

# Operational Plan 2020-21

Scottish Information Commissioner





## Introduction

This document sets out the Scottish Information Commissioner's operational plan for the period from 1 April 2020 to 31 March 2021. The operational plan explains how we will realise the Commissioner's vision and strategic aims, as set out in the Strategic Plan 2020-24, and provides a tool for on-going monitoring of outcomes and management of resources, financial and human.

## Vision

---

**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 aims

---

To realise this vision

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

1. increase knowledge and understanding of FOI rights
2. enable and support high standards of FOI policy and practice
3. develop Scottish public sector culture and practice where the proactive disclosure of information is routine and valued
4. influence and support the development and strengthening of Scottish FOI law and practice
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

---

The operational 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 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. Each project is approved by the Senior Management Team (SMT).

## Monitoring and reporting

---

Progress against the plan will be reviewed every two months by the SMT and an update of progress will be published following this review in the Operational Plan Monitoring Report.



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 Performance and Quality Framework 2020-21.

## Resources

---

The Commissioner's budget for 2020-21 is:

Total staff costs	<b>£1,497,816</b>
Total gross revenue costs	<b>£1,869,000</b>
Capital expenditure	<b>£34,000</b>
<b>Total</b>	<b>£1,903,000</b>

At the time of approving this operational plan, the office premises were temporarily closed due to the impact of the COVID-19 pandemic and business continuity arrangements were in place, including revised governance and management arrangements. As a result of this, there have been changes in the services we are able to provide and the way in which we provide them. Account of the impact of the COVID-19 pandemic has been taken in preparing this operational plan and the operational plan will continue to be kept under review during the financial year.

On 19 May 2020, the Scottish Parliament's Public Audit and Post-Legislative Scrutiny Committee published the report on its review of the Freedom of Information (Scotland) Act 2002 (FOISA). The report recognises that FOISA has improved the transparency and accountability of public bodies and makes a total of 39 recommendations which that Committee says are required for the legislation and practice to keep pace with the changing nature of public service delivery, new forms of communication and the way in which the public accesses information. The full report is published on [our website](#) and the work to consider the implications of the report, and how it will impact on our own work in this financial year, has been taken into account in the operational plan.



## Summary of activity

---

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)
- Promotion and communications (PromCom)
- Quality assurance (QA)
- 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

**DHOE:** Deputy Head of Enforcement

**HOCS:** Head of Corporate Services

**HOE:** Head of Enforcement

**HOPI:** Head of Policy and Information

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

**SIC:** Scottish Information Commissioner

**SMT:** Senior Management Team



## Human resource management

BAU					Strategic Aim						Priority	Lead Manager
Activity	Frequency	Start Date	End Date	Strategic Aim						Priority	Lead Manager	
				1	2	3	4	5	6			
1	Report to SMT on Performance & Development Framework	Annual	01/04/2020	31/08/2020						X	H	HOCS
2	Learning & Development Plan 2020-21 (internal)	Annual	01/04/2020	30/08/2020						X	H	HOCS
3	Review Human Resources Strategy	Annual	01/04/2020	31/08/2020						X	M	HOCS
4	Apply & monitor Performance & Development Framework		01/04/2020	31/03/2021						X	H	HOCS
5	Carers Accreditation – monitoring and application		01/11/2020	31/03/2021						X	M	HOCS
6	Security & Vetting scheme- monitoring and application		01/04/2020	31/03/2021						X	H	HOCS

Project					Strategic Aim						Priority	Lead Manager
Activity	Start Date	End Date	Strategic Aim						Priority	Lead Manager		
			1	2	3	4	5	6				
1	Business continuity arrangements - COVID -19 pandemic – interim human resources polices and processes	01/04/2020	31/10/2020							X	H	HOCS
2	Business continuity arrangements - COVID -19 pandemic – interim HR policies relating to expansion of remote working	01/04/2020	31/10/2020							X	H	HOCS
3	Business continuity arrangements - COVID -19 pandemic – re-opening of office premises - health and safety requirements, physical distancing and hygiene requirements	01/04/2020	31/10/2020							X	H	HOCS
4	Payroll service – review of arrangements and procurement of new service	01/04/2020	31/03/2021							X	H	HOCS
5	Equalities Monitoring and Reporting – staff – revised system	01/04/2020	31/03/2021							X	H	HOCS
6	Recruitment procedures – review and revision	01/04/2020	31/03/2021							X	H	HOCS
7	Employee Handbook – review	01/04/2020	31/12/2020							X	H	HOCS
8	Carer Positive Scheme - Accreditation	01/04/2020	31/10/2020							X	M/H	HOCS



## Improving authority practice

BAU					Strategic Aim						Priority	Lead Manager
Activity	Frequency	Start Date	End Date	1	2	3	4	5	6			
1	Improving Authority Practice Strategic Approach 2020-24 – implement for 2020-21		01/10/2020	31/03/2021		X	X	X		X	H	HOPI
2	Programme of events (on or offline) for FOI practitioners - deliver and report on for 2020-21		01/11/2020	31/03/2021		X	X	X		X	H	HOPI
3	Public sector FOI practitioner groups - support existing groups		01/04/2020	31/03/2021		X	X	X			M	HOPI
4	Decisions (and intervention) learning - deliver regular mechanism for sharing		01/04/2020	31/03/2021		X	X	X		X	H	HOE/HOPI
5	Collaborate with/involve authority representatives to inform best practice		01/04/2020	31/03/2021		X	X	X		X	M	HOPI
6	FOI/EIRs statistics portal data from public authorities - collect, collate and publish	Quarterly	01/04/2020	31/03/2021	X		X				S/H	HOPI
7	New public authorities - support to prepare for FOI duties		01/04/2020	31/03/2021		X	X	X			H	HOPI
8	Good practice resources and guidance for authorities – maintain, develop as required, and report on use		01/04/2020	31/03/2021		X	X	X	X	X	H	HOPI

Project					Strategic Aim						Priority	Lead Manager
Activity	Start Date	End Date	1	2	3	4	5	6				
1	Improving Authority Practice Strategic Approach 2020-24 – develop	01/07/2020	01/10/2020		X	X	X		X	H	HOPI	
2	Programme of events (on or offline) for FOI practitioners – develop for 2020-22	01/08/2020	01/11/2020		X	X	X			M	HOPI	
3	Review resources, channels and models for improving authority practice - map needs of target audiences, baseline current knowledge levels, existing tools, explore alternative best practice and develop workplan for replacement/new approaches	01/07/2020	31/03/2021		X	X	X		X	H	HOPI	
4	Decisions (and intervention) learning – develop regular mechanism for sharing	01/07/2020	01/11/2020		X	X	X			H	HOPI/HOE	



5	Inspiring and supporting culture change and best practice - scope mechanisms and create proposals/workplans to deliver	01/11/2020	31/03/2021		X	X	X			M	HOPI
6	Peer support for authorities - scope and where possible commence delivery new approaches supporting improved practice and culture change	01/07/2020	31/03/2021		X	X	X			M	HOPI
7	Model Publication Scheme - review SIC guidance and support materials and promote as required	01/10/2020	31/03/2021 (May go in to 2021-22)		X	X	X			M	HOPI
8	Registered Social Landlords - conduct review 1 year since designation	01/09/2020	31/03/2021		X	X	X			M	HOPI
9	Coronavirus (Scotland) Act - update authorities on changes to FOI law and promote guidance	01/04/2020	31/03/2021		X	X	X			H	HOPI
10	Review and promote guidance on areas highlighted by PAPLS report	01/07/2020	31/03/2021		X	X	X	X		M	HOPI/HOE
11	FOI/EIRs statistics portal - review approach and what is collected to ensure appropriate (make recommendations for future site)	01/10/2020	30/03/2021		X	X	X	X	X	H	HOPI
12	Research and recommendations on publication approaches and future potential models (compliance with current practice, exploration of other models, user need/wants, disclosure logs)	01/06/2020	31/03/2021			X	X	X	X	H	HOPI
13	Coronavirus (Scotland) Act 2020 - gather, analyse and publish information on how changes impacted on authority FOI practice	01/04/2020	31/03/2021		X	X	X	X	X	S/H	HOPI



## Information and records management

BAU					Strategic Aim						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		01/04/2020	31/03/2021	X		
2	IRM assurance report to SMT	Annual	01/04/2020	31/08/2020	X		X			X	S/H	HOCS
3	Maintenance of secure and reliable IT network		01/04/2020	31/03/2021						X	S/H	HOCS
4	Manage Key Documents as per the Review Programme		01/04/2020	31/03/2021	X	X	X			X	H	HOCS
5	Monitor compliance with data protection legislation and the General Data Protection Regulation		01/04/2020	31/03/2021			X			X	S	HOCS
6	Maintain a compliant publication scheme and guide to information		01/04/2020	31/03/2021	X		X		X	X	H	HOCS
7	SIC Publication Scheme - assurance report to SMT		01/01/2021	31/03/2021						X	S	HOCS
8	Monitor SIC compliance in responding to RFIs and reviews – compliance with statutory timescales, policy and procedures and quality assurance (quality assurance report to be provided by HOE to HOCS)		01/04/2020	31/03/2021		X				X	S	HOCS
9	Monitor SIC compliance in responding to SARs – compliance with statutory timescales, policy and procedures and quality assurance (quality assurance report to be provided by HOE to HOCS)		01/04/2020	31/03/2021						X	S	HOCS
10	Cyber Resilience Action Plan – implement and monitor		01/09/2020	31/03/2021						X	H	HOCS

Project					Strategic Aim						Priority	Lead Manager
	Activity	Start Date	End Date	1	2	3	4	5	6			
				1	Business continuity arrangements - COVID -19	01/04/2020	30/06/2020					



	pandemic – initial expansion of remote working – interim policies										
2	Business continuity arrangements - COVID -19 pandemic – further expansion of remote working – interim policies	01/06/2020	31/10/2020					X	X	H	HOCS
3	Residual work to implement GDPR – see GDPR 2019-20 Q4 CR to QSMTM	01/04/2020	31/03/2021	X	X			X	X	S/H	HOCS
4	Digital and IT Strategy	01/04/2020	31/08/2021						X	S/H	SIC / HOCS
5	Cyber Resilience Action Plan 2020-2021	01/04/2020	31/08/2021						X	H	HOCS
6	Cyber Essentials 2020-21 reaccreditation	10/12/2020	31/03/2021						X	H	HOCS
7	Cyber Essentials Plus 2020-21 reaccreditation	10/12/2020	31/03/2021						X	H	HOCS
8	Information requests and requests for reviews – review of procedures	01/04/2020	31/03/2021					X	X	H	HOE/HOCS
9	Information and Records Management (IRM) – Review and update File Plan and Retention Schedule	01/04/2020	31/03/2021	X					X	H	HOCS
10	IRM – consider and recommend way forward as regards review, retention and assurance	01/04/2020	31/03/2021	X					X	H	HOCS
11	IRM – Progress Update Review and revision of Records Management Plan and associated policies	01/04/2020	31/03/2021	X					X	H	
12	Case Management System – review of RFI/RFR/workflow re: GDPR and new SAR workflow	01/04/2020	31/03/2021	X					X	M/H	HOCS
13	Case Management System – access protection	01/04/2020	31/03/2021	X					X	M/H	HOCS



## Planning and reporting

BAU					Strategic Aim						Priority	Lead Manager
Activity	Frequency	Start Date	End Date	1	2	3	4	5	6			
1	Annual Report (AR) 2019-20 statutory reporting and 3Es	Annual	01/04/2020	31/10/2020						X	S	HOCS
2	AR 2019-20: Accountability Report and Financial Statements - ensure compliance with FReM, SPFM, prepare and obtain approval	Annual	01/04/2020	31/10/2020						X	S	HOCS
3	Annual Report & Accounts: Performance Report – ensure compliance with FReM, SPFM prepare and obtain approval	Annual	01/04/2020	31/10/2020						X	S	HOPI / HOCS
4	AR 2019-20 Annual Statement of Assurance to SIC	Annual	01/04/2020	31/10/2020	X	X	X			X	H	HOCS
5	AR 2019-20 Auditor’s Report – liaise with Auditor and Advisory Audit Board (AAB)	Annual	01/07/2020	31/10/2020						X	H	HOCS
6	AR 2019-20 AAB meeting 2020	Annual	01/08/2020	30/09/2020						X	H	HOCS
7	Audit Planning Report – AR 2020-21 liaise with auditor and AAB	Annual	01/10/2020	01/02/2021						X	H	HOCS
8	Performance and statistical reporting	As set out in the GRA	01/04/2020	31/03/2021	X	X	X			X	S	HOCS
9	Manage and report on Enquiries Service	Six monthly	01/04/2020	31/03/2021	X	X	X			X	H	HOCS
10	Public Service Reform (Scotland) Act 2010 – annual statement of expenditure and annual statement of sustainable growth report	Annual	01/04/2020	31/03/2021						X	S	HOCS
11	Operational Plan 2020-21 – monitor and report progress	Two monthly	01/04/2020	31/03/2021	X	X	X			X	H	SMT
12	Key Documents – reviews due and overdue reviews - monitor	Two Monthly	01/04/2020	31/03/2021	X	X	X			X	H	SMT
13	Operational Plan 2021-22 - coordinate and prepare	Annual	01/01/2021	31/07/2021	X	X	X			X	H	HOCS
14	Governance Reporting Arrangements (GRA) – reporting against cycle		01/04/2020	31/03/2021	X	X	X			X	H	HOCS/ HOPI/ HOE
15	GRA - compliance report to SMT	Annual	01/04/2020	31/03/2021	X	X	X			X	H	HOCS



16	Case Management System – reporting (manual and automatic)		01/04/2020	31/03/2021						X	M	HOCS
17	Prescribed Persons (Reports on Disclosure of Information) Regulations 2017	Annual	01/04/2020	31/08/2020						X	S	HOCS
18	Report on biodiversity (as required by the Nature Conservation (Scotland) Act 2004)	As required	01/04/2020	31/03/2021						X	S	HOCS
19	Sustainable Development - monitor and report on carbon footprint	Annual	01/04/2020	31/03/2021						X	S	HOCS

Project												
	Activity	Start Date	End Date	Strategic Aim						Priority	Lead Manager	
				1	2	3	4	5	6			
1	Business continuity arrangements - COVID -19 pandemic –enquiries - interim revised arrangements and reporting procedures	01/04/2020	31/10/2020					X	X	H	HOCS	
2	Case management system – review of in-house reporting	01/04/2020	31/03/2021	X	X	X		X	X	H	HOCS	
3	Enquiries procedures – review of outcome codes and assurance reporting	01/04/2020	31/03/2021	X	X	X		X	X	H	HOCS	
4	Equalities Monitoring and Reporting – users - revised system	01/04/2020	31/02/2021					X	X	H	HOCS	



## Promotion and communications

BAU					Strategic Aim						Priority	Lead Manager
Activity	Frequency	Start Date	End Date	1	2	3	4	5	6			
1	Communications and engagement framework / strategic approach 2020 - 2024 - deliver and report on for 2020-21	Annually	01/10/2020	01/04/2024	X	X	X	X	X	X	H	HOPI
2	News media - manage and maintain news media enquiry service and ongoing media engagement		01/04/2020	31/03/2021	X	X	X	X	X	X	M	HOPI
3	News media - manage and maintain media monitoring service		01/04/2020	31/03/2021	X	X	X	X	X	X	M	HOPI
4	Email newsletters - prepare, promote and circulate regularly and as required		01/11/2020	31/03/2021	X	X	X	X	X	X	M	HOPI
5	Email newsletters - maintain and grow mailing lists appropriately		01/08/2020	31/03/2021	X	X	X	X	X	X	M	HOPI
6	Social media - monitor, maintain and develop social media presence in line with Communications Framework/as required		01/04/2020	31/03/2021	X	X	X	X	X	X	M	HOPI
7	Events - support and participate in key conferences/events where they support strategy delivery		01/04/2020	31/03/2021	X	X	X	X	X	X	L/M	HOPI
8	Website - maintain and promote content, ensuring it is up to date and relevant, and reporting progress		01/04/2020	31/03/2021	X	X	X	X	X	X	H	HOPI
9	BSL Action plan 2019-2023 – plan, implement and report actions required	Annually	01/04/2020	31/03/2021	X	X	X	X		X	S	SMT
10	Annual report - coordinate design and promotion where required	Annually	01/04/2020	31/03/2021						X	H	HOPI
11	Web and digital communications strategic approach 2020 -2024 - implement for 2020-21		01/11/2020	31/03/2021	X	X	X	X	X	X	M	HOPI
12	Research public awareness of FOI rights - through omnibus poll and other appropriate methods - identify gaps in knowledge/awareness/needs across difference social groups	Annually	01/04/2020	31/03/2021	X					X	H	HOPI
13	Events - deliver training and briefing events to promote effective use of FOI rights to civil society and media organisations		01/04/2020	31/03/2021	X					X	M	HOPI



14	Promoting FOI rights strategic approach 2020 - 2024 - implement and report on for 2020-21		01/11/2020	31/03/2021	X					X	H	HOPI
15	Collaborate with/involve people from identified target groups for promotion in resource development where possible, to test and ensure best practice		01/04/2020	31/03/2021	X					X	M	HOPI
16	Policy monitoring and intelligence sharing systems - maintain	Monthly	01/04/2020	31/03/2021	X	X	X	X	X	X	H	HOPI
17	Key policy stakeholder relationships/ partnerships - maintain and support as required		01/04/2020	31/03/2021	X	X	X	X	X	X	M	HOPI
18	FOI Policy Strategic Approach 2020-2024 –implement for 2020-21 and report		01/10/2020	30/03/2021	X	X	X	X	X	X	M	HOPI
19	FOI policy positions - maintain positions/messages on key issues		01/04/2019	31/03/2021	X	X	X	X	X	X	L/M	HOPI
20	Legislative change and consultations - monitor and respond to relevant consultations / inform legislative change processes as required		01/04/2020	31/03/2021	X	X	X	X	X	X	H	HOPI

	Project	Activity	Start Date	End Date	Strategic Aim						Priority	Lead Manager
					1	2	3	4	5	6		
1		Communications and engagement framework / strategic approach 2020 – 2024 and action plan for 2020-21 - develop	01/07/2020	01/10/2020	X	X	X	X	X	X	H	HOPI
2		Email newsletter - develop newsletter format and relevant mailing list for authority FOI contacts	01/04/2020	30/10/2020		X	X	X		X	M	HOPI
3		Coronavirus (Scotland) Act 2020 - develop and update information hub and ensure relevant information available for all audiences regarding changes to FOI (including transitions when powers cease)	01/04/2020	31/03/2021	X	X	X	X	X	X	H/S	HOPI
4		Website – internal activity to implement changes to ensure compliance with accessibility regulations (including web manual updates)	01/04/2020	31/10/2020	X	X	X	X	X	X	S	HOPI
5		Website – coordinate website supplier activity to implement changes to ensure compliance with accessibility regulations	01/04/2020	31/10/2020	X	X	X	X	X	X	S	HOPI
6		Website - deliver discovery phase and develop	01/07/2020	31/03/2021	X	X	X	X	X	X	H	HOPI



	roadmap for new website (including specification and updates to visual identity as required/where possible).											
7	Web and digital communications strategic approach 2020 -2024 - develop	01/07/2020	01/11/2020	X	X	X	X		X	M	HOPI	
8	Promoting FOI rights strategic approach 2020-24 - develop	01/07/2020	01/11/2020	X					X	H	HOPI	
9	Resources, channels and models for promoting FOI rights - map needs of target audiences, existing resources and methods, and develop workplan for replacement/new resources	01/07/2020	31/03/2021	X					X	H	HOPI	
10	Promoting FOI awareness to young people - research, develop and begin delivery of action plan	01/04/2020	31/03/2021	X					X	H	HOPI	
11	Active membership of International Conference of Information Commissioners' Executive Committee	01/04/2020	End of tenure or 31/03/2021					X	X	H	SIC	
12	Participate in delivering Scottish Open Government Partnership Commitments, new commitments and performance assessment	01/04/2020	31/03/2021	X	X	X	X	X	X	H	SIC	
13	FOI Policy Strategic Approach 2020-2024 – develop	01/07/2020	01/10/2020	X	X	X	X	X	X	H	HOPI	



## Quality Assurance

BAU					Strategic Aim						Priority	Lead Manager
Activity	Frequency	Start Date	End Date	1	2	3	4	5	6			
1	Compliments and complaints – record, analyse and report	Six monthly	01/04/2020	31/03/2021					X		S	HOCS
2	Information Requests to SIC: (a) record, analyse and monitor performance in accordance with the Section 60 Code of Practice (b) upload details to the FOI/EIRs statistics portal	Quarterly	01/04/2020	31/03/2021		X	X		X	X	S	HOCS
3	Information Requests to SIC – provide assurance to HOCS that responses to information requests comply with relevant legislation and related guidance	Annual	01/04/2020	31/03/2021		X	X		X	X	S	HOE
4	Equalities Statistics – Service Users – recording, analysis and reporting	Annual	01/04/2020	31/03/2021			X		X	X	H	HOCS
5	Investigation targets and Key Performance Indicators - monitor and review to ensure appropriate and fit for purpose		01/04/2020	31/03/2021					X	X	H	HOE
6	Performance and Quality Framework – managers to report on performance for their areas of responsibility (including carrying out appropriate quality assurance reviews) and to review Key Performance Indicators and other targets and standards annually		01/04/2020	31/03/2021	X	X	X		X	X	S/H	SMT
7	Communication targets and key performance indicators - monitor and review to ensure appropriate and fit for purpose		01/04/2020	31/03/2021	X	X	X	X	X	X	H	HOPI

Project					Strategic Aim						Priority	Lead Manager
Activity	Start Date	End Date	1	2	3	4	5	6				
1	Complaints Policy and Handbook – review to take account of revised Model complaints Scheme issued 31/01/2020	01/04/2020	31/03/2021						X		H	HOCS
2	Unacceptable Actions Policy - review to take account of revised Model complaints Scheme issued 31/01/2020	01/04/2020	31/03/2021						X		H	HOCS



## Regulation and Enforcement

	BAU Activity	Frequency	Start Date	End Date	Strategic Aim						Priority	Lead Manager
					1	2	3	4	5	6		
1	Enforce FOI in line with Enforcement Policy		01/04/2020	31/03/2021		X	X		X		S	HOE
2	Register, validate, investigate and decide applications in line with approved procedures	Monthly	01/04/2020	31/03/2021		X			X		S	HOE
3	Monitor investigation and enforcement performance	Monthly	01/04/2020	31/03/2021			X			X	S/H	HOE
4	Report on investigation and enforcement performance	Quarterly	01/04/2020	31/03/2021		X	X	X	X	X	S/H	HOE
5	Provide legal advice to, or procure legal advice for, the SIC on matters including litigation, FOI law (including how this affects or is effected by other areas of law) or other corporate responsibilities and duties and ensure that the legal advice is recorded and the record kept up to date		01/04/2020	31/03/2021		X		X		X	H	HOE
6	Maintain a rolling programme to ensure standard/template letters on the case management system are reviewed and regularly updated, as required.		01/04/2020	31/03/2021		X				X	S	DHOE
7	Interventions - monitor intervention intelligence, record non-compliance and report to quarterly intervention meeting, enabling action in line with procedures and as resources permit	Annual	01/04/2020	31/03/2021		X	X	X			S	HOPI
8	Interventions - report on intervention performance	Quarterly	01/04/2020	31/03/2021		X					S	HOPI
9	Publication schemes - manage and monitor notifications from new authorities re: compliance with publication scheme duty		01/04/2020	31/03/2021			X		X		S	HOPI
10	Regulatory guidance for authorities – maintain and develop as required		01/04/2020	31/03/2021	X	X	X	X			S	HOE
11	Maintain a list of bodies suitable for consideration for designation under Section 4 and Section 5 and report on proposed list to be submitted to the Scottish Ministers		01/04/2020	31/03/2021		X	X			X	S	HOPI



	Project	Activity	Start Date	End Date	Strategic Aim						Priority	Lead Manager
					1	2	3	4	5	6		
1		Appeal portal - review (including procedures), including feedback survey for users and develop recommendations for future models	01/08/2020	01/01/2021		X	X		X	X	M	HOPI
2		Interventions - review and revise procedures	01/08/2020	31/03/2021			X	X		X	M	HOPI
3		Scottish Government intervention - interim report to Parliament and on site assessment	01/04/2020	31/03/2021		X			X		H	HOPI
4		Review Investigations Handbook to ensure remain efficient in the light of the impact of the Covid-19 pandemic	01/04/2020	31/12/2020		X				X	H	HOE

## Resource management

BAU					Strategic Aim						Priority	Lead Manager
	Activity	Frequency	Start Date	End Date	1	2	3	4	5	6		
					1	Set and profile budget for 2021-22	Annual	01/06/2020	31/03/2021	X		
2	Budget monitoring and control – 2020-21	Quarterly	01/04/2020	31/03/2021	X	X	X		X		H	HOCS
3	Monitor and report on payment of invoices	Annual	01/04/2020	31/03/2021	X	X	X		X		H	HOCS
4	Workforce monitoring and planning	Annual	01/04/2020	31/03/2021	X	X	X		X		H	HOCS
5	Maintenance of premises		01/04/2020	31/03/2021						X	H	HOCS
6	Contracts (see VC135957) – procurement and management (as required) – where HOCS/CST indicated as lead	As agreed in relevant contract	01/04/2020	31/03/2021						X	H	HOCS
7	Case management system – review reporting requirements and requisition new reports (as required)		01/04/2020	31/03/2021						X	H	HOCS
8	External provision of legal services: contract management	As agreed in contract	01/04/2020	31/03/2021						X	H	HOE
9	Contracts relevant to policy and information (see list VC135957) – procurement and management (as required) where HOPI/P&I indicated as lead	As agreed in contracts	01/04/2020	31/03/2021						X	H	HOPI
10	IT - replacement hardware – as per annual programme		01/04/2020	31/03/2021						X	H	HOCS

Project					Strategic Aim						Priority	Lead Manager
	Activity	Start Date	End Date	1	2	3	4	5	6			
				1	Case management system – upgrade	01/04/2020	31/03/2021					
2	IT Support and Maintenance Contract – review arrangements (dependent on Digital and IT Strategy being put in place)	01/04/2020	31/03/2021						X	H	HOCS	
3	IT - operating system project	01/04/2020	31/03/2021						X	H	HOCS	
4	IT – hardware project	01/04/2020	31/03/2021						X	H	HOCS	
5	Procurement of legal services contract: issue tender	30/09/2020	31/03/2021						X	H	HOE	
6	Website - procurement of supported hosting and	01/05/2020	31/03/2021						X	H	HOPI /	





## Risk management

BAU					Strategic Aim						Priority	Lead Manager
Activity	Frequency	Start Date	End Date	1	2	3	4	5	6			
1	Review of operational risk	Monthly	01/04/2020	31/03/2021	X	X	X		X	X	H	SMT
2	Review of strategic risk	Quarterly	01/04/2020	31/03/2021	X	X	X		X	X	H	SMT
3	Updating risk registers	Monthly / quarterly	01/04/2020	31/03/2021	X	X	X		X	X	H	HOCS
4	Annual assessment and review of risk and report to SMT	Annual	01/04/2020	31/08/2020	X	X	X		X	X	H	HOCS
5	Internal Audit Plan 2019-20 to 2021-22 – implementation and reports	Annual	01/04/2020	31/03/2021	X	X	X		X	X	H	HOCS
6	Business Continuity Plan – maintenance of plan and testing (as required)		01/04/2020	31/03/2021	X	X	X		X	X	H	HOCS
7	Health and Safety – reporting	Six monthly	01/04/2020	31/03/2021	X	X	X		X	X	H	HOCS
8	Health and Safety – monitoring	Six monthly	01/04/2020	31/03/2021	X	X	X		X	X	H	SMT
9	AAB – reports on external and internal audits, risk policy and review of strategic risk	Annual	01/04/2020	31/03/2021	X	X	X		X	X	H	HOCS

Project					Strategic Aim						Priority	Lead Manager
Activity	Start Date	End Date	1	2	3	4	5	6				
1	Internal audit – procurement of contract for internal audit services	01/04/2020	30/09/2020	X	X	X	X	X	X	H	HOCS	
2	Internal audit – GDPR compliance – external audit to assess implementation process and compliance	01/04/2020	31/03/2021	X	X	X	X	X	X	H	HOCS	
3	Business continuity arrangements - COVID -19 pandemic – office re-opening- health and safety, physical distancing and hygiene arrangements	01/04/2020	31/10/2020						X	H	HOCS	
4	Health and safety audit	01/04/2020	31/03/2021						X	H	HOCS	
5	Business Continuity arrangements – review	01/04/2020	31/03/2021					X	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 2020-21 v01 CURRENT ISSUE
VC No.	137341
Type	Plan
Approver	SMT
Responsible Manager	HOCS
Date of next planned review	N/A – new plan issued each year
Approval & Publication	
Approval Date of current major version	29/07/20
For publication (Y/N)	Y
Date published	27/08/2020
Name of document in website file library	OperationalPlan202021
Technical Changes / Unplanned or Ad hoc reviews (see Summary of changes below for details)	
Date of last update	

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 HOCS, reviewed whole section on PI test, whole document updated, corrected typos, reformatted to new branding)</i>
27/08/20	BOW	01.00	01.01	New document created following approval of draft
27/08/20	BOW	01.01	01.02	DCS updated, published on website

© Scottish Information Commissioner 2020

You may use and re-use this information (not including logos) free of charge in any format or medium, under the terms of the Open Government Licence v3.0. To view this licence, visit <http://www.nationalarchives.gov.uk/doc/open-government-licence/version/3/>