

# Operational Plan 2024-25

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**The Scottish Information Commissioner's Operational Plan  
2024-25**

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Scottish Information  
Commissioner

## Introduction

This document sets out the Scottish Information Commissioner's operational plan for the period from 1 April 2024 to 31 March 2025. The operational plan explains how we will realise the Commissioner's vision and strategic objectives, as set out in the Strategic Plan 2024-28, and provides a tool for on-going monitoring of outcomes and management of resources, financial and human.

## Vision

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**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 objectives

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To realise this vision:

### **The Commissioner's office will:**

1. increase knowledge and understanding of FOI rights
2. enable and develop high standards of FOI law, policy and practice
3. develop Scottish public sector culture and practice where the disclosure of information is routine, valued and increasingly proactive
4. deliver fair defensible decisions in a timely and efficient manner
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

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The operational plan is laid out as a programme of actions listed under types of operational activity, with cross references to which strategic objective(s) it supports. The actions listed are business as usual (BAU) and one-off projects. This is a working document which forms the basis of on-going monitoring and assessment and may be updated within the financial year.

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 general project management principles and practice. And are approved by the Senior Management Team (SMT).

## Monitoring and reporting

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Progress against the plan will be reviewed quarterly by the SMT and an update of progress will be published following this review in the Operational Plan Monitoring Report 2024-25.

Achievement and output against individual line items will also be assessed and reported in line with the organisational targets and indicators and measures set out in our Key Documents C7 Performance and Quality Framework 2024-25 and C1 Governance and Quality Assurance Reporting Arrangements .

## Resources

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The Commissioner's budget for 2024-25 is:

	£	£
Total staff costs	2,005,000	
Total running costs	178,000	
Total revenue costs		2,396,000
Capital expenditure		17,000
<b>Total</b>		<b>2,413,000</b>

The following matters have been taken into account when preparing the draft Operational Plan 2024-25:

- how we can achieve strategic priorities in 2024-25 - what can we achieve, how can we deliver strategic priorities
- workforce capacity, planning, deployment and wellbeing
- quality, efficiency, effectiveness and response/s to changing demands
- our resources - workforce, property and digital
- sustainability in our operational work

## Summary of activity

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

Functional areas are:

- Human resource management (HRMgt)
- Improving authority practice (IAP)
- Information and records management (IRM)
- Planning and reporting (PlanRep)
- Communications, Engagement and Policy (External) (CEP)
- Regulation and enforcement (RegEnf)
- Resource management (ResMgt)
- Risk management (RiMgt)

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

**Commissioner/SIC** Scottish Information  
Commissioner

**HOCS:** Head of Corporate  
Services

**HOE:** Head of Enforcement

**HOPI:** Head of Policy and  
Information

**SMT** Senior Management  
Team

**Priority:** Statutory, High, Medium,  
Low (relative)

## Human resource management

	BAU												
	Activity	Frequency	Start Date	End Date	Strategic Objective						Priority	Lead Manager	
					1	2	3	4	5	6			
1	Learning & Development Plan 2024-25 (internal)	Annual	01/04/2024	31/12/2024						X	H	HOCS	
2	Apply & monitor Performance & Development Framework	Ongoing	01/04/2024							X	H	HOCS	
3	Security & Vetting scheme - monitoring and application	Ongoing	01/04/2024							X	H	HOCS	

	Project										
	Activity	Start Date	End Date	Strategic Objective						Priority	Lead Manager
				1	2	3	4	5	6		
1	Hybrid working – review human resources and pandemic policies and processes	01/10/2024	31/03/2025						X	H	HOCS
2	Workforce Plan - review	01/04/2024	30/09/2024						X	H	SMT
3	HR data base – replacement	01/06/2024	30/09/2024						X	H	HOCS

## Improving authority practice

	BAU											
	Activity	Frequency	Start Date	End Date	Strategic Objective						Priority	Lead Manager
					1	2	3	4	5	6		
1	Prepare, deliver and report on programme of events and learning opportunities (on or offline) for FOI practitioners – prepare, deliver and report on	Ongoing	01/04/2024			X	X	X		X	H	HOPI
2	Public sector FOI practitioner peer support mechanisms and networks - support and develop	Ongoing	01/04/2024			X	X	X			M	HOPI
3	Prepare and circulate learning points from decisions	Monthly	01/04/2024			X	X	X		X	H	HOE
4	Collaborate with/involve authority representatives to inform best practice	Ongoing	01/04/2024			X	X	X		X	M	HOPI
5	FOI/EIRs statistics portal data from public authorities - collect, collate and publish	Quarterly	01/04/2024		X		X				S/H	HOPI
6	New public authorities - support to prepare for FOI duties	As required				X	X	X			H	HOPI
7	Good practice resources, guidance and case studies for authorities – maintain, develop, promote, and report on use	Ongoing	01/04/2024			X	X	X	X	X	H	HOPI

	Project										
	Activity	Start Date	End Date	Strategic Objective						Priority	Lead Manager
				1	2	3	4	5	6		
1	Statistics Portal – review and develop new collection and dissemination method.	01/04/2024	01/09/2024		X				X	M	HOPI
2	Research, design and pilot bitesize online webinars for practitioners.	01/04/2024	31/03/2025		x	x	x			M	HOPI
3	Establish network group for Further/Higher Education	01/04/2024	31/03/2025		x	x	x			M	HOPI
4	SIC to engage directly with senior staff of public authorities - roadshows/webinar/podcast	01/04/2024	31/03/2025	x	x	x	x			M	HOPI

## Information and records management

BAU					Strategic Objective						Priority	Lead Manager
Activity		Frequency	Start Date	End Date	1	2	3	4	5	6		
1	Coordinate on-going Information and Records Management (IRM) controls and procedures and ensure they are applied	Ongoing	01/04/2024		X		X			X	S/H	HOCS
2	Maintenance of secure and reliable IT network	Ongoing	01/04/2024							X	S/H	HOCS
3	Manage Key Documents as per the Review Programme	Quarterly	01/04/2024		X	X	X			X	H	HOCS
4	Monitor compliance with data protection legislation and the UK General Data Protection Regulation	Ongoing	01/04/2024				X			X	S	HOE
5	Maintain a compliant publication scheme and guide to information and provide an assurance report to SMT	Ongoing	01/04/2024		X		X		X	X	H	HOPI
6	Monitor Commissioner's compliance in responding to all rights requests – compliance with statutory timescales, policy and procedures and quality assurance	Ongoing	01/04/2024			X				X	S	HOCS

Project					Strategic Objective						Priority	Lead Manager
Activity		Start Date	End Date		1	2	3	4	5	6		
1	Information and Records Management (IRM) – consider and recommend way forward as regards review, retention and assurance	01/10/2024	31/03/2025			X				X	H	HOCS

## Planning and reporting

	BAU											
	Activity	Frequency	Start Date	End Date	Strategic Objective						Priority	Lead Manager
					1	2	3	4	5	6		
1	AR 2023-24: Accountability Report and Financial Statements - ensure compliance with FReM, SPFM, prepare and obtain approval	Annual	01/04/2024	31/10/2024						X	S	HOCS
2	AR 2023-24: Performance Report – ensure compliance with FReM, SPFM prepare and obtain approval	Annual	01/04/2024	31/10/2024						X	S	HOPI
3	Operational Plan 2024-25 – monitor and report progress	Quarterly	01/04/2024	31/03/2025	X	X	X			X	H	SMT
4	Governance and Quality Assurance Reporting Arrangements – monitor and report against cycle	Monthly, Quarterly and Annually	01/04/2024	31/03/2025	X	X	X			X	H	SMT
5	Case Management System (CMS) – reporting (manual and automatic)	Monthly, Quarterly and Annually	01/04/2024	31/03/2025						X	M	HOCS
6	Strategic Plan 2024-28 review	Annual	01/01/2025	31/03/2025	x	x	x	x	x	x	H	SMT

	Project										
	Activity	Start Date	End Date	Strategic Objective						Priority	Lead Manager
				1	2	3	4	5	6		
1	CMS – review of in-house reporting	01/10/2024	31/03/2025					X	X	H	SMT



## Communications, Engagement and Policy (External)

	BAU Activity	Frequency	Start Date	End Date	Strategic Objective						Priority	Lead Manager
					1	2	3	4	5	6		
1	Communications and engagement framework 2021 - 2024 - report on for 2023-24	Annually			X	X	X	X	X	X	H	HOPI
2	News media - manage and maintain news media enquiry service and ongoing media engagement	Ongoing			X	X	X	X	X	X	M	HOPI
3	News media - manage and maintain media monitoring service		01/04/24	31/03/25	X	X	X	X	X	X	M	HOPI
4	Email newsletters - prepare, promote and circulate regularly and as required	Bimonthly			X	X	X	X	X	X	M	HOPI
5	Social media - monitor, maintain and develop in line with Communications Framework/as required	Ongoing			X	X	X	X	X	X	M	HOPI
6	Events - support and participate in key relevant conferences/events	Ongoing			X	X	X	X	X	X	L/M	HOPI
7	Events - deliver events to promote effective use of FOI rights (such as to civil society, MSPs and media)	Ongoing			X					X	M	HOPI
8	Website - maintain and promote content, ensuring it is up to date and relevant, accessibility compliance via accessibility statements and reporting progress	Ongoing			X	X	X	X	X	X	H	HOPI
9	Publication Scheme – review and develop guidance to support proactive publication		01/04/24	31/03/25	x	x	x	x	x	x	M	HOPI
10	BSL Action plan 2024-2028 – implement		01/04/24	31/03/25	X	X	X	X		X	S	SMT
11	Annual report 2023-24 - coordinate design and promotion where required	Annually	01/06/24	31/10/24						X	H	HOPI
12	Content and communications planning – maintain and implement, delivering communications campaigns on FOI as required	Ongoing			X	X	X	X	X	X	M	HOPI
13	FOI Policy monitoring systems and policy positions – maintain as required (includes parliamentary monitoring service)	Ongoing			X	X	X	X	X	X	H	HOPI
14	Key stakeholder relationships/ partnerships – maintain, develop and support as required	Ongoing			X	X	X	X	X	X	M	HOPI
15	Input to Legislative change and consultations - monitor	Ongoing			X	X	X	X	X	X	H	HOPI

	and respond to relevant consultations / inform legislative change processes as required											
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Project											
	Activity	Start Date	End Date	Strategic Objective						Priority	Lead Manager
				1	2	3	4	5	6		
1	Review 'Your Right to Know' and related resources, text and approach	01/04/2024	31/03/2026	X						H	HOPI
2	Promoting FOI awareness to young people project	01/04/2024	30/06/2025	X					X	H	HOPI
3	Improve accessibility of website content (Briefings and Guidance)	Ongoing		X	X	X	X	X	X	H	HOPI
4	Scope promotional events for 20 years of commencement (2025)	01/04/2024	31/12/2025	X			X	X	X	M	HOPI
5	BSL Plan 2023-2028 – prepare and SMT approval	01/04/2024	31/12/2024	x	x	x	x	x	x	H	HOPI

## Regulation and Enforcement

	BAU											
	Activity	Frequency	Start Date	End Date	Strategic Objective						Priority	Lead Manager
					1	2	3	4	5	6		
1	Ensure Investigations Handbook remains up to date and effective	Ongoing				X				X	S/H	HOE
2	Investigation targets and Key Performance Indicators - monitor and review to ensure appropriate and fit for purpose	Monthly							X	X	H	HOE
3	Interventions - monitor intervention intelligence, record non-compliance and report to quarterly intervention meeting, enabling action in line with procedures and as resources permit Interventions - report on intervention performance and publish updates on intervention activity and lessons learned – dissemination of learning more widely.	Quarterly				X	X	X			S	HOPI
4	Publication schemes - manage and monitor notifications from new authorities re: compliance with publication scheme duty	As required					X		X		S	HOPI
5	Maintain a list of bodies suitable for consideration for inclusion in Schedule 1 of FOISA or for designation under Section 5 and report on proposed list to be submitted to the Scottish Ministers	Ongoing				X	X			X	S	HOPI
6	Circulate internal Decisions Round-Up	Monthly			X	X				X	H	HOE

	Project											
	Activity	Start Date	End Date	Strategic Objective						Priority	Lead Manager	
				1	2	3	4	5	6			
1	Monitor, review and adapt Project Blue strategy report to Parliament	01/01/2024	30/04/2025				X			H	HOE	
2	Scottish Government intervention - assessment and report to Parliament	01/02/2024	30/04/2025		X			X		H	HOPI	
3	Scottish Government intervention (non-corporate messaging tools) – issue report and recommendations	02/02/2024	30/12/2024	x	x	x	x	x	x	H	HOPI	
4	Develop non-corporate messaging tools guidance	02/02/2024	31/03/2025	x	x	x	x	x	x	H	HOPI	

## Resource management

BAU												
	Activity	Frequency	Start Date	End Date	Strategic Objective						Priority	Lead Manager
					1	2	3	4	5	6		
1	Set and profile budget for 2025-26	Annual	01/08/2024	31/10/2024	X	X	X		X		H	HOCS
2	Budget monitoring and control – 2024-25	Quarterly	01/04/2024	31/03/2025	X	X	X		X		H	HOCS
3	Maintenance of premises	Ongoing								X	H	HOCS
4	Contracts – procurement and management	Ongoing								X	H	SMT
5	Cyber resilience – monitor and implement work required	Ongoing								X	H	HOCS

	Project											
	Activity	Start Date	End Date	Strategic Objective						Priority	Lead Manager	
				1	2	3	4	5	6			
1	Telephone system/s – office premises and hybrid working – scope operational, technical and resource requirements and implement change	01/10/2024	31/03/2025						X	H	HOCS	
2	Cloud computing - scope and implement	01/12/2023	30/08/2025						X	M	HOCS	
3	Cleaning Services Contract – review of arrangements and procurement of contract	01/10/2024	31/01/2025						X	H	HOCS	
4	Review existing budget monitoring and forecasting processes	01/10/2024	31/03/2025						X	H	HOCS	

## Risk management

BAU												
	Activity	Frequency	Start Date	End Date	Strategic Objective						Priority	Lead Manager
					1	2	3	4	5	6		
1	Review and update operational risk	Monthly	01/04/2024	31/03/2025	X	X	X		X	X	H	SMT
2	Review and update strategic risk	Quarterly	01/04/2024	31/03/2025	X	X	X		X	X	H	SMT
3	Internal Audit Plan 2023-24 to 2025-26 – review and update	Annual	01/04/2024	30/09/2024			X		X	X	H	HOCS
4	Health and safety – ongoing monitoring and reporting	Ongoing								X	H	HOCS
5	Health and safety audit	Annual	01/03/2025	31/03/2025						X	H	HOCS
6	AAB – reports on external and internal audits, risk policy and review of strategic risk	Annual	01/08/2024	30/09/2024	X	X	X		X	X	H	HOCS

	Project											
	Activity	Start Date	End Date	Strategic Objective						Priority	Lead Manager	
				1	2	3	4	5	6			
1	Business Continuity Plan, including cyber resilience arrangements - review and testing	01/01/2024	30/09/2025						X	H	HOCS	

## Document Control Sheet

Document Information	
Full name of current version: Class, Title, Version No and Status. <i>E.g. C1 MOU Between the SIC and the IC v01</i>	C1 Operational Plan 2024-25 CURRENT
VC No.	214622
Type	Plan
Approver	SMT
Responsible Manager	HOCS
Date of next planned review	Annual
Approval Date of current major version	06/09/2024
For publication (Y/N)	Y
Date published	31/10/2024
Name of document in website file library	OperationalPlan202425
Technical Changes / Unplanned or Ad hoc reviews (see Summary of changes below for details)	
Last updated	15/11/2024

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 HOCS, reviewed whole section on PI test, whole document updated, corrected typos, reformatted to new branding)
13/09/2024	LB	01.00	01.02	New document created following approval of draft
30/10/2024	LB	01.02	01.05	Document VI's for publishing
12/11/2024	KB	01.05	01.06	Comment added to propose removing duplicate action
15/11/2024	LB	01.06	01.07	Plan updated to reflect changes agreed at Q2 QSMTM

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