

Operational Plan 2014-2015

Scottish Information Commissioner



Introduction

This document sets out the Scottish Information Commissioner's operational plan for the year April 2014 to March 2015. 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 outcome and management of resources.

Vision

The Scottish Information Commissioner aims to regulate fairly, and add value to a Scotland:

- where people are familiar with their rights to access information and exercise them knowledgeably, effectively and responsibly;
- where those bodies delivering public functions disseminate and disclose information willingly and openly;
- where access to information is the result of open dialogue and communication that enables both the exercise of rights to information and the delivery of statutory functions; and
- which is recognised and respected internationally as a world-leader in access to information law, policy and practice

Strategic aims

We will enable and support Scottish public authorities to develop and maintain high standards of FOI policy and practice through a combination of regulation, advice and assistance, and appropriate collaboration.

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- We will influence positively cultural change in Scottish public authorities' approaches to meeting their FOI duties.
- We will encourage effective and responsible use of FOI rights through support, education and promotion.
- We will influence and support the development of Scottish information law and policy to ensure it remains fit for purpose and enables effective communication.
- We will be recognised as an organisation of accessible experts, that is run efficiently, governed effectively and leads by example.

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 2014-15 is:

Total staff costs*	£1,175,600
Total revenue costs	£266,900
Capital expenditure	£3,500
Total	£1,446,000
*including a non-consolidated amount for an additional temporary post for one year	



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 (including the enquiries service)
- Regulation
- Resource management
- Risk management
- Sustainable development
- Quality assurance
- Other

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

HOE: Head of Enforcement

SIC: Scottish Information Commissioner

Priority: Relative priority Statutory, High, Medium, Low

HOPI: Head of Policy and Information

SMT: Senior Management Team

HOOM: Head of Operational Management

Human Resource Management

	Activity (Activities run for whole year unless stated otherwise)	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Lead Mgr	Comment/ Update
						1	2	3	4	5			
1	Report to SMT on outcomes of annual appraisals	BAU	Annual	01/05/2014	30/06/2014					X	H	HOOM	
2	Create Annual Learning & Development Plan (internal)	BAU	Annual	01/05/2014	30/06/2014					X	H	HOOM	
3	Review HR Strategy	BAU	Annual	01/01/2015	31/03/2015					X	M	HOOM	
4	Develop use of HR Management Information System	Project		01/10/2014	31/12/2014					X	M	HOOM	
5	Implement & monitor new Performance & Development Framework	Project		01/04/2014	31/03/2015					X	H	HOOM	



Improving authority practice

	Activity (Activities run for whole year unless stated otherwise)	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Lead Mgr	Comment/ Update
						1	2	3	4	5			
1	Monitor, by way of sampling, authority compliance with the single Model Publication Scheme	BAU		01/10/2014	31/01/2015	X	X				M	HOPI	Approach and methodology to be agreed by 01/11/14
2	Hold three regional roadshows to promote FOI leadership and governance	BAU				X	X			X	H	HOPI	Three dates throughout the year (Sept, Nov, March), programme to be confirmed by 31/05/14
3	Liaise with Holyrood Events if holding the annual Holyrood Conference	BAU		01/05/2014	31/12/2014	X	X	X		X	L	HOPI	
4	Organise & deliver a practitioners' conference for the Centre for FOI	BAU		31/01/2015	31/05/2015	X	X		X		H	HOPI	
5	Publish weekly decisions round up	BAU	Weekly	01/04/2014	31/03/2015	X	X	X		X	H	HOPI	
6	Produce annual report on lessons learned from decisions round-up	BAU	Annual	01/02/2014	28/02/2015	X				X	M	HOPI	
7	Deliver good practice guidance for authorities.	Project		01/04/2014	31/03/2015	X	X				S/H	HOPI	The specific programme and timing for delivery are outcomes of P&C13 and 15, which will result in a forward-plan for delivery of a programme of good practice delivery for both authorities and requesters. The early focus for authorities will be on improving searching for information, and giving of advice and assistance.
8	Deliver self-assessment tools for authorities.	Project		01/04/2014	31/03/2016	X	X				H	HOPI	A two year project to deliver at least six individual "tools" (e.g. checklists, supported by guidance) which authorities can use to review, evaluate and improve their FOI performance. Each module will focus on a specific FOI practice issue. Three "tools" will be delivered in the current year.
9	Develop a knowledge hub for the sharing of resources and tools between authorities	Project		01/06/2014	31/03/2015	X	X				H	HOPI	A key output of the L&D strategy
10	Develop internal guidance setting out when and how the SIC will intervene in relation to evidence of good and poor public authority FOI practice.	Project		01/10/2014	30/11/2014	X					H	HOPI	Quarterly report to IPM



Information management

	Activity (Activities run for whole year unless stated otherwise)	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Lead Mgr	Comment/ Update
						1	2	3	4	5			
1	Apply on-going IRM controls and procedures - P&I	BAU		01/04/2014	30/06/2014					X	S/H	HOOM	
2	Apply on-going IRM controls and procedures -Enforcement	BAU		01/07/2014	30/09/2014						S/H	HOOM	
3	Apply on-going IRM controls and procedures - OMT	BAU		01/10/2014	31/12/2014						S/H	HOOM	
4	Review IRM Polices & Procedures	BAU		01/01/2015	31/03/2015						S/H	HOOM	
5	IRM Assurance report to SMT	BAU	Annual	01/01/2015	31/01/2015					X	S/H	HOOM	
6	Maintenance of secure and reliable IT network	BAU		01/04/2014	31/03/2015					X	S/H	HOOM	
7	Manage Key Documents as per agreed review programme	BAU		01/04/2014	31/03/2015					X	H	HOOM	
8	Monitor compliance with Data Protection procedures	BAU		01/04/2014	31/03/2014					X	S	HOOM	
9	Respond to information requests and reviews in line with policy and procedure, within statutory time scales	BAU		01/04/2014	31/03/2015			X		X	S	SMT	
10	Achieve an "excellent" rating for the Commissioner's publication scheme	Project		01/11/2014	01/03/2015		X			X	M	HOOM	
11	Review of IT security	Project		01/04/2014	31/07/2014					X	S	HOOM	Specific timescales and deliverables to be confirmed 30/09/14
12	Case Management System - scope potential developments and prepare implementation plan	Project		01/04/2014	31/07/2014						H	HOOM	See also P&C16
13	Case Management System - deliver developments	Project		01/10/2014	31/03/2015						M	HOOM	Dependent on outcome of IM11
14	Assessment of Information and Records Management Systems functionality / requirements	Project		01/01/2015	31/07/2015						M	HOOM	



Planning and reporting

	Activity (Activities run for whole year unless stated otherwise)	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Lead Mgr	Comment/ Update
						1	2	3	4	5			
1	Publish Statement on 3Es	BAU	Annual	01/09/2014	30/09/2014					X	S	HOOM	
2	Performance and statistical reporting	BAU	by 4th wk day each month	01/04/2014	31/03/2015	X	X	X	X	X	S	HOOM	
3	Public Service Reform (Scotland) Act 2010 - Annual expenditure reporting	BAU	Quarterly	01/04/2014	31/03/2015					X	S	HOOM	
4	Co-ordinate, Prepare and publish Operational Plan 15/16	BAU	Annual	01/01/2015	31/03/2015	X	X	X	X	X	H	HOOM	
5	Oversee and steer project work	BAU	Monthly	01/04/2014	31/03/2015	X	X	X	X	X	H	SMT	
6	Monitor and report progress against Operational Plan	BAU	Quarterly	01/04/2014	31/03/2015	X	X	X	X	X	H	SMT	
7	Annual Review of Strategic Plan	BAU	Annual	01/01/2015	31/03/2015	X	X	X	X	X	M	SMT	
8	Report against our annual Governance Reporting Arrangements Cycle	BAU		01/04/2014	31/03/2015	X	X	X	X	X	H	SMT	
9	Implement performance and quality framework	Project		01/04/2014	30/06/2014	X	X	X	X	X	H	SMT	
10	Monitor and report against performance and quality framework	BAU		01/04/2014	31/03/2015	X	X	X	X	X	H	SMT	



Promotion and communications (including the enquiries service)

	Activity (Activities run for whole year unless stated otherwise)	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Lead Mgr	Comment/ Update
						1	2	3	4	5			
1	Produce annual Communications Plan to promote work of SIC via agreed media (incl external blog and twitter). To include regular communications with MSPs, liaison with media about decisions, queries or news items and internal communications	BAU	Annually	01/04/2014	31/04/14						H	HOPI	
2	Deliver annual communications plan	BAU	Annually	01/05/2014	31/03/2015						H	HOPI	
3	Manage and promote external blog and twitter	BAU		01/04/2014	31/03/2015						M	HOPI	In line with Communications Plan
4	Maintain appropriate regular communications with MSPs	BAU		01/04/2014	31/03/2015						M	HOPI	In line with other projects and the Communications Plan
5	Ad Hoc presentations, seminars and workshops, and attendance at appropriate conferences (domestic and international)	BAU	as required	01/04/2014	31/03/2015					X	L	SMT	
6	Raise awareness of civil society organisations of FOI rights through 3 regional roadshows and ad hoc presentations.	BAU		01/04/2014	31/03/2015			X			S	HOPI	
7	Publish the annual report	BAU		01/04/2014	30/09/2015					X	S	HOPI	
8	Manage and report on enquiries service	BAU	Quarterly	01/04/2014	31/03/2015	X	X	X	X	X	H	HOOM	
9	Manage and maintain media enquiry service	BAU	as required	01/04/2014	31/03/2015	X	X	X		X	H	HOPI	
10	Website Traffic Report	BAU	Quarterly	01/04/2014	31/03/2015	X	X	X		X	M	HOPI	
11	Use Internal Bulletin to disseminate information to staff	BAU		01/04/2014	31/03/2015	X	X	X	X	X	M	HOPI	
12	Review existing briefings on exemptions and key issues against the agreed programme*	Project		01/04/2014	31/03/2015	X	X	X	X	X	S/H	HOPI	Update: 1) EIR guidance and separate out EIRs (HOE), 2) update briefings to new VI and remove EIRs (HOE) 3) Develop 3 yr programme to review all briefings by end of year (HOPI)
13	Develop and implement a programme to ensure that the content of the website is regularly reviewed and updated	Project		01/04/2014	31/03/2015						H	HOPI	Specific timescales and deliverables to be confirmed by 31/04/14



14	Promote FOI rights to young people through partnership with advice providers and young people's organisations	Project		01/09/2014	31/03/2015			X			M	HOPI	Specific timescales and deliverables to be confirmed 30/09/14
15	Develop a new "practice" section on the website, to meet users' needs for guidance, tools and resources. Include arrangements for regular updating and review of content.	Project		01/05/2014	01/10/2014	X	X			X	H	HOPI	Will include self-assessment tools, guidance, knowledge hub resources, advice on responding to requests and exemptions advice.
16	Evaluate need for SIC to deliver in 2015/16 an online request form which improves the quality of requests and reduces the work involved in compliance by public authorities.	Project		01/04/2014	30/08/2014	X		X			M	HOPI	Resource requirements must be identified in time for SPCB budget
17	Create an online application form to make it easier to submit applications.	Project		01/06/2014	31/01/2015			X			H	HOPI	See also IM12 (case management system developments)
18	Develop a costed proposal to identify resources required to ensure that our website is accessible across a range of platforms	Project		01/06/2014	31/07/2014						M	HOPI	Resource requirements must be identified in time for SPCB budget submission
19	Identify and implement a technical solution to maintain existing decisions database within website resources	Project		01/05/2014	30/09/2014						H	HOPI	
20	Complete roll-out of corporate visual identity over all SIC materials	Project		01/04/2014	31/03/2016						H	HOPI	Programme to be agreed by 31/05/14, implementation to be phased for completion over two years - consistent with key documents register review periods
21	Celebrate 10 year anniversary of FOI	Project		01/05/2014	31/01/2015						H	HOPI	Options to be considered and programme agreed by 31/07/14



Regulation

	Activity (Activities run for whole year unless stated otherwise)	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Lead Mgr	Comment/ Update
						1	2	3	4	5			
1	Enforce FOI in line with Enforcement Policy	BAU		01/04/2014	31/03/2015	X	X				S	HOE	
2	Register, validate, investigate and decide applications in line with approved procedures and KPIs	BAU	Monthly	01/04/2014	31/03/2015					X	S	HOE	
3	Monitor and report on investigation performance	BAU	Monthly	01/04/2014	31/03/2015	X				X	S/H	HOE	
4	Maintain FOI/ EIR statistics portal	BAU	Quarterly	01/04/2014	31/03/2015	X	X				H	HOPI	
5	Identify appropriate bodies suitable to designate under s4 and s5 as a matter of routine, and inform Scottish Ministers	BAU	Annual	01/04/2014	31/03/2015				X	X	S	HOPI	
6	Provide legal advice to the Commissioner as and when required	BAU		01/04/2014	31/03/2015	X				X	H	HOE	
7	Publish the Model Publication Scheme 2015 and provide appropriate support to enable central government bodies to adopt it	BAU		01/09/2014	31/03/2015	X	X				S	HOPI	Publication of MPS 2015 by 31/10/14
8	Manage and monitor notifications from public authorities to comply with publication scheme	BAU		01/04/2014	31/03/2015	X					S	HOPI	Administrative task, with referral to P&I as required
9	Complete implementation of revised Investigations Procedures	Project		01/04/2014	31/03/2015	X				X	H	HOE	
10	Develop quality assurance targets and monitoring information	Project		01/07/2014	30/09/2014	X				X	H	HOE	
11	Lay a special report before the Scottish Parliament to raise awareness of the problem of failures to comply with statutory timescales for response.	Project		01/04/2014	30/06/2014	X				X	H	HOPI	
12	Lay a special report about use of the s5 power to designate new authorities	Project		01/05/2014	30/11/2014	X				X	H	HOPI	
13	Establish a rolling-programme to ensure standard letters on case management system are reviewed and updated regularly, and as needed.	Project		01/07/2014	31/03/2015	X				X	H	HOE	



Resource management

	Activity (Activities run for whole year unless stated otherwise)	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Lead Mgr	Comment/ Update
						1	2	3	4	5			
1	Set and profile budget for 2015/16	BAU	Annual	01/06/2014	31/08/2014	X	X	X	X	X	S	HOOM	
2	Current year Budget monitoring and control	BAU	Monthly	01/04/2014	31/03/2015	X	X	X	X	X	S	HOOM	
3	Workforce monitoring and planning	BAU	Quarterly	01/04/2014	31/03/2015	X	X	X	X	X	H	HOOM	
4	Audited Accounts - drafting and clean approval	BAU		01/04/2014	31/07/2014					X	S	HOOM	
5	Maintenance of premises	BAU		01/04/2014	31/03/2015					X	M	HOOM	
6	Management of procurement and contract procedures	BAU		01/04/2014	31/03/2015					X	H	HOOM	
7	Provision of Governance Statement of Assurance to SIC	BAU	Annual	01/05/2014	31/05/2014					X	S	HOOM	
8	Re-tender press cutting / parliamentary / media monitoring service	Project		01/01/2015	31/03/2015					X	M	HOPI	
9	Tender annual report design and print	Project		01/04/2014	31/05/2014					X	H	HOPI	
10	Tender IT Support & Maintenance Contract	Project		01/10/2014	31/03/2015					X	M	HOOM	

Risk management

	Activity (Activities run for whole year unless stated otherwise)	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Lead Mgr	Comment/ Update
						1	2	3	4	5			
1	Regular review of risk, updating of register and annual risk report	BAU	Monthly	01/04/2014	31/03/2015	X	X	X	X	X	S	HOOM	
2	Implement internal audit plan	BAU	Annual	01/04/2014	31/03/2015	X	X	X	X	X	S/H	HOOM	
3	BCP - maintenance of plan and testing	BAU	Annual	01/07/2014	31/03/2015	X	X	X	X	X	H	HOOM	
4	H&S reporting and procedures	BAU	Quarterly	01/04/2014	31/03/2015	X	X	X	X	X	S	HOOM	
5	BCP - review of plan	Project		01/10/2014	31/03/2015	X	X	X	X	X	M	HOOM	



Sustainable development

	Activity (Activities run for whole year unless stated otherwise)	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Lead Mgr	Comment/ Update
						1	2	3	4	5			
1	Monitor Carbon Footprint	BAU	Quarterly	01/04/2014	31/03/2015					X	S	HOOM	

Quality assurance

	Activity (Activities run for whole year unless stated otherwise)	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Lead Mgr	Comment/ Update
						1	2	3	4	5			
1	User Feedback - collection and analysis	BAU	Quarterly	01/04/2014	31/03/2015	X	X	X		X	M	HOOM	
2	Compliments and Complaints - recording and analysis	BAU	Six Monthly	01/04/2014	31/03/2015					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	01/04/2014	31/03/2015					X	S	HOOM	
4	User Equalities Statistics - collection and analysis	BAU	Annual	01/04/2014	31/03/2015			X		X	H	HOOM	
5	Monitor and review Investigation targets & KPIs to ensure appropriate and fit for purpose	BAU	Annual	01/04/2014	31/03/2015			X		X	H	HOE	



Document Control Sheet

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Summary of changes to document				
Date	Action by (<i>initials</i>)	Version updated (<i>e.g. v01.25-36</i>)	New version number (<i>e.g. v01.27, or 02.03</i>)	Brief description (<i>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</i>)
05/05/14	JAW		01.01	Creation of new document following approval
06/05/14	JAW	01.01	01.02	DCS updated with publication details
06/05/14	DL	01.02	01.03	Minor edit – correction of numbering
19/05/14	DL	01.03	01.04	Further minor edits / corrections