Operational Plan 2016-17

Scottish Information Commissioner

Introduction

This document sets out the Scottish Information Commissioner's operational plan for the period from 1 April 2016 to 30 September 2017. The plan explains how resources will be used to realise the Commissioner's vision and strategic aims, and provides a tool for on-going monitoring of outcomes and management of resources.

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 2016-17 is:

Total staff costs	**£1,231,200**
Total revenue costs	**£281,500**
Capital expenditure	**£3,500**
Total	**£1,516,200**

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
- 2015-16 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

Priority: Relative priority Statutory, High, Medium, Low

HOE: Head of Enforcement

HOPI: Head of Policy and Information

HOOM: Head of Operational Management

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	01/07/2016	31/07/2016					X	H	HOOM
2	Create Annual Learning & Development Plan (internal)	BAU	Annual	01/05/2016	30/06/2016					X	H	HOOM
3	Review HR Strategy	BAU	Annual	01/04/2016	30/06/2016					X	M	HOOM
4	Apply & monitor Performance & Development Framework	BAU		01/04/2016	30/09/2017					X	H	HOOM

Improving authority practice

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Lead
						1	2	3	4	5		Mgr
1	Monitor authority compliance with the Model Publication Scheme	BAU		01/11/2016	31/05/2017	X	X				M	HOPI
2	Hold a programme of regional roadshows to promote FOI authority good practice, leadership and governance	BAU		01/04/2016	31/03/2017	X	X			X	H	HOPI
3	Liaise with Holyrood Events about the annual Holyrood Conference	BAU		01/04/2016	31/12/2016	X	X	X		X	L	HOPI
4	Organise & deliver a practitioners' conference for the Centre for FOI - May 2017	BAU		01/11/2016	31/05/2017	X	X		X		M	HOPI
5	Produce and publish weekly decisions round up	BAU	Weekly	01/04/2016	31/09/2017	X	X	X		X	H	HOE/HOPI
6	Produce & publish annual report on lessons learned from decisions round-up	BAU	Annual	01/01/2017	29/02/2017	X				X	M	HOPI
7	Maintain and build engagement in the Knowledge Hub group for public authorities	BAU		01/05/2016	30/09/2017	X	X		X		H	HOPI
8	Provide quarterly intervention procedure reports to Investigations Performance Meetings	BAU		01/04/2016	30/09/2017	X		X			H	HOPI
9	Develop a BAU approach to producing quarterly intervention procedure reports procedures	Project		01/07/2016	30/09/2016	X		X			H	HOPI
10	Deliver one Level 3 intervention with a single authority or group of authorities as needed (as recommended by IPM and approved by SMT)	Project		01/05/2016	31/03/2017	X		X			S/H	HOPI
11	Draft, manage approval and publish a self-assessment toolkit for authorities on proactive publication.	Project		01/06/2016	31/08/2016	X	X				H	HOPI
12	Draft, manage approval and publish a self-assessment toolkit for authorities on FOI reviews.	Project		01/01/2017	28/02/2017	X		X			H	HOPI
13	Produce and publish support materials for housing associations on proactive dissemination	Project		01/10/2016	30/10/2016	X		X			M	HOPI
14	Provide a training event for new FOI practitioners at the SIC offices	Project		01/03/2017	31/04/2017	X		X			M	HOPI
15	Provide a themed round table event at the SIC offices	Project		01/04/2017	30/05/2017	X		X			M	HOPI
16	Provide support to new authorities designated under s5 to prepare for FOI duties	Project		01/04/2016	01/09/2016	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	Apply on-going IRM controls and procedures - P&I	BAU	Annual	01/06/2016	30/09/2016					X	S/H	HOOM
2	Apply on-going IRM controls and procedures -Enforcement	BAU	Annual	01/07/2016	30/09/2016					X	S/H	HOOM
3	Apply on-going IRM controls and procedures - OMT	BAU	Annual	01/10/2016	31/03/2017					X	S/H	HOOM
4	Review IRM Policies & Procedures	BAU	Annual	01/01/2017	31/03/2017					X	S/H	HOOM
5	IRM Assurance report to SMT	BAU	Annual	01/07/2016	31/07/2016					X	S/H	HOOM
6	Maintenance of secure and reliable IT network	BAU		01/04/2016	30/09/2017					X	S/H	HOOM
7	Agree review programme for Key Documents	BAU		01/05/2016	31/05/2016					X	H	HOOM
8	Manage Key Documents as per agreed review programme agreed annually	BAU		01/04/2016	30/09/2017					X	H	HOOM
9	Monitor compliance with Data Protection legislation	BAU		01/04/2016	30/09/2017					X	S	HOOM
10	Respond to information requests and reviews in line with policy and procedure, within statutory time scales	BAU		01/04/2016	30/09/2017		X			X	S	HOOM
11	Maintain a compliant publication scheme and guide to information	BAU		01/04/2016	30/09/2017	X				X	S	HOOM
12	SIC Publication Scheme Assurance report to SMT	BAU	Annual	01/01/2017	31/01/2017					X	S/H	HOOM
13	EDRMS - develop records management processes (retention and disposal, and key documents)	Project		01/01/2017	31/03/2017					X	M	HOOM
14	Introduction of EU General DP Regulation - update/revise corporate arrangements to ensure compliance	Project		01/07/2016	31/05/2018					X	S/H	HOOM
15	Implementation of Information Management Strategy - Phase I: Scoping & Planning, and implement 'quick hits'	Project		01/04/2016	31/12/2016					X	S/H	SIC
16	Implementation of Information Management Strategy - Phase II: Implementation of plan developed at Phase I	Project		01/01/2017	TBA					X	S/H	HOOM
17	Scope project to bring website file library metadata up to Dublin Core standard or equivalent and making it open and machine readable	Project		01/10/2016	30/11/2016					X	S/H	HOPI
18	Deliver website file library metadata project (as above)	Project		dependent on IM17	dependent on IM17					X	S/H	HOPI
19	Re-organise Access to our information completely on website	Project		01/06/2016	30/06/2016					X	S/H	HOPI

Planning and reporting

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim 1	2	3	4	5	Priority	Lead Mgr
1	Publish Statement on 3Es	BAU	Annual	01/09/2016	30/09/2016					X	S	HOOM
2	Performance and statistical reporting	BAU	by 4th wk day each	01/04/2016	30/09/2017	X	X	X	X	X	S	HOOM
3	Public Service Reform (Scotland) Act 2010 - Annual expenditure reporting	BAU	Quarterly	01/04/2016	30/09/2017					X	S	HOOM
4	Co-ordinate, prepare and publish Operational Plan 17/18	BAU	Annual	01/01/2017	31/03/2017	X	X	X	X	X	H	HOOM
5	Programme Board - oversee and steer project work	BAU	Monthly	01/04/2016	30/09/2017	X	X	X	X	X	H	SMT
6	Monitor and report progress against Operational Plan	BAU	Quarterly	01/04/2016	30/09/2017	X	X	X	X	X	H	SMT
7	Report against our annual Governance Reporting Arrangements Cycle	BAU		01/04/2016	30/09/2017	X	X	X	X	X	H	SMT
8	Prepare Annual Report Statistics	BAU	Six -Monthly	01/04/2016	30/09/2017	X	X	X	X	X	M	HOOM
9	Case Management System - development and implementation of reports, data-sets, & develop in-house report-writing skills	Project		01/06/2016	31/12/2016					X	M	HOOM

Promotion and communications

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Lead
						1	2	3	4	5		Mgr
1	Produce and implement annual Communication Plan, introducing regular reporting	BAU	Annually	01/04/2016	30/05/2016	X	X	X	X	X	H	HOPI
2	Manage and maintain press and media enquiry service	BAU		01/04/2016	30/09/2017					X	H	HOPI
3	Promote effective use of FOI rights to civil society and media organisations	BAU		01/04/2016	30/09/2017		X				S	HOPI
4	Research the extent of public awareness of FOI rights through an omnibus poll	BAU	Annually	01/07/2016	31/10/2016		X				H	HOPI
5	Promote use by applicants of the online appeal portal: increase prominence of portal across website; gather user feedback to improve the service	BAU		01/05/2016	30/09/2016		X		X		S	HOPI
6	Research, draft and publish the Annual Report and Accounts (see also RM5 & P&C13)	BAU		01/04/2016	30/09/2016	X	X	X	X	X	S	HOPI
7	Manage and report on enquiries service	BAU	Quarterly	01/04/2016	30/09/2017	X	X	X	X	X	H	HOOM
8	Report on website usage against performance targets	BAU	Quarterly	01/04/2016	30/09/2017	X			X		H	HOPI
9	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
10	Manage the collection of statistics from the FOI/ EIR statistics portal	BAU	Quarterly	01/04/2016	30/09/2017	X	X				H	HOPI
11	Develop, implement and monitor internal procedures for press and media work	Project		01/10/2016	31/12/2016					X	H	HOPI
12	Scope a promotional activity for Year of Young People, or similar	Project		01/08/2016	01/09/2016		X				M	HOPI
13	Implement new FReM annual reporting requirements and establish design template for future reports	Project		18/04/2016	31/07/2016					X	S/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				M	HOPI

Quality Assurance

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Lead
						1	2	3	4	5		Mgr
1	User Feedback - collection and analysis	BAU	Six Monthly	01/04/2016	30/09/2017	X	X	X		X	M	HOOM
2	Compliments and Complaints - recording and analysis	BAU	Six Monthly	01/04/2016	30/09/2017					X	S	HOOM
3	Information requests - collection of performance data in line with the requirements of the s60 code of practice and the FOI/EIRs statistics portal	BAU	Quarterly	01/04/2016	30/09/2017					X	S	HOOM
4	Service User Equalities Statistics - collection and analysis	BAU	Annual	01/04/2016	30/09/2017			X		X	H	HOOM
5	Monitor and review Investigation targets & KPIs to ensure appropriate and fit for purpose	BAU		01/04/2016	31/03/2017			X		X	H	HOE
6	Monitor and report against performance and quality framework, including an annual review of KPIs and other targets and standards	BAU		01/04/2016	31/03/2017	X	X	X	X	X	H	SMT
7	Quality Assurance reviews - Investigations	BAU		01/04/2016	30/09/2017					X	M	HOE
8	Quality Assurance reviews - Enquiries	BAU		01/04/2016	30/09/2017					X	M	HOOM
9	User Feedback - review of effectiveness of current methodology	Project		01/05/2016	31/12/2016					X	M	HOOM

Regulation and Enforcement

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Lead Mgr
						1	2	3	4	5		
1	Enforce FOI in line with Enforcement Policy	BAU		01/04/2016	30/09/2017	X	X				S	HOE
2	Register, validate, investigate and decide applications in line with approved procedures and KPIs	BAU	Monthly	01/04/2016	30/09/2017					X	S	HOE
3	Monitor and report on investigation performance	BAU	Monthly	01/04/2016	30/09/2017	X				X	S/H	HOE
4	Consider whether there are appropriate bodies suitable to designate under s4 and s5 as a matter of routine, and propose to Scottish Ministers	BAU		01/01/2017	28/02/2017				X	X	S	HOPI
5	Provide legal advice to the Commissioner as and when required, and update record of legal advice	BAU		01/04/2016	30/09/2017	X				X	H	HOE
6	Review the Model Publication Scheme, Commissioner's Guidance and support materials, communicating updates to all authorities	BAU		01/02/2017	30/04/2017	X	X				S	HOPI
7	Manage and monitor notifications from new authorities to comply with publication scheme	BAU	As required	01/04/2016	30/09/2016	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		01/04/2016	30/09/2017	X				X	H	HOE
9	Respond to the Scottish Government consultation on designation of Registered Social Landlords under s5	BAU		dependent on consultation dates	dependent on consultation dates	X		X			H	HOPI
10	Provide support, as required, to the review of the Scottish Social Housing Charter	BAU		01/04/2016	30/07/2016	X		X			M	SIC
11	Survey new authorities' experience of FOI	BAU		01/02/2017	30/04/2017	X		X			M	HOPI
12	Ensure compliance with Re-use of Public Sector Information Regulations 2015	BAU		01/04/2016	30/09/2017				X		S	HOE
13	Publish a Special Report on proactive publication	Project		01/11/2016	28/02/2017	X		X			H	HOPI
14	Scope the potential for a Special Report in 2017-18 on designation of third sector organisations under s5	Project		01/12/2016	31/03/2017	X		X			M	HOPI

Resource management

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Lead Mgr
						1	2	3	4	5		
1	Set and profile budget for 2017/18	BAU	Annual	01/06/2016	31/08/2016	X	X	X	X	X	S	HOOM
2	Current year Budget monitoring and control	BAU	Monthly	01/04/2016	31/03/2017	X	X	X	X	X	S	HOOM
3	Implement and report upon prompt payment of invoices	BAU	Quarterly	01/04/2016	30/09/2017					X	S/H	HOOM
4	Workforce monitoring and planning	BAU	Quarterly	01/04/2016	30/09/2017	X	X	X	X	X	H	HOOM
5	Audited Accounts element of Annual Report and Accounts - drafting and clean approval (see also P&C 6)	BAU		01/04/2016	31/08/2016					X	S	HOOM
6	Maintenance of premises	BAU		01/04/2016	30/09/2017					X	M	HOOM
7	Procurement and contract management	BAU		01/04/2016	30/09/2017					X	S/H	HOOM
8	Provision of Governance Statement of Assurance to SIC	BAU	Annual	01/05/2016	31/05/2016					X	S	HOOM
9	Legal Services contract option to extend - review	BAU		01/05/2016	30/06/2016					X	H	HOE
10	Tender for Provision of Legal Services	Project		01/01/2017	30/06/2017					X	H	HOE
11	Tender IT Support & Maintenance Contract	Project		01/07/2016	31/12/2016					X	H	HOOM
12	Business review of corporate function	Project		01/05/2016	31/12/2016					X	H	HOOM

Risk management

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Lead
						1	2	3	4	5		Mgr
1	Review of risk, updating of register and annual risk report	BAU	Monthly	01/04/2016	30/09/2017	X	X	X	X	X	S	HOOM
2	Implement internal audit plan	BAU	Annual	01/10/2016	31/03/2017	X	X	X	X	X	S/H	HOOM
3	BCP - maintenance of plan and testing	BAU	Annual	01/01/2017	30/09/2017	X	X	X	X	X	H	HOOM
4	H&S reporting and procedures	BAU	Quarterly	01/04/2016	30/09/2017	X	X	X	X	X	S	HOOM
5	BCP - review of plan	Project		01/07/2016	31/12/2016	X	X	X	X	X	H	HOOM

Sustainable development

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Lead
						1	2	3	4	5		Mgr
1	Monitor Carbon Footprint	BAU	Quarterly	01/04/2016	30/09/2017					X	S	HOOM

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Lead
						1	2	3	4	5		Mgr
1	**Human Resource Management** Employee Handbook - finalisation, approval & communication	Project		01/04/2016	31/07/2016					X	S/H	HOOM
2	**Information Management** Website File Library - development and implementation of improved records management procedures	Project		01/04/2016	30/06/2016					X	H	HOOM/HOPI
3	**Planning & Reporting** Case Management System - development and implementation of improved reporting	Project		01/04/2016	31/05/2016					X	H	HOOM
4	**Resource Management** Review of Procurement Policy & Procedures	Project		01/04/2016	30/06/2016					X	S/H	HOOM
5	**Improving Authority Practice** Publish and promote Model Publication Scheme monitoring report	BAU		01/04/2016	30/04/2016	X	X				M	HOPI
6	**Improving Authority Practice** Produce and publish annual report on lessons learned from decisions round-up	BAU		01/04/2016	30/06/2016	X				X	M	HOPI
7	**Improving Authority Practice** Publish revised self-assessment tools for authorities	Project		01/04/2016	31/05/2016	X	X				H	HOPI
8	**Promotion and Communications** Launch external blog and email service	Project		01/04/2016	30/06/2016	X	X	X	X	X	M	HOPI
9	**Promotion and Communications** Complete migration of statistics portal database	BAU		01/04/2016	30/05/2016	X	X	X		X	H	HOPI
10	**Promotion and Communications** Review and deliver the range of reports available from the FOI/EIR statistics dataset	Project		01/06/2016	30/07/2016	X	X				M	HOPI
11	**Promotion and Communications** Launch online appeal portal integrated with Case Management System	Project		01/04/2016	30/06/2016			X			H	HOOM/HOPI

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 2016-17 v01 CURRENT ISSUE
VC No.	71886
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Approver	SMT
Responsible Manager	HOOM
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Technical Changes / Unplanned or Ad hoc reviews (see Summary of changes below for details)	
Date of last update	17/05/16

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)*
17/05/16	JAW	01.00	01.01	New document created
17/05/16	JAW	01.01	01.02	DCS updated with VC No, footer updated.
17/05/16	LB	01.02	01.03	DCS updated and document published