

# WhatsApp in government

How ministers and officials should use messaging apps – and how they shouldn't



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## About this report

This report looks at the increasing use of WhatsApp and other messaging apps in government, and their associated risks and benefits. These apps are useful but need to be used carefully to ensure the downsides – including a lack of transparency, poor communication and poor record keeping – do not outweigh the positives.

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## Summary

The messaging app WhatsApp is used widely across Westminster. From the prime minister discussing the pandemic with his top aides, to backbench MPs plotting rebellions, to special advisers and civil servants issuing departmental positions to journalists, the app is now fundamental to how the UK government and politics function. Just as Twitter has changed the relationship between politicians, the public and the press, so WhatsApp is changing the way politicians and others debate, take decisions and build (or dismantle) relationships with each other. This is already having an impact on UK politics, but there is little attention paid to how it affects the way government works.

The app – and similar ones like Signal and Telegram\* – is popular in government for the same reason it is worldwide: it allows quick and convenient communication, in pairs or groups, without the logistical hassle of a phone call or meeting, or the administrative burden of a lengthy email exchange. WhatsApp allows ministers to bypass the hierarchy of Whitehall to get decisions directly from colleagues; it allows advisers in different departments to liaise over their respective ministers' priorities; and, at its most prosaic, it allows officials to let colleagues know if they are running late for a meeting.

The content of these conversations is not new. Government decision making has long been a mix of the formal and informal. Generations of ministers have made sure to arrive early to cabinet to try to sway their colleagues before the official minute-takers arrive, or host dinners to thrash out political difficulties – these informal aspects of government have always been common. The speed and accessibility of WhatsApp, however, has accentuated these informal ways of working, and exacerbated their problems – namely that decisions can be made too quickly without the full facts or without sufficient input from key individuals.

And the use of WhatsApp is growing. Over the last few years, especially with the shift to remote working during the pandemic, WhatsApp has become deeply embedded in the UK government and the wider political world. Between 13% and 31% of officials in some departments have the app installed on their work phones, while leaked screenshots of WhatsApp groups often surface, such as when Steve Baker removed the culture secretary, Nadine Dorries, from a Conservative WhatsApp group for defending the prime minister after Lord Frost's resignation.<sup>1</sup>

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\* Throughout this paper we use WhatsApp as a catch-all term for all messaging apps; from our conversations it seems WhatsApp is the most widely used in Westminster.

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WhatsApp and other messaging apps can be efficient, and are of clear value to ministers, MPs and officials, who tend to be short on time. But Dominic Cummings's publication in 2021 of WhatsApp conversations with the prime minister over key Covid decisions, and the revelation that the prime minister's previous phone number was widely known and used to get direct access to him, reveal some of the risks that the widespread use of WhatsApp brings to government:

- **Messaging apps risk poor decisions being made with incomplete information.** Instant messaging may be quick, but it is a superficial way to make decisions. Unlike formal written submissions, presentations, discussions and even emails, WhatsApp encourages short messages that do not allow for much detail or nuance, which risks key information, perspectives or challenge being missed. It can help support other decision making or resolve a specific block, but not when it is to the detriment of detailed policy decisions. Lack of control also risks different overlapping group chats and parallel conversations duplicating each other and causing chaotic decision making.
- **These apps also make record keeping and scrutiny more difficult.** Various pieces of departmental guidance say that conversations in informal messaging services should be moved over to formal documents and systems. This is important for the government's duties to ensure they are keeping a historical record, but they are also vitally important so that people inside government understand how decisions were taken and what action should follow. However, from our conversations with people inside government it became clear that this is not always done. The Good Law Project has recently claimed there is "little evidence" that WhatsApp messages "are generally recorded properly".<sup>2</sup> And, as the former information commissioner Elizabeth Denham told the Institute for Government,<sup>3</sup> this means historic decisions could go undocumented.
- **The apps undermine accountability and transparency on official information.** The purpose of government records is to ensure good decision making, but also to enable accountability and transparency of government. While many departments have guidance saying that WhatsApp messages should be searched in the event of a relevant Freedom of Information (Fol) request, many people we spoke to were unaware of any process for doing so. This can mean information that should be made public is not. For example, a journalist who sent an Fol to the Cabinet Office requesting WhatsApp messages relating to the Downing Street flat refurbishment was told it did not hold any such messages<sup>4</sup> – though messages between the prime minister and Lord Brownlow, the Conservative Party donor overseeing the refurbishment, were later revealed by an Electoral Commission investigation. The messages existed, but the Cabinet Office procedure to find them was insufficient.

None of these shortcomings means that WhatsApp should be banned in government. Indeed, departments that do not allow their ministers or officials to use it on their work phones (including Defra and HMRC) are shutting off the advantages of such apps. WhatsApp is widely used and it is better to facilitate its use and manage it properly than see people resorting to using personal phones to discuss government business.

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Where departments do allow the use of WhatsApp they can require civil servants to abide by certain procedures, such as appointing an administrator for groups or transferring messages to permanent departmental records. They cannot, however, oversee how ministers and special advisers choose to communicate. But ministers and their advisers should by now be aware that how they use WhatsApp in their government roles can have damaging consequences – political and legal – and that basic good practice is in their own interest as well as better for how they operate as a government.

To ensure that the advantages of WhatsApp outweigh the disadvantages, there are several steps the government should take:

- **Ministers, advisers and officials should not use personal phones for substantive government business.** When ministers join the government there are already several ways in which they are asked to separate government business from their personal or political activities, including limits on who they can share information with, use of government laptops and controls on official papers. Yet ministers and special advisers often keep using the same phone and phone number that they used as a backbench MP or party aide (most civil servants will already be accustomed to only using government devices for their work). As part of a legal action challenging the use of private phones in government, the Good Law Project has uncovered unpublished guidance to ministers stating that they should not use their personal phones for government business.<sup>5</sup> The prime minister should enforce this guidance so that, once in government, ministers and advisers are told more explicitly to conduct all their detailed business on an official device.
- **Departments need to manage WhatsApp properly so information gets to all the relevant people and it is not used to make detailed decisions.** WhatsApp is used in a variety of ways – many groups or individual chats will be temporary or ad hoc; many won't seek to duplicate formal meetings or correspondence. But where permanent groups are established to conduct government business, it is important that this is done properly. The business department recommends that groups should only be used if there is no other way to meet a particular business need.

To avoid duplication or key people not being included, ministers, advisers and officials should view WhatsApp groups in the same way they would setting up formal meetings or correspondence. Those who set up permanent groups should also consider appointing an administrator to each group to ensure that relevant people are included and that if the discussion veers towards making substantive decisions, the conversation is moved to another forum (another system from BEIS). If ministers and special advisers do not want to have external administrators, they must make sure their use of the app still abides by all the relevant requirements and that their private office is aware of the use if it is about government business. And guidance on using WhatsApp in government, drawn up by departmental security teams, like that issued by BEIS, should be given to everyone – ministers, special advisers and civil servants – when they join government.

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- **Departments must ensure relevant WhatsApp messages are kept for the long term.** Each department decides what information to keep so that past actions and decisions can be understood. After 20 years, records are sent to the National Archives. There is a risk that WhatsApp conversations are not kept, meaning the discussions informing key decisions could be lost. Some departments already require certain WhatsApp messages to be transferred to permanent record keeping systems – all departments should take the same approach.
  - **Departments must ensure WhatsApp does not hinder transparency or scrutiny.** While WhatsApp messages are in theory subject to the FoI Act like all other government information, departments clearly do not always have sufficient processes in place to check WhatsApp when they receive a FoI request. To maintain trust in the FoI process and respond to scrutiny, departments need to establish a way to check WhatsApp messages – from ministers, special advisers and officials – to respond to requests and explain the reasons for the decisions they make.

None of these changes would stop the use of WhatsApp – nor should they. But they would ensure that it was properly transparent, accessible where appropriate and recorded for posterity. Banning WhatsApp in government is not practical and the app itself is an established part of how we all communicate. But to maintain the legitimacy of its use, government should take the steps above to ensure that its advantages outweigh its risks.

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# Introduction

WhatsApp is widely used by ministers, special advisers and officials across government. From 'shadow whipping operations' and backbench rebellions to simply arranging meetings, messaging apps are embedded in how Westminster works. They allow for rapid communication but can also make information harder to access – for those inside government not in key groups or those outside who want to know how decisions have been made.

How members of the government communicate matters. To make good decisions, ministers and senior officials require the right information from a range of sources and to debate the pros and cons of particular actions. Political and personal clashes need to be resolved and ministers and officials need to hear the views of outside groups, from backbench MPs to businesses to members of the public. And ministers and advisers need to communicate the decisions they have taken.

All of this communication needs to be secure, but it also needs to be managed well. Ministers and officials need to understand what has been decided and what needs to happen as a result. And government as a whole has a duty to ensure the records of its decision making are fulfilling its legal requirements to maintaining historical records for inquiries, court challenge or the National Archives as well as Freedom of Information requests. For all these reasons, it is important that government thinks about the ways it communicates as much as the content of those communications.

In recent decades, technology has changed the means of communication within government – texts, emails and direct messages like WhatsApp are all now daily features of government work. Direct communication with ministers (by MPs, civil servants, journalists or others) has become easier outside formal routes and face-to-face meetings. This has in turn changed behaviour. The dynamics of government and politics are now more likely to be shaped by communications that take place via direct messaging. This analysis paper, which draws on interviews with current and former members of the government, examines how WhatsApp and similar apps are being used in government – and what government needs to do to ensure that the benefits of these apps outweigh their disadvantages.

## **WhatsApp is widely used in government**

Over the last few years WhatsApp groups have grown in importance as a tool for doing politics. At the height of the Brexit process, Conservative backbenchers in the European Research Group (ERG) used a WhatsApp group to co-ordinate positions and effectively run a separate whipping position to (and often against) the May government. Various backbench government and opposition heirs to the ERG, including the Covid Recovery Group, have made use of the same model.<sup>6</sup> Many new MPs who joined the Commons in 2019 have relied on WhatsApp to build political alliances in the absence of face-to-face meetings with colleagues. Political parties increasingly use WhatsApp groups to broadcast messages to the media, while ministers and special advisers use it, for example, to agree quotes with journalists (or sometimes to leak information).



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WhatsApp is also a useful tool within government. Special advisers use it to communicate their ministers' preferences to colleagues in other departments. Civil servants in departmental press offices use it to issue press releases and other statements and their colleagues in ministerial private offices use it to communicate with their minister.

This paper focuses not on WhatsApp as a purely political tool, but on its use within government by ministers, special advisers and officials. As part of this we wanted to investigate how WhatsApp and similar messaging apps are used within government in ways that are not visible to the public (except when direct message conversations are leaked, as Dominic Cummings did a number of times on his blog when discussing the initial response to the pandemic).<sup>7</sup> We sent Freedom of Information (FOI) requests to all government departments to understand how widely these apps are used on official government devices. Their responses do not capture ministers' and special advisers' use of their personal phones to communicate on government business, but the limited responses we received do reveal a picture of the extent to which WhatsApp and other similar messaging apps have become embedded in how government works.

## **FOI request: Departments' use and regulation of messaging apps**

We asked:

- Are ministers, special advisers and civil servants permitted to use WhatsApp, Signal, Telegram or Viber on their departmental phones for government business? If so, how many of each of ministers, special advisers and civil servants currently have at least one of these applications installed on their phones?
- Has the department issued any guidance for ministers, special advisers, or civil servants on:
  - The use of these applications in conducting government business
  - The keeping of records of messages that discuss government business
  - The keeping of records of emails on non-government email accounts that discuss government business?
- Does the department have a staff member or team responsible for ensuring proper use of the messaging applications WhatsApp, Signal, Telegram and Viber?

A number of departments refused to answer, citing sections 24 and 31 of the FOI Act that allow information to be withheld because of security concerns. However, the responses we received showed that in at least some departments WhatsApp is permitted on work phones. Where they gave detailed responses, the numbers are notable: 31% of Treasury staff, 17.6% of Cabinet Office staff and 13.5% of BEIS staff have access to WhatsApp on their work phones as do some ministers.<sup>8</sup> While not a majority of staff, these are substantial proportions, showing that use of the app is not just confined to ministers and those who directly support them.

Department	Is the use of WhatsApp permitted? How many people use it?	Is there guidance?	Is there a staff member or team responsible for WhatsApp use?
BEIS	Yes – 3 ministers, 1 special adviser, 759 civil servants	Yes	No
CO	Yes – 1,704 (including ministers, special advisers and civil servants)	Yes	Yes – the Departmental Records Officer and the Government Security Group
DLUHC	Yes to WhatsApp – 302 individuals; breakdown of groups withheld No to Signal, Viber and Telegram	Yes	No
DCMS	Yes to WhatsApp – 621 civil servants; information on ministers and special advisers withheld No to Signal, Viber and Telegram	General guidance on the use of collaboration tools and record keeping	No, but the records team provides advice
Defra	Not permitted when conducting government business	No	No
DfE	Refused to answer – section 31	Refused to answer – section 31	Refused to answer – section 31
DfT	Refused to answer – section 31	Code of Practice on general management of records	Refused to answer – section 31
DHSC	Awaiting response	Awaiting response	Awaiting response
DIT	Refused to answer – section 31	General guidance regarding the keeping of records and messages	Refused to answer – section 31
DWP	Refused to answer – section 31	Refused to answer – section 31	Refused to answer – section 31
FCDO	Refused to answer – sections 24 and 31	CO guidance on use of private emails and records management	Yes – the team that oversees IT systems
HMRC	Not permitted when conducting government business	No	No
HMT	Yes to WhatsApp – 2 ministers, 2 special advisers, 629 civil servants	Yes, but no specific guidance on the keeping of records of messages that discuss government business	No
HO	Refused to answer – sections 24 and 31	Refused to answer – sections 24 and 31	Refused to answer – sections 24 and 31
MoD	Yes, but no ministers or special advisers have any of these apps on their department-issued mobile phones	Yes	Yes – the Defence Digital organisation
MoJ	Yes to WhatsApp	Yes	No

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# The challenges of WhatsApp

As WhatsApp has become more widespread in government, its benefits for the people who use it have become more evident, but so have some of the problems it can bring. In this section we consider how the use of WhatsApp and similar apps can help some aspects of how government communicates, and the reasons they are so widely used, before looking at the risks they present.

## **Messaging apps are convenient and quick**

We spoke to former ministers and special advisers, current civil servants, MPs, journalists and others in and around government to understand the advantages and disadvantages of WhatsApp. Many made the same points – that WhatsApp gives them more control over their communications and allows them to talk to their colleagues, teams and other people efficiently as part of their inherently busy jobs.

This is not, of course, a completely new form of communication – in many cases conversations now taking place on WhatsApp would previously have happened in person or on the phone. Today a backbench MP might send a WhatsApp to a minister rather than talking to them quickly in the parliamentary tea room; a private secretary might send a message to their colleagues to say that their minister is running late for a meeting rather than calling them on the phone. For such standard communications, WhatsApp is now simply the most convenient way to communicate.

The use of these apps is also seductive for the flexibility they allow to communicate outside the official structures and processes of written correspondence, which can be much slower. One former minister told us about an occasion when they were waiting for the views of a political adviser in No.10. Requests had gone from the minister's departmental office to officials in No.10, but an answer was only received when the minister sent a WhatsApp message directly to the adviser. This shortcut meant that the department was able to make progress on their minister's priority more swiftly. Other interviewees told us about the benefit of agreeing a quote with a journalist directly rather than via a departmental press office, allowing an MP or minister to get their views out quickly. And during the pandemic, when meeting in person has been more difficult, WhatsApp has allowed for conversations between large or small groups without the hassle of email or the scheduling difficulties of video calls.

But while those we spoke to all saw these examples of more efficient communication, there can also be downsides to their use.

## **There are downsides to these apps as well**

From our interviews for this paper we have identified three main disadvantages to the use of these apps in government. These are all compounded when ministers and special advisers use their personal phones, rather than officially issued devices, to communicate about government business.

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## These apps can mean those making key decisions in government have less information than they would get via other methods

While many of the people we spoke to said that WhatsApp is mainly used in government for practical discussions, there is some evidence that it is beginning to be used for more detailed discussions that inform ministerial decision making.

According to Dominic Cummings, the prime minister's former chief adviser, there were several WhatsApp groups created during the pandemic to discuss priority issues.<sup>9</sup> These groups all had slightly different members and remits, with names including "Covid No 10 Coordination", "CSA-CMO-Matt-PM-Dom" and "Numberten action".<sup>10</sup> As an official told Politico:

**"People were having parallel conversations and one half of a team was behind the other half because they had already had this conversation over WhatsApp and it was really confusing. You didn't know what time people had taken decisions and made different steers."<sup>11</sup>**

Whether this approach is because of the difficulties of the pandemic, the preferences of Boris Johnson as prime minister or of his advisers, or it is a longer-term trend, the change presents major risks to good decision making in government.

Unlike formal written submissions, presentations and discussions, and even emails, WhatsApp encourages short messages that do not allow for much detail, nuance or challenge from those who disagree. This means that those taking decisions based on a WhatsApp conversation may not have as much information to hand that they would have had in other forums. Such decisions may be speedier, but not necessarily better, running the risk that they lead to flawed outcomes that only show up later.

These risks also relate to the membership of the WhatsApp conversations (both who is in the group and who is actively monitoring it and taking part). People told us about groups between ministers and special advisers, ministers and their private office staff, and others. Of course, there are risks in any type of communication – meetings can be held, or email chains started, without including key people, but WhatsApp exacerbates these risks. Because there is no formal process for setting up a WhatsApp group, there is always a risk that a group may be created to discuss an issue which does not include everyone whose presence would be helpful (either because of the perspective that they would bring, or because they need to turn whatever decisions are made into action). For example, of the groups that Cummings discussed, the cabinet secretary, the most senior civil servant, was added to one group only later in the pandemic.

Sometimes excluding certain people will be entirely deliberate on the part of the person setting up the group – that itself is telling about the way this app can change behaviours when it comes to decision making. Deliberately excluding or attempting to bypass someone is hardly new in political decision making, but it can be easier by WhatsApp than in formal meetings. On other occasions it will be accidental. Incomplete membership may be less visible to participants than on an email chain or a formal write-round between departments, and therefore less easy to resolve.

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The app also means that not all contributions are equal. The nature of WhatsApp and different people's approaches to using it can affect how an issue is discussed and resolved: some will message immediately, frequently, or with long replies, others will be sparse in their responses. It would be all too easy for a member of a WhatsApp group to fail to make a key contribution because they missed the conversation happening or did not have their phone with them. Though WhatsApp can be helpful for quick reactions because of its immediacy, it can be very damaging if those in the conversation assume that everyone has been able to contribute.

These characteristics all make the app very risky for major decisions. If discussions happen without the input of key individuals, experts or advisers, subsequent decisions may be poorly informed, lack key context or fail to be put into effect. Officials and advisers may also duplicate effort if there are parallel conversations happening – which is a greater risk when WhatsApp groups are set up informally. The ease of WhatsApp, and its immediacy, can mean that while it is the simplest way for people to feel like they are getting things done, it carries a greater risk of exacerbating classic problems of poor decision making.

### **These apps also make record keeping and scrutiny more difficult**

Under the ministerial code, ministers have “a duty to parliament to account, and be held to account, for the policies, decisions and actions of their departments and agencies”; it is difficult to fulfil this duty fully without proper record keeping. The inquiry into the ‘cash for ash’ scandal in Northern Ireland found failings around the documentation of meetings held by ministers in the Northern Ireland executive were a big factor in the scandal, leading to the introduction of the [Functioning of Government Act](#) in Northern Ireland. To avoid similar issues in the UK government, it is important that records are properly kept and that ministers recognise the need for proper documentation.

However, the use of WhatsApp can make it more difficult to store official information. Various pieces of departmental guidance say that conversations in messaging services should be moved over to formal documents and systems to ensure they can be kept. However, from our conversations it became clear that this is not always done. Indeed, the Good Law Project recently claimed there is “little evidence” that messages sent by WhatsApp “are generally recorded properly”.<sup>12</sup> As well as maintaining records within government, it is important that government communications are maintained for history. The Public Records Act of 1958 is the main piece of legislation that governs how official information should be stored, a requirement that applies regardless of the medium by which information is transmitted.

The lack of properly documenting WhatsApp conversations in turn harms scrutiny, accountability and institutional memory. If people cannot understand what decisions were made, and how they were made, then it becomes very difficult to hold anybody to account for them. It also becomes difficult for future politicians and officials to know or understand how situations have been dealt with, in ways that may be helpful. As Cummings's messages show, WhatsApp was used for discussing key decisions during

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the pandemic – this means that it will be an important source for the [public inquiry](#) led by Baroness Hallett. This inquiry could prove an important test case in whether government can accurately show how decisions were made and in what forum.

### **These apps also hinder transparency and public accountability**

As well as complicating the flow of information within government, the use of these apps can make it more difficult for those outside government to access official information as they may be entitled to do. People we spoke to suggested there were often no formal or regularised processes for checking government WhatsApp conversations to see if they contained any relevant information. As the information commissioner has said, there is a concern that “information in private email accounts or messaging services is forgotten, overlooked, autodeleted or otherwise not available when a Freedom of Information request is later made”.<sup>13</sup>

As well as making it more difficult to ensure that certain FoI requests are answered comprehensively, the use of WhatsApp can make it more difficult for the government to explain its decision making when called on to do so publicly. During the pandemic there has been much criticism of emergency procurement, and the Good Law Project has brought several legal cases against the government. In one such case, the former health minister Lord Bethell has been criticised over his use of WhatsApp, and other private communication methods, in relation to testing contracts given to Abingdon Health. Bethell, who used WhatsApp on his personal phone to communicate with the then health secretary, Matt Hancock, and other key figures, admitted that he may have deleted relevant messages from his phone when trying to free up storage.<sup>14</sup>

### **Government needs to get a grip on how these apps are used**

None of this means that WhatsApp should be banned in government. It is a useful tool that provides many benefits. A ban would be ineffective and would likely lead to ministers, advisers, officials and others using other apps to communicate. There is also no need for new legislation governing the management, storage and openness of information – this is already in place.\* But there is a need for a system and political will to ensure it is properly enforced within government and to ensure the codes that govern those in government are updated to reflect its use.

The government needs to get a grip on how these kinds of apps are being used in government. Ensuring that there is a consistent, managed approach to their use will mean that ministers and officials can be reassured that the benefits of these apps outweigh their disadvantages. It will also help ministers tackle the implications of sleaze and corruption that have dogged the Johnson government and accompany any story around the use of WhatsApp. And taking such an approach will mean the

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\* The previous information commissioner, Elizabeth Denham, called for a “root and branch” review of the Freedom of Information Act, but that is outside the scope of this report. Her evidence to the Public Administration and Constitutional Affairs Committee can be found at <https://committees.parliament.uk/oralevidence/3069/html>

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government is better prepared for future technological changes – there will be other communication tools after WhatsApp that raise similar questions, and government should be on the front foot, not playing catch-up as it is doing with WhatsApp.\*

The next sections make recommendations about how the government – ministers, special advisers and officials – can manage the use of these apps to ensure they can maximise the advantages to Whitehall and minimise the downsides. Departments can enforce compliance among their officials, but it is up to ministers and their advisers to choose to adapt how they use these apps to ensure they do not create more problems for themselves or their policy priorities down the line.

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\* Indeed, WhatsApp is apparently introducing a new option whereby messages disappear after 24 hours, [www.theguardian.com/world/2021/dec/06/whatsapp-criticised-for-plan-to-allow-messages-to-disappear-after-24-hours](https://www.theguardian.com/world/2021/dec/06/whatsapp-criticised-for-plan-to-allow-messages-to-disappear-after-24-hours). Technology changes rapidly so government needs to have a strong, principled approach to managing its use.

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# Ministers, advisers and officials should not use personal phones for substantive government business

It is well known that politicians and officials use WhatsApp on their personal phones for government business. The prime minister “is known for his propensity to reach out via text”<sup>15</sup> to party colleagues and other contacts; in 2021 he had to change his personal mobile phone number after it was revealed it had been available online for several years.<sup>16</sup> Over the course of their careers, politicians and their advisers build big networks of contacts – in the media, in business, in their constituencies and elsewhere – many of whom they keep in touch with via WhatsApp and other messaging apps.

But entering government needs to lead to a change of mindset. Becoming a minister or special adviser allows access to a wealth of government information that has to be protected. The ministerial code places emphasis on ministers’ duties to ensure the security of government business, new ministers discover that there are limits to what they can share with their former parliamentary colleagues and there are legal and other requirements around transparency and record keeping.

The different world they are entering means that once an individual becomes a minister or special adviser it should not be acceptable for them to use their personal phone to discuss detailed aspects of their work in the way that they would have done as a backbencher or party adviser. There should be a clear line that ministers, advisers and officials apply that if the person they are talking to is in touch with them because of their government role, they are probably discussing government business. That means if a businessman sends a message to the prime minister about tax policy, or if a journalist asks a special adviser about something their minister has said, they are discussing government business.

A purely logistical discussion – for example, confirming the time of a meeting or the agenda for a visit – would be acceptable on personal phones, but anything more detailed should only be discussed on official phones. Of course, to make it easier, ministers and advisers could choose to only use government phones to discuss official business.

Defining what is substantive government business is not always clear-cut. A particular difficulty comes with political discussions. If a minister is discussing how to sell their policy to their party with their special advisers, or explaining aspects of planned legislation to a backbench MP, they are drawing on their government role. However, some conversations are more purely political and go beyond government business. As such, ministers and advisers may prefer to have these conversations using their personal phones, but should be as conscious of not blurring the line between their role in government and their party political role as they ought to be of the likelihood of a WhatsApp conversation with parliamentary colleagues leaking.



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Other areas will be more clear cut. For example, ministers who are also MPs may have conversations with colleagues about party business and constituency issues, which are not government business. Understanding the line between what is government business and what is purely political is something that all new ministers and special advisers should be taken through when they are first appointed.

## What should be done?

Guidance uncovered by the Good Law Project as part of its legal action challenging the use of private phones in government – the Security of Government Business policy – makes clear that “ministers must not use personal devices, private email or personal apps to conduct government business”.<sup>17</sup> The prime minister needs to enforce this policy and explicitly ban the use of personal mobile phones for substantive government business by ministers, special advisers and officials (officials generally are more likely to be accustomed to using official devices for work business). The prime minister should [update the ministerial code](#) to make clear that ministers and their advisers should only use government-issued devices to conduct detailed government business. From our interviews we know that several ministers and special advisers, in different departments, already choose to do all their government work on a government phone, including using WhatsApp. Given the government’s guidance, it is unacceptable that their colleagues do not do the same.

This does not mean excluding WhatsApp from government business. Our FoI requests revealed that at least some departments (HMRC, which has no ministers or special advisers; and Defra, which does) do not allow the use of WhatsApp for government business. This approach does not reflect the reality of how communication works in Westminster in the 2020s, particularly for departments with ministers and advisers. As the Information Commissioner’s Office has noted:

**“If staff repeatedly use non-corporate communication channels, this may signal that you need to review the capability, usability and limitations of your current corporate channels. You may need to either update your policies or provide additional corporate communication options.”<sup>18</sup>**

Given the clear benefits of using WhatsApp, and the fact that it is now an everyday part of how politics and government function, departments with ministers and special advisers need to expand their corporate communication options to include WhatsApp.

## How will this help?

Ensuring that all substantive government business takes place on government devices, as the existing guidance already requires, would ensure there is “a clear demarcation between political work and departmental work”,<sup>19</sup> as the Information Commissioner’s Office has called for and mean that the information in question can be properly monitored and saved. Banning the use of personal phones for detailed government business is essential for the other changes we recommend below, which will ensure that WhatsApp can continue to be used within government while making sure the information communicated via the app is appropriately managed.

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# Departments need to manage WhatsApp properly so information gets to all the relevant people

While WhatsApp allows quick and convenient communication, it can also be a barrier to efficient information sharing. It does not allow for detailed conversations and key people may not be included in groups, meaning people can miss out on the material they need to take decisions.

## What should be done?

To ensure that WhatsApp does not prevent the proper flow of information, departments need to make sure they are managing its use properly. There are a number of steps that departmental leaders can take to ensure that ministers, special advisers and officials are using WhatsApp in a way that maximises the benefits of communicating via the app.

### Plan the membership of permanent WhatsApp groups

The Department for Business, Energy and Industrial Strategy (BEIS) has internal guidance on the use of WhatsApp, which says: “The department will allow use of WhatsApp where there’s no alternative to meeting a business need.”<sup>20</sup> Other departments – and ministers and special advisers in particular – may not want to go this far, but ministers, advisers and officials should view WhatsApp groups in the same way they would setting up formal meetings or correspondence and ensure that important information gets to all the people it needs to. This does not mean that there could not be long-term groups, used over long periods, as long as they are set up carefully.

### Provide instructions for use of WhatsApp as part of the induction process

When new officials join their department, they are given an induction to the policies and processes of their new employer. This induction, which will already include information on departmental IT policies, should make clear when WhatsApp should and should not be used.

Ministers and special advisers, on the other hand, are rarely given a formal induction to how government works (as opposed to the important parts of their policy portfolio). Departments should ensure that inductions to ministers include clear guidance on how to use WhatsApp and similar apps, the legal requirements and reasons for the various processes in place and the importance of information getting to the right people to ensure that what a minister wants to happen can be taken forward.

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### **Consider appointing an administrator to WhatsApp groups**

The BEIS guidance also states that all “WhatsApp groups [must] have an active administrator”, responsible for logging access to the group and removing members when they no longer need to be included. This requirement should be adopted by all departments where possible – at least in groups comprising solely civil servants. The administrator should also be responsible for ensuring that, if the discussion in a group touches on a topic relevant to a colleague who is not a member, they are added to the group or informed of the discussion. WhatsApp can be useful for arranging a conversation or getting quick answers to straightforward questions, but if a conversation is more detailed, looking at different policy options for example, there will probably be better ways to communicate – such as in a meeting or on email. In this case, the administrator should encourage the participants in the group to move to that medium.

Of course, ministers and special advisers may not want an external administrator in a group, even where they are using government phones. The speed of WhatsApp makes it the modern equivalent of the snatched conversation in a corridor – not everyone will be in that corridor, and this has always been the case. Regardless, ministers should make sure that groups are properly set up so that information gets to the relevant people, that they abide by all the requirements on information management and that their private office is aware of the use if it is about government business.

### **How will this help?**

These simple steps, if taken across government, would give everyone a clearer understanding of what these apps should and should not be used for. They would increase the likelihood that information gets to the right people, and that an alternative medium is used when apps are not the best way to communicate (particularly for detailed decision making). Nominating an administrator for each group would mean that there are specific, identifiable individuals who are responsible for ensuring that WhatsApp is used appropriately.

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# Departments must ensure relevant WhatsApp messages are kept for the long term

The increasing use of WhatsApp raises questions about whether government is fully discharging its responsibility to preserve records internally and, in due course, to release them to the National Archives.

It is not realistic to keep a record of every discussion that occurs in government, nor is it necessary, as often WhatsApp is used to replace informal in-person discussions, which would not have been recorded anyway. The public records process acknowledges this and undertakes 'weeding' of records to ensure that the most important sources are kept, but not all records. It is also true that no record-keeping system is perfect, even without WhatsApp. For example, it emerged late last year that the minutes of a key phone call in April 2021 between the former health minister Lord Bethell and the former MP Owen Paterson could not be found.<sup>21</sup> This call took place around the time that Radox – for whom Paterson was employed on a part-time basis – was awarded a £133m testing contract by the government.<sup>22</sup> So traditional record-keeping methods are not failsafe – as historians of government know.

However, as the ICO has pointed out, "the use of non-corporate communications channels [such as WhatsApp] for official business makes adherence to good records management practice significantly more difficult" because of, among other things, "limited search functionality" and the "risk of information... being auto deleted".<sup>23</sup> As a result, it is important that the government sets up systems to ensure that important WhatsApp messages are properly recorded for the long term.

## What should be done?

### Make clear which messages need to be kept

Many WhatsApp messages are purely operational and will not need to be recorded. An FoI request to the Scottish government in 2020, which sought access to all WhatsApp messages in the group used by the minister for children and young people and her private office, revealed only practical exchanges: for example, "we've postponed your catch-up" and "Can I have takeaway gnocchi at 2pm".<sup>24</sup> Messages like these clearly do not need to be kept for posterity.

But other messages do need to be kept. The Department for Levelling Up, Housing and Communities (DLUHC) already provides a list of the types of messages that should be recorded, including those involving "decisions to start or end a project" and "approvals to spend". Other departments should now follow the example of DLUHC and reflect on how best to ensure those in government know which messages to record. A simple test could be for ministers and officials to ask themselves whether a message would be useful in explaining a decision they have made or an action they have taken. They should be able to seek support from their department's knowledge management team if they are unsure of whether to upload a message.

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While relevant messages should be uploaded regularly – within a few weeks of being sent – there will always be a lag between the sending and receiving of messages, and their review and upload. This means that messages should not be deleted unless and until they have been reviewed.

### **Introduce a process for transferring messages on to government systems**

Some departments already issue guidance on how to ensure WhatsApp messages are recorded. BEIS orders messages to be “saved in SharePoint as BEIS’ official records management system to ensure accountability and transparency”.<sup>25</sup> And DLUHC provides step-by-step instructions on how to save WhatsApp chats by exporting them on government devices.<sup>26</sup> But there seems to be no consistent approach across departments. In the US, the Presidential and Federal Records Act Amendments require that:

**“an officer or employee of an executive agency ... forwards a complete copy of the record [from a non-official electronic messaging account] to an official electronic messaging account ... no later than 20 days after the original creation or transmission of the record.”<sup>27</sup>**

If government bans personal phones as we recommend, “non-official electronic messaging accounts” would not be in use – but the government should nonetheless put in place a similar process, whereby ministers and officials are required to copy WhatsApp messages into an official government record-keeping system. This should minimise the room for human error and be as quick and easy to use as possible. It should be enforced by a senior official in each department, with the permanent secretary ultimately being responsible for making sure that records are kept properly.

Ensuring that WhatsApp messages are transferred to the permanent record-keeping system would mean that they would be available for consideration for transfer to the National Archives when they become 20 years old. In the event that a minister or official needs to delete messages or thinks they may be about to lose them – for example, due to faulty technology or the need to make space on a device – they should first contact their department’s record keepers.

### **How will this help?**

Implementing these recommendations will ensure that records relating to government business will be preserved, allowing ministers and officials to be held accountable, and also to defend themselves against any accusations of impropriety. In addition, this will ensure that departments can more easily examine the reasons behind previous decisions, aiding future decision making. As the former UK information commissioner Elizabeth Denham argues, “it is through documenting [previous] decisions that lessons can be learned to inform future decisions”.<sup>28</sup>

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## Departments must ensure WhatsApp does not hinder transparency or accountability

If WhatsApp is used on personal phones or devices then messages are outside of government systems, meaning that they need to be actively handed over for storage. And even if the app is used on government phones, there is still a risk that messages may not be routinely collected and stored in the same way that formal communications such as government email are.

This makes it harder for those outside government to scrutinise ministers and officials and hold them to account for their decisions, which can in turn damage public faith in government. The example of the prime minister's WhatsApp messages to Lord Brownlow over the Downing Street refurbishment is the most well-known example of messages that were revealed long after they should have been.

As the information commissioner has stated: "It concerns the public to feel there may be a loss of transparency about decisions affecting them and their loved ones."<sup>29</sup> The ICO has also issued guidance saying: "You should therefore be aware of the importance of capturing official information contained on non-corporate channels about such events for the purposes of future scrutiny."<sup>30</sup>

### What should be done?

Existing legislation is clear that all government business, regardless of how or where it is discussed, is subject to the same transparency requirements. This includes WhatsApp conversations that relate to the work of government. But a lack of formal processes for storing and recording WhatsApp messages means that, practically, they are all too often inaccessible to those wanting to hold government to account. The government therefore needs to act to ensure WhatsApp messages are systematically recorded and stored.

### Establish a process to search phones and other devices for information requested under the Freedom of Information Act

To ensure that WhatsApp messages are accessible under existing transparency requirements, the government should introduce and clearly set out a process – to be adopted by all departments – through which phones and other devices can be routinely searched in response to FoI requests. As the information commissioner said in an article aimed at local authorities: "When handling FoI requests make sure you consider whether communications held on private correspondence channels, such as WhatsApp, may be relevant to the request."<sup>31</sup>

Central government needs to take the same approach. However, people we spoke to in government said they were not aware of any process for checking whether information held solely in WhatsApp fell within the scope of an FoI request.

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The process should cover all devices on which WhatsApp could be used (such as phones and tablets), and outline how, when, and by whom they will be searched, as well as how the details of the search will be recorded. And departments should make ministers, special advisers and civil servants aware of how this process works when they join the government.

### **How will this help?**

Setting up a process to check WhatsApp messages when answering Freedom of Information requests will help departments to fulfil their legal obligations. Instilling the expectation that WhatsApp messages may also be checked in the course of answering FoI requests will help government departments build a culture of compliance with the legislation.

This approach of being more open and transparent is not just important for complying with legislation – it is in the government’s own interest. Throughout the pandemic the government has been criticised for a lack of transparency over how key decisions have been made, including but not limited to procurement of personal protective equipment (PPE). The government has been unable to defend its handling of this procurement in some cases because key messages have been lost or deleted. This has reinforced the need for good communications practices – they help government explain (and justify) its actions in the face of scrutiny.

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## Conclusion: Managing WhatsApp properly will help government

WhatsApp is already widely used within government, and it would be unrealistic and counter-productive to try to put a stop to this. Ministers and officials use the app for the same reasons as members of the public and people in other sectors: it is quick and convenient. But ministers, special advisers and officials are not members of the public, and although most of the use of WhatsApp in government is focused on day-to-day practicalities, at times – and especially during the pandemic – it has also been used for discussion of policy, the spending of public money and other matters of public interest (including the Downing Street flat refurbishment). This means that the government must ensure that WhatsApp conversations are properly managed and recorded.

Yet government does not take a consistent or rigorous approach to the use of WhatsApp. There are different policies and guidance in place across departments – and in some places no guidance at all. And although WhatsApp messages are technically subject to the same rules as government business discussed via email or letter, the practicalities of its use in government have gone unaddressed for too long. Processes for searching devices, or transferring messages to government systems for storage, are weak and inconsistent.

This causes problems for everybody. For ministers and officials, it makes it harder for them to answer questions and justify the actions they have taken, which can risk creating a perception of wrongdoing at a time of already low trust in government. And for those outside government, it makes it harder to hold ministers and officials to account.

The changes set out in this paper are practical steps that the government can quickly take to improve the use and oversight of WhatsApp in Whitehall. By doing this, the government will be better able to help get the right information to the right people at the right time. It will be able to explain its thinking more clearly, and answer questions from parliament, media and the public.

Banning ministers, special advisers and officials from using personal phones for substantive government business will reduce the risk of important information being lost and will help prevent the blurring of boundaries between personal and government business that can – and has – raised questions about propriety and ethics. In turn, this step will help ministers and officials better follow the other steps that we believe are needed to ensure the effective use of WhatsApp and to uphold transparency.

By adopting these processes, and clearly communicating and enforcing them across departments, the government will be better able to draw on the benefits of WhatsApp while minimising the risks it poses to effective and transparent government.



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## Acknowledgements

The authors would like to thank all those – officials, former ministers and special advisers, journalists, campaigners and others – who spoke to us for this report. We would also like to thank Bronwen Maddox, Hannah White, Catherine Haddon, Sam Macrory, Will Driscoll and Melissa Ittoo for their help and support in putting this report together, and Jack Pannell for managing the FoI process over many months. Any mistakes or omissions are ours alone.

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