Operational Plan 2017-18

Scottish Information Commissioner

Introduction

This document sets out the Scottish Information Commissioner's operational plan for the period from 1 April 2017 to 30 September 2018. The plan explains how we will realise the Commissioner's vision and strategic aims, and provides a tool for on-going monitoring of outcomes and management of resources, financial and human.

Vision

Freedom of Information will add demonstrable value to public services and contribute positively to the transparency and accountability of public functions in Scotland

Strategic aims

To realise this vison

The Commissioner's office will:

1. support the on-going development of Scottish public sector culture and practice where the sharing and disclosing information is routine, and which actively serves openness, transparency and the public interest

2. help people to be familiar with their rights to access information and exercise them knowledgeably and responsibly

3. enable and support Scottish public authorities to develop and maintain high standards of FOI policy and practice. We will do this through a combination of regulation, advice and assistance, and appropriate collaboration. This includes promoting embedding FOI in good communication, excellent customer service, creation and management of records and in supporting efficient, equitable and accountable delivery of statutory functions

4. contribute positively to Scotland being respected as a world-leader in openness, transparency, and access to information law, policy and practice. Including supporting the development of Scottish access to information law to ensure it remains fit for purpose

5. be recognised as an organisation of accessible experts, that is run efficiently, governed effectively and leads by example in the delivery of its statutory functions. We will ensure that delivery of our functions meets and keeps pace with recognised standards and national public service improvements, and is delivered openly and transparently.

Structure of the operational plan

The plan is laid out as a programme of actions listed under types of operational activity, with cross references to which strategic aim(s) it supports. The actions listed are a mixture of 'business as usual' and one-off projects. The aim is to make this a working document which forms the basis of on-going monitoring and assessment.

In general, business as usual will be managed and monitored in line with set targets, performance indicators, established reporting structures and approved policy.

Project-based work will be managed according to sound project management principles and practice. Each project will be scoped, then initiated by the Senior Management Team and reported on monthly for its duration.

Monitoring and reporting

Progress against plan will be reviewed monthly. An update of progress against plan, using a traffic-light system, will be published quarterly.

Achievement and output against individual line items will be assessed and reported in line with the organisational targets and indicators and measures set out in our Performance and Quality Framework.

Resources

The Commissioner's budget for 2017-18 is:

Total staff costs	**£1,273.700**
Total revenue costs	**£295,800**
Capital expenditure	**£3,500**
Total	**£1,573,000**

Summary of activity

The majority of activity in relation to regulation of FOI (investigations and publication schemes) is recorded as business as usual. Only the major activities are shown in this plan. Underpinning this is the day-today management of the organisation and its resources, which again is not listed in detail.

Functional areas are:

- Human resource management
- Improving authority practice
- Information management
- Planning and reporting

- Promotion and communications
- Quality assurance
- Regulation and enforcement
- Resource management

- Risk management
- Sustainable development
- 2016-17 Completions

The dates in the plan are as firm as they can be at the start of the year, but may change in response to external factors or a change in priorities.

KEY:

BAU: Business as Usual

DHOE: Deputy Head of Enforcement

Priority: Relative priority Statutory, High, Medium, Low

HOE: Head of Enforcement

HOPI: Head of Policy and Information

HOCS: Head of Corporate Services

SIC: Scottish Information Commissioner

SMT: Senior Management Team

Human resource management

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Lead Mgr
						1	2	3	4	5		
1	Annual report to SMT on Performance & Development Framework	BAU	Annual	01/07/2017	31/07/2017					X	H	HOCS
2	Create Annual Learning & Development Plan (internal)	BAU	Annual	01/05/2017	30/06/2017					X	H	HOCS
3	Review HR Strategy	BAU	Annual	01/04/2017	30/06/2017					X	M	HOCS
4	Apply & monitor Performance & Development Framework	BAU	As required	01/04/2017	30/09/2018					X	H	HOCS
5	Training for appropriate staff in using webinar software	Project		01/10/2017	31/12/2017					X	M	HOPI
6	Training for appropriate staff to develop online learning materials	Project		01/01/2018	31/03/2018					X	L	HOPI

Improving authority practice

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Lead Mgr
						1	2	3	4	5		
1	Monitor authority compliance with the Model Publication Scheme	BAU	Annual	01/09/2017	31/03/2018	X		X		X	M	HOPI
2	Hold a programme of regional roadshows to promote FOI authority good practice, leadership and governance	BAU	As required	01/04/2017	31/03/2018	X		X		X	H	HOPI
3	Develop refreshed approach to future public authority roadshows for delivery in 2018/19	Project		01/01/2018	31/03/2018	X		X		X	H	HOPI
4	Liaise with Holyrood Events about the annual Holyrood Conference	BAU	Annual	01/04/2017	31/12/2018	X		X		X	L	HOPI
5	Organise & deliver a practitioners' conference for the Centre for FOI - May 2017	BAU	Annual	01/11/2016	31/05/2017	X		X		X	M	HOPI
6	Organise & deliver a practitioners' conference for the Centre for FOI - May 2018	BAU	Annual	01/11/2017	31/05/2018	X		X		X	M	HOPI
7	Produce and publish weekly decisions round up	BAU	Weekly	01/04/2017	31/03/2018	X	X	X		X	H	HOE/HOPI
8	Update the lessons learned (website pages) with new cases from decisions round up	BAU	Monthly	01/04/2017	31/03/2018	X	X	X		X	H	HOPI
9	Maintain and build engagement in the Knowledge Hub group for public authorities	BAU	Monthly	01/04/2017	31/03/2018	X				X	H	HOPI
10	Collect, collate and publish FOI/EIRs statistics portal data from public authorities	BAU	Quarterly	01/04/2017	31/03/2018						S/H	HOPI
11	Review the accuracy of data submitted to the statistics portal, revise reporting arrangements and consult on identified changes to the data set	Project		01/04/2017	31/10/2017	X		X	X	X	S	HOPI
12	Provide quarterly intelligence reports, including on failures to respond, to IPM to inform decisions about interventions	BAU	Quarterly	01/04/2017	31/03/2018	X		X			H	HOPI
13	Intervention Procedures: ensure non-compliance is recorded and take action in line with the procedures as appropriate and as resources allow.	BAU	As required	01/04/2017	31/03/2018	X		X		X	S/H	HOE
14	Intervention Procedures: monitor practice issues and report to IPM when intervention may be appropriate.	BAU	Monthly	01/04/2017	31/03/2018	X		X		X	S/H	HOPI
15	Publish a self-assessment toolkit for authorities on monitoring and managing FOI performance	Project		01/04/2017	01/09/2017	X		X		X	H	HOPI
16	Publish a self-assessment toolkit module for authorities on good practice (topic to be determined by interventions and authority feedback)	Project		01/10/2017	31/03/2018	X		X		X	H	HOPI
17	Explore and report to SMT on the potential to make self-assessment toolkits available as a digital resource	Project		01/10/2017	28/02/2018	X		X		X	M	HOPI
18	Provide support to new authorities to prepare for FOI duties	BAU	As required	01/04/2017	31/03/2018	X		X		X	H	HOPI

Information management

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Lead
						1	2	3	4	5		Mgr
1	Coordinate on-going IRM controls and procedures and ensure they are applied	BAU	Annual	01/04/2017	31/03/2018					X	S/H	HOCS
2	IRM Assurance report to SMT	BAU	Annual	01/07/2017	31/07/2017					X	S/H	HOCS
3	Maintenance of secure and reliable IT network	BAU	As required	01/04/2017	30/09/2018					X	S/H	HOCS
4	Agree review programme for Key Documents	BAU	As required	01/05/2018	31/07/2018					X	H	HOCS
5	Manage Key Documents as per agreed review programme agreed annually	BAU	As required	01/04/2017	30/09/2018					X	H	HOCS
6	Develop implementation plan to ensure SIC is GDPR compliant	Project		01/03/2017	30/06/2017	X		X	X	X	S	HOCS
7	Deliver implementation plan to ensure SIC is GDPR compliant	Project		01/07/2016	31/04/2018	X		X	X	X	S	HOCS
8	Monitor compliance with Data Protection legislation	BAU	As required	01/04/2017	31/03/2018	x				X	S	HOCS
9	Respond to information requests and reviews in line with policy and procedure, within statutory time scales	BAU	As required	01/04/2017	30/09/2018			X		X	S	HOCS
10	Maintain a compliant publication scheme and guide to information	BAU	As required	01/04/2017	30/09/2018		X			X	S	HOCS
11	SIC Publication Scheme Assurance report to SMT	BAU	Annual	01/01/2018	31/01/2018					X	S/H	HOCS
12	Develop Information and Digital Strategy (dependent on report on Data Maturity Assessment)	Project		01/11/2017	31/03/2018			X	X	X	M	HOCS

Planning and reporting

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Lead
						1	2	3	4	5		Mgr
1	Ensure Statement on 3Es is incorporated in the Annual Report and Accounts	BAU	Annual	01/04/2017	30/09/2017					X	S	HOCS
2	Annual Report and Accounts: draft and obtain clean approval of Accountability Report and Financial Statements elements	BAU	Annual	01/04/2017	30/09/2017					X	S	HOCS
3	Performance and statistical reporting	BAU	As required	01/04/2017	30/09/2018	X	X	X	X	X	S	HOCS
4	Public Service Reform (Scotland) Act 2010 - Annual expenditure reporting	BAU	Quarterly	01/04/2017	30/09/2018					X	S	HOCS
5	Co-ordinate, prepare and publish Operational Plan 17/18	BAU	Annual	01/01/2018	31/03/2018	X	X	X	X	X	H	HOCS
6	Programme Board - oversee and steer project work	BAU	Monthly	01/04/2017	30/09/2018	X	X	X	X	X	H	SMT
7	Monitor and report progress against Operational Plan	BAU	Quarterly	01/04/2017	30/09/2018	X	X	X	X	X	H	SMT
8	Report against our annual Governance Reporting Arrangements Cycle	BAU	As required	01/04/2017	30/09/2018	X	X	X	X	X	S/H	HOCS
9	Manage delivery and maintenance of regular CMS reports, including manual preparation (as required) until second tranche of CMS reports are available	BAU	As required	01/04/2017	31/03/2018	X	X	X	X	X	S/H	HOCS
10	Validate and accuracy check annual report data-set	BAU	Six-monthly	01/04/2017	30/09/2018	X	X	X	X	X	M	HOCS
11	Case Management System - development and implementation of second tranche of reports, & develop in-house report-writing skills	Project		01/04/2017	31/03/2018					X	M	HOCS

Promotion and communications

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Lead Mgr
						1	2	3	4	5		
1	Review, update and deliver Communication Plan	BAU	As required	01/04/2017	31/03/2017	X	X	X	X	X	H	HOPI
2	Manage and maintain press and media enquiry service	BAU	As required	01/04/2017	31/03/2017	X	X	X	X	X	H	HOPI
3	Refresh approach and materials for Roadshows and other media for promoting FOI rights to civil society and media organisations	Project		01/10/2017	31/08/2018		X			X	H	HOPI
4	Deliver training and briefing events to promote effective use of FOI rights to civil society and media organisations	BAU	As required	01/04/2017	31/03/2017		X			X	S	HOPI
5	Pilot a civil society workshop for young people aged 15-19 to raise awareness of FOI rights and the relevance of the rights to them. Measure: self-evaluation, How much do you agree with the statement? "As a result of this workshop I better understand when I might make an information request"	Project		01/04/2017	30/11/2017		X			X	M	HOPI
6	Plan a writing, art or photography competition to raise Children & Young People awareness of FOI, for delivery in Yr of YP 2018. Measures: Partner organisation agreement to jointly promote the competition, agreed brief and budget in place.	Project		01/04/2017	31/08/2017		X			X	M	HOPI
7	Plan production of new promotional materials to raise awareness among young people, aged 12 – 25, of their FOI rights. The product will be delivered in Yr of Young People 2018. Measures: an agreed production brief which involves young people in the design, communication plan	Project		01/04/2017	31/08/2017		X			X	M	HOPI
8	Research the extent of public awareness of FOI rights through an omnibus poll	BAU	Annually	01/01/2018	31/03/2018		X				H	HOPI
9	Promote use by applicants of the online appeal portal: increase prominence of portal across website; gather user feedback to improve the service	Project		01/04/2017	31/10/2017		X			X	H	HOPI
10	Research, draft and publish the Annual Report and Accounts (see also - P&R sheet)	BAU	As required	01/04/2017	30/10/2017	X	X	X	X	X	S	HOPI
11	Manage and report on enquiries service	BAU	Quarterly	01/04/2017	30/09/2018	X	X	X	X	X	H	HOCS
12	Report on website usage against performance targets	BAU	Quarterly	01/04/2016	30/09/2017	X	X	X		X	H	HOPI
13	Maintain website content, ensuring it is up to date and relevant, and reporting progress	BAU	Quarterly	01/04/2016	30/09/2017	X	X	X		X	H	HOPI
14	Maintain and support standing advisory group of practitioners e.g. development of resources and learning	Project		01/04/2016	30/09/2017	X		X		X	M	HOPI
15	Co-host the International Information Commissioners' Conference 2017 in Manchester, specifically, communications and co-ordination of programme	Project		01/11/2016	30/09/2017				X		H	HOPI

Quality Assurance

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Lead Mgr
						1	2	3	4	5		
1	Compliments and Complaints - recording and analysis	BAU	Six-monthly	01/04/2017	30/09/2018					X	S	HOCS
2	Service User Equalities Statistics - collection and analysis	BAU	Annual	01/04/2017	30/09/2018			X		X	H	HOCS
3	Monitor and review Investigation targets & KPIs to ensure appropriate and fit for purpose	BAU	Quarterly	01/04/2017	31/03/2018			X		X	H	HOE
4	Performance and Quality Framework: managers to report against performance for their areas of responsibility (including carrying out appropriate quality assurance reviews) and to review KPIs and other targets and standards annually	BAU	As Required	01/04/2017	31/03/2018	X	X	X	X	X	S/H	SMT
5	Information requests to SIC: record and report on performance data in line with the requirements of the s60 code of practice and upload to the FOI/EIRs statistics portal	BAU	Quarterly	01/04/2017	30/09/2018	X		X	X	X	S	HOCS
6	Commissioner triennial survey of service user satisfaction	Project		01/10/2017	31/12/2017					X	M	HOCS

Regulation and Enforcement

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim 1	2	3	4	5	Priority	Lead Mgr
1	Enforce FOI in line with Enforcement Policy	BAU	As required	01/04/2017	30/09/2018	X		X			S	HOE
2	Register, validate, investigate and decide applications in line with approved procedures and KPIs	BAU	Monthly	01/04/2016	30/09/2018					X	S	HOE
3	Monitor and report on investigation and enforcement performance	BAU	Monthly	01/04/2016	30/09/2018	X				X	S/H	HOE
4	Maintain a list of bodies suitable for consideration for designation under s4 and s5. Propose list to Scottish Ministers	BAU	As required	01/01/2018	28/02/2018				X	X	S	HOPI
5	Provide legal advice to, or procure legal advice for, the Commissioner on matters including litigation, FOI law (including how this affects or is affected by other areas of law) or other corporate responsibilities; ensure record of legal advice kept up to date.	BAU	As required	01/04/2016	30/09/2018	X				X	H	HOE
6	Review the Model Publication Scheme, Commissioner's Guidance and support materials, communicating updates to all authorities. Review to include presentation of materials.	BAU	As required	01/02/2017	30/04/2017	X		X		X	S	HOPI
6	Review the Model Publication Scheme, Commissioner's Guidance and support materials, communicating updates to all authorities. Review to include presentation of materials.	BAU	Annual/ as Required	01/02/2018	30/04/2018	X		X		X	S	HOPI
7	Manage and monitor notifications from new authorities to comply with publication scheme	BAU	As required	01/04/2017	01/03/2018	X		X			S	HOPI
8	Maintain a rolling-programme to ensure standard letters on case management system are reviewed and updated regularly, and as needed.	BAU	As required	01/04/2017	30/09/2018	X				X	H	DHOE
9	Survey new authorities' experience of FOI	BAU	As required	01/04/2017	30/05/2017	X		X			M	HOPI

Resource management

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Lead
						1	2	3	4	5		Mgr
1	Set and profile budget for 2018/19	BAU	Annual	01/06/2017	31/08/2017	X	X	X	X	X	S	HOCS
2	Current year Budget monitoring and control	BAU	Monthly	01/04/2017	31/03/2018	X	X	X	X	X	S	HOCS
3	Implement and report upon prompt payment of invoices	BAU	Quarterly	01/04/2017	30/09/2018					X	S/H	HOCS
4	Workforce monitoring and planning	BAU	Quarterly	01/04/2017	30/09/2018	X	X	X	X	X	H	HOCS
5	Maintenance of premises	BAU	As Required	01/04/2017	30/09/2018					X	M	HOCS
6	Procurement and contract management	BAU	As Required	01/04/2017	30/09/2018					X	S/H	HOCS
7	Provision of Governance Statement of Assurance to SIC	BAU	Annual	01/05/2017	31/05/2017					X	S	HOCS
9	Tender for External Provision of Legal Services	Project		01/01/2017	30/06/2017					X	H	HOE
10	Market test external provision of case management system	Project		01/01/2018	31/03/2018					X	H	HOCS
11	External Provision of Legal Services: ongoing contract management	BAU	As agreed in contract	01/04/2017	31/03/2018					X	H	HOE
12	Tender IT Support & Maintenance Contract	Project		01/04/2017	30/09/2017					X	H	HOCS
13	Review availability and cost of survey software and recommend a suitable solution	Project		01/08/2017	01/10/2017					X	M	HOPI
14	Review approach to website supported hosting and maintenance contract	Project		01/11/2017	31/12/2017					X	M	HOCS/HOPI
15	Review approach to how SIC manages contracts and delivery of service	Project		01/01/2018	31/03/2018					X	H	HOCS

Risk management

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Lead Mgr
						1	2	3	4	5		
1	Review of risk, updating of register and annual risk report	BAU	Monthly	01/04/2017	30/09/2018	X	X	X	X	X	S	HOCS
2	Implement internal audit plan	BAU	Annual	01/10/2017	31/03/2018	X	X	X	X	X	S/H	HOCS
3	BCP - maintenance of plan and testing	BAU	Annual	01/04/2017	30/09/2018	X	X	X	X	X	H	HOCS
4	H&S reporting and procedures	BAU	Quarterly	01/04/2017	30/09/2018	X	X	X	X	X	S	HOCS
5	Develop updated business continuity arrangements	Project		01/04/2017	30/09/2017	X	X	X	X	X	H	HOCS

Sustainable development

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim 1	2	3	4	5	Priority	Lead Mgr
1	Monitor Carbon Footprint	BAU	Quarterly	01/04/2017	30/09/2018					X	S	HOCS

2016-17 Completions

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim 1	2	3	4	5	Priority	Lead Mgr
1	Review of Procurement Policy and Procedures	Project		01/04/2016	30/06/2017					X	S/H	HOCS
2	Complete delivery of tranche 1 of WorkPro reports	Project		01/01/2016	31/05/2017					X	H	HOCS
3	BCP - review of plan	Project		01/07/2016	31/03/2017	X	X	X	X	X	H	HOCS
4	Human Resource Management: Employee Handbook - finalisation, approval & communication	Project		01/04/2016	31/01/2017					X	S/H	HOCS
5	Self-assessment toolkit on reviews	Project		01/04/2017	30/05/2017	X		X			H	HOPI
6	Special report on proactive publication	Project		01/03/2017	30/04/2017	X	X	X	X	X	H	HOPI
7	Promotion and Communications Complete migration of statistics portal database	BAU		01/04/2016	30/05/2016	X	X	X		X	H	HOPI
8	Statistics portal reports	BAU		01/03/2017	30/04/2017	X		X			H	HOPI
9	Re-organise information on our website to make it easier to find	Project		01/05/2017	31/08/2017					X	M	HOPI
10	Establish whether there is interest in an emergency services practitioners' group	Project		01/04/2017	30/05/2017	X		X			L	HOPI
11	Develop, implement and monitor internal procedures for press and media work	Project		01/01/2017	31/01/2017					X	H	HOPI
12	Commission and have carried out DMM Assessment	Project		01/03/2017	30/04/2014	X		X		X	M	SIC

Document Control Sheet

Document Information	
Full name of current version: Class, Title, Version No and Status. *E.g. C1 MOU Between the SIC and the IC v01*	C2 Operational Plan 2017-18 v01 CURRENT ISSUE
VC No.	91407
Type	Plan
Approver	SMT
Responsible Manager	HOCS
Date of next planned review	N/A – new plan issued each year
Approval & Publication	
Approval Date of current major version	14/03/17
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Technical Changes / Unplanned or Ad hoc reviews (see Summary of changes below for details)	
Date of last update	03/08/17

Summary of changes to document				
Date	**Action by** *(initials)*	**Version updated** *(e.g. v01.25-36)*	**New version number** *(e.g. v01.27, or 02.03)*	**Brief description** *(e.g. updated paras 1-8, updated HOPI to HOOM, reviewed whole section on PI test, whole document updated, corrected typos, reformatted to new branding)*
03/08/17	KB	01.00	01.01	New document created, amend from excel to word document
03/08/17	KB	01.01	01.02	DCS updated
28/09/17	HGS	01.02	01.03	Opened in edit to consider for approval. Approved by HOCS for publication
03/10/17	KB	01.03	01.04	DCS updated, published on website