

How to clear copy in the ICO

Version 3

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This procedure is to be used by ICO staff when communications materials (such as leaflets, DVDs, web pages, reports, codes of practice, guidance documents etc) are being prepared. It shows who is responsible for signing off written material before publication. It should be read in conjunction with the procedure written by the Head of Policy Delivery and agreed by the Information Rights Committee on 4 October 2010 (attached at end of document).

1. Agree a communications plan at the start of a project

- A communications plan ensures that basic issues such as level of publication, objective, audience, deadlines and authority are all agreed at the start.
- Corporate Affairs staff will write the plan in conjunction with the project manager or author. While smaller projects may not need full plans, it is good practice to ensure most materials have a communications plan, to ensure a common understanding and to avoid late changes of direction. Typically the plan will help identify the objective, main messages, audience, style, format, distribution, launch, budget, promotion and evaluation.
- All ICO published material must follow the ICO corporate identity and Style Guide, and the [Communications Policy](#) which

is published on the ICO website. Among other things, the policy defines good communication as appropriate to the audience, medium and message, in correct, clear language, honest, relevant, timely, appropriate, useful, inclusive and authoritative.

- Publications must be checked with the regional offices from the start, to ensure that they are valid across the UK and that any necessary regional variations (in terminology, for example) are taken into account.

2. New policy / publications

- New, novel and complex policy issues are passed to the Policy Sub Group for consultation. This group is a sub-group of the Information Rights Committee, and will be convened on ad-hoc basis, often with different members, depending on the policy issue. It is chaired by the Head of Policy Delivery and Corporate Affairs will be involved for communications planning, format and style purposes. Policy outputs are checked and signed off by Policy Delivery.
- The ICO has different levels of publication (see [the Publication Categories policy](#) in Meridio). Most level one and some level two documents offer clear advice to citizens or organisations, and they should reflect existing policy lines (rather than form new policy). These publications can be checked by the relevant department expert and signed off by the relevant person in Policy Delivery.

3. Production of publications (eg leaflets, web pages etc)

The normal route is:

- 1 Designated author (usually a member of Policy Delivery staff) starts the project and may form a project group or panel made of experts usually identified by ET; the group should include a representative from Corporate Affairs. The author's

website representative must be informed – they are familiar with the web pages, layout and site navigation and can advise in the early stages, for example on writing style for the web and where the item would best fit.

- 2 Author drafts document in consultation with the project group.
- 3 Draft document is consulted on internally (eg via ICO committees, selected individuals, staff groups or notes on ICON).
- 4 Amends are made.
- 5 The document is sent to Corporate Affairs to arrange Plain English editing.
- 6 The draft document is consulted on externally (optional).
- 7 Amends are made in consultation with project group.
- 8 Final sign off in Policy Delivery.
- 9 Corporate Affairs arranges design and production, in consultation with the author or project group.
- 10 Master copy of word document is retained and filed accessibly by Policy Delivery.
- 11 If any subsequent amends are made - eg to the web copy – Policy Delivery must be consulted and must sign the amends off; they also ensure the master copy word document is amended in line.

4. Authority for final sign off

The author must liaise with Corporate Affairs to ensure the writing adheres to the ICO's Style Guide and, where necessary (ie if it is a level one or two document), plain language rules. Any differences in opinion should be discussed and negotiate until a satisfactory agreement is reached. Content, policy line issues are determined by Policy Delivery managers. Style, design and suitability for audience issues are determined by the Communications Planning Manager or Online and Internal Communications Manager.

Any conflicts are resolved by the relevant ET member (or a combination of them) or - ultimately - the Information Commissioner:

- **Data protection and PECR materials:** Director of Data Protection.
- **Notification materials:** Operations Director in consultation with the Director of Data Protection.
- **Freedom of information and EIR materials:** Director of Freedom of Information.
- **Corporate materials:** Director of Corporate Affairs or Information Commissioner.
- **Style, design and suitability of materials:** Director of Corporate Affairs.

Steve Wood, Head of Policy Delivery, 30 Sept 2010, agreed at Information Rights Committee 4 October 2010.

Developing Information Rights Policy

Background

Project Evolve has created, for the first time, one department (Policy Delivery) that has lead responsibility for guidance and policy lines. This has particular benefits in terms of consistency and co-ordinating key policy messages. Other ICO departments may also still have a need to produce documents such as guidance.

Previously the ICO had a process for publishing guidance and signing off key policy documents entitled: "How to clear copy in the ICO". The ICO also has three levels of publication category set out in the document: "Publication Categories policy". Both documents are currently under review but attached for reference.

There is a need to reconsider how significant policy outputs are developed and signed off in light of new structure.

Proposed way forward

1. Create a Policy Sub Group of the Information Rights Committee

It is important that ICO departments (often Policy Delivery) consult on significant policy outputs that may disseminated internally or externally. It is proposed that new, novel and complex policy issues are passed to a new Policy Sub Group for consultation. This group will be convened on ad-hoc basis and may often have different members, depending on the policy issue. It is proposed to contain following:

- Head of Policy Delivery (Chair)
- Group Manager Policy Delivery
- Strategic Liaison rep(s).
- Operations Directorate rep(s).
- Corporate Affairs rep(s) (*maybe only needed for certain issues?*)

The group will be consulted on policy outputs that may be in the form of "lines to take", position papers, briefing notes or draft guidance. Primarily, Policy Delivery will bring policy outputs to the Sub Group but other departments may also wish to consult the group.

Once the group has been consulted the Head of Policy Delivery will sign off the final policy outputs (e.g. guidance, lines to take) and can refer up significant documents to IRC or to a relevant ET member(s) to decide if significant cross office differences are not resolved.

Note: Routine or straightforward policy lines will signed off by the Head of Policy Delivery or a Policy Delivery Group Manager without going to the sub group. Any new lines will be communicated to the office in the "policy delivery newsletter" (currently in development).

Other departments should also consider referring related policy issues to the Sub Group e.g. significant operational policies with significant information rights impacts or issues relating to the application of policy lines. Sign off arrangements for these outputs would lie with the relevant department, subject to the same resolution process via an ET member(s) if needed.

2. Guidance sign off process

Most of the guidance outputs will now be produced by Policy Delivery but is acknowledged that other departments may have a need to produce guidance. All guidance updates or changes to other copy on the ICO website, related to information rights must be routed through Policy Delivery. This to ensure consistency of approach.

Guidance will be signed off by the Head of Policy Delivery or a Policy Delivery Group Manager, before it is passed to Corporate Affairs. Significant departmental differences over guidance will be resolved by the relevant ET member(s). This will also be reflected in the revised "How to clear copy in the ICO" document.

3. Guidance project

It is proposed that that the Policy Sub Group will also be consulted on a new project to review the ICO's information rights guidance.

The guidance project will cover the following:

- Consultation with stakeholders about the content and form of the content e.g. levels, currency, complexity, topics covered etc.

- Internal consultation on guidance to seek staff views on how ICO guidance can reinforce the ICO's regulatory lifecycle.
- Development of new guidance policy – what should the ICO be seeking to achieve with its guidance. A new policy/process for commissioning guidance
- Development of new procedures for updating and maintaining guidance
- The balance between internal lines/guidance and external guidance.
- Consideration of other methods for disseminating technical/legal information e.g ICO blog.

Approval is sought from IRC to take forward the proposals in this document.