



THE OFFICE OF THE DATA PROTECTION COMMISSIONER

Communications Strategy

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Communications Strategy

1. Statement of purpose

This document details how we plan to communicate our key messages. It covers the period 2019 – 2021, and will be reviewed in December of each year.

This communications strategy defines:

- what our key messages are;
- what our communications objectives are;
- how we plan to spread those messages to our various target audiences;
- and how we plan to measure the success of the strategy.

The overall aim of the strategy is:

To promote Guernsey's position as a jurisdiction with excellent and innovative data protection standards which retains its 'adequacy' recognition from the EU.

2. Our key messages

The Office of the Data Protection Commissioner:

2.1: Empowers individuals and **protects their rights**

2.2: Promotes **excellence** in data protection

2.3: Supports the data economy to **embrace innovation**

2.4: Regulates data protection legislation through an **ethics-based** approach

2.5: **Our office motto** is: *Excellence through ethics*

2.6: **Our identity**: we are the Office of the Data Protection Commissioner. We can also use the terms 'ODPC', or the 'Data Protection Commission'. Our board is The Data Protection Authority or The Authority. We do not use the term 'Data Protection Office' to refer to ourselves. The **public face** of the ODPC is our Commissioner and Deputy Commissioner.

2.7: **Our commitment to maximum transparency**: we will operate in the most transparent way possible for us. We commit to publishing regular statistics and information about our activities, as well as governance details (for example: approved board minutes, code of conduct, register of board members' interests, and the memorandum of understanding with the States of Guernsey).

2.8: **Our community and global context**: we recognise that regulating a small jurisdiction such as Guernsey¹ brings opportunities as well as challenges. We stand alongside the citizens whose rights we are here to protect, putting them at the heart of our activity. We value open, honest, and constructive interactions with the organisations we regulate, our local journalists, our politicians, and civil servants. We see beyond the Bailiwick to the global ecosystem our citizens exist in and we seek to elevate the conversation around data protection. We strive to uphold the islands' reputation on the international stage as having the highest standards of: ethics, transparency, innovation and excellence.

¹ In this document we refer to The Bailiwick of Guernsey for the sake of brevity as simply 'Guernsey'.

3. Our communications objectives:

3.1: Public awareness

To **promote public awareness of risks, rules, safeguards and rights** in relation to processing of personal information, especially in relation to children.

3.2: Promotion of Guernsey

To promote Guernsey's position as a jurisdiction with **excellent and innovative data protection standards** which retains its 'adequacy' recognition from the EU

3.3: Awareness of law

To **promote awareness of the legal duties** placed on organisations who are controlling or processing personal information.

3.4: Protection of reputation

To **protect the ODPC / Data Protection Authority's reputation** by communicating in-line with our mission, vision and values².

4. Communication style: words, images, font, colour and logo use

4.1: Words

We will communicate clearly and concisely, using plain English at all times, for all audiences. If we use technical terms we will explain them. From 2020 onwards we will endeavour to translate key guidance documents into Portuguese and Latvian if resources allow.

4.2: Images

When we use images in our communication activities we will use only high quality photography and/or graphics.

We will mainly use simple black on white background images depicting people (and/or objects) to assist in delivering our key messages.

4.3: Font and colour

Our preferred font is Calibri (black text). We will use this in our official documents and presentations. Dark green (RGB 112:173:71) can also be used for text and graphic elements as an 'accent' colour to tie-in with our logo.

4.4: Logo use

We will use our logo and accompanying motto on all official documents, and on all other related materials.

5. Communication channels

We will use a variety of channels to share our key messages, these will include:

5.1: Website

We will use our website to house all public-facing information. We will regularly update content across the site (e.g. blog / news items, thematic reviews, case studies, public statements, official guidance, policy statements, stats updates, events, ODPC governance materials).

We will endeavour to keep our website as user-friendly, useful, and secure as possible.

We will undertake a website re-development project during the period covered by this strategy. This project is high priority and will be scoped in Quarter 4 2018. The aim of the project will be to create an online one stop shop for local organisations and individuals that allows them to manage their interaction

² See <https://odpc.gg/wp-content/uploads/2018/05/Strategic-Plan-2018.pdf>

with us. As part of this project we will consider the Web Content Accessibility Guidelines (WCAG) 2.1 and apply what we can to make our website as accessible as possible for partially-sighted people.

5.2: E-newsletter

We will publish a monthly e-newsletter which anyone can sign up to receive via our website. This will include: our own news items; comment on data protection issues that may be in the news; overview of specific issues; profiles of staff; profiles of data protection officers at local organisations; upcoming events; guidance; success stories etc.

5.3: PR

We will work collaboratively with all local media to communicate our key messages to the general public and local organisations.

We will also, where appropriate, share information with local professional bodies so that they can pass on relevant information to their membership.

We will produce regular updates on our statistics (e.g. breach reporting, notifications) - these will be published on our website and released to all local media.

We will contribute to articles in local and off-island publications/platforms/professional bodies³ as required and where appropriate.

5.4: Public statements

We will issue The Data Protection Authority's public statements as necessary in accordance with the specific conditions outlined in section 64 of The Data Protection (Bailiwick of Guernsey) Law, 2017.

Public statements will be issued in exceptional circumstances where it is in the public interest to do so. They may relate to specific data breaches, complaints, investigations, inquiries, recommendations, determinations, or enforcement action.

5.5: Annual report

We will publish the Data Protection Authority's annual report in accordance with Schedule 6 (section 13) of the Law.

These reports will include details of: numbers of complaints received; numbers of investigations and inquiries; an anonymous summary of any sanctions imposed under section 73; anonymised examples of complaints received and their outcome.

The report will also detail whether the Authority thinks it is necessary to change any part of the Law to make it easier to achieve its aim, and include general commentary on data protection matters relevant to the period.

5.6: Official guidance

We will publish non-legally binding opinions and/or guidance in accordance with section 63 of the Law – of our own initiative or as requested by any person, where we deem appropriate.

We may produce these in relation to: any data protection issue; compliance with the Law; or how the Authority plans to perform its functions.

³ E.g. *Privacy Law and Business*, *Data Protection Leader*, *IAPP*, *DataIQ*, *Data Protection Law & Policy*, *Hunton Andrews Kurth – Privacy & Information Security Law Blog*, *Field Fisher, Latham & Watkins*, *PDP Journal*, *Mondaq*, *Info Rights* etc.

For the benefit of members of our regulated community who operate in other jurisdictions we will, where we deem appropriate, signpost to other data protection authorities' official guidance on topics that are substantially similar to our local law to conserve resources and to achieve consistency.

5.7: Events

We will run an events programme with the aim of effecting cultural change by:

- **being accessible** to local organisations and citizens of all ages
- **improving compliance** by building awareness of topical issues in data protection
- **encouraging innovation and excellence** in data protection practices
- **exploring official guidance** with the regulated community
- **gathering feedback** from local industry and individuals

The ODPC does not have a training remit and as such our events should not be considered to constitute a training programme. Our events programme should be considered in the context of section 61 of the Law which outlines our duty to raise public awareness of their rights and to promote awareness of data controllers/processors' legal duties.

Our events will be non-profit making and we aim to cover costs and increase reach through corporate sponsorship. For transparency and to safeguard our independence we will publish a memorandum of understanding for each sponsor we use, that will detail the extent and purpose of their support.

The format of our events programme will be varied, e.g. workshops, forums, 1-2-1 surgeries with organisations/individuals, talks from invited speakers, live-streamed webinars, lunch & learn informal Q&As.

We will devise a small number of key events that will form the core of a rolling programme. These core events will repeat every 4-6 months, and will be punctuated with ad hoc events on specific, timely subjects.

Topics will include: data ethics; the role of data in society; impact of data mis-use; building a data protection culture; the role of the data protection officer; how to respond to subject access requests; exploring new official guidance; public consultations; breach reporting; international developments; etc.

We will run, and/or attend, specific events aimed at raising awareness of individual rights in particular groups (e.g. attendance at Digital ACE event and running in-house awareness sessions in schools to reach local school-age children).

We will promote our events programme via our website, social media, e-newsletter, press release, and relevant professional organisations.

All ODPC staff are encouraged to prioritise their involvement in our events, either directly as speakers or indirectly as attendees. Our staff members will also undertake speaking engagements and will consider all invitations to speak at external events in-line with our policy statement⁴.

5.8: Social media

We will use a single platform – *LinkedIn*, as we feel this is the most appropriate place for us to be and makes best use of our limited resources. If you see official pages or content on other platforms claiming to be the ODPC, it is not us.

We have taken the deliberate decision not to position ourselves on other platforms (such as Facebook, Twitter, Instagram) at this time, but will keep this position under review. We based this decision on the fact that we are choosing to focus our time, effort and attention in pursuing more meaningful public

⁴ https://odpc.gg/wp-content/uploads/2016/09/Speaking-Engagements_Sept16.pdf

engagement via our events programme – where we can give our regulated community direct access to our expertise and guidance in a way that is more useful to them than maintaining social media content across multiple platforms would be.

We will invite *LinkedIn* users to follow our ODPC page on *LinkedIn*.

We will use *LinkedIn* to regularly share information, predominantly in the form of short text and image-based updates that link back to fuller content on our website.

Examples of content we would share socially include: news items, details of upcoming events, public statements, new guidance/policies, vacancies etc.

Where appropriate the ODPC will post third-party content that serves the purpose of reinforcing our key messages or raising awareness of issues relevant to our jurisdiction.

We trust the good judgement of ODPC staff and board members and we encourage them to share ODPC content with their network as they deem appropriate. ODPC staff members and board members are encouraged to use their own discretion when posting their own content as individuals, as well as when they comment/like others' content (on *LinkedIn*, or other platforms). For further guidance please refer to the ODPC Social Media Policy⁵.

6. Work plan

We will maintain an internal work plan to detail all activities delivered under this strategy. This will be used as the basis for reporting to the Authority.

7. Measuring the success of this strategy

We will define this strategy's success in relation to whether we achieve its overall aim – *To promote Guernsey's position as a jurisdiction with excellent and innovative data protection standards which retains its 'Adequacy' recognition from the EU.*

Success measures for this aim include the existence of:

1. A **functioning law** that is achieving its aim of protecting individuals' rights and allowing for free movement of personal data.
2. **Effective governance** (as defined by the behaviour of our Chairman and board, and associated policies.)
3. **Documented public engagement activity** delivered in-line with this communications strategy.

If you have any questions about this document please contact enquiries@odpc.gg

⁵ In draft at time of writing.