

Report to:	MSMTM
Report by:	Claire Stephen, Head of Policy and Information (HOPI)
Meeting Date:	02 June 2023
Subject/ Title: (and VC no)	2022-23 Communication and Engagement Framework Performance Report (VC185960)
Attached Papers (title and VC no)	Scottish Information Commissioner's Communication and Engagement Framework (VC176660)

Purpose of report

1. To provide the annual report of performance in 2022-2023 against the measures in the Scottish Information Commissioner's ('the Commissioner') Communication and Engagement Framework 2020-2024, in line with the Commissioner's governance reporting arrangements.

Recommendation and actions

2. It is recommended that:
 - The Senior Management Team (SMT) notes the contents of this report
 - This report is published in full as set out in the publication section of this report.

Executive summary

3. This document reports on the Commissioner's progress during 2022-23 in relation to communication activity, measured against the performance measures contained in the Commissioner's Communication and Engagement Framework 2020-2024.
4. The Commissioner has statutory duties to promote Freedom of Information law, contributing to openness and transparency in Scottish public authorities, including assessing, promoting and monitoring practice, alongside giving advice and assistance about access to information under FOI legislation.
5. The Commissioner's Communication and Engagement Framework 2020-2024 was developed to support the Commissioner's Strategic Plan 2020-2024, setting out a communication and engagement strategy to support the delivery of the objectives set out in the Strategic Plan.
6. While the Communication and Engagement Framework was designed to cover the period between 2020-2024 a number of factors, including the impact of the Covid-19 pandemic and subsequent resource challenges contributed to delays in the approval and implementation of the Framework. The Framework was approved in May 2022.
7. The Communication and Engagement Framework lists ten indicators to support the evaluation of the Framework. These sets out that the following should be achieved / maintained by 31 March 2024:
 - FOI awareness at 90% and above and FOI understanding at 75% or above, as measured by omnibus polling

- At least one successful campaign or initiatives per year from 2022-23 onwards, increasing FOI awareness amongst those known to have lower levels awareness/understanding, such as young people
- FOI practitioners reporting confidence in their FOI skills increases by 10% (from baseline to be captured in 2021 with survey)
- Increase subscribers to newsletter (from 360 to 800)
- 80% or more of participants/attendees in training, events or presentations given across each year report main learning goal set for the session achieved (such as increase understanding of FOI, increase confidence in dealing with FOI requests)
- 90% or more of proactive news media engagement across each year results in top two key messages appearing in target publications
- Increased unique visits and page views on website by 20% from 2020-21 baseline
- Average engagement rates of 1.5% and above for posts on Twitter (and equivalent for any other social media channels utilised)
- Average of 85% or more of targets set for views, engagement with or downloads of resources, reports and campaigns are met across each year
- Accessible and inclusive communication guidance developed and implemented across organisation in accordance with our legal responsibilities and duties

8. Progress against each of these measures over 2022-23 is summarised below.

2022-23 Performance against 2020-2024 Communication and Engagement Framework Measures

Measure (to be achieved / maintained by 31 March 2024)	Status	2022-23 performance
(i) FOI awareness at 90% and above and FOI understanding at 75% or above, as measured by omnibus polling	Ongoing	FOI awareness: 89% FOI understanding: 63%
(ii) At least one successful campaign or initiative per year from 2022-23 onwards, increasing FOI awareness amongst those known to have lower levels awareness/understanding, such as young people	Not achieved	No campaign activity undertaken
(iii) FOI practitioners reporting confidence in their FOI skills increases by 10% (from baseline to be captured in 2021 with survey)	Ongoing	Baseline captured with 67% of practitioners reporting they are 'confident' or 'very confident'
(iv) Increase subscribers to newsletter from 360 to 800)	Ongoing	733 active subscribers at 31 March 2023
(v) 80% or more of participants/attendees in training, events or presentations given across	Not achieved	Centre for FOI Conference 2022:

each year report main learning goal set for the session achieved (such as increase understanding of FOI, increase confidence in dealing with FOI requests)		<i>The Conference gave me a better understanding of FOI issues: 76%</i> <i>I learned something to help me in my job: 74%</i>
(vi) 90% or more of proactive news media engagement across each year results in top two key messages appearing in target publications	Achieved	One major proactive news media engagement carried out. Key messages appeared in target publications.
(vii) Increased unique visits and page views on website by 20% from 2020-21 baseline	Ongoing	Revision to measure proposed
(viii) Average engagement rates of 1.5% and above for posts on Twitter (and equivalent for any other social media channels utilised)	Achieved	3.3% average engagement rate on Twitter across 2022-23
(ix) Average of 85% or more of targets set for views, engagement with or downloads of resources, reports and campaigns are met across each year	Not Applicable	No active targets set for engagements
(x) Accessible and inclusive communication guidance developed and implemented across organisation in accordance with our legal responsibilities and duties	Ongoing	Ongoing

9. Progress against each of these measures over 2022-23 is discussed in more detail below. Proposals for amendment to measures and / or further work required by the Policy and Information Team are also detailed below, where relevant.

10. Areas for amendment / adjustment include:

- The addition of a short survey of FOI practitioners to the Policy and Information Team workplan for Q4 2022-23 (see Measure (iii)).
- Policy and Information Team to set and evaluate learning goals for all relevant training and events where the Commissioner has an active role in setting goals (see Measure (v)).
- Policy and Information Team to consider whether proactive media engagement is appropriate in relation to relevant project work and organisational outputs. Policy and Information Team to develop a template to support recording of engagements and impact (see Measure (vi)).
- Proposed amendment to Measure (vii)
- Policy and Information Team to develop template resources to support the effective setting, reporting and recording of engagement with resources (see Measure (ix)).

- Policy and Information Team workplan to be amended to include work to consolidate, collate and create new accessibility guidance to inform communications and engagement activity (see Measure (x)).

Performance in detail

Measure (i): FOI awareness at 90% and above and FOI understanding at 75% or above, as measured by omnibus polling

Performance against this measure

11. Our most recent omnibus polling, carried out by ScotPulse in February 2022 and published in May 2022, found the following:
 - **FOI awareness was at 89%**
65% of respondents reported that they were 'definitely' aware, while 25% reported that they 'thought they were' aware. ScotPulse report the combined awareness figure as 89%. Combined awareness in 2019 was slightly higher at 91%, although the 2022 figures show an increase in 'definite' awareness, up from 59% in 2019 to 65% in 2022.
 - **FOI understanding was at 63%**
In response to the 2022 question designed to measure 'understanding' of FOI rights, 21% of respondents reported they were 'fully' aware of their right to ask for information from public bodies, and 42% reported they were 'moderately' aware. Combined understanding in 2019 was higher, with 71% reporting 'full' or 'moderate' awareness.

Relevant communications and engagement activity planned for 2023-24:

12. Work planned for 2023-24 includes:
 - Activity to promote FOI awareness to children and young people
 - Review of Your Right to Know and related resources, text and approach – including collaboration with ICO on Beginners Guides.
 - Delivery of events to promote the effective use of FOI rights
 - Refreshed and renewed activity on social media, including twitter and LinkedIn
13. We will also seek to use other related activity to promote and develop FOI awareness and understanding, including e.g. through opportunities arising through engagement with relevant stakeholders including the Scottish Public Information Forum, measures around FOI reform and activities associated with the transition between the third and fourth Scottish Information Commissioners.

Measure (ii): At least one successful campaign or initiative per year from 2022-23 onwards, increasing FOI awareness amongst those known to have lower levels of awareness/understanding, such as young people

Performance against this measure

14. While discussions were held in August / September 2022 with Young Scot to explore the development of an approach to promote FOI rights to young people, the team was unable to take this work forward due to a combination of resource shortages within the team and competing, high profile work priorities.

Relevant communications and engagement activity planned for 2023-24:

15. Work planned includes:

- Activity to promote FOI awareness to children and young people
- Review of Your Right to Know and related resources, text and approach. Collaboration with ICO on production of materials conveying key concepts.
- Delivery of events to promote the effective use of FOI rights, including events for journalism students and law students
- Refreshed and renewed activity on social media, including twitter and LinkedIn

16. We will also seek to use other related activity to promote and develop FOI awareness and understanding, including e.g. through opportunities arising through engagement with relevant stakeholders including the Scottish Public Information Forum, measures around FOI reform and activities associated with the transition between the third and fourth Scottish Information Commissioners.

Measure (iii): FOI practitioners reporting confidence in their FOI skills increases by 10% (from baseline to be captured in 2021 with survey)

Performance against this measure

17. Measure is ongoing. Baseline measure captured in in survey carried out in January February 2022 and published in August 2022.

18. The levels of confidence reported in the August 2022 survey are detailed in the table below.

To what degree do you feel confident you have the skills and knowledge required to be an effective FOI practitioner?

Confidence Level	%
Very confident	23.6%
Confident	44.1%
Somewhat confident	27.7%
Not at all confident	4.6%

19. Given the baseline data captured in the August 2022 survey, it is proposed that the target for Measure (iii) should be that 78% of FOI practitioners report that they are ‘confident’ or ‘very confident’ in their skills and knowledge by 2024.

Relevant communications and engagement activity planned for 2023-24:

20. Work planned for 2023-24 to support FOI practitioners and build confidence levels includes:
- Programme of events for FOI practitioners, including Centre for FOI, Holyrood, eCase FOI Awards and Conference
 - Continued support of FOI network groups, alongside support for development of new groups
 - Piloting of online events and training for FOI practitioners
 - Ongoing interventions activity
 - Review of self-assessment toolkit approach
 - Improved accessibility of website content, including briefings and guidance
 - Refreshed and renewed activity on social media, including twitter and LinkedIn.

Measure (iv): Increase subscribers to newsletter from 360 to 800

Performance against this measure

21. There were 808 total subscribers at 31 March 2023, for whom **733** successful sends were achieved during our newsletter mail out on 4 April 2023 (successful sends will exclude ‘inactive’ recipients and contacts who have unsubscribed).
22. Recent subscriber growth is shown in the following table:

Date sent	Jun 22	Aug 22	Sep 22	Nov 22	Dec 22	Apr 23
Total sends	590	636	677	700	721	808
Successful sends	564	591	630	639	652	733

Relevant communications and engagement activity planned for 2023-24:

23. Work planned for 2023-24 includes:
- Continued preparation, promotion and circulation of Open Update email newsletter

Measure (v): 80% or more of participants/attendees in training, events or presentations given across each year report main learning goal set for the session achieved (such as increase understanding of FOI, increase confidence in dealing with FOI requests)

Performance against this measure

24. The August 2022 Centre for FOI Practitioners' Conference, which was planned in partnership with the University of Dundee Law School, was the key event in 2022 where the SIC had a role in setting the learning goals and reviewing the evaluation of the event.

25. Learning goal evaluation for the event was as follows:

	Strongly agree	Agree	Total agree
The conference gave me a better understanding of issues related to FOI in Scotland	20%	56%	76%
I learned something during the conference which would help me do my job	23%	51%	74%

26. The Centre for FOI Conference was held fully online in 2022. The event faced some technical disruption, with a number of participants unable to access breakout rooms, or facing distracting pop-ups. This is likely to have impacted on the overall rating of the event. This was evidenced in a number of the comments received, e.g.:

- *Not enough time per speaker – all were good but it felt rushed – technological issues rather than a problem with content.*
- *The late arrival / admission process, chat and background noise was off-putting / unfair to speakers.*
- *The whole event was overshadowed by technical difficulties.*
- *The content was excellent but let down by the technology.*

27. The full Centre for FOI evaluation report is available in VC183851.

28. Staff from the Commissioner's office also took place in a number of other training events across the year. This included the Annual Holyrood FOI Conference and the eCase FOI Awards. While we do not set the learning goals for these events and do not directly collect evaluations, some limited data is available from event organisers. Relevant data relating to SIC staff content is available from the 2023 eCase Awards conference, where sessions involving SIC staff were highly rated by event participants:

Event	eCase FOI Awards
Keynote session approval	4.75/5
Workshop session approval	4.76/5

29. A limited evaluation report from the Holyrood 2022 FOI Conference (with no direct evaluation of SIC content) is also available in VC179658.

Relevant communications and engagement activity planned for 2023-24:

30. A range of events are planned for 2023-24, including:

- Prepare deliver and report on a programme of events and learning opportunities (on or offline) for FOI practitioners
- Good practice resources, guidance and case studies for authorities – maintain develop, promote and report on use (including webinars)
- Deliver events to promote effective use of FOI rights (such as to civil society, MSPs and media).

Additional actions for 2023-24

31. Policy and Information Team to ensure that appropriate learning goals are set for relevant training and events where the Commissioner has an active role in setting goals, and that associated evaluation is carried out, where relevant.

Measure (vi): 90% or more of proactive news media engagement across each year results in top two key messages appearing in target publications

Performance against this measure

32. There has been a limited amount of proactive news media engagement across 2022-23, partly as a result of resource challenges faced across the team.

33. The principle area where proactive media engagement was undertaken was in support the launch of the Scottish Government intervention progress report in May 2022. Notification of the report and a press release setting out key messages was distributed to key media contacts including the BBC, the Herald, the Scotsman and the Ferret. Reporting of key messages was achieved in all target publications. Coverage included lead front-page coverage and an editorial column carried in the Scotsman.

34. This measure was therefore achieved.

Relevant communications and engagement activity planned for 2023-24:

35. Activity planned for 2023-24, includes:

- Continued appropriate, targeted media engagement

- Media training to be sourced and delivered to P&I Team

Additional actions for 2023-24

36. Policy and Information Team to consider whether proactive media engagement is appropriate in relation to relevant project work and organisational outputs. Where proactive media engagement is carried out, Policy and Information Team to record details of that engagement, including details of:
 - Scope of engagement (who was approached)
 - Key messages communicated
 - Impact of engagement (what was reported)
37. Policy and Information Team will develop a template form to support this activity.

Measure (vii): Increase unique visits and pageviews on website by 20% from 2021-22 baseline

Performance against this measure

38. The Scottish Information Commissioner launched a new website in April 2022. The new website was introduced following a range of issues arising with the previous version of the website, including those relating to the presentation, accessibility and usability of the site.
39. A further issue with the previous version of the site related to the accuracy of the user data collected through the site. Concerns relating to the accuracy of this data have been reported in previous reports. Evidence that suggested that, previously, certain user data may be being ‘double-counted’ (this included a sudden, dramatic and ongoing increase in our ‘pageviews’ which occurred between December 2020 and January 2021 (from 23,256 to 39,846 between those dates) and a sudden and dramatic reduction in our ‘bounce rate’ (the percentage of single-page sessions where there is no interaction with the page – from 42.93% to 5.75% between December 2020 and January 2021)).
40. As a result, it is considered that a measure which assesses performance against a baseline which is taken from the previous version of our website will be inaccurate. It is therefore proposed that Measure (viii) be amended to ensure that any measure of performance is made in relation to performance across the new website, to ensure that we have confidence in the reliability and comparability of the data.
41. It is also proposed that the measure is amended from assessing “unique visits and pageviews” to assessing “users and pageviews”. This is because the term “unique visits” does not have a direct comparator term available in Google Analytics. It is therefore proposed that Measure (vii) is amended to:

Measure (vii): Increase users and pageviews on website by 20% from May 2022 baseline

42. An assessment of users will enable us to assess any growth in the total number of distinct devices (users) that access our site. An assessment of pageviews will enable us to assess a grown in the total number of pages viewed across the site.
43. Considered against the proposed revised measure, our current performance against this measure is as follows:

	May 2022 baseline	March 2023	% change	Performance against revised measure
Users	2,860	3,685	+28.8%	Achieved
Pageviews	16,906	17,631	+4.2%	Not achieved

Relevant communications and engagement activity planned for 2023-24:

44. Activity planned for 2023-24, includes:
- Ongoing management and promotion of content on the website
 - Improved accessibility of website content (briefings and guidance)
 - Increased activity on social media, including introduction of new channel (directing users to website content)
 - Ongoing issue of email newsletter (directing recipients to website content).
 - Development of good practice resources, guidance and case studies
 - Delivery of programme of events (with appropriate links to website)

Measure (viii): Average engagement rates of 1.5% and above for posts on Twitter (and equivalent for any other social media channels utilised)

Performance against this measure

45. While the Policy and Information Team has been working hard to maintain our social media presence over a period of reduced resource, the combination of resource limitations and a focus on high priority work has led to fewer opportunities to expand and innovate through our content on social media.
46. Nevertheless, over the year we issued 176 tweets to our 1,196 followers (down from 229 in 2021-22), with tweets focussed a range of content, including newsletter promotion, promotion of the EIRs and the proactive publication duty, highlighting of key messages from reports and publications and the promotion and live tweeting of events.
47. Our performance over 2022-2023 was as follows:

	2022-23 Q1	2022-23 Q2	2022-23 Q3	2022-23 Q4	2022-23 Total
Tweets	39	48	63	26	176
Average Engagement Rate	3.3%	3.6%	3.7%	2.7%	3.3%

48. **Our goal of an average engagement rate of 1.5% and above was therefore achieved.**
49. Our 2022-23 engagement rate also represents an increase on our average engagement rate for 2021-22, which was 1.92%.
50. While, therefore, our volume of content reduced during 2022-23, user engagement with that content (including 'retweets', replies, link-clicks and 'likes') increased.

Relevant communications and engagement activity planned for 2023-24:

51. Activity planned for 2023-24, includes:
 - Increased activity on social media, including introduction of new channel (subject to scoping and related implementation work)
 - Ongoing management and promotion of content on the website
 - Ongoing issue of email newsletter (directing recipients to website content).
 - Promotion of good practice resources, guidance and case studies
 - Promotion of programme of events

Measure (ix): Average of 85% or more of targets set for views, engagement with or downloads of resources, reports and campaigns are met across each year

Performance against this measure

52. Resource challenges within the Policy and Information Team meant that we were not active in taking forward the setting of targets for views and engagement with resources, reports and campaigns.

Relevant activity planned for 2023-24:

53. Further work in this area will be undertaken in 2023-24. This will include:
 - Analysis of views, engagements and downloads of resources across 2021-22 and 2022-23, to inform the setting of targets for engagement activity in 2023-24.
 - Template resources to be developed to support the effective setting, recording and reporting of performance in this area.

Measure (x): Accessible and inclusive communication guidance developed and implemented across organisation in accordance with our legal responsibilities and duties

Performance against this measure

54. Resource issues within the Team have again contributed to progress in this area not moving as rapidly as anticipated.
55. Across 2022-23, however, the following related work was undertaken:
- The development and collation of documentation, resources and guidance relating to accessibility matters (VC1711156)
 - The undertaking of an accessibility audit of our website (VC170047)
 - The sourcing and sharing of (external) guidance relation to the creation of accessible PDF documents (VC170828).
 - The development and sharing of accessibility guidance to support the preparation of Decision Notices (VC165500)
 - All high-profile external communications, including Annual Report and Accounts, Consultation responses, Scottish Government intervention assessment report, practitioner survey, public awareness research and SIC twitter content being reviewed to support accessibility and inclusivity, and adjusted where appropriate.

Relevant activity planned for 2023-24:

56. Activity planned for 2023-24 includes:
- Translation of key resources into British Sign Language
 - Improve accessibility of website content (briefings and guidance)
 - Review of visual identity and formatting guides
 - Website – maintain, develop and report on accessibility compliance via accessibility statements
 - Provision of inclusive communication support to the Scottish Public Information Forum, as appropriate.
 - Review of ‘Your Right to Know’ and related resources, text and approach

Additional actions for 2023-24 proposed:

57. It is proposed that the Policy and Information Team workplan be amended to include work to consolidate, collate and create new accessibility guidance to inform communications and engagement activity.

Risk impact

58. The risks associated with non-delivery of a communication strategy or framework are recognised in existing risk management frameworks, and relevant mitigations set out.

Equalities impact

59. No new specific equalities impact identified by this report. The 2021-2024 Communications & Engagement Framework considered any relevant equalities impacts.

Privacy impact

60. No new privacy impacts are identified or arising from this report.

Resources impact

61. The resources for delivering the Communication Strategy are met through planned resources. There are no new impacts highlighted in this report which will not be addressed elsewhere.

Operational/ strategic plan impact

62. The 2021-2024 Communications & Engagement Framework addresses how communications and engagement work supports and compliments our strategic and operational priorities.

Records management impact (including any key documents actions)

63. Some revisions to the Communications and Engagement Framework suggested as a result of this report. Usual Key Document procedures to be followed.

Consultation and Communication

64. This report has been prepared in consultation with the relevant members of the Policy and Information Team, and communications performance data contained within it is considered each month in Policy and Information Team meetings.
65. This report will be published on the Commissioner's website.

Publication

66. I recommend that this committee report is published in full.