



## **Recent Developments in Freedom of Information in Great Britain: A Preliminary Appraisal of the Government's "Code of Practice"**

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The time has come for us to recognise the wisdom of Thomas Jefferson between whom and the Freedom of Information there flows an apostolic line. The want of freedoms which the Americans receive . . . has always been a British deficiency. [1]

To Americans frustrated by the sometimes cumbersome nature of the Freedom of Information Act, it may come as a surprise to learn that there is a certain amount of envy and admiration in the mother country for what the FOIA can do for the patient citizen who takes the time to put it to use. The quotation above is, we think, a fair appraisal of the state of freedom of information in Great Britain. Frustrated by access barriers, British writers often find information in U. S. documents to shed light on British politics. In a recently-published book titled *The Fall of Hong Kong*, dealing with the imminent departure of the British from that colony and the events leading thereto, author Mark Roberti leaned on American documents to build a case for what he calls "Britain's betrayal." [2] The reviewer noted that a good deal of the background to the withdrawal agreement was well hidden from the British public.

Much of this is unknown to the British people; the Thirty Year Rule conceals the documentation. The U. S. Freedom of Information Act, on the other hand, has already put many of the facts into the public domain; it is from this source that the author has drawn extensively. [3]

Most of an issue of Secrets, publication of the Campaign for Freedom of Information, a rough equivalent to the Washington-based Reporters Committee, amplifies the curious circumstance described above, including information about cleanliness on British cruise ships, pesticide data unavailable in England and environmental problems at an American air base in England--all taken from documents obtained by using the U. S. FOIA. [4]

### **Persistent Zeal for Openness**

It is accurate to describe the legal state of affairs vis à vis open records at the national level in Great Britain as lagging behind the United States, but the persistent zeal for openness there is on a par with the freedom of information movement in the United States. The collective effort of British journalists and other interested groups has not yet led to legislation. But it did lead to the establishment of an Open Government Code of Practice in April 1994. [5]

This article will (1) summarize some of the fundamentals in the British political culture that affect freedom of information, (2) review the history of the freedom of information movement in Great Britain, (3) describe the unsuccessful attempt to pass a national freedom of information law in Great Britain that led to the government's adoption of a Code of Practice with no legal enforcement powers and (4) report on the use the Code in the period from April to December 1994.

Readers should note that there has been considerable success in working toward openness at the local government level in Great Britain, in terms of access to both records and meetings. These advances in law, roughly equivalent to the 50 sets of laws governing openness at the state level in the United States, are not the focus of this article.

### **British Political Culture and Openness in Government**

Those who seek more openness in government in any nation-state must work within the political culture. Commentators in Great Britain who have tried to explain the difficulty in effecting change must confront the question of ". . . why Britain's tradition of governmental secrecy has proved so durable." [6] Professor A. P. Tant's summary of the British political tradition and its effect on secrecy is a useful one.

Old Tory theory saw a King as the earthly leader of a heavenly ordained society, holding the initiative in policy making. The English Civil War overturned that view and replaced it with a Whig "balanced constitution" that put Parliament and its members at the center of policy making. The result was not a purely people-centered democracy, but one that dealt with a system of checks, balances and patronage involving the King, Lords and Commons. Parliament took on a coloration that was more deliberative than representative, though it was the latter as well. The result "institutionalized a narrow, elitist concept of representation." [7] The elected representatives thus set themselves apart as an independent authority from those they

represented. Professor Tant argues that this has led to an elitism in British governmental theory that seems "highly questionable in a democratic era," [8] and unquestionably bears on the matter of official secrecy.

Cabinet ministers, plucked from the House of Commons when a government is formed, thus become charged with the responsibility for seeing that government pursues a wise policy, whether or not it meets with immediate public approval.

Strong, centralized, decisive and independent government is thus again emphasized, with the assumption that good government is not founded upon what the people want, but rather, upon what their governors consider to be right. [9]

### **Not Directly Accountable**

Responsibility in this scheme of things is to the Parliament, rather than popular opinion. Ministers must be ready to resign when mistakes are disclosed, "rather than when they are discovered." [10] Undisclosed mistakes do not pose a constitutional problem, and ministers thus have a strong incentive to keep a lid on information release. Leaking is not only irresponsible but a breach of trust and duty, and undermines public confidence and support. "Since government is not (directly) accountable to the people, there is little need for the people to be well-informed about the details of public policy." [11] Responsiveness is not an obligation. All this identifies, according to Professor Tant

. . . an idea central throughout the whole of the British tradition, and upon which official secrecy rests. That is, that government--whatever the form or ideological justification--is the sole arbiter of the national interest/public good. [12]

Another commentator, David Galbraith, posed the difficulty in a slightly different way: "Open government depends upon a justification grounded in moral rights which contradicts the received theory of constitutional law in the United Kingdom." [13] Under the received theory, ". . . the State is the Leviathan and open government has no place in the Leviathan. The Leviathan is all-powerful, sovereign, and open government implies a sharing of power in the act of knowing and the right to know." [14]

This summary of British political theory and its application to government openness may, to the cynic, seem to be a carbon copy of what is operative on the American side of the Atlantic. Citizens and journalists have long struggled against oppressive methods of controlling information in the United States. But, without reviewing two hundred years of American political theory, there is an obvious and fundamental difference in a nation which rejected imperial control in favor of a system that picked its governors from among the people at the outset. Accountability resides in the elected official, and Americans have never been shy in going directly to those officials for answers. Truth and full disclosure are not easy or guaranteed, but the distance between the governed and the government seems much closer than in Great Britain. As scholar Martin Smith writes:

The official mind in Britain has an exaggerated regard for tradition. Tradition consists largely of the accumulation of precedents. In the establishment canon precedent is overwhelmingly on the side of 'discretion' and 'confidentiality.' Both terms signify values which are deeply rooted in ruling British political culture. [15]

### **The Freedom of Information Movement**

Observers date the contemporary campaign for freedom of information in Britain to the 1960s. Into the 1970s the movement is described by Professor Tant as "no more than a loose association of bodies and individuals sharing a common position on a single issue, and working together informally to further parliamentary bills." [16]

The "loose association" included many press and consumer groups, some carrying the imprimatur of the legal establishment. In 1978, for instance, a committee of Justice, the British section of the International Commission of Jurists, issued a pamphlet titled, Freedom of Information. [17] It was edited by Anthony Lincoln, Q. C., (Queen's counsel), representing the Justice council including lawyers, jurists and legal scholars. It succinctly set forth a rationale for more openness in government. It recognized the basic difficulty in defining the term, "freedom of Information," and the fact that universal openness was a pragmatic impossibility. But it insisted that "too little information is furnished to the public by government in the United Kingdom and its agencies and that unnecessary secrecy surrounds many aspects of the administration and the legislative process." [18]

The committee suggested that it was time to go beyond stating the need for more information by moving to concrete action. They recommended a Code of Practice that would establish an affirmative framework for openness as well as a set of rules within the Code. This included a requirement to provide information or documents on request, unless there was an exception or exemption. The exemption list was remarkably short and reasonably precise: (1) defense, national security and internal security, (2) law enforcement, (3) litigation material otherwise protected by privilege, (4) material entrusted in confidence to an agency or authority, (5) matters concerning individual privacy and (6) material which would expose an individual to a defamation action. [19] The exemptions were not foolproof, and there was no enforcement mechanism inherent in the proposed code, but the document added prestige and commitment to the FOI movement.

### **Efforts to "Legislate" Openness**

Attempts to legislate openness at a variety of levels increased. A 1979 bill unsuccessfully introduced in Parliament by Clement Freund sought access to advice and information that had been available to ministers, making "factual advice" available without delay, thus separating it from the more sensitive "policy advice." [20] Without the support of the government--including for a long period of time that of Prime Minister Margaret Thatcher, a stubborn opponent of openness--most attempts at change led nowhere. [21]

The ingathering of a variety of organizations under an umbrella organization in the early 1980s was a critical milestone in the FOI campaign. The 1984 Campaign for Freedom of Information

brought together what might best be described as a diverse and interesting group of organizations, which numbers at least 81 at present. [22] The organizations range from the predictable (Campaign for Press and Broadcasting Freedom, National Union of Journalists and Institute of Journalists) to the unpredictable (Church of England Board for Social Responsibility, Greenpeace and the Vegetarian Society), at least by American freedom of information standards. (The Orwellian "1984" has since been dropped from the title, and a three-member staff headed by director Maurice Frankel works out of a compact 20-by-20 foot, efficiently organized office at 88 Old Street, London.)

The unified campaign produced its first major legislative success with the Local Government (Access to Information) Act 1985. The bill legislated openness of subcommittees to the public and amended a 1960 open meetings law to redefine vague closure provisions for reasons of "confidentiality" and "public interest." Minutes were to be made available along with government information assembled for governmental use. Publication of the public's right of access to information was also required in the new law. Passage of the law represented an instance in which the Thatcher government did not oppose a private member's bill, and required only some modification to give the support needed for passage. [23]

Other successes short of a national freedom of information bill followed, including laws providing individual access to personal files (1987) and medical records (1988). Some observers regard these as only minor triumphs, without denigrating the level of difficulty required, in that they made little or no dent in the larger circle of secrecy drawn around Westminster and Whitehall by political tradition and laws such as the Official Secrets Act. [24]

### **The (Failed) Attempt for a Freedom of Information Bill**

In 1991, the Campaign for FOI launched its most important effort, a move for national legislation covering access to major organs of government, roughly equivalent to the U. S. Freedom of Information act. A 165-page document [25] was published in November 1991 that contained a draft bill and commentary.

The authors described the draft bill as accomplishing the following:

1. Creating a "general public right of access to government records." [26]
2. Defining exempt classes of information.
3. Preventing government from withholding records "unless it can demonstrate that their contents are exempt." [27]
4. Establishing a review body--a Commissioner and Tribunal--with power to examine records and require disclosure. [28]

Exempt information was designed to "protect information where a genuine case for preserving confidentiality" [29] existed, and would permit withholding if significant damage would be done to specific interests: defense, security and intelligence services, foreign relations, law

enforcement, the economy, commercial activities of a public activity or a third party, privacy invasion, policy advice (but not expert advice) and legal advice related to possible litigation. [30]

The Commissioner and Tribunal arrangement was designed to expedite review where denial resulted and be less expensive and more informal than the courts; a body of case law would be built up over time. [31]

The Introduction argued forcibly and directly that the law was not an attempt to undermine traditional parliamentary accountability, but only opened up access on the part of both Members of Parliament and the public. That it would change Ministers' ability to withhold information was acknowledged but found no reason to use this as an argument for opposing the law. The introduction also cited the experience of other democracies--particularly Commonwealth nations such as Canada, Australia and New Zealand--which had modified their own parliamentary systems by passage of open records legislation; none of those countries examined reported a weakening of traditional power and authority beyond the increased openness. The advantages far outweighed any perceived disadvantages. [32] Any person would have a right of access to information not exempted, and fees would be minimal and predictable. A thirty-day response time was set for agencies. Procedures for appeals through the Tribunal were simply and clearly outlined.

The bill was introduced by Labour Party MP Mark Fisher as a private member bill in 1992. It survived into a second reading and a five-hour debate on the floor of the House of Commons February 19, 1993, and was voted into committee 168-2. That there was enormous support seemed evident, and comment wide ranging. Glenda Jackson, Labour Party MP and actor, noted that Sweden had had an FOI law for two hundred years as did the United States, "which had more paranoia than most about internal and external threats to its security." [33] A Conservative MP, Alan Howarth, said "the great prize" in FOI was the improved opportunity it would give the press for serious discussion of important issues. Decision making would be improved if the advice of experts was "tested by being exposed to the scrutiny of common sense and of alternative experts." [34]

### **Openness Loses Out**

In the end, the naysayers prevailed and the bill died in committee, because of a lack of support by John Major's government. Conservative MP Bernard Jenkin said the bill represented a "blunderbuss approach" to increased openness. [35] The government's spokesman, William Waldegrave, said that information sometimes must be kept secret, that governing involved negotiation at many public and private levels where "one cannot always have all the cards face up." [36] The proposed bill went further than legislation in other countries, he claimed. And, he asked, was it right that public authorities should provide access to internal papers in what might be a "fruitless diversion of effort?" [37] He promised a White Paper on openness before the end of summer, 1993. [38]

That is just what happened. The position paper, simply titled Open Government [39], was the government's non-legislative response to the failed open records bill. Commentators found both good and bad in the government's proposals. Professor Charles Raab said it "ambitiously and

creditably encompasses issues that constitute a broadly-based agenda for information policy. It brings together measures concerning public access to information about the current workings of government . . ." [40] There was in the document the possibility for "modest but achievable change that builds upon recent laws and initiatives." [41] On the other hand, Professor Raab continued, the implementation of a Code of Practice was heavily dependent on personality and persuasion without an enforcement mechanism within the law. Discretion was still broad and vague. "Whilst the White Paper grasps the importance of openness as a democratic principle, it blurs it through uneven and arbitrary application to different objects, he said." [42] While opening access to information, the White Paper denied a right to documents. The Justice report of 1978 [43] was incorporated in the Code, without permitting access to documents as suggested in the Justice report. [44]

### **A Foot in the Door**

The Campaign for Freedom of Information was less approving than the scholarly analysis provided by Professor Raab. The lead story in its publication said it directly with its headline, "Code of Practice Falls Short of Right to Know." [45] The Open Government document contained some positive aspects, but "stops a long way short of delivering freedom of information." The good news was that there was a "foot in the door" but the failure to provide access to documents (as opposed to information) was disappointing. Despite concessions, "the need for genuine freedom of information is as pressing as ever," the organization argued. [46]

What then, is this "Code of Practice" which the government initiated and implemented on its own in the wake of the unsuccessful open records legislation? In a document urging citizens to use the code, which went into effect in April 1994, the Campaign for Freedom of Information outlined what the Code offered:

- A government promise to release information unless it was exempt by one of fifteen broad classes of exempt information.
- A government response to requests within twenty working days.
- An appeal mechanism. The citizen can ask the department to review its decision and then request review through the Parliamentary Commissioner for Administration (the Parliamentary Ombudsman), an action which has to be initiated by a Member of Parliament.
- Publication of departmental internal rules and manuals.
- A general commitment to explain to citizens administrative decisions which affect them. [47]

The defects remained, however: supplying information but not documents, too many exemptions vaguely worded, an uncertain and probably overpriced fee system, limited coverage of governmental bodies, no authority to compel disclosure, no direct, citizen appeal to the Ombudsman. [48]

A copy of the pamphlet published by the government to explain the Code and its use is appended to this article. [49] It is a simply written document in question-and-answer style that describes how the citizen may use the Code, and which government departments are covered by it. The

Campaign for FOI urged that the Code be used, despite its shortcomings, and asked for feedback on problems. [50]

### **Differing Interpretations**

The first comprehensive report on the effect of the Code was issued November 9, 1994 and seemed to bear out the worst fears of those in the freedom of information campaign. [51] The two key problems were wildly varying charges for information and searches, and differing interpretations of how the Code should be applied to requests.

The worst case of photocopying charges was found in the National Rivers Authority, which required £/50 a page for regular size photocopies and £/100 per oversize page, roughly equivalent to \$80 and \$160, respectively. The Public Health Laboratory Service said it would charge between £/2,000 and £/3,000 to name local authorities who reported salmonella food poisoning incidents since 1988. Some agencies asked for a flat £/15 application fee paid in advance, nonrefundable even if no information was forthcoming. [52]

There were some bright spots. The Cabinet Office, the Department of National Heritage, the Lord Chancellor's Department, the Scottish Office and most of the Northern Ireland Office were waiving charges for the first five hours of work. The Department of Trade and Industry and the Welsh Office also did not charge if costs were under £/100. [53]

The media have been supportive in the campaign and in reporting most developments in the implementation of the Code, according to director Maurice Frankel. [54] For instance, both the Times and the Guardian carried succinct summaries of the Campaign's report on the code [55] and the Times editorialized strongly that the application of the Code was being undermined by uneven application and exorbitant fees. [56] The media response is predictably uncertain, Frankel says, and some reports on specific agency responses to requests have been ignored by newspapers. [57]

It is too early to assess fairly the effectiveness of the Ombudsman in supporting the code, but a few early successes were reported late in November. William Reid, the Parliamentary Ombudsman, said both the Department of Health and the Minister of Transport had disclosed information after an appeal to his office was carried to the departments concerned. He reported only twenty-one complaints to his office by the end of November, 1994, but said they demonstrate "the way in which information, which the Government had been reluctant to release, can be obtained under the Code." [58]

### **Summary and Conclusions**

With less than two years of experience of using the Code, it is premature to assess it as a success or failure. What has been reported so far reminds us of the early years of the U. S. Freedom of Information Act, where response time was uncertain, the appeals process nonexistent and the fee structure capricious. A certain amount of realism about freedom of information is urged by one commentator:



The experiences of Freedom of Information in the USA, and support for the Local Government (Access to Information) Act in [Great Britain], support the contention that open government is a minority interest. Nevertheless, the lesson from all aspects of politics is that action is ultimately determined by the powerful, not by the majority. [59]

The Code as government response to blunt the freedom of information movement will not, it is safe to say, satisfy the individuals and organizations who have worked in recent decades to change deep-seated resistance to openness. Although the level of legal openness in Great Britain may indeed be below that which is enjoyed in the United States, the commitment to improve, change and educate is neck-and-neck. The British government can expect no respite in the years ahead from those committed to open government.

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## End Notes

[1] Edward Pearce, *New Statesman*, January 22, 1988, 8.

[2] Martin Booth, "The Last Signing" (review), *The Sunday Times (London) Books*, November 13, 1994, 6.

[3] *Ibid.*

[4] "What the American FOI Act Reveals about Britain," *Secrets*, July 1991, 1, 2, 4, 5.

[5] "Testing the Open Government Code of Practice," *Open Government Briefing No. 1*. (London: Campaign for Freedom of Information, May 1994), appendix.

[6] A. P. Tant, "The Campaign for Freedom of Information: A Participatory Challenge to Elitist British Government," *Public Administration* 68 (Winter 1990):478.

[7] Tant, 479.

[8] *Ibid.*

[9] Tant, 480.

[10] *Ibid.*

[11] *Ibid.*

[12] *Ibid.*, 481.

[13] "Official Secrets, Security and Open Government," in *Freedom of Speech: Basis and Limits*, Garry Maher, ed. (Stuttgart: Franz Steiner Verlag Wiesbaden GmbH, 1986), 64.

[14] Ibid.

[15] "Open Government and the Consumer in Britain," in Freedom of Information Trends in the Information Age, Tom Riley and Harold C.Relyea, ed. (London: Frank Cass and Co., 1983), 125.

[16] Tant, 481.

[17] (London: Justice, 1978).

[18] Ibid., 1.

[19] Ibid., 17-18.

[20] Tant, 482.

[21] Ibid., 483.

[22] "The Campaign's Supporting and Observer Organizations," Secrets, August 1993, 8.

[23] Tant, 483-4.

[24] Tant, 484-5.

[25] A Freedom of Information Act for Britain: A Draft Bill and Commentary (London: Campaign for Freedom of Information, 1991).

[26] Ibid., 1.

[27] Ibid.

[28] Ibid.

[29] Ibid.

[30] Ibid., 1-2.

[31] Ibid., 2.

[32] Ibid., 5-7.

[33] "The Commons Debate: What MPS said," Secrets, August 1993, 3.

[34] Ibid.

[35] Ibid.

[36] Ibid.

[37] Ibid.

[38] Ibid.

[39] Cm 2290, Open Government (London: HMSO, 1993).

[40] Charles D. Raab, "Open Government: Policy Information and Information Policy," *Political Quarterly* 65 (July-September 1994): 340.

[41] Ibid., 341.

[42] Ibid.

[43] See footnote 17, *supra*.

[44] Raab, 342-3.

[45] *Secrets*, August 1993, 1.

[46] Ibid.

[47] "Testing the Open Government Code of Practice," May 1994 (London: Campaign for Freedom of Information, 1994), 1-2.

[48] Ibid., 2-3.

[49] "Open Government: Access to Government Under the Code of Practice," 1994 (London, n.p., 1994).

[50] "Testing," 3-12.

[51] "Cost of Information 'Prices Right to Know out of Public's Reach,'" (news release, Campaign for Freedom of Information), 9 November 1994.

[52] Ibid.

[53] Ibid.

[54] Interview, Maurice Frankel, London, November 18, 1994.

[55] "Whitehall Data Fees 'excessive,'" *Guardian*, November 9, 1994, 6; "£/100 a Photocopy is Price of Public's 'Right to Know,'" *Times*, November 9, 1994, 8.

[56] "Glasnost for Sale: Freedom of Information Requires Reasonably Low Fees," Times, November 9, 1994, 19.

[57] Frankel interview.

[58] "Ombudsman Flexes Muscles," Independent, November 24 , 1994, 12.

[59] M.C. Hunt, Open Government in the 1980s (Sheffield, England: PAVIC Publications, Sheffield City Polytechnic, 1988), 10.

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## **Appendix**

### **Open Government: Access to Government Information Under the Code of Practice**

*On 4 April 1994 a new Code of Practice came into effect to provide greater access to government information. This leaflet explains how it will operate.*

#### **What will the Code of Practice Mean?**

The Code of Practice is based on Citizen's Charter themes of increased openness and accountability. It will support informed policy making and debate and efficient service delivery. It will make information about the policies, actions and decisions of Government departments, agencies and public bodies more widely available.

The Code includes five commitments:

- to give facts and analysis with major policy decisions.
- to open up internal guidelines about departments' dealings with the public.
- to give reasons for administrative decisions.
- to provide information under the Citizen's Charter about public services, what they cost, targets, performance, complaints and redress.
- to answer requests for information.

#### **Which bodies are covered by the Code?**

Central government departments and their agencies as well as many other public bodies which are subject to investigation by the Parliamentary Ombudsman. A list appears in this leaflet. Similar Codes are being prepared for the National Health Service and local authorities.

#### **Will all government information be available?**

The presentation is in favour of the release of information. But the Government must honour personal privacy and commercial confidences, and will not operate the Code in a way which

undermines good management and internal decision making, or such functions as law enforcement and defence. A list of exemptions is included in the Code.

### **How do I apply to see information?**

The first step is to contact the relevant department, agency or body. Write to them explaining what information you are looking for. Being as precise as possible will help the department to answer your request more quickly. You do not have to specify particular files or documents, and the Code does not entitle you to see them. It is the Department's responsibility to find and provide the information you are seeking.

### **How long will it take?**

Departments have set themselves a target of twenty days in which to deal with simple requests. If they are going to need longer to reply, they will let you know and give you a new deadline by which you can expect to see the information.

### **What will it cost me?**

Much information will continue to be provided free of charge, especially where this is necessary to explain:

- benefits, grants and entitlements.
- the standards and performance of services.
- the reasons for administrative decisions made in your case.
- the way in which you may exercise rights to appeal or complain about a decision.
- regulatory requirements bearing on your business.

To ensure that the Code does not create extra burdens on the taxpayer there may be a charge for information if a request does not come within one of these categories and causes additional work. Charges may consist of an initial flat rate to cover straightforward requests, with the possibility of an additional payment if your request causes significant extra work, but this will always be notified in advance so that you can confirm you are willing to pay before work is undertaken. Charging schemes vary, so contact the Department or agency for details.

### **What if I have a complaint?**

If you believe that your request has not been answered properly, or that a response has taken too long to come, or if you think that you have been charged too much, then you may ask the body who provided the information to review its decision. You will be given details about internal review along with the response to your request.

### **What if I am not satisfied with the outcome of the internal review?**

The next step would be to approach the Ombudsman through an MP [Member of Parliament]. He is an independent officer of Parliament who has the power to see papers relevant to each case

and will be able to test decisions against the Code of Practice. The Ombudsman has produced his own leaflet explaining how he can help the public in these and other matters. This is available from Citizen's Advice Bureaux, public libraries and the Office of the Parliamentary Commissioner for Administration, Millbank Tower, Millbank, London, SW1P 4 QP.

### **Where can I get a copy of the Code?**

To order a copy of the full Code of Practice either call 0345 223242 or write to:

Open Government, Room 417b  
Office of Public Service and Science  
70 Whitehall  
London SW1A 2AS

### **Does the Code affect my statutory rights?**

No. You already have some statutory rights to personal information held by local authority housing and social services departments, and to certain education, health and medical files. The Data Protection Act creates rights of access to personal information held on computer, the Environmental Information Regulations to certain environmental information and the Consumer Credit Act to credit reference records. The White Paper on Open Government proposed that there should be new rights of access to personal files and health and safety information; these are subject to Parliamentary approval and are not yet in place. There are also requirements in law that certain personal and commercial information must be kept confidential. The Code does not cut across these.

### **List of bodies covered by the code of practice**

Advisory, Conciliation and Arbitration Service  
Agricultural and Food Research Council  
Agricultural Training Board  
Agricultural, Fisheries and Food, Ministry of  
Agricultural Wages Committees  
Arts Council of Great Britain  
British Council  
British Film Institute  
British Library Board  
Building Societies Commission  
Central Office of Information  
Central Statistical Office  
Certification Officer  
Charity Commission  
Construction Industry Training Board  
Co-operative Development Agency  
Countryside Commission  
Countryside Council for Wales  
Crafts Council  
Crofters Commission  
Crown Estate Office  
Customs and Excise

Data Protection Registrar  
Defense, Ministry of  
Economic and Social Research Council  
Education, Department for  
Education Assets Board  
Educational Visits and Exchanges, Central Bureau for  
Education and Training in Social Work, Central Council for  
Standards in Education, Office for  
Electricity Regulation, Office of  
Employment, Department of  
Engineering Construction Industry Training Board  
English Tourist Board  
Environment, Department of  
Equal Opportunities Commission  
Export Credits Guarantee Department  
Fair Trading, Office of the Director General  
Foreign and Commonwealth Office  
Forestry Commission  
Friendly Societies, Registry of  
Friendly Societies Commission  
Gas Supply, Office of  
General Register Office, Scotland  
Health, Department of  
Health and Safety Commission  
English Heritage  
Health and Safety Executive  
HM Chief Inspector of Schools in England  
HM Chief Inspector of Schools in Wales  
Home Office  
Horserace Betting Levy Board  
Hotel and Catering Industry Training Board  
Housing Corporation  
Housing for Wales  
Human Fertilisation and Embryology Authority  
Inland Revenue  
Valuation Office  
Intervention Board for Agricultural Produce  
Land Registry  
Legal Aid Board  
Legal Aid Board, Scottish  
Lighthouse Authorities  
--(a) The Corporation of the Trinity House of Deptford Strond  
--(b) The Commissioners of Northern Lighthouses  
Lord Chancellor's Department  
Lord President of the Council's Office  
Medical Practices Committee  
Medical Research Council  
Scottish Medical Practices Committee  
Museums and Galleries Commission  
National Debt Office  
National Heritage, Department of  
National Heritage Memorial Fund, Trustees of  
National Lottery, Director General of  
National Rivers Authority  
National Savings, Department for  
Natural Environment Research Council

Nature Conservancy Council for England  
New Towns, Commission for  
New Towns, Development Corporations for  
Northern Ireland Court Service  
Northern Ireland Office  
Ordnance Survey  
Passenger Rail Franchising, Director of  
Population Censuses and Surveys, Office of  
Rail Regulator  
Registrar of Public Lending Right  
Public Records Office  
Public Service and Science, Office of  
Racial Equality, Commission for  
Red Deer Commission  
Registers of Scotland, Department of  
Residuary Bodies  
Rights of the Trade Union Members, Office of the Commissioner for  
Royal Mint  
Rural Development Commission  
Science and Engineering Research Council  
Scottish Courts Administration  
Scottish Homes  
Scottish Natural Heritage  
Scottish Office  
Scottish Records Office  
Scottish Sports Council  
Scottish Tourist Board  
Social Security, Department of  
--Child Support Agency  
--Social Security Contributions Agency  
--War Pensions Agency  
Sports Council  
Sports Council for Wales  
Stationery Office  
Protection against Unlawful Industrial Action, Office of the Commissioner for  
Telecommunications, Office of the Director General  
Board of Trade  
Trade and Industry, Department of  
Traffic Director for London  
Transport, Department of  
Driver and Vehicle Licensing Agency  
Treasury  
Treasury Solicitor  
Urban Development Corporations  
Urban Regeneration Agency  
Rural Wales, Development Board for  
Water Services, Office of  
Wales Tourist Board  
Welsh Language Board  
Welsh Office

As well as other government agencies not mentioned in this list.

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## **About the Author**

Wallace B. Eberhard is a professor in the College of Journalism and Mass Communication, The University of Georgia. He was a newspaper and magazine journalist in Michigan for ten years after graduating from the University of Michigan in 1955. He holds a Ph.D. from the University of Wisconsin, and has been in journalism education for thirty years. He has published research in a variety of journals, and is editor of *American Journalism*, which is devoted to the study of mass media history.

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