

FCO/Marshall Aid Commemoration Commission



Foreign & Commonwealth Office Information Management Agreement

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Chair Marshall Aid Commemoration Commission

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Not protectively marked

Introduction

Background

1. Founded by a 1953 Act of Parliament, Marshall Scholarships are mainly funded by the Foreign and Commonwealth Office (FCO) and commemorate the humane ideals of the Marshall Plan. The Scholarships are administered by the Marshall Aid Commemoration Commission (MACC or the Commission) on behalf of the FCO. The MACC Secretariat is provided by the Association of Commonwealth Universities.
2. The following key principles outline the Commission's approach to risk management and internal control. The Commission should:
 - have responsibility for overseeing risk management within the organisation as a whole;
 - have an open and receptive approach to solving risk problems;
 - make conservative and prudent recognition and disclosure of the financial and non-financial implications of risks, whilst recognising them; and
 - identify key risk indicators and closely monitor them on a regular basis.
3. The Commission must also observe any mandatory requests from the Treasury and Cabinet Office, such as the requirements for the publication of materials such as spend and contracts under the transparency agenda; and compliance with the requests for controls and reporting on specific procurement categories such as consultancy.
4. This document's purpose is to set out some complementary detail to ensure compliance with relevant legislative obligations, including public record and open government requirements.

Scope

5. This Information Management Agreement (IMA) defines the formal information management relationship between the FCO and the Marshall Aid Commemoration Commission as an Executive Non-Departmental Public Body sponsored by the FCO. The IMA's provisions apply to all people working on behalf of both the FCO and the Commission, and must be followed at all times for information in paper and electronic form.

Information Assurance

6. The Commission has appointed the Chair of the Commission as Senior Information Risk Owner (SIRO) to oversee information risk management and report on such issues, where necessary, to the FCO SIRO. The Commission's SIRO will be aware of all the organisation's information assets (equipment as well as content), and monitor any risks in relation to them.
7. The MACC will ensure that it meets all necessary requirements set out in HMG Information Assurance (IA) Standards for Central Government Departments and Agencies. Unless a separate procedure is required by the Commission, the organisation will follow

relevant FCO guidance. If the Commission needs to pursue any separate procedure this will at all times meet, or exceed, the requirements of the FCO.

Legislative Compliance

Public Records Act (PRA)

8. As an Executive Non-Departmental Public Body sponsored by the FCO, the Marshall Aid Commemoration Commission is a Public Records Body. The Commission will therefore ensure that it meets all necessary requirements relating to information for the public record:

- a. The Commission has appointed the Assistant Secretary as a Departmental Records Officer (DRO) to oversee PRA compliance on behalf of the FCO DRO.
- b. The Commission will manage PRA compliance independently, supported by FCO's Information Management Department (IMD);
- c. The Commission will physically retain and manage its own paper files;
- d. The Commission will manage all its files in electronic form and has an electronic archive on its ICT system for the purpose of PRA compliance;
- e. The Commission will hold a direct relationship with The National Archive (TNA), as well as a relationship with the Lord Chancellor's Advisory Council on National Records and Archives through the FCO, for the purpose of PRA compliance.

Freedom of Information / Data Protection / Environmental Information Regulations

9. Requests under the Freedom of Information Act (FOI), Data Protection Act (DPA) and Environmental Information Regulations (EIR) will all be handled as follows:

- a. The Commission will be responsible for replying to requests relating to MACC business using FCO guidance;
- b. The FCO will liaise with the Commission on all requests where it is agreed that the FCO will reply on behalf of the FCO and its Agencies;
- c. The Commission is registered with the Information Commissioner's Office as an independent Data Controller as set out in the DPA;
- d. The Commission will inform IMD about all FOI, DPA and EIR requests it receives directly;
- e. The Commission will manage, and must notify IMD, the FCO sponsor team and the Commission's Chair and Board about all incidents involving personal data.

Copyright

10. The Commission's information is not subject to Crown copyright protection unless stated otherwise.

Copyright Licensing

11. Copyright license agreements with third parties such as the Copyright Licensing Agency and the Newspaper Licensing Agency for payment of copyright royalties are the responsibility of the Marshall Aid Commemoration Commission.

HMG Procedural Compliance

Parliamentary Questions

12. The FCO is responsible for answering Parliamentary Questions (PQs) that relate to MACC business. The FCO will liaise with the Commission to prepare the answers.

Ministerial Correspondence

13. The Commission will usually be responsible for drafting replies relating to MACC business. The MACC Chair will respond about matters delegated to him by the Secretary of State.

14. The FCO will liaise with the Commission for all correspondence where it has been agreed that the FCO will reply about MACC business.

Compliance Monitoring

15. The Commission and the FCO will ensure that this agreement is current and accessible at all times. IMD and MACC SIRO and/or DRO will formally review and renew the agreement on an annual basis.

16. The FCO sponsor team is the primary contact for the Commission. However, IMD's Data Handling & Information Risk Team and the Commission's Assistant Secretary will liaise regularly about the agreement, and other related issues, where necessary.

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