



Scottish Information  
Commissioner  
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# Operational Plan 2018-19 Monitoring Report

Scottish Information Commissioner

# Introduction

## Introduction

This document sets out the Scottish Information Commissioner's operational plan for the period from 1 April 2018 to 31 March 2019. The plan explains how we will realise the Commissioner's vision and strategic aims, and provides a tool for on-going monitoring of outcomes and management of resources, financial and human.

## Vision

**Freedom of Information will add demonstrable value to public services and contribute positively to the transparency and accountability of public functions in Scotland**

## Strategic aims

To realise this vision, the Commissioner's office will:

- (1) **Support** the on-going development of Scottish public sector culture and practice where the sharing and disclosing information is routine, and which actively serves openness, transparency and the public interest
- (2) **Help** people to be familiar with their rights to access information and exercise them knowledgeably and responsibly
- (3) **Enable and support** Scottish public authorities to develop and maintain high standards of FOI policy and practice. We will do this through a combination of regulation, advice and assistance, and appropriate collaboration. This includes promoting embedding FOI in good communication, excellent customer service, creation and management of records and in supporting efficient, equitable and accountable delivery of statutory functions
- (4) **Contribute positively** to Scotland being respected as a world-leader in openness, transparency, and access to information law, policy and practice. Including supporting the development of Scottish access to information law to ensure it remains fit for purpose
- (5) **Be recognised** as an organisation of accessible experts, that is run efficiently, governed effectively and leads by example in the delivery of its statutory functions. We will ensure that delivery of our functions meets and keeps pace with recognised standards and national public service improvements, and is delivered openly and transparently.

## Structure of the operational plan

The plan is laid out as a programme of actions listed under types of operational activity, with cross references to which strategic aim(s) it supports. The actions listed are a mixture of "business as usual" and one-off projects. Each functional area is shown on a separate tab.

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 2018-19 is **£1,565,893**:

- Total staff costs: **£1,245,593**
- Total revenue costs: **£316,800**
- Capital expenditure: **£3,500**

## 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:** Relative priority - Statutory, High, Medium, Low  
**SIC:** Scottish Information Commissioner  
**SMT:** Senior Management Team

## Human Resources Management

Activity	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
					1	2	3	4	5							
1 Report to SMT on Performance & Development Framework	BAU	Annual	01/05/2018	31/07/2018					X	H	OT	OT	OT	Comp	HOCS	Report due in April 2019
2 Learning & Development Plan (internal)	BAU	Annual	01/06/2018	31/07/2018					X	H	OT	OT	OT	Comp	HOCS	Report due in April 2019
3 Review HR Strategy	BAU	Annual	01/06/2018	31/07/2018					X	M	OT	OT	OT	Comp	HOCS	Report due in April 2019
4 Apply & monitor Performance & Development Framework	BAU		01/04/2018	31/03/2019					X	H	OT	Slip	Slip	Comp	HOCS	
5 Carers Accreditation – monitoring and application	BAU		31/08/2018	31/03/2019					X	M	NS	NS	NS	C/f new	HOCS	This will be a C/F to 2019/20
6 Security & Vetting scheme- monitoring and application	BAU		01/04/2018	31/03/2019					X	H	OT	OT	OT	OT	HOCS	
7 Protection of Vulnerable Groups scheme – monitoring and application	BAU		01/04/2018	31/03/2019					X	H	NS	Disc	Disc	Disc	HOCS	Discontinued as not required
1 Employee Handbook	Project		01/04/2018	31/08/2018					X	H	OT	Slip	Slip	C/f new	HOCS	HOCS determining the next steps and project will be C/F into 2018/19
2 Procurement - Employment Advice Contract	Project		01/04/2018	31/12/2018					X	H	NS	NS	NS	Comp	HOCS	
3 Carer Positive Scheme - Accreditation	Project		01/04/2018	31/12/2018					X	H	NS	NS	NS	C/f new	HOCS	This will be a C/F to 2019/20
4 Protection of Vulnerable Groups Designated Body Registration and Framework	Project		01/04/2018	31/08/2018					X	H	NS	Disc	Disc	Disc	HOCS	

## Improving Authority Practice

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
						1	2	3	4	5							
1	Commission and commence public authority compliance monitoring with the Model Publication Scheme	BAU	Annual	01/09/2018	31/03/2019	X		X		X	M	NS	OT	Comp	Comp	HOPI	
2	Liaise with Holyrood Events about the annual Holyrood Conference	BAU	Annual	01/04/2018	31/12/2018	X		X		X	L	OT	OT	Comp	Comp	HOPI	
3	Deliver a practitioners' conference for the Centre for FOI - May 2018	BAU	Annual	01/04/2018	31/05/2018	X		X		X	M	Comp	Comp	Comp	Comp	HOPI	
4	Prepare a practitioners' conference for the Centre for FOI - May 2019	BAU	Annual	01/10/2018	31/03/2019	X		X		X	M	NS	OT	OT	Comp	HOPI	
5	Maintain and build engagement in the Knowledge Hub group for public authorities	BAU		01/04/2018	31/03/2019	X				X	H	OT	OT	OT	Comp	HOPI	
6	Collect, collate and publish FOI/EIRs statistics portal data from public authorities	BAU	Quarterly	01/04/2018	31/03/2019	X		X			S/H	OT	OT	OT	Comp	HOPI	
7	Provide quarterly intelligence reports to IPM to inform decisions about interventions	BAU	Quarterly	01/04/2018	31/03/2019	X		X		X	H	OT	OT	OT	Comp	HOPI	
8	Provide monthly intervention reports to IPM	BAU	Monthly	01/04/2018	31/03/2019	X		X			S/H	OT	OT	OT	Comp	HOPI	
9	Intervention Procedures: ensure non-compliance is recorded and take action in line with procedures and resources	BAU		01/04/2018	31/03/2019	X		X		X	S/H	OT	OT	OT	Comp	HOE	
10	Provide support to new public authorities to prepare for FOI duties	BAU		01/04/2018	31/03/2019	X		X		X	H	NS	NS	NS	Comp	HOPI	
11	Provide new advice and guidance (as required)	BAU		01/04/2018	31/03/2019	X		X		X	H	OT	OT	OT	Comp	HOE	
12	Complete public authority compliance monitoring with the Model Publication Scheme	BAU	Annual	01/04/2019	30/05/2019	X		X		X	M	Slip	OT	Disc	Disc	HOPI	Suspended: proactive publication proposed for post-legislative scrutiny
1	Publish a self assessment toolkit for public authorities on monitoring and managing FOI performance	Project		01/08/2018	31/12/2018	X		X	X		H	NS	NS	NS	C/f new	HOPI	
2	Preparation of Registered Social Landlords and subsidiaries to meet their new FOI duties	Project		01/06/2018	31/03/2019	X		X	X		S	NS	OT	OT	Comp	HOPI	
3	Decisions Round Up – evaluate, review and way forward	Project		01/01/2019	28/02/2019	X	X	X	X	X	M	NS	OT	OT	C/f new	HOPI	Partially completed.
4	Promote revised Section 38/Regulation 11 guidance (when issued)	Project		01/05/2018	25/05/2018	X	X	X	X	X	S/H	OT	Comp	Comp	Comp	HOPI	

## Information Management

Activity	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
					1	2	3	4	5							
1 Coordinate on-going IRM controls and procedures and ensure they are applied	BAU		01/04/2018	31/03/2019	X	X			X	S/H	OT	OT	OT	Comp	HOCS	
2 IRM Assurance report to SMT	BAU	Annual	01/04/2018	31/03/2019	X	X			X	S/H	Comp	Comp	Comp	Comp	HOCS	Assurance report was submitted to SMT in June 2018
3 Maintenance of secure and reliable IT network	BAU		01/04/2018	31/03/2019					X	S/H	OT	OT	OT	Comp	HOCS	
4 Review Programme for Key Documents	BAU	Annual	01/05/2018	31/07/2018 *31/10/18	X	X	X	X	X	H	Slip	Slip	Slip	C/f new	HOCS	
5 Manage Key Documents as per the Review Programme	BAU		01/04/2018	31/03/2019	X	X	X	X	X	H	OT	OT	OT	Comp	HOCS	
6 Monitor compliance with data protection legislation and the General Data Protection Regulation	BAU	Six monthly	01/04/2018	31/03/2019	X				X	S	OT	OT	OT	Comp	HOCS	
7 Maintain a compliant publication scheme and guide to information	BAU		01/04/2018	31/03/2019	X	X		X	X	H	OT	OT	OT	Comp	HOCS	
8 SIC Publication Scheme Assurance report to SMT	BAU	Annual	01/01/2019	30/04/2019					X	S	NS	NS	OT	Comp	HOCS	Q3 report
9 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)	BAU	Quarterly	01/04/2018	31/03/2019			X		X	S	OT	OT	OT	Comp	HOCS	HOE's Annual Assurance statement covered in QA Section
1 Deliver implementation plan to ensure SIC is GDPR compliant	Project		01/04/2018	31/03/2019	X		X	X	X	S/H	OT	OT	OT	C/f new	HOCS	
2 IT and Digital Strategy	Project		01/04/2018	31/07/2018					X	S/H	Slip	Slip	Slip	C/f new	HOCS/SIC	Will be carried forward as a project in 2019/20
3 Cyber Resilience Action Plan	Project		01/04/2018	31/03/2019					X	H	OT	OT	OT	C/f new	HOCS	
4 Cyber Essentials Accreditation	Project		01/04/2018	31/05/2018					X	H	Comp	Comp	Comp	Comp	HOCS	
5 Cyber Essentials Plus Accreditation	Project		31/05/2018	31/10/2018					X	H	OT	OT	Comp	Comp	HOCS	
6 IRM – consider and recommend way forward as regards review, retention and assurance	Project		01/04/2018	31/03/2019	X	X			X	H	OT	Slip	Slip	C/f new	HOCS	Will be carried forward asa project in 2019/20

## Planning & Reporting

Activity	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update	
					1	2	3	4	5								
1	Incorporation of 3Es statement in Annual Report & Accounts	BAU	Annual	01/04/2018	01/09/2018					X	S	Comp	Comp	Comp	Comp	HOCS	
2	Annual Report & Accounts: Accountability Report and Financial Statements - ensure compliance with FReM, prepare and obtain approval	BAU	Annual	01/04/2018	30/09/2018					X	S	OT	Comp	Comp	Comp	HOCS	
3	Annual Report & Accounts: Performance Report – ensure compliance with FReM, prepare and obtain approval	BAU	Annual	01/04/2018	30/09/2018					X	S	OT	Comp	Comp	Comp	HOPI/HOCS	
4	Annual Statement of Assurance to SIC	BAU	Annual	01/04/2018	31/07/2018 *31/08/18	X	X	X	X	X	S/H	OT	OT	Comp	Comp	HOCS	
5	Performance and statistical reporting	BAU		01/04/2018	31/03/2019	X	X	X	X	X	S	OT	OT	OT	Comp	HOCS	
6	Manage and report on Enquiries Service	BAU	Six monthly	01/04/2018	31/03/2019	X	X	X	X	X	H	OT	OT	OT	Comp	HOCS	
7	Public Service Reform (Scotland) Act 2010 – annual expenditure reporting	BAU	Six monthly	01/04/2018	31/03/2019					X	S	OT	OT	OT	Comp	HOCS	Q2 & Q4 reports
8	Operational Plan 2018-19 – monitor and report progress	BAU	Two monththly	01/04/2018	31/03/2019	X	X	X	X	X	H	OT	OT	OT	Comp	SMT	Trial monthly review from 01/02/19 until 31/03/19
9	Operational Plan 2018-19 Projects – monitor and review progress	BAU	Two monthly	01/04/2018	31/03/2019	X	X	X	X	X	H	OT	OT	OT	Comp	SMT	Trial monthly review until 31/03/19
10	Key Documents – reviews due and overdue reviews - monitor	BAU	Monthly	01/04/2018	31/03/2019	X	X	X	X	X	H	OT	OT	OT	Comp	SMT	
11	Operational Plan 2019-20 - coordinate and prepare	BAU	Annual	01/01/2019	31/03/2019	X	X	X	X	X	H	NS	NS	NS	C/f new	HOCS	
12	Governance Reporting Arrangements – reporting against cycle	BAU		01/04/2018	31/03/2019	X	X	X	X	X	H	OT	OT	OT	Comp	HOCS/HOPI/HOE	
13	Governance Reporting Arrangements- compliance report to SMT	BAU	Annual	01/04/2018	31/03/2019	X	X	X	X	X	H	OT	OT	OT	OT	HOCS	Q4 report
14	Case Management System – reporting (manual and automatic)	BAU								X	M	OT	OT	OT	Comp	HOCS	
15	Prescribed Persons (Reports on Disclosure of Information) Regulations 2017	BAU	Annual	01/04/2018	31/07/2018					X	S	Comp	Comp	Comp	Comp	HOCS	
16	Report on biodiversity (as required by the Nature Conservation Act 2004)	BAU	Annual	01/04/2018	31/07/2018					X	S	Comp	Comp	Comp	Comp	HOCS	
17	Sustainable Development - monitor and report on carbon footprint	BAU	Annual	01/04/2018	31/03/2019					X	S	OT	OT	OT	Comp	HOCS	Q4 report
1	Case Management System – implementation of recommendations following internal audit of performance reporting	Project		01/04/2018	31/03/2019	X	X	X	X	X	H	OT	OT	Slip	C/f new	HOCS	Two out of three management actions have been completed - remaining action relates to the review of automated Workpro reports - this action will be carried forward in 2019/20
2	Case Management System – development of additional reporting	Project		01/04/2018	31/03/2019					X	M	OT	Slip	Slip	C/f new	HOCS	This follows on from (1) above and will be carried forward in 2019/20
3	Case Management System – publication scheme reporting	Project		01/04/2018	31/03/2019					X	H	OT	Slip	Slip	C/f new	HOCS	
4	Enquiries Service – review reporting arrangements	Project		01/04/2018	31/07/2018 *31/10/18	X	X	X	X	X	H	Slip	Slip	Slip	C/f new	HOCS	Will be carried forward in 2019/20
5	Strategic Plan – revision	Project		01/04/2018	31/03/2019	X	X	X	X	X	H	NS	NS	NS	C/f new	SIC	Will be carried forward in 2019/20

## Promotion and Communications

Activity	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ update	
					1	2	3	4	5								
1	Communication Strategy Report	BAU	Annual	01/04/2018	31/03/2019	X	X	X	X	X	H	OT	OT	OT	Comp	HOPI	Q4 report. Monthly review of data also introduced.
2	Manage and maintain press and media enquiry service	BAU		01/04/2018	31/03/2109	X	X	X	X	X	H	OT	OT	OT	Comp	HOPI	
3	Deliver training and briefing events to promote effective use of FOI rights to civil society and media organisations	BAU		01/04/2018	31/03/2019		X		X	X	S	NS	OT	OT	Comp	HOPI	
4	Research public awareness of FOI rights through omnibus poll	BAU	Annual	01/04/2018	31/03/2019		X				H	NS	NS	Slip	A c/f compl	HOPI	Delay in GDPR assurance
5	Report on website usage and social media reach against performance targets	BAU	Six monthly	01/04/2018	31/03/2019	X	X	X		X	H	OT	OT	OT	Comp	HOPI	
6	Maintain website content, ensuring it is up to date and relevant and reporting progress	BAU	Six monthly	01/04/2018	31/03/2019	X	X	X		X	H	OT	OT	OT	Comp	HOPI	Q2 & Q4 reports
7	Maintain and support standing advisory group of practitioners, e.g. development of resources and learning	BAU		01/04/2018	31/03/2019	X		X		X	M	OT	OT	OT	Comp	HOPI	
1	Raise awareness of young people of their FOI rights through a workshop	Project		01/04/2018	31/08/2018		X		X		S/H	Comp	Comp	Comp	Comp	HOPI	Anticipate further spin-off opportunitites
2	Produce and publish a case study to promote FOI rights to young people	Project		01/08/2018	31/12/2018		X		X		S/H	NS	OT	Slip	C/f new	HOPI	Production delayed to September 19 to fit with Scottish Youth Parliament timings (an election year)
3	Review of website and signposting	Project		01/04/2018	31/03/2019	X	X	X		X	H	NS	NS	OT	Comp	HOPI	
4	British Sign Language – Action Plan	Project		01/04/2018	31/10/2018		X		X		H	OT	OT	Comp	Comp	SIC	Implementation of plan is a c/f to 19/20

## Quality Assurance

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ update
						1	2	3	4	5							
1	Compliments and complaints – record, analyse and report	BAU	Six monthly	01/04/2018	31/03/2019					X	S	OT	OT	OT	Comp	HOCS	Q2 & Q4 reports
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	BAU	Quarterly	01/04/2018	31/03/2019	X		X	X	X	S	OT	OT	OT	Comp	HOCS	Stats for Q3 not uploaded to Portal due to ongoing problems
3	Information Requests to SIC – provide assurance to HOCS that responses to information requests comply with relevant legislation and related guidance	BAU	Annual	01/04/2018	31/03/2019	X		X	X	X	S	OT	OT	OT	Comp	HOE	Q4
4	Equalities Statistics – Service Users – recording, analysis and reporting	BAU	Annual	01/04/2018	31/03/2019			X	X		H	OT	OT	OT	C/f new	SIC	
5	Investigation targets and Key Performance Indicators - monitor and review to ensure appropriate and fit for purpose	BAU		01/04/2018	31/03/2019					X	H	OT	OT	OT	Comp	HOE	Targets and KPIs continue to be monitored at monthly IPMs and are still considered fit for purpose. However, for a number of different reasons, not all of the targets are being met.
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	BAU		01/04/2018	31/03/2019	X	X	X	X	X	S/H	OT	OT	OT	OT	SMT	HOE: draft procedures for review of existing investigations QA work to be completed by the end of March.
1	Review effectiveness of appeal portal for service users to inform future developments	Project		01/10/2018	31/03/2019		X		X	X	M	NS	NS	Slip	Disc	HOPI	Not possible withing current DP and analytical restraints



## Regulation & Enforcement

Activity	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update	
					1	2	3	4	5								
1	Enforce FOI in line with Enforcement Policy	BAU		01/04/2018	31/03/2019	X		X	X	X	S	OT	OT	OT	Comp	HOE	
2	Register, validate, investigate and decide applications in line with approved procedures and Key Performance Indicators	BAU	Monthly	01/04/2018	31/03/2019	X		X	X	X	S	Slip	Slip	Slip	Comp	HOE	9 out of 12 KPIs met
3	Monitor investigation and enforcement performance	BAU	Monthly	01/04/2018	31/03/2019	X				X	S/H	OT	OT	OT	Comp	HOE	
4	Report on investigation and enforcement performance	BAU	Monthly & Quarterly	01/04/2018	31/03/2019	X				X	S/H	OT	OT	OT	Comp	HOE	Monthly at IPM's and Quarterly at QSMTM's
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	BAU		01/04/2018	31/03/2019	X				X	H	OT	OT	OT	Comp	HOE	
6	Maintain a rolling programme to ensure standard/template letters on the case management system are reviewed and regularly updated, as required.	BAU		01/04/2018	31/03/2019	X				X	S	OT	OT	OT	Comp	DHOE	
7	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	BAU	Annual	01/04/2018	31/03/2019	X			X	X	S	OT	OT	OT	Comp	HOPI	
8	Review the Model Publication Scheme, SIC guidance and support materials (including presentation of materials), publish updates and communicate updates to all public authorities	BAU	Annual	<del>01/04/2018</del> 01/08/2018	<del>30/05/2018</del> 30/09/18	X		X	X	X	S	Slip	OT	Comp	Comp	HOPI	
9	Manage and monitor notifications from new authorities re: compliance with publication scheme duty	BAU		01/04/2018	31/03/2019	X		X	X	X	S	NS	NS	NS	Comp	HOPI	
1	Manage and monitor notifications by Registered Social Landlords and subsidiaries re compliance with publication scheme duty	Project		01/04/2018	31/03/2019	X		X		X	S/H	NS	NS	NS	C/f new	HOPI/ HOE	s5 order laid late Feb. Parliamentary approval on 4 April 2019
2	Contribute to post-legislative scrutiny of the FOISA	Project		01/01/2019	31/03/2019	X	X	X	X	X	S	OT	OT	OT	Comp	SIC	Initial evidence provided Ongoing engagement

## Resource Management

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
						1	2	3	4	5							
1	Set and profile budget for 2019/2020	BAU	Annual	01/06/2018	30/09/2018	X	X	X	X	X	H	OT	OT	Comp	Comp	HOCS	
2	Budget monitoring and control – 2018/19	BAU	Quarterly	01/04/2018	31/03/2019	X	X	X	X	X	H	OT	OT	OT	Comp	HOCS	
3	Monitor and report on payment of invoices	BAU	Annual	01/04/2018	31/03/2019					X	H	OT	OT	OT	Comp	HOCS	Q4 report
4	Workforce monitoring and planning	BAU	Annual	01/04/2018	31/03/2019	X	X	X	X	X	H	OT	OT	OT	Comp	HOCS	Q4 report
5	Maintenance of premises	BAU		01/04/2018	31/03/2019					X	H	OT	OT	OT	Comp	HOCS	
6	Contracts (all except as noted below in (9), (10) (11) and (12))– procurement and management	BAU	As agreed in relevant contract	01/04/2018	31/03/2019					X	H	OT	Slip	Slip	C/f new	HOCS	Contracts have been managed so not accurate to say slip for all
7	Case management system – review reporting requirements and requisition new reports (as required)	BAU		01/04/2018	31/03/2019					X	H	OT	Slip	Slip	C/f new	HOCS	
8	Governance Statement of Assurance to SIC	BAU	Annual	01/04/2018	31/03/2019					X	H	OT	Comp	Comp	Comp	HOCS	
9	External provision of legal services: contract management	BAU	As agreed in contract	01/04/2018	31/03/2019					X	H	OT	OT	OT	Comp	HOE	
10	External provision of website: contract management	BAU	As agreed in contract	01/04/2018	31/03/2019					X	H	OT	OT	Slip	Comp	HOPI	Delay in signing new contract
11	Contract management for design and printing of Annual Report & Accounts	BAU	As agreed in contract	01/04/2018	31/03/2019					X	H	OT	OT	Slip	Comp	HOPI	
12	Contract management for press cutting service	BAU	As agreed in contract	01/04/2018	31/03/2019					X	H	OT	OT	OT	Comp	HOPI	
1	Case management system – upgrade	Project		01/04/2018	31/08/2018					X	H	OT	Slip	Comp	Comp	HOCS	
2	IT Support and Maintenance Contract – review arrangements	Project		01/04/2018	31/08/2018					X	H	OT	Slip	Slip	C/f new	HOCS	Dependent on Digital & IT Strategy (not yet in place)
3	Lease Renewal	Project		01/04/2018	31/03/2019					X	M	OT	OT	OT	OT	HOCS	SIC progressing
4	Procurement of legal services contract	Project		01/04/2018	31/08/2018					X	H	OT	Slip	Slip	C/f new	HOE	
5	Review website supported hosting and maintenance arrangements	Project		01/10/2018	31/03/2019					X	H	Slip	C/f new	C/f new	C/f new	HOPI	Procurement planned 2019-20
6	Recruitment of additional staff if extension of FOISA to RSL's and subsidiaries (provided additional funding allocated to the Commissioner)	Project		01/04/2018	31/03/2019					X	H	NS	NS	NS	Comp	HOPI/ HOCS	Recruitment launched 08/03/19. HOE also involved in recruitment

## Risk Management

Activity	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
					1	2	3	4	5							
1 Review of operational risk	BAU	Two monthly	01/04/2018	31/03/2019	X	X	X	X	X	H	Comp	Comp	Comp	Comp	SMT	
2 Review of strategic risk	BAU	Quarterly	01/04/2018	31/03/2019	X	X	X	X	X	H	Comp	Comp	Comp	Comp	SMT	At QSMTMs
3 Updating risk registers	BAU	Monthly/quarterly	01/04/2018	31/03/2019	X	X	X	X	X	H	Comp	Comp	Comp	Comp	HOCS	
4 Annual assessment and review of risk and report to SMT	BAU	Annual	01/04/2018	31/03/2019	X	X	X	X	X	H	Comp	Comp	Comp	Comp	HOCS	Report made after year end
5 Internal Audit Plan - report	BAU	Annual	01/04/2018	31/01/2019	X	X	X	X	X	H	OT	Slip	Slip	C/f new	HOCS	Work to be carried forward to 2019-20
6 Business Continuity Plan – maintenance of plan and testing (as required)	BAU		01/04/2018	31/03/2019	X	X	X	X	X	H	OT	OT	OT	Comp	HOCS	
7 Health and Safety – reporting and monitoring	BAU	6 monthly	01/04/2018	31/03/2019	X	X	X	X	X	H	OT	OT	OT	Comp	SMT	Q1 & Q3 reports
8 Advisory Audit Board – reports on audits and review of strategic risk	BAU	As required	01/04/2018	31/03/2019	X	X	X	X	X	H	OT	Comp	Comp	Comp	HOCS	
1 Internal audit – GDPR compliance – external audit to assess implementation process and compliance	Project		01/11/2018	31/03/2019	X	X	X	X	X	H	NS	NS	NS	Disc	HOCS	
2 Internal audit – investigations – external audit to review compliance with approved processes in place for undertaking FOI investigations	Project		01/09/2018	31/12/2018 *31/03/2019	X	X	X	X	X	M	NS	NS	Slip	Comp	HOCS/HOE	
3 Internal audit – planning & resources – in house audit to assess whether level of resources adequate to enable SIC to carry out functions.	Project		01/10/2018	31/03/2019	X	X	X	X	X	H	NS	NS	NS	Disc	HOCS	
4 Risk management – in-house audit using Audit Scotland toolkit - assessment of compliance with legislation, best practice and effectiveness of policy and procedures.	Project		01/04/2018	31/07/2018 *31/10/18	X	X	X	X	X	M	Slip	Slip	Slip	Disc	HOCS	
5 Investigations: review quality assurance arrangements	Project		01/06/2018	30/09/2018 *31/03/2019	X	X	X	X	X	H	NS	Slip	Slip	Comp	HOE	With SMT for comment - aim to reintroduce QA from 1/06/19
6 Enquiries: review quality assurance arrangements	Project		01/04/2018	31/07/2018	X	X	X	X	X	H	NS	Slip	Slip	C/f new	HOCS	Carried forward to 2019/20