Operational Plan 2020-21 Monitoring Report

Scottish Information Commissioner

Introduction

This document sets out the Scottish Information Commissioner's operational plan for the period from 1 April 2020 to 31 March 2021. 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

The impact of Freedom of Information is increased, being recognised and valued as the key enabler of openness and transparency of public functions in Scotland, enhancing people's right to access the information that matters to them

Strategic aims

To realise this vision, the Commissioner's office will:

(1) increase knowledge and understanding of FOI rights

(2) enable and support high standards of FOI policy and practice

(3) develop Scottish public sector culture and practice where the proactive disclosure of information is routine and valued

(4) influence and support the development and strengthening of Scottish FOI law and practice

(5) contribute to Scotland being respected as a world-leader in openness and transparency

(6) be recognised as an organisation of independent and trusted experts that is run efficiently, governed effectively and is open and transparent

Structure of the operational plan

This 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 business as usual (BAU) and one-off projects. This a working document which forms the basis of on-going monitoring and assessment and may be updated.

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

Projects will be managed according to project management principles and practice. Each project is approved by the Senior Management Team.

Monitoring and reporting

Progress against the plan will be reviewed every two months by the Senior Management Team and an update of progress will be published following this review. Achievement and output against individual line items will be also 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 2020-21 is £1,903,000:

 - Total staff costs: £1,497,816
 - Total gross revenue costs: £1,869,000
 - Capital expenditure: £34,000

KEY

BAU: Business as Usual
DHOE: Deputy Head of Enforcement
HOCS: Head of Corporate Services
HOE: Head of Enforcement
HOPI: Head of Policy and Information
Priority: Relative priority - Statutory, High, Medium, Low
SIC: Scottish Information Commissioner
SMT: Senior Management Team

Human Resources Management

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim 1	2	3	4	5	6	Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
1	Report to SMT on Performance & Development Framework	BAU	Annual	01/04/2020	31/08/2020						X	H	Slip	Comp	Comp	Comp	HOCS	HOCS reported to MSMTM on 06/10/20 - initially delayed due to impact of COVID-19 pandemic
2	Learning & Development Plan 2020-21 (internal)	BAU	Annual	01/04/2020	30/08/2020						X	H	Slip	OT	Comp	Comp	HOCS	Revised arrangements in place - updated plan for 2020-21 put in place following further information from line managers
3	Review Human Resources Strategy	BAU	Annual	01/04/2020	31/08/2020						X	M	Slip	Comp	Comp	Comp	HOCS	HOCS reported to Q2 QSMTM - delayed due to impact of COVID-19 pandemic - now complete
4	Apply & monitor Performance & Development Framework	BAU		01/04/2020	31/03/2021						X	H	OT	OT	OT	Comp	HOCS	Adapted procedures in place
5	Carers Accreditation – monitoring and application	BAU		01/11/2020	31/03/2021						X	M	NS	NS	NS	NS	HOCS	Dependent on project below - will be included in Operational Plan 2021-22
6	Security & Vetting scheme – monitoring and application	BAU		01/04/2020	31/03/2021						X	H	OT	OT	OT	Comp	HOCS	All required actions completed.

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim 1	2	3	4	5	6	Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
1	Business continuity arrangements - COVID -19 pandemic – interim human resources polices and processes	Project		01/04/2020	31/10/2020						X	H	OT	OT	OT	C/f new	HOCS	As office premises remain temporarily closed this will be ongoing in 2021-22
2	Business continuity arrangements - COVID -19 pandemic – interim HR policies relating to expansion of remote working	Project		01/04/2020	31/10/2020						X	H	OT	OT	OT	C/f new	HOCS	As office premises remain temporarily closed this will be ongoing in 2021-22
3	Business continuity arrangements - COVID -19 pandemic – re-opening of office premises - health and safety requirements, physical distancing and hygiene requirements	Project		01/04/2020	31/10/2020						X	H	OT	OT	OT	C/f new	HOCS	As office premises remain temporarily closed this will be ongoing in 2021-22
4	Payroll service – review of arrangements and procurement of new service	Project		01/04/2020	31/03/2021						X	H	OT	OT	OT	C/f new	HOCS	Project ongoing - to be included as project in 2021-22.
5	Equalities Monitoring and Reporting – staff – revised system	Project		01/04/2020	31/03/2021						X	H	OT	OT	OT	C/f new	HOCS	To be included in Operational Plan 2021-22.
6	Recruitment procedures – review and revision	Project		01/04/2020	31/03/2021						X	H	OT	OT	OT	C/f new	HOCS	Delayed due to impact of COVID-9 pandemic - due in Q4. To be included in Operational Plan 2021-22.
7	Employee Handbook – review	Project		01/04/2020	31/12/2020						X	H	OT	OT	Slip	C/f new	HOCS	Revised Handbook circulated to SMT for comments - was to be considered at MSMTM on 25/11/20 but due to comments received further time now required to consider any changes to the revised draft and then consult staff- due to other work priorities will be progressed in Q4 - revised Employee Hanbook updated and and SMT to provide comments by 26/03/21. Revised draft Employee Handbook circulated to staff for comment on 21/04/21. Project c/f into 2021-211.
8	Carer Positive Scheme - Accreditation	Project		01/04/2020	31/10/2020						X	M/H	OT	OT	Slip	C/f new	HOCS	Delayed due to impact of COVID-9 pandemic - due in Q4 - to be carried forward to Operational Plan 2021-22

Improving Authority Practice

	Activity	Type	Frequency	Start Date	End Date	SA 1	2	3	4	5	6	Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
1	Improving Authority Practice Strategic Approach 2020-24 – implement for 2020-21	BAU		01/10/2020	31/03/2021		X	X	X		X	H	NS	NS	NS	C/f new	HOPI	Document not due for approval until April/May 2021. Work will be carried forward, but not as separate line, to avoid duplication - delivery will be inherent across other lines.
2	Programme of events (on or offline) for FOI practitioners - deliver and report on for 2020-21	BAU		01/11/2020	31/03/2021		X	X	X		X	H	NS	NS	OT	C/f new	HOPI	Development of formal event programme delayed due to pandemic impact (while source online events mechanism) - but continuing to speak at events (Social Security Scotland, Holyrood etc)
3	Public sector FOI practitioner groups - support existing groups	BAU		01/04/2020	31/03/2021		X	X	X			M	OT	OT	OT	Comp	HOPI	
4	Decisions (and intervention) learning - deliver regular mechanism for sharing	BAU		01/04/2020	31/03/2021		X	X	X		X	H	Slip	Slip	OT	Comp	HOPI/ HOE	
5	Collaborate with/involve authority representatives to inform best practice	BAU		01/04/2020	31/03/2021		X	X	X		X	M	OT	OT	OT	Comp	HOPI	Limited given pandemic disruption
6	FOI/EIRs statistics portal data from public authorities - collect, collate and publish	BAU	Quarterly	01/04/2020	31/03/2021	X		X				S/H	OT	OT	OT	Comp	HOPI	
7	New public authorities - support to prepare for FOI duties	BAU		01/04/2020	31/03/2021		X	X	X			H	OT	OT	OT	Comp	HOPI	
8	Good practice resources and guidance for authorities – maintain, develop as required, and report on use	BAU		01/04/2020	31/03/2021		X	X	X	X	X	H	OT	OT	OT	Comp	HOPI	Range developed for Covid-19 and FOI infohub

	Activity	Type	Frequency	Start Date	End Date	SA 1	2	3	4	5	6	Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
1	Improving Authority Practice Strategic Approach 2020-24 – develop	Project		01/07/2020	01/10/2020		X	X	X		X	H	NS	OT	Slip	C/f new	HOPI	Being consulted on, due for approval by May 2021. Not required as new project in 2021-22, but delivery of approach tactics will be inherent through BAU and projects.
2	Programme of events (on or offline) for FOI practitioners – develop for 2020-22	Project		01/08/2020	01/11/2020		X	X	X			M	NS	Slip	Slip	C/f new	HOPI	Delayed as result of pandemic disruption / pending securing online events mechanism. To be carried forward to 2021-22
3	Review resources, channels and models for improving authority practice - map needs of target audiences, baseline current knowledge levels, existing tools, explore alternative best practice and develop workplan for replacement/new approaches	Project		01/07/2020	31/03/2021		X	X	X		X	H	NS	NS	Slip	C/f new	HOPI	Combined with Website discovery - and will continue in 2021-22 with survey and revised resources for authorities.
4	Decisions (and intervention) learning – develop regular mechanism for sharing	Project		01/07/2020	01/11/2020		X	X	X			H	NS	OT	OT	Comp	HOPI/ HOE	
5	Inspiring and supporting culture change and best practice - scope mechanisms and create proposals/workplans to deliver	Project		01/11/2020	31/03/2021		X	X	X			M	NS	NS	NS	Disc	HOPI	Work will continue as part of IAP programme generally, but no capacity for standalone project in 2021-22.
6	Peer support for authorities - scope and where possible commence delivery new approaches supporting improved practice and culture change	Project		01/07/2020	31/03/2021		X	X	X			M	NS	NS	OT	C/f new	HOPI	Scoping continuing, since landscape of remote meeting/peer support still in flux due to pandemic. Will be covered by peer support/networks BAU in new ops plan.
7	Model Publication Scheme - review SIC guidance and support materials and promote as required	Project		01/10/2020	31/03/2021 (May go in to 2021-22)		X	X	X			M	NS	NS	NS	Comp	HOPI	
8	Registered Social Landlords - conduct review 1 year since designation	Project		01/09/2020	31/03/2021		X	X	X			M	NS	NS	OT	Comp	HOPI	Surve with Scottish Government underway. Report due February 2021
9	Coronavirus (Scotland) Act - update authorities on changes to FOI law and promote guidance	Project		01/04/2020	31/03/2021		X	X	X			H	OT	OT	OT	Comp	HOPI	No further changes anticipated before 2021-22.
10	Review and promote guidance on areas highlighted by PAPLS report	Project		01/07/2020	31/03/2021		X	X	X	X		M	OT	OT	OT	C/f new	HOPI/ HOE	Work underway and will continue across 2021-22 - but will be subsumed into other areas rather than standalone project.

Improving Authority Practice

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim 1	2	3	4	5	6	Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
11	FOI/EIRs statistics portal - review approach and what is collected to ensure appropriate (make recommendations for future site)	Project		01/10/2020	30/03/2021		X	X	X	X	X	H	NS	NS	OT	Comp	HOPI	
12	Research and recommendations on publication approaches and future potential models (compliance with current practice, exploration of other models, user need/wants, disclosure logs)	Project		01/06/2020	31/03/2021			X	X	X	X	H	NS	OT	OT	Comp	HOPI	
13	Coronavirus (Scotland) Act 2020 - gather, analyse and publish information on how changes impacted on authority FOI practice	Project		01/04/2020	31/03/2021		X	X	X	X	X	S/H	NS	OT	OT	Comp	HOPI	Report published Dec 2020. Follow up report likely 2021-22

Information Management

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim						Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
						1	2	3	4	5	6							
1	Coordinate on-going Information and Records Management (IRM) controls and procedures and ensure they are applied	BAU		01/04/2020	31/03/2021	X		X			X	S/H	Comp	Comp	Comp	Comp	HOCS	Annual report to Q1 QSMTM
2	IRM assurance report to SMT	BAU	Annual	01/04/2020	31/08/2020	X		X			X	S/H	Comp	Comp	Comp	Comp	HOCS	Annual report to Q1 QSMTM
3	Maintenance of secure and reliable IT network	BAU		01/04/2020	31/03/2021						X	S/H	Comp	Comp	Comp	Comp	HOCS	
4	Manage Key Documents as per the Review Programme	BAU		01/04/2020	31/03/2021	X	X	X			X	H	Slip	Comp	Comp	Comp	HOCS	Review re-start in September 2020 - delayed due to impact of COVID-19 pandemic
5	Monitor compliance with data protection legislation and the General Data Protection Regulation	BAU		01/04/2020	31/03/2021			X			X	S	Comp	Comp	Comp	Comp	HOCS	From 31/12/2020 - GDPR now referred to as "UKGDPR" - Q4 GDPR report to be submitted to Q4 QSMTM in April 2021
6	Maintain a compliant publication scheme and guide to information	BAU		01/04/2020	31/03/2021	X		X		X	X	H	Comp	Comp	Comp	Comp	HOCS	
7	SIC Publication Scheme - assurance report to SMT	BAU		01/01/2021	31/03/2021						X	S	Comp	Comp	Comp	Comp	HOCS	Assurance report provided to Q3 QSMTM
8	Monitor SIC compliance in responding to RFIs and reviews – compliance with statutory timescales, policy and procedures and quality assurance (quality assurance report to be provided by HOE to HOCS)	BAU		01/04/2020	31/03/2021		X				X	S	Comp	Comp	Comp	Comp	HOCS	6 monthly report to be submitted to Q4 QSMTM in April 2021
9	Monitor SIC compliance in responding to SARs – compliance with statutory timescales, policy and procedures and quality assurance (quality assurance report to be provided by HOE to HOCS)	BAU		01/04/2020	31/03/2021						X	S	Comp	Comp	Comp	Comp	HOCS	6 monthly report will be submitted to Q4 QSMTM in April 2021
10	Cyber Resilience Action Plan – implement and monitor	BAU		01/09/2020	31/03/2021						X	H	NS	NS	NS	C/f new	HOCS	To be carried forward into Operational Plan 2021-22

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim						Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
1	Business continuity arrangements - COVID -19 pandemic – initial expansion of remote working – interim policies	Project		01/04/2020	30/06/2020					X	X	H	Comp	Comp	Comp	Comp	HOCS	As office premises remain temporarily closed this will be ongoing in 2021-22
2	Business continuity arrangements - COVID -19 pandemic – further expansion of remote working – interim policies	Project		01/06/2020	31/10/2020					X	X	H	Comp	Comp	Comp	Comp	HOCS	As office premises remain temporarily closed this will be ongoing in 2021-22
3	Residual work to implement GDPR – see GDPR 2019-20 Q4 CR to QSMTM	Project		01/04/2020	31/03/2021	X		X		X	X	S/H	OT	OT	OT	C/f new	HOCS	Ongoing work to be carried forward into 2021-22
4	Digital and IT Strategy	Project		01/04/2020	31/08/2021						X	S/H	NS	NS	Slip	C/f new	SIC /HOCS	Preparatory work to start Q1 2021-22 following website discovery report
5	Cyber Resilience Action Plan 2020-2021	Project		01/04/2020	31/08/2021						X	H	NS	NS	Slip	C/f new	HOCS	Planned for Q4 - delay due to COVID-19 pandemic
6	Cyber Essentials 2020-21 reaccreditation	Project		10/12/2020	31/03/2021						X	H	NS	NS	Comp	Comp	HOCS	Due at end Q3/ in Q4. Re-accredited in December 2020.
7	Cyber Essentials Plus 2020-21 reaccreditation	Project		10/12/2020	31/03/2021						X	H	NS	NS	Comp	Comp	HOCS	Due in Q4. Re-accredited in March 2021.
8	Information requests and requests for reviews – review of procedures	Project		01/04/2020	31/03/2021					X	X	H	Slip	Slip	Slip	C/f new	HOCS/ HOE	Delayed due to impact of COVID-19 pandemic. Meeting of Working Party took place on 09/02/21 - to be carried into 2021-22 as project.

Information Management

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim							Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
						1	2	3	4	5	6								
9	Information and Records Management (IRM) – Review and update File Plan and Retention Schedule	Project		01/04/2020	31/03/2021		X					X	H	Slip	Slip	Slip	C/f new	HOCS	Due in Q4 - delayed due to impact of COVID-19 pandemic. To be carried forward into 2021-22 as project.
10	IRM – consider and recommend way forward as regards review, retention and assurance	Project		01/04/2020	31/03/2021		X					X	H	NS	NS	Disc	Disc	HOCS	Update of Records Management Plan will need to take place before this project can take place - will be included in Operational Plan 2021-22
11	IRM – Progress Update Review and revision of Records Management Plan and associated policies	Project		01/04/2020	31/03/2021		X					X	H	NS	NS	OT	C/f new	HOCS	Due in Q4 - will not be undertaking a PUR as undertaking a full review of Records Management Plan. To be carried into 2021-22 as project.
12	Case Management System – review of RFI/RFR/workflow re: GDPR and new SAR workflow	Project		01/04/2020	31/03/2021		X					X	M/H	NS	NS	NS	C/f new	HOCS	CMS upgrade (due in Q4) will need to take place before this project can take place. To be carried forward into 2021-22.
13	Case Management System – access protection	Project		01/04/2020	31/03/2021		X					X	M/H	NS	NS	NS	C/f new	HOCS	CMS upgrade (due in Q4) will need to take place before this project can take place. To be carried forward into 2021-22.

Planning & Reporting

#	Activity	Type	Frequency	Start Date	End Date	Strategic Aim						Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
						1	2	3	4	5	6							
1	Annual Report (AR) 2019-20 statutory reporting and 3Es	BAU	Annual	01/04/2020	31/10/2020						X	S	OT	Comp	Comp	Comp	HOCS	
2	AR 2019-20: Accountability Report and Financial Statements - ensure compliance with FReM, SPFM, prepare and obtain approval	BAU	Annual	01/04/2020	31/10/2020						X	S	OT	Comp	Comp	Comp	HOCS	
3	Annual Report & Accounts: Performance Report – ensure compliance with FReM, SPFM prepare and obtain approval	BAU	Annual	01/04/2020	31/10/2020						X	S	OT	Comp	Comp	Comp	HOPI / HOCS	
4	AR 2019-20 Annual Statement of Assurance to SIC	BAU	Annual	01/04/2020	31/10/2020	X	X	X			X	H	OT	Comp	Comp	Comp	HOCS	
5	AR 2019-20 Auditor's Report – liaise with Auditor and Advisory Audit Board (AAB)	BAU	Annual	01/07/2020	31/10/2020						X	H	OT	Comp	Comp	Comp	HOCS	
6	AR 2019-20 AAB meeting 2020	BAU	Annual	01/08/2020	30/09/2020						X	H	OT	Comp	Comp	Comp	HOCS	
7	Audit Planning Report – AR 2020-21 liaise with auditor and AAB	BAU	Annual	01/10/2020	01/02/2021						X	H	NS	NS	OT	Comp	HOCS	Due in Q4
8	Performance and statistical reporting	BAU	As set out in the GRA	01/04/2020	31/03/2021	X	X	X			X	S	Comp	Comp	Comp	Comp	HOCS	
9	Manage and report on Enquiries Service	BAU	Six monthly	01/04/2020	31/03/2021	X	X	X			X	H	OT	Comp	OT		HOCS	6 monthly report to be submitted to Q4 QSMTM in April 2021.
10	Public Service Reform (Scotland) Act 2010 – annual statement of expenditure and annual statement of sustainable growth report	BAU	Annual	01/04/2020	31/03/2021						X	S	OT	OT	OT	Comp	HOCS	Annual report to be submitted to Q4 QSMTM in April 2021.
11	Operational Plan 2020-21 – monitor and report progress	BAU	Two monthly	01/04/2020	31/03/2021	X	X	X			X	H	Slip	Comp	Comp	Comp	SMT	
12	Key Documents – reviews due and overdue reviews - monitor	BAU	Two Monthly	01/04/2020	31/03/2021	X	X	X			X	H	Slip	Comp	Comp	Comp	SMT	
13	Operational Plan 2020-21 - coordinate and prepare	BAU	Annual	01/01/2021	31/07/2021	X	X	X			X	H	OT	Comp	Comp	Comp	HOCS	
14	Governance Reporting Arrangements (GRA) – reporting against cycle	BAU		01/04/2020	31/03/2021	X	X	X			X	H	Comp	Comp	Comp	Comp	HOCS / HOPI / HOE	Final reporting in Q4 QSMTM
15	GRA - compliance report to SMT	BAU	Annual	01/04/2020	31/03/2021	X	X	X			X	H	Comp	Comp	Comp	Comp	HOCS	2019-20 compliance report submitted to Q1 QSMTM.
16	Case Management System – reporting (manual and automatic)	BAU		01/04/2020	31/03/2021						X	M	Comp	Comp	Comp	Comp	HOCS	
17	Prescribed Persons (Reports on Disclosure of Information) Regulations 2017	BAU	Annual	01/04/2020	31/08/2020						X	S	Comp	Comp	Comp	Comp	HOCS	
18	Report on biodiversity (as required by the Nature Conservation (Scotland) Act 2004)	BAU	As required	01/04/2020	31/03/2021						X	S	NS	NS	OT	Comp	HOCS	Due in Q4. CR and draft Report to be submitted to SMT on 26/03/21.
19	Sustainable Development - monitor and report on carbon footprint	BAU	Annual	01/04/2020	31/03/2021						X	S	OT	OT	OT	Comp	HOCS	Annual report to be submitted to Q4 QSMTM in April 2021.

#	Activity	Type	Frequency	Start Date	End Date	Strategic Aim						Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
1	Business continuity arrangements - COVID -19 pandemic –enquiries - interim revised arrangements and reporting procedures	Project		01/04/2020	31/10/2020					X	X	H	OT	OT	OT	C/f new	HOCS	As office premises remain temporarily closed this will be ongoing in 2021-22
2	Case management system – review of in-house reporting	Project		01/04/2020	31/03/2021	X	X	X		X	X	H	OT	OT	C/f new	C/f new	HOCS	To be carried forward to Operational Plan 2021-22, if required
3	Enquiries procedures – review of outcome codes and assurance reporting	Project		01/04/2020	31/03/2021	X	X	X		X	X	H	OT	OT	OT	C/f new	HOCS	To be carried forward into 2021-22 Operational Plan
4	Equalities Monitoring and Reporting – users - revised system	Project		01/04/2020	31/03/2021					X	X	H	OT	OT	OT	C/f new	HOCS	To be carried forward into 2021-22 Operational Plan

Promotion and Communications

#	Activity	Type	Frequency	Start Date	End Date	1	2	3	4	5	6	Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ update
						Strategic Aim												
1	Communications and engagement framework / strategic approach 2020 - 2024 - deliver and report on for 2020-21	BAU	Annually	01/10/2020	01/04/2024	X	X	X	X	X	X	H	NS	NS	OT	C/f new	HOPI	
2	News media - manage and maintain news media enquiry service and ongoing media engagement	BAU		01/04/2020	31/03/2021	X	X	X	X	X	X	M	OT	OT	OT	Comp	HOPI	Phone enquiries unavailable due to office premises closure, but responding to email enquiries
3	News media - manage and maintain media monitoring service	BAU		01/04/2020	31/03/2021	X	X	X	X	X	X	M	OT	OT	OT	Comp	HOPI	
4	Email newsletters - prepare, promote and circulate regularly and as required	BAU		01/11/2020	31/03/2021	X	X	X	X	X	X	M	NS	NS	OT	Comp	HOPI	
5	Email newsletters - maintain and grow mailing lists appropriately	BAU		01/08/2020	31/03/2021	X	X	X	X	X	X	M	NS	NS	OT	Comp	HOPI	
6	Social media - monitor, maintain and develop social media presence in line with Communications Framework/as required	BAU		01/04/2020	31/03/2021	X	X	X	X	X	X	M	OT	OT	OT	Comp	HOPI	
7	Events - support and participate in key conferences/events where they support strategy delivery	BAU		01/04/2020	31/03/2021	X	X	X	X	X	X	L/M	OT	OT	OT	Comp	HOPI	
8	Website - maintain and promote content, ensuring it is up to date and relevant, and reporting progress	BAU		01/04/2020	31/03/2021	X	X	X	X	X	X	H	OT	OT	OT	Comp	HOPI	
9	BSL Action plan 2019-2023 – plan, implement and report actions required	BAU	Annually	01/04/2020	31/03/2021	X	X	X	X		X	S	OT	OT	OT	Comp	SMT	
10	Annual report - coordinate design and promotion where required	BAU	Annually	01/04/2020	31/03/2021						X	H	OT	Comp	Comp	Comp	HOPI	
11	Web and digital communications strategic approach 2020 - 2024 - implement for 2020-21	BAU		01/11/2020	31/03/2021	X	X	X	X	X	X	M	NS	NS	NS	Disc	HOPI	Discontinued - whether needed will be considered following Website Discovery project and as IT and Digital strategy is developed
12	Research public awareness of FOI rights - through omnibus poll and other appropriate methods - identify gaps in knowledge/awareness/needs across difference social groups	BAU	Annually	01/04/2020	31/03/2021	X					X	H	NS	NS	C/f new	C/f new	HOPI	Agreed to conduct in 2021-22
13	Events - deliver training and briefing events to promote effective use of FOI rights to civil society and media organisations	BAU		01/04/2020	31/03/2021	X					X	M	OT	OT	OT	Comp	HOPI	Online training session held with TPASS residents housing association
14	Promoting FOI rights strategic approach 2020 - 2024 - implement and report on for 2020-21	BAU		01/11/2020	31/03/2021	X					X	H	NS	NS	NS	C/f new	HOPI	Delayed as result of pandemic disruption and team capacity changes.
15	Collaborate with/involve people from identified target groups for promotion in resource development where possible, to test and ensure best practice	BAU		01/04/2020	31/03/2021	X					X	M	NS	NS	NS	Comp	HOPI	Via website discovery project work, Feb - Mar 2021
16	Policy monitoring and intelligence sharing systems - maintain	BAU	Monthly	01/04/2020	31/03/2021	X	X	X	X	X	X	H	OT	OT	OT	Comp	HOPI	
17	Key policy stakeholder relationships/ partnerships - maintain and support as required	BAU		01/04/2020	31/03/2021	X	X	X	X	X	X	M	OT	OT	OT	Comp	HOPI	
18	FOI Policy Strategic Approach 2020-2024 –implement for 2020-21 and report	BAU		01/10/2020	30/03/2021	X	X	X	X	X	X	M	NS	NS	NS	Disc	HOPI	
19	FOI policy positions - maintain positions/messages on key issues	BAU		01/04/2019	31/03/2021	X	X	X	X	X	X	L/M	NS	OT	OT	Comp	HOPI	
20	Legislative change and consultations - monitor and respond to relevant consultations / inform legislative change processes as required	BAU		01/04/2020	31/03/2021	X	X	X	X	X	X	H	OT	OT	OT	Comp	HOPI	

Promotion and Communications

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim 1	2	3	4	5	6	Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ update
1	Communications and engagement framework / strategic approach 2020 – 2024 and action plan for 2020-21 - develop	Project		01/07/2020	01/10/2020	X	X	X	X	X	X	H	NS	OT	OT	C/f new	HOPI	Draft complete, awaiting comments and approval.
2	Email newsletter - develop newsletter format and relevant mailing list for authority FOI contacts	Project		01/04/2020	30/10/2020		X	X	X		X	M	OT	OT	Comp	Comp	HOPI	
3	Coronavirus (Scotland) Act 2020 - develop and update information hub and ensure relevant information available for all audiences regarding changes to FOI (including transitions when powers cease)	Project		01/04/2020	31/03/2021	X	X	X	X	X	X	H/S	OT	OT	Comp	Comp	HOPI	Hub launched April 2020. Marked as complete for 2021-22 as changes extended to end of financial year.
4	Website – internal activity to implement changes to ensure compliance with accessibility regulations (including web manual updates)	Project		01/04/2020	31/10/2020	X	X	X	X	X	X	S	OT	OT	Comp	Comp	HOPI	
5	Website – coordinate website supplier activity to implement changes to ensure compliance with accessibility regulations	Project		01/04/2020	31/10/2020	X	X	X	X	X	X	S	NS	Comp	Comp	Comp	HOPI	
6	Website - deliver discovery phase and develop roadmap for new website (including specification and updates to visual identity as required/where possible).	Project		01/07/2020	31/03/2021	X	X	X	X	X	X	H	NS	OT	OT	Comp	HOPI	
7	Web and digital communications strategic approach 2020 - 2024 - develop	Project		01/07/2020	01/11/2020	X	X	X	X		X	M	NS	OT	OT	Disc	HOPI	Propose discontinue - pending website discovery project / determining if still required
8	Promoting FOI rights strategic approach 2020-24 - develop	Project		01/07/2020	01/11/2020	X					X	H	NS	OT	Slip	C/f new	HOPI	Draft prepared, finalising measurement - dependent on outcomes of website discovery project.
9	Resources, channels and models for promoting FOI rights - map needs of target audiences, existing resources and methods, and develop workplan for replacement/new resources	Project		01/07/2020	31/03/2021	X					X	H	NS	NS	Slip	C/f new	HOPI	Scope reviewed - aligns with website discovery. Specific work on Your Right to Know and related resources carried forward into 2021-22
10	Promoting FOI awareness to young people - research, develop and begin delivery of action plan	Project		01/04/2020	31/03/2021	X					X	H	NS	NS	Slip	C/f new	HOPI	Social media promotion via Young Scot in March 2021. Further work to carry forward into 2021/22
11	Active membership of International Conference of Information Commissioners' Executive Committee	Project		01/04/2020	End of tenure or 31/03/2021					X	X	H	OT	OT	OT	Comp	SIC	Work continues in preparation for next Conference and retirement from Executive Committee with preparation fro elections and approval of strategic priorities being sought.
12	Participate in delivering Scottish Open Government Partnership Commitments, new commitments and performance assessment	Project		01/04/2020	31/03/2021	X	X	X	X	X	X	H	OT	OT	OT	Comp	SIC	Commitments now formally completed. Report on IRM supported by Steering Group for final Ministerial decision
13	FOI Policy Strategic Approach 2020-2024 – develop	Project		01/07/2020	01/10/2020	X	X	X	X	X	X	H	NS	NS	Slip	Disc	HOPI	Preparation work done and will be used to inform policy and planning work across 2021-22, but document itself no longer required.

Quality Assurance

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim						Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ update
						1	2	3	4	5	6							
1	Compliments and complaints – record, analyse and report	BAU	Six monthly	01/04/2020	31/03/2021						X	S	OT	Comp	OT	Comp	HOCS	6 monthly report to be submitted to Q4 QSMTM in April 2021.
2	Information Requests to SIC: (a) record, analyse and monitor performance in accordance with the Section 60 Code of Practice (b) upload details to the FOI/EIRs statistics portal	BAU	Quarterly	01/04/2020	31/03/2021		X	X		X	X	S	Comp	Comp	Comp	Comp	HOCS	Quarterly report to be submitted to Q4 QSMTM in April 2021.
3	Information Requests to SIC – provide assurance to HOCS that responses to information requests comply with relevant legislation and related guidance	BAU	Annual	01/01/2021	31/03/2021		X	X		X	X	S	NS	NS	NS	Comp	HOE	
4	Equalities Statistics – Service Users – recording, analysis and reporting	BAU	Annual	01/04/2020	31/03/2021			X		X	X	H	NS	NS	NS	NS	HOCS	Delayed due to impact of COVID-19 pandemic.
5	Investigation targets and Key Performance Indicators - monitor and review to ensure appropriate and fit for purpose	BAU		01/04/2020	31/03/2021					X	X	H	OT	OT	OT	Comp	HOE	
6	Performance and Quality Framework – managers to report on performance for their areas of responsibility (including carrying out appropriate quality assurance reviews) and to review Key Performance Indicators and other targets and standards annually	BAU		01/04/2020	31/03/2021	X	X	X		X	X	S/H	Comp	Comp	Comp	Comp	SMT	Final report due to be made to Q4 QSMTM.
7	Communication targets and key performance indicators - monitor and review to ensure appropriate and fit for purpose	BAU		01/04/2020	31/03/2021	X	X	X	X	X	X	H	OT	OT	OT	Comp	HOPI	Development of new measures ongoing

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim						Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ update
1	Complaints Policy and Handbook – review to take account of revised Model complaints Scheme issued 31/01/2020	Project		01/04/2020	31/03/2021						X	H	NS	NS	OT	C/f new	HOCS	To be carried forward into 2021-22 as project.
2	Unacceptable Actions Policy - review to take account of revised Model complaints Scheme issued 31/01/2020	Project		01/04/2020	31/03/2021						X	H	NS	NS	OT	C/f new	HOCS	To be carried forward into 2021-22 as project.

Regulation & Enforcement

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim						Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
						1	2	3	4	5	6							
1	Enforce FOI in line with Enforcement Policy	BAU		01/04/2020	31/03/2021		X	X		X		S	OT	OT	OT	Comp	HOE	
2	Register, validate, investigate and decide applications in line with approved procedures	BAU	Monthly	01/04/2020	31/03/2021		X			X		S	OT	OT	OT	Comp	HOE	
3	Monitor investigation and enforcement performance	BAU	Monthly	01/04/2020	31/03/2021			X			X	S/H	OT	OT	OT	Comp	HOE	
4	Report on investigation and enforcement performance	BAU	Quarterly	01/04/2020	31/03/2021		X	X	X	X	X	S/H	OT	OT	OT	Comp	HOE	
5	Provide legal advice to, or procure legal advice for, the SIC on matters including litigation, FOI law (including how this affects or is effected by other areas of law) or other corporate responsibilities and duties and ensure that the legal advice is recorded and the record kept up to date	BAU		01/04/2020	31/03/2021		X		X		X	H	OT	OT	OT	Comp	HOE	
6	Maintain a rolling programme to ensure standard/template letters on the case management system are reviewed and regularly updated, as required.	BAU		01/04/2020	31/03/2021		X				X	S	OT	OT	OT	Comp	DHOE	
7	Interventions - monitor intervention intelligence, record non-compliance and report to quarterly intervention meeting, enabling action in line with procedures and as resources permit	BAU	Annual	01/04/2020	31/03/2021		X	X	X			S	Slip	OT	OT	Comp	HOPI	
8	Interventions - report on intervention performance	BAU	Quarterly	01/04/2020	31/03/2021		X					S	Slip	OT	OT	Comp	HOPI	
9	Publication schemes - manage and monitor notifications from new authorities re: compliance with publication scheme duty	BAU		01/04/2020	31/03/2021			X		X		S	OT	OT	OT	Comp	HOPI	
10	Regulatory guidance for authorities – maintain and develop as required	BAU		01/04/2020	31/03/2021	X	X	X	X			S	OT	OT	OT	Comp	HOE	
11	Maintain a list of bodies suitable for consideration for designation under Section 4 and Section 5 and report on proposed list to be submitted to the Scottish Ministers	BAU		01/04/2020	31/03/2021		X	X			X	S	OT	OT	OT	Comp	HOPI	

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim						Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
1	Appeal portal - review (including procedures), including feedback survey for users and develop recommendations for future models	Project		01/08/2020	01/01/2021		X	X		X	X	M	NS	NS	NS	Comp	HOPI	Combined with website discovery - interviews with appeal portal users conducted Feb/March 2021 and recommendations included in website discovery report. Further development will be undertaken as part of any future website development.
2	Interventions - review and revise procedures	Project		01/08/2020	31/03/2021			X	X		X	M	NS	Slip	OT	Comp	HOPI	
3	Scottish Government intervention - interim report to Parliament and on site assessment	Project		01/04/2020	31/03/2021		X			X		H	OT	OT	OT	Comp	HOPI	Publication of interim report published Sept 2020. On site assessment now to be conducted summer 2021-22
4	Review Investigations Handbook to ensure remain efficient in the light of the impact of the Covid-19 pandemic	Project		01/04/2020	31/12/2020		X				X	H	Comp	Comp	Comp	Comp	HOE	

Resource Management

#	Activity	Type	Frequency	Start Date	End Date	Strategic Aim 1	2	3	4	5	6	Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
1	Set and profile budget for 2021-22	BAU	Annual	01/06/2020	31/03/2021	X	X	X		X		H	OT	Comp	Comp	Comp	HOCS	
2	Budget monitoring and control – 2020-21	BAU	Quarterly	01/04/2020	31/03/2021	X	X	X		X		H	Comp	Comp	Comp	Comp	HOCS	
3	Monitor and report on payment of invoices	BAU	Annual	01/04/2020	31/03/2021	X	X	X		X		H	OT	OT	OT	Comp	HOCS	Annual report to Q4 QSMTM in April 2021.
4	Workforce monitoring and planning	BAU	Annual	01/04/2020	31/03/2021	X	X	X		X		H	OT	OT	OT	Comp	HOCS	Annual report to Q4 QSMTM in April 2021.
5	Maintenance of premises	BAU		01/04/2020	31/03/2021						X	H	Comp	Comp	Comp	Comp	HOCS	
6	Contracts (see VC135957) – procurement and management (as required) – where HOCS/CST indicated as lead	BAU	As agreed in relevant contract	01/04/2020	31/03/2021						X	H	Comp	Comp	Comp	Comp	HOCS	
7	Case management system – review reporting requirements and requisition new reports (as required)	BAU		01/04/2020	31/03/2021						X	H	Comp	Comp	Comp	Comp	HOCS	
8	External provision of legal services: contract management	BAU	As agreed in contract	01/04/2020	31/03/2021						X	H	OT	OT	OT	Comp	HOE	
9	Contracts relevant to policy and information (see list VC135957) – procurement and management (as required) where HOPI/P&I indicated as lead	BAU	As agreed in contracts	01/04/2020	31/03/2021						X	H	OT	OT	OT	Comp	HOPI	
10	IT - replacement hardware – as per annual programme	BAU		01/04/2020	31/03/2021						X	H	OT	OT	Comp	Comp	HOCS	

#	Activity	Type	Frequency	Start Date	End Date	Strategic Aim 1	2	3	4	5	6	Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
1	Case management system – upgrade	Project		01/04/2020	31/03/2021						X	H	NS	NS	NS	C/f new	HOCS	Testing undertaken and awaiting changes before can roll out. Delay in fixes being applied as need to c/f to 31...
2	IT Support and Maintenance Contract – review arrangements (dependent on Digital and IT Strategy being put in place)	Project		01/04/2020	31/03/2021						X	H	NS	NS	C/f new	C/f new	HOCS	To be added to 2021-22 operational plan
3	IT - operating system project	Project		01/04/2020	31/03/2021						X	H	OT	OT	Comp	Comp	HOCS	
4	IT – hardware project	Project		01/04/2020	31/03/2021						X	H	OT	OT	Comp	Comp	HOCS	
5	Procurement of legal services contract: issue tender	Project		30/09/2020	31/03/2021						X	H	NS	NS	NS	C/f new	HOE	Scottish Government Procurement and Property Directorate assisting with preparation of tender documentation - Q2 of 2021/22
6	Website - procurement of supported hosting and maintenance services	Project		01/05/2020	31/03/2021						X	H	Comp	Comp	Comp	Comp	HOPI / HOCS	Completed June 2020
7	Cleaning Services Contract – review of arrangements and procurement of contract	Project		01/04/2020	31/03/2021						X	H	OT	OT	OT	C/f new	HOCS	To be added to 2021-22 operational plan
8	Website - procurement of website discovery / roadmap / specification	Project		01/08/2020	31/12/2020	X	X	X	X	X	X	H	NS	NS	OT	Comp	HOPI	
9	Media monitoring/press cuttings - secure service to meet new requirements	Project		01/03/2020	30/09/2020	X	X	X	X	X	X	M	OT	OT	Comp	Comp	HOPI	
10	Webinar/online events platform - scope need for service and secure contract if required	Project		01/07/2020	01/09/2020	X	X	X	X	X	X	H	NS	NS	OT	C/f new	HOPI	
11	Internal communications (including bulletin alternative) - scope need for service and secure contract if required	Project		01/07/2020	01/02/2021						X	M	NS	NS	C/f new	Disc	HOPI/ HOCS	

Risk Management

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim 1	2	3	4	5	6	Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
1	Review of operational risk	BAU	Monthly	01/04/2020	31/03/2021	X	X	X		X	X	H	Comp	Comp	Comp	Comp	SMT	
2	Review of strategic risk	BAU	Quarterly	01/04/2020	31/03/2021	X	X	X		X	X	H	Comp	Comp	Comp	Comp	SMT	
3	Updating risk registers	BAU	Monthly / quarterly	01/04/2020	31/03/2021	X	X	X		X	X	H	Comp	Comp	Comp	Comp	HOCS	
4	Annual assessment and review of risk and report to SMT	BAU	Annual	01/04/2020	31/08/2020	X	X	X		X	X	H	Comp	Comp	Comp	Comp	HOCS	Report is made to Q1 QSMTM
5	Internal Audit Plan 2019-20 to 2021-22 – implementation and reports	BAU	Annual	01/04/2020	31/03/2021	X	X	X		X	X	H	OT	OT	Slip	Slip	HOCS	Revised IAPlan - due to timetabling internal auditor unable to carry out internal audit in Q4
6	Business Continuity Plan – maintenance of plan and testing (as required)	BAU		01/04/2020	31/03/2021	X	X	X		X	X	H	Comp	Comp	Comp	Comp	HOCS	
7	Health and Safety – reporting	BAU	Six monthly	01/04/2020	31/03/2021	X	X	X		X	X	H	OT	OT	Comp	Comp	HOCS	
8	Health and Safety – monitoring	BAU	Six monthly	01/04/2020	31/03/2021	X	X	X		X	X	H	Comp	Comp	Comp	Comp	SMT	
9	AAB – reports on external and internal audits, risk policy and review of strategic risk	BAU	Annual	01/04/2020	31/03/2021	X	X	X		X	X	H	Comp	Comp	Comp	Comp	HOCS	Reports submitted to AAB meeting in September 2020.

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim 1	2	3	4	5	6	Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
1	Internal audit – procurement of contract for internal audit services	Project		01/04/2020	30/09/2020	X	X	X	X	X	X	H	OT	Comp	Comp	C/f new	HOCS	Revised contract documentation to be put in place because of merger/re-branding of Scott Moncrieff with Azets. Contract to continue into 2021-22.
2	IInternal audit – GDPR compliance – external audit to assess implementation process and compliance	Project		01/04/2020	31/03/2021	X	X	X	X	X	X	H	Disc	Disc	Disc	Disc	HOCS	To be carried out in 2021-22
3	Business continuity arrangements - COVID -19 pandemic –office re-opening- health and safety, physical distancing and hygiene arrangements	Project		01/04/2020	31/10/2020						X	H	OT	OT	OT	C/f new	HOCS	Following SG advice and guidance, office premises remain temporarily closed and only essential work to be carried out on a weekly basis - next review by SMT due to take place in May 2021.
4	Health and safety audit	Project		01/04/2020	31/03/2021						X	H	OT	OT	OT	C/f new	HOCS	As office premises remain temporarily closed this will be ongoing in 2021-22.
5	Business Continuity arrangements – review	Project		01/04/2020	31/03/2021					X	X	H	OT	OT	OT	C/f new	HOCS	As office premises remain temporarily closed this will be ongoing in 2021-22