Operational Plan 2015-2016

Scottish Information Commissioner





Introduction

This document sets out the Scottish Information Commissioner's operational plan for the year April 2015 to March 2016. 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

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

To work towards this vision, the Commissioner has set out her strategic aims as follows, the overarching theme being **improving access to information through adding value:**

- (i) 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.
- (ii) We will influence positively cultural change in Scottish public authorities' approaches to meeting their FOI duties.
- (iii) We will encourage effective and responsible use of FOI rights through support, education and promotion.
- (iv) We will influence and support the development of Scottish information law and policy to ensure it remains fit for purpose and enables effective communication.
- (v) 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.

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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 2015-16 is:

Total staff costs*	£1,175,200
Total revenue costs	£285,300
Capital expenditure	£3,500
Total	£1,464,000
*including a non-consolidated am	nount for an additional

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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)

Quality assurance

Regulation and enforcement

Resource management

Risk management

Sustainable development

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

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	St	trat	egio	Aiı	m	Priority	Lead
	(Activities run for whole year unless stated otherwise)					1	2	3	4	5		Mgr
	Annual report to SMT on Performance & Development Framework	BAU	Annual	01/05/2015	30/06/2015					Х	Н	НООМ
2	Create Annual Learning & Development Plan (internal)	BAU	Annual	01/05/2015	30/06/2015					Χ	Н	ноом
3	Review HR Strategy	BAU	Annual	01/01/2016	31/03/2016					Х	М	ноом
4	Apply & monitor Performance & Development Framework	BAU		01/04/2015	31/03/2016					Х	Н	ноом
5	Achieve recognition as a 'Carer Positive' organisation	Project		01/10/2015	31/03/2016					Х	М	ноом
6	Major review of Employee Handbook	Project		01/10/2015	31/12/2015					Χ	S/H	ноом



Improving authority practice

	Activity	Туре	Frequency	Start Date	End Date	S	trat	egi	c Ai	m	Priority	Lead
	(Activities run for whole year unless stated otherwise)					1	2	3	4	5		Mgr
1	Monitor authority compliance with the Model Publication Scheme	BAU		01/06/2015	30/08/2015	Х	Х				М	НОРІ
2	Hold a programme of regional roadshows to promote FOI authority good practice, leadership and governance	BAU		01/04/2015	31/03/2016	Х	Х			Х	Н	НОРІ
3	Liaise with Holyrood Events (if holding the annual Holyrood Conference)	BAU		01/04/2015	31/12/2015	Х	Х	Х		Х	L	НОРІ
4	Organise & deliver a practitioners' conference for the Centre for FOI - May 2015	BAU		01/04/2015	31/05/2015	Х	Х		Х		Н	НОРІ
5	Organise & deliver a practitioners' conference for the Centre for FOI - May 2016	BAU		01/11/2015	31/03/2016	Х	Х		Х		М	НОРІ
6	Produce and publish weekly decisions round up	BAU	Weekly	01/04/2015	31/03/2016	Х	Х	Х		Х	н	HOE/HOPI
7	Produce & publish annual report on lessons learned from decisions round-up	BAU	Annual	01/04/2015	29/02/2016	Х				Х	М	НОРІ
8	Produce and publish an interventions procedure to deliver the Enforcement Policy	Project		01/04/2015	31/05/2015	Х	Х				S/H	НОРІ
9	Deliver a programme of self-assessment tools for authorities.	Project		01/04/2015	31/03/2016	Х	Х				Н	НОРІ
10	Scope the development of a strategy to enable knowledge sharing between authorities	Project		01/04/2015	31/08/2015	Х	Х				М	НОРІ
11	Deliver a strategy to enable knowledge sharing between authorities (dependent on outcome of IAP 10)	Project		01/09/2015	31/03/2016	Х	Х				М	НОРІ



Information management

	Activity	Туре	Frequency	Start Date	End Date	Strat	egi	c Ai	m	Priority	Lead
	(Activities run for whole year unless stated otherwise)					1 2	3	4	5		Mgr
1	Apply on-going IRM controls and procedures - P&I	BAU		01/06/2015	30/09/2015				Х	S/H	НООМ
2	Apply on-going IRM controls and procedures -Enforcement	BAU		01/07/2015	30/09/2015				Х	S/H	НООМ
3	Apply on-going IRM controls and procedures - OMT	BAU		01/10/2015	31/03/2016				Х	S/H	НООМ
4	Review IRM Policies & Procedures	BAU	Annual	01/01/2016	31/03/2016				Х	S/H	НООМ
5	IRM Assurance report to SMT	BAU	Annual	01/04/2015	30/04/2015				Χ	S/H	НООМ
6	Maintenance of secure and reliable IT network	BAU		01/04/2015	31/03/2016				Χ	S/H	ноом
7	Agree review programme for Key Documents	BAU		01/05/2015	31/05/2015				Х	Н	ноом
8	Manage Key Documents as per agreed review programme agreed annually	BAU		01/05/2015	31/03/2016				Х	Н	НООМ
9	Monitor compliance with Data Protection legislation	BAU		01/04/2015	31/03/2016				Х	S	ноом
	Respond to information requests and reviews in line with policy and procedure, within statutory time scales	BAU		01/04/2015	31/03/2016		Х		Х	S	НООМ
11	Maintain a compliant publication scheme and guide to information	BAU		01/04/2015	31/03/2016	Х			Х	S	НООМ
12	SIC Publication Scheme Assurance report to SMT	BAU	Annual	01/04/2015	30/06/2015				Χ	S/H	ноом
13	Create a record of information assets	BAU		01/04/2015	30/06/2015	Х			Χ	М	ноом
	Complete implementation of Review of IT & Information Security	Project		01/04/2015	30/06/2015				Х	S/H	НООМ
15	Case Management System - establish functionality meets requirements, including for integrated online application 'web form' (See also P&C18)	Project		01/04/2015	30/06/2015				Х	Н	НООМ
16	Case Management System - deliver upgrade (dependant on outcome of IM15 and P&C18)	Project		01/07/2015	31/01/2016				Х	Н	ноом
	Complete implementation of new Electronic Documents & Records Management System	Project		01/04/2015	30/06/2015				Х	Н	ноом
18	Develop functionality of new EDRMS	Project		01/10/2015	31/01/2016				Х	М	ноом
	Website file library: Review file structure and content; develop and implement improved records management policy and procedures	Project		01/10/2015	31/03/2016				Х	Н	НООМ/НОРІ



Planning and reporting

Activity	Туре	Frequency	Start Date	End Date	S	trat	egi	c Ai	m	Priority	Lead
(Activities run for whole year unless stated otherwise)					1	2	3	4	5		Mgr
1 Publish Statement on 3Es	BAU	Annual	01/09/2015	30/09/2015					Х	S	ноом
2 Performance and statistical reporting	BAU	by 4th wk	01/04/2015	31/03/2016	Χ	Χ	Χ	Χ	Х	S	ноом
		dayeach									
3 Public Service Reform (Scotland) Act 2010 - Annual	BAU	Quarterly	01/04/2015	31/03/2016					Х	S	ноом
expenditure reporting											
4 Co-ordinate, prepare and publish Operational Plan	BAU	Annual	01/01/2016	31/03/2016	Χ	Χ	Χ	Χ	Х	Н	ноом
16/17											
5 Programme Board - oversee and steer project work	BAU	Monthly	01/04/2015	31/03/2016	Χ	Χ	Χ	Χ	Χ	Н	SMT
6 Monitor and report progress against Operational Plan	BAU	Quarterly	01/04/2015	31/03/2016	Χ	Χ	Χ	Χ	Χ	Н	SMT
7 Report against our annual Governance Reporting	BAU		01/04/2015	31/03/2016	Χ	Χ	Χ	Χ	Х	Н	SMT
Arrangements Cycle											
8 Enquiries service - review of revised classification	BAU		01/07/2015	31/07/2015	Χ	Χ	Χ	Χ	Х	М	ноом
codes											
9 Prepare 'annual report' statistics on a 6-monthly basis,	Project		01/10/2015	31/10/2015					Х	М	ноом
incorporating review of methodology											
10 Develop, lay and publish Strategic Plan 2016-2020	Project	Annual	01/12/2015	31/03/2016	Χ	Χ	Χ	Χ	Χ	S	SIC



Promotion and communications (including the enquiries service)

	Activity	Туре	Frequency	Start Date	End Date	S	trat	egi	c Ai	m	Priority	Lead
	(Activities run for whole year unless stated otherwise)					1	2	3	4	5		Mgr
1	Produce and implement annual Communication Plan, introducing regular reporting	BAU	Annually	01/04/2015	31/03/2016	Х	Х	Х	Х	Х	Н	НОРІ
2	Revise Communication Strategy to include social media strategy, incorporating roll-out of use of twitter, external blog and email marketing. Update	Project		01/04/2015	31/07/2015	Х	Х	Х	Х	Х	М	HOPI
3	Review Regional Roadshows	Project		01/04/2015	31/03/2016			Х			М	НОРІ
4	Promote effective use of FOI rights to civil society and media organisations	BAU		01/04/2015	31/03/2016			Х			S	НОРІ
5	Promote FOI rights to young people through partnership with advice providers and young people's organisations	Project		01/04/2014	31/03/2016			Х			М	НОРІ
6	Research the extent of public awareness of FOI rights through an omnibus poll	BAU	Annually	01/06/2015	31/08/2015			Х			М	HOPI
7	Evaluate need for an online 'Request for Information' form which improves the quality of requests and reduces the work involved in compliance by public authorities.	Project		01/09/2015	30/11/2015	Х		Х			L	НОРІ
8	Research, draft and publish the annual report	BAU		01/04/2015	30/09/2015	Х	Х	Х	Х	Х	S	НОРІ
9	Manage and report on enquiries service	BAU	Quarterly	01/04/2015	31/03/2016	Χ	Х	Х	Х	Х	Н	ноом
10	Manage and maintain press and media enquiry service	BAU	as required	01/04/2015	31/03/2016					Х	Н	НОРІ
11	Complete programme of migration of website databases and deliver staff website training and	BAU		01/04/2015	31/05/2015					Х	Н	НОРІ
12	Regularly review and update existing website content according to a maintenance plan	BAU	Quarterly	01/04/2015	31/03/2016	Х	Х	Х		Х	S/H	НОРІ
13	Review website content in light of good practice and user needs. Produce and implement a development plan to improve content and navigation.	Project		01/04/2015	31/03/2016	Х	Х	Х			Н	НОРІ
14	Develop and implement an improved approach to managing mailings to subscribers	Project		01/10/2015	29/02/2016					Х	Н	НОРІ



	Activity	Туре	Frequency	Start Date	End Date	S	trat	egi	: Ai	m	Priority	Lead
	(Activities run for whole year unless stated otherwise)					1	2	3	4	5		Mgr
15	Manage the collection of statistics from the FOI/ EIR statistics portal	BAU	Quarterly	01/04/2015	31/03/2016	Х	Х				Н	НОРІ
16	Review and deliver the range of reports available from the FOI / EIR statistics dataset	Project		01/04/2015	30/07/2015	Х	Х				М	НОРІ
17	Update existing briefings on exemptions and key issues against the agreed programme	Project		01/04/2015	31/03/2016	Х	Х	Х	Х	Х	S/H	HOE
18	Develop online application form which can be integrated with Case Management System (Online form -essential; Link to CMS - desirable). (See also IM 15 & 16)	Project		01/04/2015	31/03/2016			Х			Н	HOPI
19	Establish a standing advisory group of practitioners e.g. development of resources and learning	Project		01/04/2015	31/03/2016	Х	Х				М	НОРІ
20	Audit Scotland and Accounts Commission -scope information sharing	Project		01/07/2015	29/02/2016	X	Х				L	НОРІ



Quality Assurance

	Activity	Туре	Frequency	Start Date	End Date	Si	trat	egio	C Ai	m	Priority	Lead
	(Activities run for whole year unless stated otherwise)					1	2	3	4	5		Mgr
1	User Feedback - collection and analysis	BAU	Six Monthly	01/04/2015	31/03/2016	Χ	Χ	Χ		Χ	М	ноом
2	Compliments and Complaints - recording and analysis	BAU	Six Monthly	01/04/2015	31/03/2016					Χ	S	ноом
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	01/04/2015	31/03/2016					Х	S	НООМ
4	Service User Equalities Statistics - collection and analysis	BAU	Annual	01/04/2015	31/03/2016			Х		Х	Н	ноом
5	Monitor and review Investigation targets & KPIs to ensure appropriate and fit for purpose	BAU		01/04/2015	31/03/2016			Х		Х	Н	HOE
6	Monitor and report against performance and quality framework, including an annual review of KPIs and other targets and standards	BAU		01/04/2015	31/03/2016	X	Х	X	Х	Х	H	SMT



Regulation and Enforcement

	Activity	Туре	Frequency	Start Date	End Date	S	trat	egi	c Ai	m	Priority	Lead
	(Activities run for whole year unless stated otherwise)					1	2	3	4	5		Mgr
1	Enforce FOI in line with Enforcement Policy	BAU		01/04/2015	31/03/2016	Χ	Χ				S	HOE
2	Register, validate, investigate and decide applications in line with approved procedures and KPIs	BAU	Monthly	01/04/2015	31/03/2016					Х	S	HOE
3	Monitor and report on investigation performance	BAU	Monthly	01/04/2015	31/03/2016	Х				Х	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		01/04/2015	29/02/2016				Х	Х	S	НОРІ
	Provide legal advice to the Commissioner as and when required, and update record of legal advice	BAU		01/04/2015	31/03/2016	Χ				Х	Н	HOE
	Publish the Model Publication Scheme 2016, Commissioner's Guidance and support materials, including reference to open data	BAU		01/09/2015	31/03/2016	Х	Х				S	НОРІ
	Manage and monitor notifications from Parts 1 & 2 bodies to comply with publication scheme	BAU		01/08/2015	31/03/2016	Х	Х				S	НОРІ
8	Maintain a rolling-programme to ensure standard letters on case management system are reviewed and updated regularly, and as needed.	BAU		01/04/2015	31/03/2016	X				Х	Н	HOE
	Respond to Scottish Government consultation on designation	Project		01/04/2015	01/07/2015				Х	Х	S/H	НОРІ
10	Special Report 2016-17 - scoping	Project		01/09/2015	11/02/2016						М	HOPI



Resource management

	Activity	Туре	Frequency	Start Date	End Date	Si	trat	egi	c Ai	m	Priority	Lead
	(Activities run for whole year unless stated otherwise)					1	2	3	4	5		Mgr
1	Set and profile budget for 2016/17	BAU	Annual	01/06/2015	31/08/2015	Χ	Χ	Χ	Х	Х	S	ноом
2	Current year Budget monitoring and control	BAU	Monthly	01/04/2015	31/03/2016	Χ	Χ	Х	Χ	Х	S	ноом
3	Workforce monitoring and planning	BAU	Quarterly	01/04/2015	31/03/2016	Χ	Χ	Х	Х	Х	Н	ноом
4	Audited Accounts - drafting and clean approval	BAU		01/04/2015	31/08/2015					Х	S	ноом
5	Maintenance of premises	BAU		01/04/2015	31/03/2016					Х	М	ноом
6	Procurement and contract management	BAU		01/04/2015	31/03/2016					Х	S/H	ноом
7	Provision of Governance Statement of Assurance to SIC	BAU	Annual	01/05/2015	31/05/2015					Х	S	ноом
8	Legal Services contract option to extend - review	BAU		01/05/2015	30/06/2015					Х	Н	HOE
	Re-tender press cutting / parliamentary / media monitoring service	Project		01/04/2015	30/06/2015					Х	M	НОРІ
10	Review of procurement policy & procedures	Project		01/04/2015	30/09/2015					Х	Н	ноом
11	Tender IT Support & Maintenance Contract	Project		01/06/2015	30/09/2015					Х	Н	ноом



Risk management

Activity	Туре	Frequency	Start Date	End Date	Si	trat	egi	c Ai	m	Priority	Lead
(Activities run for whole year unless stated otherwise)					1	2	3	4	5		Mgr
1 Regular review of risk, updating of register and annual risk report	BAU	Monthly	01/04/2015	31/03/2016	Х	Χ	Х	Х	Х	S	ноом
2 Implement internal audit plan	BAU	Annual	01/10/2015	31/03/2016	Χ	Х	Х	Х	Х	S/H	ноом
3 BCP - maintenance of plan and testing	BAU	Annual	01/01/2016	31/03/2016	Χ	Χ	Χ	Χ	Χ	Н	ноом
4 H&S reporting and procedures	BAU	Quarterly	01/04/2015	31/03/2016	Χ	Χ	Χ	Χ	Χ	S	ноом
5 BCP - review of plan	Project		01/06/2015	30/09/2015	Χ	Χ	Х	Χ	Χ	Н	ноом



Sustainable development

Activity		Frequency	Start Date	End Date	Strategic Aim		m	Priority	Lead		
(Activities run for whole year unless stated otherwise)					1	2	3	4	5		Mgr
1 Monitor Carbon Footprint	BAU	Quarterly	01/04/2015	31/03/2016					Χ	S	ноом



Document Control Sheet

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Technical Changes / Unplanned or Ad hoc reviews (see Summary of changes below for details)					
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Summary of changes to document									
Date	Action by	-		Brief description					
			number						
	(initials)	(e.g. v01.25-36)	(e.g. v01.27, or 02.03)	(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)					
15/04/2015	DL	01.01	01.02	Approved Plan					
16/04/2015	DL	01.02	01.03	Technical Change: HRM6 end date corrected to 31/12/15					
17/04/2015	DL	01.03	01.04	DCS update					
30/04/2015	KB	01.04	01.05	DCS update with publish date					
13/07/2015	RA	01.05	01.07	Amended text under strategic aims					
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15/07/2015	KB	01.08	01.09	DCS updated. Published on website					

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