed in line with the rights of data subjects; secured and protected against unauthorised or unlawful processing or accidental loss; and not transferred outside the European Economic Area without adequate protection.

Task assigned to: All Staff

2. Personal data must not be shared with third parties without a clear business need and in line with procedures agreed with Openness Unit.

Task assigned to: All Staff

3. All relevant personal data must be made available to the Data Protection Officer when requested and according to deadlines set by the Data Protection Officer. All personal data requested, regardless of age or format, will normally be released unless a DPA exemption applies.

Task assigned to: All Staff

4. Any request for personal data made outside the course of normal business should be treated as a Subject Access Request and must be referred to the Openness Unit immediately before any response is made to the requester.

Task assigned to: All Staff

5. No response may be made to a Subject Access Request by DFID staff other than the Openness Unit.

Task assigned to: All Staff

6. Any complaints about the processing of personal data under the DPA must be referred to Openness Unit.

Task assigned to: All Staff

7. All data breaches (loss, theft of personal data or inappropriate disclosure) must be reported to the Data Protection Officer immediately on discovery (foi@dfid.gov.uk or telephone +44 (0) 1355 843549). For more detailed guidance please refer to Openness Unit data protection page on Insight.

Task assigned to: All Staff

8. The Openness Unit must be contacted to determine whether a Privacy Impact Assessment is required for any DFID project involving processing of personal data.

Task assigned to: All Staff

9. All staff routinely handling personal data as part of their role must complete appropriate training.

Task assigned to: All Staff

Risks of non-compliance

- Loss of information or breach of confidence
- Failure in duty of care to staff or others

- Infringement of privacy leading to adverse impact on individuals (identity theft, risk of harm) and DFID (litigation or damage to reputation)
- Detrimental impact on resources from protracted searches, correspondence or complaint cases
- Negative impact on DFID's relations with staff and stakeholders
- Legal challenge to DFID for acting incompatibly with the DPA or the Human Rights Act 1998 (particularly Article 8)
- Monetary penalty imposed by the ICO for serious breaches of the DPA
- Adverse finding against DFID by the ICO or Information Rights Tribunal

Associated learning and skills

Basic DP awareness as part of Openness Unit training for all registry and records staff.

Openness Unit DP training for DP Liaison Officers and Quest Information Managers.

J3: Records management

Background

All documents and records created or received in DFID (and other public bodies) could form part of our Public Records. Under the Public Records Acts of 1958 and 1967, each Government Department must appoint a Departmental Records Officer (DRO) who is responsible for all records management within a department and is answerable to The National Archives (TNA, formerly the Public Record Office). TNA holds those UK Government records which have been selected for permanent preservation.

DFID has a clear business need to keep records in a logical and meaningful way. Efficient record keeping enables us to meet our legal requirements, be transparent as an organisation and work effectively towards the Millennium Development Goals.

DFID's records are normally held in electronic form in the Quest Electronic Document and Records Management System (EDRMS). Paper originals should only be kept on file where

- The security classification is higher than Restricted
- The paper original has high ongoing evidential value
- Scanning is not cost-effective
- Copyright would be breached, or
- The paper document is of limited, local informational value.

Databases and applications will be retained in electronic form outside Quest.

Compliance Tasks

1. All departments and overseas offices must appoint an Information Manager (IM) to oversee information and records management and associated training in their departments and offices. Information Managers should, where necessary, be supported by Departmental Information Support Officers (DISOs).

Task assigned to: Head of Department, Head of Overseas Office

2. All new staff must receive Quest Essentials training within two weeks of taking up their appointment. Newly appointed DISOs and Information Managers must also receive appropriate training when taking on the role.

Task assigned to: All staff, Information Manager

3. All documents (including emails) which record a significant action or decision or provide significant evidence of DFID's business must be captured in the corporate record, either by saving to Quest or by placing a paper version on the relevant registered file. Such actions or decisions could include policy or procedural decisions, spending or programme commitments, or agreements between departments.

Task assigned to: All staff

4. All documents must be saved to Quest in a relevant folder with adequate security settings, have clear and meaningful titles, accurate metadata and be declared as records when appropriate or deleted from the system if there is no reason for further retention.

Task assigned to: All staff

5. The Head of Department, with the assistance of the Information Manager and DISO, must ensure that all staff keep adequate and appropriate records to document their business activities. The Information Manager must complete and submit a Quest Quality Assurance Return each quarter, approved by their Head of Department or Office, to Information Management Unit.

Task assigned to: Head of Department, Head of Overseas Office, Information Manager

6. Paper documents scanned to Quest must be scanned at designated scanning stations or multi-function devices (MFDs) in compliance with DFID's Scanning Policy to ensure record quality.

Task assigned to: All staff, Information Manager

7. Disposal of records on Quest will be carried out by Information Management Unit with the support of Information Managers, based on agreed disposal schedules.

Task assigned to: Head of Department, Head of Overseas Office, Information Manager

8. All departments/overseas offices must review closed paper files for disposal action. This review is undertaken by the Information Manager or a suitable officer of at least B2 grade. They must use the file disposal schedule for their department or office for this purpose. Files noted for Second Review must be kept for eventual review by Information Management Unit.

**Task assigned to: Head of Department, Head of Overseas Office,
Information Manager**

Risks of Non-Compliance

- Failure to find necessary information and records
- Loss of evidence of decision-making or audit trail
- Loss of critical information
- Failure to meet Freedom of Information and Data Protection requirements
- Damage to DFID's reputation
- Breach of the Public Records Acts
- Legal challenge to DFID for acting incompatibly with the 1998 Human Rights Act.

J4: Media relations

Background

Effective media handling helps DFID to promote its work and protect its reputation.

The Press Office is at the frontline of DFID's relationship with the media. Professional press officers handle UK and international journalists' enquiries; set up briefings and interviews; brief news stories to newspapers and broadcasters; and offer media handling advice to ministers and officials. They act as official spokespeople for DFID.

In the UK, DFID ministers are usually the public face of the department. They give interviews on-camera and are quoted by name in media coverage. Occasionally officials will give background briefing on particular subjects but these will always be coordinated by the Press Office.

In overseas offices it's not always practical to involve ministers, and Heads of Office can act as named spokespeople in briefings and interviews. However, if the UK or international press will be involved briefings and interviews must be agreed and coordinated with the DFID Press Office. If the issue being discussed is known to be particularly newsworthy or controversial in the UK, the Press Office should agree the interview first - just in case comments are picked up internationally. However, all other local media work should be agreed with the Head of Office, rather than with Press Office.

For all enquiries, call the Press Office on +44 (0) 7023 0600 - a 24-hour pager service is in operation for emergencies.

Compliance Tasks

You must contact Press Office when:

- Any DFID staff member contacted by a UK or international (e.g. Reuters, Associated Press) journalist must immediately pass the journalist's enquiry to the Press Office, based in London Headquarters. (+44 (0) 20 7023 0600). Staff should not agree to provide briefing to, nor agree to an interview with, a UK journalist without having discussed this with Press Office.

Task assigned to: All Staff

- Staff working overseas must not agree to provide briefing materials or information to, or agree to an interview with a local journalist without prior agreement of their Head of Office.

Task assigned to: All Staff

- Heads of Overseas Offices are authorised to undertake local media briefings or interviews at their own discretion; any briefing or interviews with UK or international journalists - or any interviews on an issue which is known to be particularly contentious - must first be cleared with the UK Press Office.

Task assigned to: Head of Overseas Office

Risks of non-compliance

- Damage to the Department's reputation
- Inconsistent/contradictory information/messages
- Officials exposed to personal vilification in the media

J5: Publicity issues

Background

Well managed communications ensure that Ministers' priorities are reflected in all DFID's external messaging. To achieve this, Communications Division plans, coordinates and supports delivery of all external communications activity.

UK based, specialist communications staff may only be employed within Communications Division and overseas communications staff may only be employed with the agreement of the Director of Communications.

All communications activity must be either at no cost or low cost and any spending must be agreed in advance by the Director of Communications. Along with all other Whitehall Departments, DFID continues to be under strict controls on spending on communications that promote DFID's work, particularly publications and events in the UK.

Compliance Tasks

- The Director of Communications must approve any proposal for spending on communications that promote DFID's work, particularly publications and events in the UK, prior to submission to ministers.

Task assigned to: All Staff

- The Director of Communications, as head of profession and head of the Communications Cadre must approve all new communication posts. All communication jobs in the UK should be based in the central Communications Division.

Task assigned to: Information Manager, Line Manager, Office Manager, Overseas Security Managers

- All communication sections in submissions, along with all dates for announcements, events or publications must be agreed with Communications Division before putting them forward to Ministers.

Task assigned to: All Staff

- A communications adviser from Communications Division must approve all publications and publicity materials before production.

Task assigned to: Information Manager, Line Manager, Office Manager, Overseas Security Managers

- No team outside Communications Division may create a post with 'communications' in the job title.

Task assigned to: Head of Department

- No team should engage the services of external professional communications suppliers such as conference organisers, photographers, writers, editors, graphic designers or printers independently or without prior agreement from Communications Division.

Task assigned to: All Staff

- On the rare occasion that external suppliers, including photographers, writers or editors are employed (in line with the marketing controls) they must be contracted on terms that ensure DFID has the right to use and re-use their material as required.

Task assigned to: All Staff

- Electronic versions of DFID publications that are to be posted on the web-site must meet the accessibility criteria agreed in collaboration with the Corporate Communications Team and the Web team.

Task assigned to: All Staff

- Ensure that the UK aid logo is applied to all programmes funded by DFID, whether managed by ourselves or our partners and that the logo is used as set out in the Standards For Use of the UK Aid Logo.

Task assigned to: All Staff

- DFID employees should only use the official DFID business card.

Task assigned to: All Staff**Risks of non-compliance**

- Loss of credibility or broader damage to DFID's reputation. Lack of strategic focus to DFID's external communications output. Potential for mixed or conflicting messages to be delivered to known stakeholders or the broader UK public.
- Weakening of DFID's brand and presence.
- Breach of DFID/Her Majesty's Government (HMG) policies and guidelines such as those relating to use of 'green' and sustainable stock (recycled paper) and print production methods.

J6: Using electronic channels to communicate with DFID staff (inSight)**Background**

The DFID intranet (inSight) is the core electronic communications channel available to virtually all staff, both in the UK and in country offices. It enables staff to carry out tasks and share information across DFID. Each department has its own area explaining the work of the various teams, together with a who's who, news, key documents, policies and services.

The role of **Electronic Content Manager** (ECM) has been created in each department to approve and publish all material from staff. The Web Team in Business Solutions Division provides training and documentation for new ECMs and supports all ECMs. It is the responsibility of ECMs to cooperate with the Web Team to ensure that their site adheres to core standards and guidelines, and remains up-to-date.

Spotlight is the homepage of inSight and contains a daily news service, plus a feature of the week and module updates. The Employee Engagement Team in Communications Division checks and approves all material that has been booked for a Spotlight story by staff. Responsibility for overall editorial control of material lies with the Director of Communications Division.

Compliance Tasks

- Each department and country office must appoint at least one ECM who is responsible for publishing material on inSight

Task assigned to: Head of Department, Head of Overseas Office

- All ECMs must take the Electronic Content Manager training by the Web Team before they can publish to inSight

Task assigned to: Head of Department, Head of Overseas Office, Line Manager

- Requests for new sections in inSight must be made to the Head of the Web Team.

Task assigned to: All Staff

Risks of non-compliance

- Material not meeting standards will not be published resulting in unnecessary delays
- Poor visibility of your messages and objectives
- Ineffective internal communication.

J7: Communicating using DFID's website (external)

Compliance tasks

If DFID staff need to communicate using the web, they must do so through the www.gov.uk/dfid web address. They must not set up or fund their own external website.

Task assigned to: All staff

Requests to have data placed on DFID's website or data.gov.uk must go to the [DFID web team](#).

Task assigned to: All staff

In cases where material will be produced on our behalf but as part of a wider project with another organisation, the contract must include a statement that ensures that DFID is given access to the material and can link to it.

Task assigned to: All staff

Risks of non-compliance

- Poorly formatted material may prevent people with disabilities from using our website. It also risks prosecution under accessibility legislation.
- Damage to members of staff and the departmental reputation through inappropriate comments posted on social media websites.
- Multiple, unregulated websites risk confusion of DFID's message and identity among external audiences. They also cause confusion over lines of responsibility and corporate ownership of material on these websites.
- Damage to the departmental reputation through failing to comply with the government's website and spending controls.
- If the web team is not given sufficient notice for new material to be published, this may result in the missing of key publication deadlines and loss of credibility among DFID's external audience.

Background


DFID communicates with the UK public and our various partners and stakeholders to show how our assistance delivers real impact and that it is value for money. The DFID website became part of the UK Government's single website GOV.UK in March 2013. We continue to communicate our news, policies, priorities, worldwide locations and our corporate information and publications through this website. Our social media channels (twitter, facebook, and blogs) are used to engage audiences in the digital arena.

The digital and web teams in DFID publish all material on the DFID website to the quality standards and style required by the Government Digital Service, which supports and maintains the GOV.UK web platform. Web content must meet internationally recognised standards in usability and accessibility.

DFID's digital team manages our organisation's social media accounts which include twitter, facebook and YouTube. Staff may communicate in their capacity as civil servants on their own social media accounts as long as they follow the Cabinet Office and DFID's own guidance and the Civil Service code.

DFID also manages the Development Tracker which has details of all our projects and programmes and what they achieve. The information is drawn from ARIES and updated monthly.

The Freedom of Information Act refers to DFID's obligation to make documents and publications available to the public.

The  [National Archives](#) store online snapshots of the DFID website so that older material is still accessible for posterity from search engines.

No new websites

The Government has strict controls on spending on marketing, advertising and web/digital activities. Any teams planning a web element to a project should first speak to their Strategic Communications advisor to find out how best to communicate with their audiences. No new websites can be set up. Even if a web or digital activity is agreed in a business case for programme spend, it will still require approval by DFID's digital leader in line with spending controls.

J8: Copyright

Background

Copyright Legislation

Copyright is a right given by law to authors, publishers, designers, musicians, artists and other creators to protect and control certain uses of their work. The current applicable laws are the Copyright, Design and Patents Act 1988 and

the Copyright and Related Rights Regulations 2003. Creators do not need to apply for copyright protection, it is automatic.

The copyright owner has exclusive rights to their work. No one is allowed to copy, issue copies to the public, rent or lend it, broadcast or adapt it etc without their written permission.

Documents and material which DFID does not own cannot be scanned and saved on DFID systems without prior written permission from the copyright owner.

Quest is fully compliant with copyright legislation.

Crown Copyright

Works written or produced by officers of the Crown in the course of their official duties qualify for Crown copyright. DFID staff are therefore generally permitted to save or copy Crown copyright material for official use.

Fair dealing

The legislation allows the photocopying of limited portions of protected printed works for private study or non-commercial research without infringing the legal rights of authors or copyright owners. Fair dealing does not cover making multiple copies of articles, chapters or extracts.

Compliance Tasks

1. Read and be familiar with the DFID Corporate Copyright Policy and Quest Copyright Guidance and Policy.

Task assigned to: All staff

2. Photocopying and scanning of printed documents and materials, which DFID does not own, must comply with copyright legislation.

Task assigned to: All staff

3. ALL material and documents available on external websites must be accessed via links only. Documents or material available on websites must not be downloaded to any DFID system.

Task assigned to: All staff

4. Externally written material may only be saved to corporate systems if DFID has written permission from the copyright owner to do so or is in the process of seeking that permission.

Task assigned to: All staff

5. Documents or material for which DFID has copyright permission from the copyright owner must be saved and used only in accordance with the terms of the copyright owner's letter, license agreement or contract.

Task assigned to: All staff

6. Copyright permission will also be requested from individual department's specific business partners and made available to all staff.

Task assigned to: Information Manager

Risks of non-compliance

- Civil and/or Criminal prosecution
- Breach of existing contracts and licences
- Damage to DFID's reputation

J9: Information sharing

Background

The sharing of information and knowledge with external partners, other government departments, UK and international organisations and individuals can be crucial to DFID's functions. Information sharing supports our delivery of overseas development assistance and is also necessary for the exercise of many corporate support functions. Information sharing is central to DFID's transparency commitments.

Information may be shared proactively by DFID or may be shared in response to a request for information from a partner organisation, other government department or member of the public (under Freedom of Information legislation, for example).

All staff have a general authority to share information in their official capacity which is necessary for the carrying out of their official functions. Improper use of official information may breach the contractual obligations of DFID staff.

Information should however only be shared where there is a legitimate business need to do so. DFID information must only be used and shared for official DFID purposes and not for any other reason. Even unclassified (not protectively marked) information is official information and should not be disclosed to external organisations unless there is a business need to do so. 'Business need' should be understood to mean that the information sharing is necessary for any activity undertaken by DFID staff acting in an official capacity. Please read the full policy document listed under processes and tools for full details.

Compliance Tasks

- All disclosures of DFID information are to be made in accordance with DFID's Information Sharing Policy, related DFID policy and procedures, processes and tools.

Task assigned to: All Staff

- Staff must not brief or provide information to journalists without prior approval from Press Office.

Task assigned to: All Staff

- Staff will not disclose information in response to the Freedom of Information Act, Data Protection Act or the Environmental Information Regulations other than as agreed by the Information Rights and Public Enquiries team or the Public Records Acts other than as agreed by the Information Management Unit.

Task assigned to: All Staff

- Information Asset Owners will ensure that any framework for disclosure of information from their assets is agreed, published and communicated to all staff and is founded in consideration of this policy.

Task assigned to: Information Asset Owner

Risks of non-compliance

- security breach leading to compromise of information and damage to DFID's reputation and ability to operate effectively or adverse impact on staff safety
- leaks to the media
- breach of DFID's legal obligations leading to action by Information Commissioner
- damage to relations with partner organisations
- loss of confidence by Ministers in professionalism of DFID staff
- breach of Civil Service Code
- adverse finding by court against DFID.