GCHQ Policy for Staff from OGDs and SIA partners with access to GCHQ systems and data (Part I)

I. Introduction

1. Staff on loan to GCHQ from other government departments (OGD), including the UK's intelligence and security agencies and other UK customer organisations, are a welcome and valuable addition to GCHQ in meeting the demands of an integrated intelligence and security mission now and in the future They bring personal knowledge, particular skills and expertise into GCHQ and, by their presence, help to strengthen relationships and promote greater understanding at all levels between the respective organisations.

2. GCHQ's policy for such staff with access to GCHQ systems and data consists of two parts Part I explains the need for such a policy and outlines the different aspects that it covers Part II conveys the detail of the policy and itself constitutes a Code of Conduct which both the member of staff on loan and the local GCHQ Business Unit Head are requested to read and sign to indicate that they agree to abide by it.

II. Why Do We Need a Policy?

3 Staff on loan to GCHQ enjoy a privileged position within the department. Their work often brings them into contact with sensitive information that they would not normally be party to at their parent organisation and as such this brings with it certain responsibilities for both the individual and GCHQ as a whole A clear understanding of these at the beginning of the period of loan will help to ensure a successful tour for all concerned.

III. To whom does it apply?

4. It applies to all members of staff on loan to GCHQ with access to systems and/or data For the most part, they work here for a limited period only, although for some the period may be much longer The spirit of the policy also applies to members of the military unit embedded in GCHQ and the members of the Armed Forces who are not part of that unit, although they are governed by separate administrative arrangements

IV. Policy Statements

5. The detail of GCHQ's Policy for staff from the aforementioned agencies and OGDs working on GCHQ systems and data is encapsulated within the attached Code of Conduct (Pt II)

6. The Code applies in full to the period of the loan and afterwards, when such staff leave GCHQ, in respect of continuing to protect knowledge about GCHQ, its sources, methods and relationships.

7. It set outs clearly what the member of staff can expect of GCHQ in terms of the wherewithal to do their job properly and, equally, what GCHQ expects of the individual in the day-to-day execution of their duties. The Code covers the following aspects in greater detail:

- *Acting as a member of the GCHQ team*
- *Declaration of status inside & outside GCHQ*
- *Access to data, including that which GCHQ does not own*
- *Privileged access to information*
- *Respecting GCHQ's need for secrecy*
- *Working with external customers, foreign partners, collaborating Agencies etc*
- *Representing GCHQ's interests*
- *Protecting our sources and methods*
- *Conflict of Interests*
- *The continuing obligation after leaving GCHQ not to reveal details of sources, methods and relationships*
- *Deriving maximum benefit for both organisations from the period spent working at GCHQ*

Code of Conduct for Staff from UK Intelligence and Security Agencies and OGDs (Part II)

I. Introduction

1 Welcome to GCHQ. Staff on loan to GCHQ from other government departments (OGD), including the UK's intelligence and security agencies and other UK customer organisations, are a welcome and valuable addition to GCHQ in meeting the demands of an integrated intelligence and security mission now and in the future. They bring personal knowledge, particular skills and expertise into GCHQ and, by their presence, help to strengthen relationships and promote greater understanding at all levels between the respective organisations.

2. While on loan here you will enjoy a privileged position within GCHQ. Your work will often bring you into contact with sensitive information that you would not normally be party to at your parent organisation and as such this brings certain responsibilities for both you and GCHQ as a whole. A clear understanding of these at the beginning of your period on loan will therefore ensure a successful outcome for both you and us

3. This is why we have produced this Code of Conduct which complements, and should be read in conjunction with, Part I of GCHQ's Policy for Staff from OGDs with access to systems and data. In essence, the Code sets out the specifics of our policy and applies in full to the time you spend working with us and afterwards in part, when you leave us, in respect of continuing to protect sensitive information and knowledge about GCHQ, its sources, methods and relationships.

4. Please read the Code carefully and sign it to indicate that you understand the need for such a Code and agree to abide by it. Once you arrive in post at GCHQ the Head of your Business Unit (BU) will meet you and also sign it as part of the induction process

II. The Code

i) What you can expect from GCHQ

➢ ***Access to GCHQ's data***

5 GCHQ will endeavour to treat you in the same way it treats all its employees with respect to your work-related duties. In principle we will supply you with all the tools necessary for you to do your job properly, including access to relevant database information, unless particular sensitivities prevent it. However, in keeping with all other GCHQ staff, the 'need to know' rule will continue to apply to you in GCHQ as it does in your parent organisation, and therefore you will not be given blanket access to information, neither by means of IT nor by across-the-board attendance at meetings, briefings etc. Arrangements put in place for you to do your work will remain for as long as you need them and will be withdrawn by your local line management when no longer required

6. As with all other GCHQ employees, if you are working away from GCHQ at any time your location, means of communication and local security arrangements will also be a factor in deciding what information you will be given access to.

[REDACTED]

7 [REDACTED]

8. [REDACTED]

➢ ***Access to other non-GCHQ data***

9. If there is a need for you to access other data or material which GCHQ does not own, the permission of the originating organisation will have to be obtained first This applies to both Sigint and non-Sigint data / reports / assessments etc. from any of the 5 Eyes partners. A request for blanket access is not an appropriate option but it is envisaged that access to a particular line of material will only need to be requested once for an individual. Although it is unlikely, please appreciate that on occasions this may be refused for reasons of sensitivity. If this happens, your BU Head will endeavour to find an alternative solution on your behalf.

➢ ***Declaring your status as a secondee inside & outside GCHQ***

10 If the nature of your work involves contact with individuals or organisations outside GCHQ (including any foreign partner contacts), your local line management may, with your consent, declare your status to them and identify your parent organisation before contact is made This will avoid any embarrassment that might ensue from a contact believing that you are a permanent employee of GCHQ and consequently imparting information to you which they might not otherwise have chosen to do.

11. For the same reason your status as a secondee will similarly be declared to those within GCHQ with whom you work. You should also reflect your status

as a secondee in any 'point of contact' details listed on your BU's webpages, in your e-mail signature block and in the GCHQ phone directory [REDACTED]. Throughout the period on loan you and your BU Head will need to ensure that your internal and external contacts remain aware of your status, especially when a change of incumbent takes place

ii) **What GCHQ expects from you**

- ***You are one of us***

12. You are an integrated member of the team and should conduct yourself as a member of GCHQ In common with your colleagues this means complying with the same range of GCHQ practices and culture that they do. These include everything from strict adherence to the rules laid down by the STRAP system and GCHQ's Compliance Documentation to acting in accordance with GCHQ's Values and observing accepted office etiquette If in doubt about how to proceed on a particular matter, your colleagues will be happy to assist.

- ***Privileged access to information***

13. During your period on loan you will have privileged access to GCHQ and partner information and data and will inevitably see much which is not directly related to your work and is only intended for internal GCHQ consumption Any such information should not be passed outside GCHQ in any shape or form.

- ***Respecting GCHQ's need for secrecy***

14. We will endeavour to ensure that you are not placed in an awkward position by exposing you to information to which you are not entitled to have access. However, should this ever happen, please do not pursue or investigate further and report the incident to your local management immediately.

- ***Working with external contacts***

15. All work related business and communications with external contacts should only be conducted within the same authorised channels used by your colleagues. You may retain accounts on e-mail systems or databases at your parent organisation but may only access them from GCHQ for administrative purposes, or for keeping up with developments there You may only use them for operational activities where there is a business need to do so which has been agreed with your BU Head.

- ***Representing GCHQ's interests***

16. When dealing with external contacts, please remember that you are a member of GCHQ and as such should primarily represent GCHQ's interests. If there is a need to draw on any other views or interests as a result of work in your parent or any other organisation, you must make this clear and where appropriate emphasise that those views may not reflect official GCHQ thinking on whatever the issue at hand may be.

➢ ***Protecting our Sources and Methods***

17 Where your work does involve contact with others outside GCHQ, you should not reveal any information you have been privy to other than that which is normally discussed as a matter of course between external parties and others in your immediate work area Except in specific, job-related circumstances, which must be agreed in advance by your BU Head, you must not otherwise disclose information or details about GCHQ's sources, methods, or relationships

➢ ***Conflict of Interest***

18 In any loan / host Department arrangement it is a fact of life that situations can arise in which a sense of divided loyalties may be experienced (by either party). The cause of such problems can be many and varied, a difference of opinion over policy, approach, the correct course of action to take in a particular situation, and so on. Regardless of whether such feelings are justified or simply the result of a misunderstanding, the key to resolving problems of this kind is immediate, frank and open discussion between all concerned

19 We would therefore ask both parties to adopt this approach and, in the case of staff on loan, to please raise the issue with GCHQ in the first instance. If difficulties remain after discussion has run its course, the issue should be escalated within GCHQ and pursued as a matter of urgency until the matter has been resolved amicably.

➢ ***After you leave us***

20 In accordance with the provisions of the Official Secrets Acts (1911-1989) the obligation not to reveal information, documents or articles relating to security or intelligence, which includes details about GCHQ's sources, methods, or relationships, continues after you have left GCHQ and will continue after you have left your home Department. We do, however, expect you to draw on the knowledge and experience you will have gained by working with us and to make the most of future opportunities where you believe GCHQ can be of assistance to appropriately cleared colleagues in your own or other organisations when you return to your home Department. When such opportunities arise you should not attempt to represent GCHQ's capabilities in any way, but seek to put interested parties in contact with the appropriate area of GCHQ The reason for this is that apart from the risk of inadvertently compromising those capabilities, Sigint is a fast-moving business and the most current and authoritative information will always be available in GCHQ itself.

III. Further Guidance / Complaints

21 We very much hope that you enjoy the time you spend with us and everybody in GCHQ will be only too happy to assist you in settling in fast and becoming part of the Team. If you do have any cause for concern, please consult your local management in the first instance.

22 Once you arrive in post at GCHQ the Head of your Business Unit (BU) will meet you and also sign this Code of Conduct to indicate that you have both understood it and have agreed to abide by it. Each of you should retain a copy for future reference. Copies should be stored locally for the duration of the posting.

23. The relevant policy team should also be notified when a new Integree has signed this agreement for our records (email [REDACTED]).

Staff member		GCHQ BU Head	
Name	.....	Name	.....
Signature	.....	Signature	.....
Parent Organisation	.....	BU	.....
Date	.....	Date	.....