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# Propriety & Ethics Guidance for Government Communicators

A comprehensive guide on best practices in propriety, made specifically for government communicators.

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## Introduction

Maintaining a high standard of propriety and ethics within government communications is fundamental to preserving trust in public institutions. It is the job of the Government Communication Service (GCS) to explain the policies of the government and support the delivery of its priorities. Government communicators must carry out their work objectively and without political bias, with any content produced by civil servants demonstrably relevant to government responsibilities and a justifiable use of public funds.

This guidance has been developed by GCS to inform all government communicators of their responsibilities, and support them by providing real examples, scenario-based advice and a clear process to access help or raise concerns. [Propriety – how to raise a concern \(GCS members only\)](#) will provide information on the steps involved, with more detail provided towards the end of this page.

In addition, the GCS Propriety & Ethics training course has been created to provide insight and support on these hugely important topics in an engaging way. The training course is mandatory for all GCS members in ministerial departments to complete, and strongly recommended for those working in ALBs.

The course provides you with the knowledge you need to deliver communications responsibly and confidently. You will hear from senior communications leaders who share what they've learnt from navigating complex situations, as well as bringing to life the dilemmas we all might face using a mixture of real life case studies and a fictional scenario for you to work through.

The course also assists you with the practical elements of managing stakeholders and raising concerns.

[Introduction: Propriety and Ethics for Government Communication](#)

[Election and referenda guidance](#)

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[Propriety and ethics](#)

[Propriety in digital and social media](#)

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### Related topics

All grades and all levels

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### **1. Government communications should be relevant to government responsibilities**

The focus of government communications must be on areas where the Government has direct and significant responsibilities, i.e. explaining government policy and decisions, or alerting the public during times of crisis. Government communication needs to be justified in these terms, and not stray into areas which are party political or which cannot be linked back to core government responsibilities. If you have any concerns, doubts or questions, you are strongly encouraged to discuss these with your Director or Head of Communications.

### **2. Government communication should be objective and explanatory, not biased or polemical**

It is important that any information shared with the public, either directly or via the media, is as objective as possible. As set out above, government communications should seek to explain the decisions of the government of the day in a balanced and objective way. It should not be biased in terms of how the information is presented or what is shared with the public. Government communications should not attack or be critical of groups which may oppose a decision or policy. This is what we mean when we refer to government communications as not being polemical in tone. This would not be an acceptable use of government resources and risks affecting the ability of civil servants to work with such groups constructively either now or in the future.

### **3. Government communication should not be – or liable to be – misrepresented as being party political**

As a civil servant, it is our duty to present and describe the policies of a Minister, and to put forward the Minister's justification in defence of them. However, it would not be appropriate to justify or defend those policies in party political terms. As set out above, whilst it may be necessary to respond to the policies or opinions of opposition parties and groups, this should be done carefully, factually and objectively.

Whilst it is possible that a well-founded publicity campaign can create political credit for the party in government, this must not be the primary or a significant purpose of government communication activities. In addition, whilst it may be right to acknowledge the part played by individual Ministers, personal image-making must be avoided.

An example of where propriety and ethics considerations need to be especially carefully thought through is when communications teams are asked to produce constituency-specific materials.

Ministers or Special Advisers may ask government communications teams to produce briefing materials, including graphics, for specific geographical areas or constituencies. In this scenario it is very important that clear justification, supported by factual evidence, is set out as to why the communication of government policy or decisions may be needed with audiences in that specific area.

To ensure there is no risk to your communication team's impartiality, or perceived impartiality, GCS and Cabinet Office guidance is as follows:

- As the accounting officer, the Permanent Secretary is the ultimate decision-maker
- The material should be genuinely cross-party, a justifiable use of public funds, and compatible with the overall GCS propriety guidance
- If the project is likely to use official information not already in the public domain, Ministerial authorisation to share it must be obtained
- The material must be presented objectively and impartially; in terms of objectivity, graphics must be an accurate representation of the facts
- The selection of constituencies should be impartial and based on government policy and factual evidence from the department. It cannot be used as a way to promote a particular political party's agenda
- Check and adhere to any specific pieces of guidance for statistical and social research activities (generally and in the particular circumstances of political events such as elections or referendums),

### **4. Government communication should be conducted in an economic and appropriate way and should be able to justify the costs as expenditure of public funds**

The Government is accountable to Parliament for the use it makes of Civil Service staff or other public resources or expenditure. The resources employed should be proportional to the objectives or policy of the programme involved and justifiable on value-for-money grounds.

Government communication teams should follow GCS guidance on how to deliver effective campaigns, specifically the [OASIS campaign planning framework](#) and the [GCS Evaluation Cycle](#). In addition, all campaigns or programmes which involve expenditure over £100,000 over a financial year needs approval via Cabinet Office [Advertising, Marketing and Communication spending controls](#) before spend is committed. All communications expenditure must be carefully justified.

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## Ministers and the press office

It is the duty of media officers to communicate the policies of their department to the public through the media and to try to ensure that the policies are understood. The communication must always reflect the ministerial line clearly, even where policies are opposed by opposition parties.

As part of the Government's duty to govern, it needs to explain its policies and decisions to the electorate. The Government has the right to expect the department to further its policies and objectives, regardless of how politically controversial they might be.

Media officers have a duty to abide by the Civil Service Code and to remain objective and impartial, especially when dealing with politically controversial issues.

[Press office dos and don'ts](#)

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## Working with Ministers

Working with Ministers can be exciting and rewarding, and often leads to government communicators becoming highly motivated and involved. As civil servants, government communicators must abide by their obligations under the [Civil Service Code](#) at all times.

The [Ministerial Code](#) sets out that Ministers must not use government resources for party political purposes, must uphold the political impartiality of the civil service, and must not ask civil servants to act in a way that would conflict with the Civil Service Code.

The Government has the right to expect the full support of the Civil Service to explain its policies and objectives, however, public resources cannot be used for building Ministers' personal image and brands, which is the province of the Minister's political party.

Individually, communicators must behave in a way that will allow them to work for any future Minister of any future government. They must also work effectively as part of a team that includes Ministers, Special Advisers and other government communicators inside and outside their department.

If you're unsure or need any more clarity on roles and responsibilities, the Director of Communications, who is responsible to the Permanent Secretary and the Chief Executive of GCS for supporting government communicators, should provide the necessary support and advice.

[Party conferences](#)

[Issuing official speeches and texts](#)

[Announcing new policies](#)

[Ministers' private interests](#)

[Supporting a Ministerial event or visit](#)

[Using content from official Ministerial visits](#)

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## Digital and social media

The principles covering the use of digital media by civil servants in both an official and personal capacity are the same as those that apply for any other media. Social media,

for example, is a public forum and the same considerations apply as would, say, to speaking in public or writing something for publication either officially or in a personal capacity outside of work.

All government communication through digital channels must be consistent with the [Civil Service Code](#) and the established criteria for government communication outlined above.

Here are five things to bear in mind when using social and digital media, either at work or in a personal capacity:

1. **Common sense:** Social media helps us work openly and connect with the citizens we serve – just remember to apply common sense!
2. **Adhere to the Civil Service Code:** Apply the same standards online as are required offline, whether acting in an official or personal capacity.
3. **Doubts?** If in doubt, don't post it.
4. **Accuracy:** Check the accuracy and sensitivity of what you are posting before pressing submit.
5. **Permanence:** Remember that once something is posted online, it's very difficult to remove it.

Detailed guidance is available from the [Propriety in digital and social media page](#).

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## Marketing and publicity

The propriety challenges facing government communicators who work in marketing and publicity may be more subtle than for those working with ministers, but they are no less important. A substantial amount of public funds are spent on campaigns every year. It is essential that the cost of this paid publicity can be justified and reflects best practices.

The Government has a duty to inform the public about legislation, policies, the services available to them and their rights and liabilities. All communications and marketing programmes must be considered in the light of propriety and value for money. Government communicators are advised to keep a record of the options considered and the rationale for the decision taken.

Paid publicity may be used where the Government believes that a direct approach to the public is needed to give more information about particular issues and policies. This type of publicity is wide ranging and may follow legislation which has given the public new entitlements or obligations. Whatever the publicity is for, it needs to comply with Ofcom regulations on television and radio advertising.

All paid publicity work must be objective, factual, appropriate and intended to communicate government policies. It should not be, or appear to be, used for party political purposes. This applies to all aspects of the work, including content, context, treatment, style, tone and quality of presentation. The cost of any paid publicity must be justified and in proportion to the message being communicated.

The Government also has a responsibility and a right to use publicity to encourage behaviour that is in the public interest (for example crime prevention or road safety advertising). These campaigns may include a wide range of media channels and techniques to engage with audiences in a timely, appropriate and effective manner. Some of these simply provide factual information and practical advice, but others need to be more persuasive in content and presentation. Similar publicity is used to explain changes in the law that affect individuals or businesses, or the work of their professional advisers and intermediaries e.g. accountants, tax advisers, Citizens Advice Bureaux, etc.

There may be some sensitivity where the matters publicised are the product of controversial legislation or potentially controversial policies. However, the Government has a responsibility to inform the public of policy and legislative changes. Government communicators must ensure that the information is presented in an objective way that concentrates on informing the public about the content of legislation and how it affects them.

The Government may use a variety of media, including paid and unpaid publicity, to achieve its objectives.

Papers, briefings and documents set out what the Government is doing and what it wants to achieve and may cover topics that are politically controversial. In this case, government communicators must ensure that the content and tone remain objective, impartial and within the rules of the Civil Service Code.

[Paid publicity essentials](#)

[Distribution of unsolicited material](#)

[Justifying the costs of paid publicity](#)

[Ofcom guidance on advertising](#)

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## Direct marketing

Direct marketing is a term used to cover publicity methods that either involve a direct approach to an individual or seek a response directly from an individual.

The Government uses direct marketing when it needs to communicate directly with a specific target audience.

Direct marketing is a valuable, cost-effective, measurable media channel. However, when unsolicited, it can be regarded as intrusive and a nuisance. Inappropriate use in the past by commercial organisations has led to unsolicited material being labelled as junk mail or, in the case of digital activity, spam. This has created resistance among some recipients.

[The appropriate use of direct marketing](#)

[Criteria for using direct marketing](#)

[Further guidance: the Direct Marketing \(DM\) Code](#)

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## Public relations consultancy

Government departments can use PR consultancies or agencies for some work, provided that certain criteria are met. Please refer to guidance on procurement set out in [MCOM 3.0](#) which sets out that government frameworks must be used for the purchasing of external advertising, marketing and communications services and support.

[Buying communication support – GCS](#) will also help determine which framework is correct to use.

[Using PR consultancies](#)

[Criteria for appointing a PR consultancy](#)

[Written brief](#)

[Seeking advice](#)

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## Commercial and legal sensitivity

The purpose of this section is to provide guidance on legal and other restrictions that can affect the reporting of civil and criminal proceedings, and demonstrate how to deal with media enquiries about criminal cases.

### Checklist:

- Be aware of the potential sensitivities affecting civil and criminal proceedings and commercially sensitive information
- Understand the restrictions that affect news reporting of such information
- Ensure that reporters are made aware of these restrictions, whenever necessary

- Always check with legal advisers or appropriate officials before using advice that has not been updated very recently.

[Commercially sensitive information](#)

[Commercial confidentiality](#)

[Market sensitivity](#)

[Criminal proceedings](#)

[Reporting restrictions under the Magistrates' Courts Act – 'sub judge'](#)

[Contempt of court](#)

[Pre-trial briefings](#)

[Reporting breaches or contempt of court](#)

[Civil proceedings](#)

[Judicial review](#)

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## The legislative environment

The day-to-day work of government communicators must be understood in the wider context of the legislative environment. There is a range of legislation relating to the work of government communicators and they should, at least, have awareness of data protection, Welsh language, disability discrimination, freedom of information and copyright.

[Checklist](#)

[Data protection](#)

[Duties under the Equality Act 2010](#)

[GCS Accessible Standards](#)

[British Sign Language Act 2022](#)

[Welsh language](#)

[Freedom of information](#)

[Copyright](#)

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## Procedures

Government departments have a responsibility for ensuring that the conventions on propriety are observed and that value for money is being achieved. The principal source of advice to Ministers and heads of departments is the departmental Director of Communications.

Officials planning publicity or advertising campaigns should consult their departmental Director of Communications at the earliest stage and Heads of Department should ensure that the Director of Communications and the finance division have sufficient opportunity to advise on proposals for paid publicity. All proposals for paid activity are subject to scrutiny and expenditure is only permitted where:

- The Government has a legal duty to provide people with information, such as changes to legislation or public services
- Marketing and advertising are critical to the effective running of the Government
- There is robust evidence that marketing and advertising deliver measurable outcomes that meet government objectives.

No contractual arrangements with third-party suppliers can be entered into without prior approval under the terms of the controls.

If the departmental arrangements work well, the need for reference to central advice on propriety should be very limited. Central advice should be sought in the following three distinct circumstances:

- If a publicity proposal falls into a category where central reference is mandatory, as is at present the case for paid publicity in advance of legislative approval
- If a proposal is novel or contentious in expenditure terms, in which case early reference to the Cabinet Office team who administers the AMC spending controls is advised
- Where a Minister, Head of Department or Director of Communications wants a second opinion on the compatibility of a proposal with the current central guidance.

Departments may wish to seek professional advice on the most appropriate and effective ways of meeting their publicity objectives.

Directors of Communications can provide this advice both directly and in consultation with the wide range of private sector specialists that they commission and manage.

Directors of Communications regularly exchange advice and experience with their opposite numbers in other government departments and can consult the GCS propriety team and the Executive Director for Government Communication on matters of communications propriety, if required. They will advise if the matter needs further consideration by the Propriety and Ethics Team in the Cabinet Office, or by the Head of the Home Civil Service.

Government publicity for proposals which are, or may become, the subject of legislation in Parliament remains a particularly sensitive area. Until such measures have become law, any government publicity must neither assume nor anticipate parliamentary approval. Ministers should make sure that all proposals for paid publicity (including, for example, leaflets) which refer to legislation in advance of parliamentary approval, together with the proposed distribution of the material, are considered by the Cabinet Secretary and copied to the Minister for the Cabinet Office.

[Recruitment](#)

[Value for money](#)

[Legal position](#)

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## How to raise a concern

Here's how you, as a member of GCS, should raise an issue or concern – and how we will support you to do so.

### Stage 1

Bring it to the attention of a colleague or manager immediately. Refer to the GCS Propriety guidance, and:

- Talk to your line manager
- Review the issue within your team
- Refer to the [Government Communication Propriety guidance \(GCS\) to help you make a decision](#).

### Stage 2

If you feel the concern can't be resolved at team level, consult your departmental Director of Communications (DoC):

- Keep to the facts and stay neutral
- DoCs can also advise if the matter needs further consideration from the Propriety and Ethics team at Cabinet Office.

### Stage 3

Contact the GCS propriety inbox:

For further help and advice, send your queries to the GCS inbox:

- [gcs.propriety](mailto:gcs.propriety@hmrc.gov.uk) 

All messages and concerns raised will be handled directly by the Chief Operating Officer (Gem Walsh) and will be treated with confidence and sensitivity. We aim to reply within 3 working days.

## Contact

Email [gcs.propriety](mailto:gcs.propriety@gro.gov.uk) [GRO](mailto:gcs.propriety@gro.gov.uk)

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## Related content

- [Propriety](#)
- [Propriety in digital and social media](#)
- [Propriety – how to raise a concern](#)

**Published 2014**  
**Last updated February 2024**

Published 2014  
Last updated 12 September 2024



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