



Scottish Information  
Commissioner  
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# Operational Plan 2020-21 Monitoring Report

Scottish Information Commissioner

## Introduction

### Introduction

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This document sets out the Scottish Information Commissioner's operational plan for the period from 1 April 2020 to 31 March 2021. 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

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**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

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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

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This 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 a working document which forms the basis of on-going monitoring and assessment and may be updated.

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 project management principles and practice. Each project is approved by the Senior Management Team.

### Monitoring and reporting

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Progress against the plan will be reviewed every two months by the Senior Management Team and an update of progress will be published following this review. Achievement and output against individual line items will be also assessed and reported in line with the organisational targets and indicators and measures set out in our Performance and Quality Framework.

### Resources

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The Commissioner's budget for 2020-21 is £1,903,000:

- Total staff costs: £1,497,816
- Total gross revenue costs: £1,869,000
- Capital expenditure: £34,000

### KEY

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**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	6							
1 Report to SMT on Performance & Development Framework	BAU	Annual	01/04/2020	31/08/2020						X	H	Slip	Comp	Comp		HOCS	HOCS reported to MSMTM on 06/10/20 - delayed due to impact of COVID-19 pandemic
2 Learning & Development Plan 2020-21 (internal)	BAU	Annual	01/04/2020	30/08/2020						X	H	Slip	OT	OT		HOCS	Revised arrangements in place - update plan to be put in place following further information from line managers
3 Review Human Resources Strategy	BAU	Annual	01/04/2020	31/08/2020						X	M	Slip	Comp	Comp		HOCS	HOCS reported to Q2 QSMTM - delayed due to impact of COVID-19 pandemic - now complete
4 Apply & monitor Performance & Development Framework	BAU		01/04/2020	31/03/2021						X	H	OT	OT	OT		HOCS	Adapted procedures in place
5 Carers Accreditation – monitoring and application	BAU		01/11/2020	31/03/2021						X	M	NS	NS	NS		HOCS	
6 Security & Vetting scheme – monitoring and application	BAU		01/04/2020	31/03/2021						X	H	OT	OT	OT		HOCS	

1 Business continuity arrangements - COVID -19 pandemic – interim human resources policies and processes	Project		01/04/2020	31/10/2020						X	H	OT	OT	OT		HOCS	
2 Business continuity arrangements - COVID -19 pandemic – interim HR policies relating to expansion of remote working	Project		01/04/2020	31/10/2020						X	H	OT	OT	OT		HOCS	
3 Business continuity arrangements - COVID -19 pandemic – re-opening of office premises - health and safety requirements, physical distancing and hygiene requirements	Project		01/04/2020	31/10/2020						X	H	OT	OT	OT		HOCS	
4 Payroll service – review of arrangements and procurement of new service	Project		01/04/2020	31/03/2021						X	H	OT	OT	OT		HOCS	
5 Equalities Monitoring and Reporting – staff – revised system	Project		01/04/2020	31/03/2021						X	H	OT	OT	OT		HOCS	
6 Recruitment procedures – review and revision	Project		01/04/2020	31/03/2021						X	H	OT	OT	OT		HOCS	Delayed due to impact of COVID-9 pandemic - due in Q3/Q4
7 Employee Handbook – review	Project		01/04/2020	31/12/2020						X	H	OT	OT	Slip		HOCS	Revised Handbook circulated to SMT for comments - was to be considered at MSMTM on 25/11/20 but due to comments received further time now required to consider any changes to the revised draft and then consult staff- due to other work priorities unlikely to be able to progress until Q4
8 Carer Positive Scheme - Accreditation	Project		01/04/2020	31/10/2020						X	M/H	OT	OT	OT		HOCS	Delayed due to impact of COVID-9 pandemic - due in Q3/Q4

## 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	6							
1	Improving Authority Practice Strategic Approach 2020-24 – implement for 2020-21	BAU		01/10/2020	31/03/2021		X	X	X		X	H	NS	NS	NS		HOPI	Development delayed as result of team capacity change.
2	Programme of events (on or offline) for FOI practitioners - deliver and report on for 2020-21	BAU		01/11/2020	31/03/2021		X	X	X		X	H	NS	NS	OT		HOPI	Development of formal event programme delayed due to pandemic impact (while source online events mechanism) - but continuing to provide events (Social Security Scotland, Holyrood etc)
3	Public sector FOI practitioner groups - support existing groups	BAU		01/04/2020	31/03/2021		X	X	X			M	OT	OT	OT		HOPI	
4	Decisions (and intervention) learning - deliver regular mechanism for sharing	BAU		01/04/2020	31/03/2021		X	X	X		X	H	Slip	Slip	OT		HOPI/ HOE	
5	Collaborate with/involve authority representatives to inform best practice	BAU		01/04/2020	31/03/2021		X	X	X		X	M	OT	OT	OT		HOPI	
6	FOI/EIRs statistics portal data from public authorities - collect, collate and publish	BAU	Quarterly	01/04/2020	31/03/2021	X		X				S/H	OT	OT	OT		HOPI	
7	New public authorities - support to prepare for FOI duties	BAU		01/04/2020	31/03/2021		X	X	X			H	OT	OT	OT		HOPI	
8	Good practice resources and guidance for authorities – maintain, develop as required, and report on use	BAU		01/04/2020	31/03/2021		X	X	X	X	X	H	OT	OT	OT		HOPI	Range developed for Covid-19 and FOI infohub

1	Improving Authority Practice Strategic Approach 2020-24 – develop	Project		01/07/2020	01/10/2020		X	X	X		X	H	NS	OT	Slip		HOPI	Delayed as result of team capacity change, now due Dec 2020
2	Programme of events (on or offline) for FOI practitioners – develop for 2020-22	Project		01/08/2020	01/11/2020		X	X	X			M	NS	Slip	Slip		HOPI	Delayed as result of pandemic disruption - pending securing online events mechanism
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	Project		01/07/2020	31/03/2021		X	X	X		X	H	NS	NS	Slip		HOPI	Delayed as result of pandemic disruption and team capacity changes - scope being reviewed.
4	Decisions (and intervention) learning – develop regular mechanism for sharing	Project		01/07/2020	01/11/2020		X	X	X			H	NS	OT	OT		HOPI/ HOE	
5	Inspiring and supporting culture change and best practice - scope mechanisms and create proposals/workplans to deliver	Project		01/11/2020	31/03/2021		X	X	X			M	NS	NS	NS		HOPI	
6	Peer support for authorities - scope and where possible commence delivery new approaches supporting improved practice and culture change	Project		01/07/2020	31/03/2021		X	X	X			M	NS	NS	OT		HOPI	
7	Model Publication Scheme - review SIC guidance and support materials and promote as required	Project		01/10/2020	31/03/2021 (May go in to 2021-22)		X	X	X			M	NS	NS	NS		HOPI	
8	Registered Social Landlords - conduct review 1 year since designation	Project		01/09/2020	31/03/2021		X	X	X			M	NS	NS	OT		HOPI	Survey being launched with Scottish Government. Report due February 2021
9	Coronavirus (Scotland) Act - update authorities on changes to FOI law and promote guidance	Project		01/04/2020	31/03/2021		X	X	X			H	OT	OT	OT		HOPI	
10	Review and promote guidance on areas highlighted by PAPLS report	Project		01/07/2020	31/03/2021		X	X	X	X		M	OT	OT	OT		HOPI/ HOE	
11	FOI/EIRs statistics portal - review approach and what is collected to ensure appropriate (make recommendations for future site)	Project		01/10/2020	30/03/2021		X	X	X	X	X	H	NS	NS	OT		HOPI	Survey being conducted to gather authority views. Report due Jan 2021
12	Research and recommendations on publication approaches and future potential models (compliance with current practice, exploration of other models, user need/wants, disclosure logs)	Project		01/06/2020	31/03/2021			X	X	X	X	H	NS	OT	OT		HOPI	

## 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	6							
13	Coronavirus (Scotland) Act 2020 - gather, analyse and publish information on how changes impacted on authority FOI practice	Project		01/04/2020	31/03/2021		X	X	X	X	X	S/H	NS	OT	OT		HOPI	Report due for publication Q3

## 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	6							
1	Coordinate on-going Information and Records Management (IRM) controls and procedures and ensure they are applied	BAU		01/04/2020	31/03/2021	X		X			X	S/H	OT	OT	OT		HOCS	
2	IRM assurance report to SMT	BAU	Annual	01/04/2020	31/08/2020	X		X			X	S/H	Comp	Comp	Comp		HOCS	
3	Maintenance of secure and reliable IT network	BAU		01/04/2020	31/03/2021						X	S/H	OT	OT	OT		HOCS	
4	Manage Key Documents as per the Review Programme	BAU		01/04/2020	31/03/2021	X	X	X			X	H	Slip	OT	OT		HOCS	Review re-start in September 2020 - delayed due to impact of COVID-19 pandemic
5	Monitor compliance with data protection legislation and the General Data Protection Regulation	BAU		01/04/2020	31/03/2021			X			X	S	OT	OT	OT		HOCS	
6	Maintain a compliant publication scheme and guide to information	BAU		01/04/2020	31/03/2021	X		X		X	X	H	OT	OT	OT		HOCS	
7	SIC Publication Scheme - assurance report to SMT	BAU		01/01/2021	31/03/2021						X	S	OT	OT	OT		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)	BAU		01/04/2020	31/03/2021		X				X	S	Comp	Comp	OT		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)	BAU		01/04/2020	31/03/2021						X	S	Comp	Comp	OT		HOCS	
10	Cyber Resilience Action Plan – implement and monitor	BAU		01/09/2020	31/03/2021						X	H	NS	NS	NS		HOCS	

1	Business continuity arrangements - COVID -19 pandemic – initial expansion of remote working – interim policies	Project		01/04/2020	30/06/2020					X	X	H	OT	OT	OT		HOCS	
2	Business continuity arrangements - COVID -19 pandemic – further expansion of remote working – interim policies	Project		01/06/2020	31/10/2020					X	X	H	OT	OT	OT		HOCS	
3	Residual work to implement GDPR – see GDPR 2019-20 Q4 CR to QSMTM	Project		01/04/2020	31/03/2021	X		X		X	X	S/H	OT	OT	OT		HOCS	
4	Digital and IT Strategy	Project		01/04/2020	31/08/2021						X	S/H	NS	NS	OT		SIC /HOCS	Preparatory work to start in Q3
5	Cyber Resilience Action Plan 2020-2021	Project		01/04/2020	31/08/2021					X		H	NS	NS	OT		HOCS	Planned for Q3/Q4 - delay due to COVID-19 pandemic
6	Cyber Essentials 2020-21 reaccréditation	Project		10/12/2020	31/03/2021					X		H	NS	NS	OT		HOCS	Due at end Q3/ in Q4.
7	Cyber Essentials Plus 2020-21 reaccréditation	Project		10/12/2020	31/03/2021					X		H	NS	NS	OT		HOCS	Due in Q4
8	Information requests and requests for reviews – review of procedures	Project		01/04/2020	31/03/2021					X	X	H	Slip	Slip	Slip		HOCS/ HOE	Delayed due to impact of COVID-19 pandemic. Meeting of Working Party being arranged.
9	Information and Records Management (IRM) – Review and update File Plan and Retention Schedule	Project		01/04/2020	31/03/2021		X				X	H	Slip	Slip	OT		HOCS	Due in Q3/Q4 - delayed due to impact of COVID-19 pandemic

## 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	6							
10	IRM – consider and recommend way forward as regards review, retention and assurance	Project		01/04/2020	31/03/2021		X				X	H	NS	NS	Disc		HOCS	Update of Records Management Plan will need to take place before this project can take place - will be included in Operational Plan 2021-22
11	IRM – Progress Update Review and revision of Records Management Plan and associated policies	Project		01/04/2020	31/03/2021		X			X	H	NS	NS	OT			HOCS	Due in Q3/Q4
12	Case Management System – review of RFI/RFR/workflow re: GDPR and new SAR workflow	Project		01/04/2020	31/03/2021		X			X	M/H	NS	NS	Disc			HOCS	CMS upgrade (due in Q4) will need to take place before this project can take place.
13	Case Management System – access protection	Project		01/04/2020	31/03/2021		X			X	M/H	NS	NS	Disc			HOCS	CMS upgrade (due in Q4) will need to take place before this project can take place.

## 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	6							
1 Annual Report (AR) 2019-20 statutory reporting and 3Es	BAU	Annual	01/04/2020	31/10/2020						X	S	OT	Comp	Comp		HOCS	
2 AR 2019-20: Accountability Report and Financial Statements - ensure compliance with FReM, SPFM, prepare and obtain approval	BAU	Annual	01/04/2020	31/10/2020						X	S	OT	Comp	Comp		HOCS	
3 Annual Report & Accounts: Performance Report – ensure compliance with FReM, SPFM prepare and obtain approval	BAU	Annual	01/04/2020	31/10/2020						X	S	OT	Comp	Comp		HOPI / HOCS	
4 AR 2019-20 Annual Statement of Assurance to SIC	BAU	Annual	01/04/2020	31/10/2020	X	X	X			X	H	OT	Comp	Comp		HOCS	
5 AR 2019-20 Auditor's Report – liaise with Auditor and Advisory Audit Board (AAB)	BAU	Annual	01/07/2020	31/10/2020						X	H	OT	Comp	Comp		HOCS	
6 AR 2019-20 AAB meeting 2020	BAU	Annual	01/08/2020	30/09/2020						X	H	OT	Comp	Comp		HOCS	
7 Audit Planning Report – AR 2020-21 liaise with auditor and AAB	BAU	Annual	01/10/2020	01/02/2021						X	H	NS	NS	OT		HOCS	Due in Q4
8 Performance and statistical reporting	BAU	As set out in the GRA	01/04/2020	31/03/2021	X	X	X			X	S	OT	OT	OT		HOCS	
9 Manage and report on Enquiries Service	BAU	Six monthly	01/04/2020	31/03/2021	X	X	X			X	H	OT	OT	OT		HOCS	
10 Public Service Reform (Scotland) Act 2010 – annual statement of expenditure and annual statement of sustainable growth report	BAU	Annual	01/04/2020	31/03/2021						X	S	OT	OT	OT		HOCS	
11 Operational Plan 2020-21 – monitor and report progress	BAU	Two monthly	01/04/2020	31/03/2021	X	X	X			X	H	Slip	OT	OT		SMT	Delayed due to impact of COVID-19 pandemic
12 Key Documents – reviews due and overdue reviews - monitor	BAU	Two Monthly	01/04/2020	31/03/2021	X	X	X			X	H	Slip	OT	OT		SMT	Delayed due to impact of COVID-19 pandemic
13 Operational Plan 2020-21 - coordinate and prepare	BAU	Annual	01/01/2021	31/07/2021	X	X	X			X	H	OT	Comp	Comp		HOCS	
14 Governance Reporting Arrangements (GRA) – reporting against cycle	BAU		01/04/2020	31/03/2021	X	X	X			X	H	OT	OT	OT		HOCS / HOPI / HOE	
15 GRA - compliance report to SMT	BAU	Annual	01/04/2020	31/03/2021	X	X	X			X	H	Comp	Comp	Comp		HOCS	2019-20 compliance report
16 Case Management System – reporting (manual and automatic)	BAU		01/04/2020	31/03/2021						X	M	OT	OT	OT		HOCS	
17 Prescribed Persons (Reports on Disclosure of Information) Regulations 2017	BAU	Annual	01/04/2020	31/08/2020						X	S	Comp	Comp	Comp		HOCS	
18 Report on biodiversity (as required by the Nature Conservation (Scotland) Act 2004)	BAU	As required	01/04/2020	31/03/2021						X	S	NS	NS	OT		HOCS	
19 Sustainable Development - monitor and report on carbon footprint	BAU	Annual	01/04/2020	31/03/2021						X	S	OT	OT	OT		HOCS	

1 Business continuity arrangements - COVID -19 pandemic –enquiries - interim revised arrangements and reporting procedures	Project		01/04/2020	31/10/2020					X	X	H	OT	OT	OT		HOCS	
2 Case management system – review of in-house reporting	Project		01/04/2020	31/03/2021	X	X	X		X	X	H	OT	OT	Disc		HOCS	To be carried forward to Operational Plan 2021-22
3 Enquiries procedures – review of outcome codes and assurance reporting	Project		01/04/2020	31/03/2021	X	X	X		X	X	H	OT	OT	OT		HOCS	
4 Equalities Monitoring and Reporting – users - revised system	Project		01/04/2020	31/02/2021					X	X	H	OT	OT	OT		HOCS	



## 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	6							
1	Communications and engagement framework / strategic approach 2020 - 2024 - deliver and report on for 2020-21	BAU	Annually	01/10/2020	01/04/2024	X	X	X	X	X	X	H	NS	NS	OT		HOPI	
2	News media - manage and maintain news media enquiry service and ongoing media engagement	BAU		01/04/2020	31/03/2021	X	X	X	X	X	X	M	OT	OT	OT		HOPI	Phone enquiries unavailable due to office premises closure, but responding to email enquiries
3	News media - manage and maintain media monitoring service	BAU		01/04/2020	31/03/2021	X	X	X	X	X	X	M	OT	OT	OT		HOPI	
4	Email newsletters - prepare, promote and circulate regularly and as required	BAU		01/11/2020	31/03/2021	X	X	X	X	X	X	M	NS	NS	OT		HOPI	
5	Email newsletters - maintain and grow mailing lists appropriately	BAU		01/08/2020	31/03/2021	X	X	X	X	X	X	M	NS	NS	OT		HOPI	
6	Social media - monitor, maintain and develop social media presence in line with Communications Framework/as required	BAU		01/04/2020	31/03/2021	X	X	X	X	X	X	M	OT	OT	OT		HOPI	
7	Events - support and participate in key conferences/events where they support strategy delivery	BAU		01/04/2020	31/03/2021	X	X	X	X	X	X	L/M	OT	OT	OT		HOPI	
8	Website - maintain and promote content, ensuring it is up to date and relevant, and reporting progress	BAU		01/04/2020	31/03/2021	X	X	X	X	X	X	H	OT	OT	OT		HOPI	
9	BSL Action plan 2019-2023 – plan, implement and report actions required	BAU	Annually	01/04/2020	31/03/2021	X	X	X	X		X	S	OT	OT	OT		SMT	
10	Annual report - coordinate design and promotion where required	BAU	Annually	01/04/2020	31/03/2021						X	H	OT	Comp	Comp		HOPI	
11	Web and digital communications strategic approach 2020 - 2024 - implement for 2020-21	BAU		01/11/2020	31/03/2021	X	X	X	X	X	X	M	NS	NS	NS		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	BAU	Annually	01/04/2020	31/03/2021	X					X	H	NS	NS	C/f new		HOPI	Agreed to conduct in 2021-22
13	Events - deliver training and briefing events to promote effective use of FOI rights to civil society and media organisations	BAU		01/04/2020	31/03/2021	X					X	M	OT	OT	OT		HOPI	Online training session held with TPASS residents housing association
14	Promoting FOI rights strategic approach 2020 - 2024 - implement and report on for 2020-21	BAU		01/11/2020	31/03/2021	X					X	H	NS	NS	NS		HOPI	
15	Collaborate with/involve people from identified target groups for promotion in resource development where possible, to test and ensure best practice	BAU		01/04/2020	31/03/2021	X					X	M	NS	NS	NS		HOPI	Delayed as result of pandemic disruption
16	Policy monitoring and intelligence sharing systems - maintain	BAU	Monthly	01/04/2020	31/03/2021	X	X	X	X	X	X	H	OT	OT	OT		HOPI	
17	Key policy stakeholder relationships/ partnerships - maintain and support as required	BAU		01/04/2020	31/03/2021	X	X	X	X	X	X	M	OT	OT	OT		HOPI	
18	FOI Policy Strategic Approach 2020-2024 –implement for 2020-21 and report	BAU		01/10/2020	30/03/2021	X	X	X	X	X	X	M	NS	NS	NS		HOPI	
19	FOI policy positions - maintain positions/messages on key issues	BAU		01/04/2019	31/03/2021	X	X	X	X	X	X	L/M	NS	OT	OT		HOPI	
20	Legislative change and consultations - monitor and respond to relevant consultations / inform legislative change processes as required	BAU		01/04/2020	31/03/2021	X	X	X	X	X	X	H	OT	OT	OT		HOPI	Including re Coronavirus (Scotland) Act 2020

1	Communications and engagement framework / strategic approach 2020 – 2024 and action plan for 2020-21 - develop	Project		01/07/2020	01/10/2020	X	X	X	X	X	X	H	NS	OT	OT		HOPI	Draft complete - due for internal consultation
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## 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	6							
2	Email newsletter - develop newsletter format and relevant mailing list for authority FOI contacts	Project		01/04/2020	30/10/2020		X	X	X		X	M	OT	OT	Comp		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)	Project		01/04/2020	31/03/2021	X	X	X	X	X	X	H/S	OT	OT	Comp		HOPI	Hub launched April 2020. Marked as complete for 2021-22 as changes extended to end of financial year.
4	Website – internal activity to implement changes to ensure compliance with accessibility regulations (including web manual updates)	Project		01/04/2020	31/10/2020	X	X	X	X	X	X	S	OT	OT	Comp		HOPI	
5	Website – coordinate website supplier activity to implement changes to ensure compliance with accessibility regulations	Project		01/04/2020	31/10/2020	X	X	X	X	X	X	S	NS	Comp	Comp		HOPI	
6	Website - deliver discovery phase and develop roadmap for new website (including specification and updates to visual identity as required/where possible).	Project		01/07/2020	31/03/2021	X	X	X	X	X	X	H	NS	OT	OT		HOPI	
7	Web and digital communications strategic approach 2020 - 2024 - develop	Project		01/07/2020	01/11/2020	X	X	X	X		X	M	NS	OT	OT		HOPI	Text may form part of IT and Digital Strategy.
8	Promoting FOI rights strategic approach 2020-24 - develop	Project		01/07/2020	01/11/2020	X					X	H	NS	OT	Slip		HOPI	Draft prepared, finalising measurement pending delays with other strategic approach documents, caused by team capacity changes.
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	Project		01/07/2020	31/03/2021	X					X	H	NS	NS	Slip		HOPI	Initial delay as result of web accessibility work / impact of pandemic. Scope under review.
10	Promoting FOI awareness to young people - research, develop and begin delivery of action plan	Project		01/04/2020	31/03/2021	X					X	H	NS	NS	Slip		HOPI	Delayed as result of pandemic and team capacity changes. Scope under review.
11	Active membership of International Conference of Information Commissioners' Executive Committee	Project		01/04/2020	End of tenure or 31/03/2021					X	X	H	OT	OT	OT		SIC	Work continues on expansion of membership and chairing of strategic priorities WG.
12	Participate in delivering Scottish Open Government Partnership Commitments, new commitments and performance assessment	Project		01/04/2020	31/03/2021	X	X	X	X	X	X	H	OT	OT	OT		SIC	Work continuing with both commitment 4 and the independent reporting mechanism WG, as well as attendance at steering group.
13	FOI Policy Strategic Approach 2020-2024 – develop	Project		01/07/2020	01/10/2020	X	X	X	X	X	X	H	NS	NS	Slip		HOPI	Delayed as result of pandemic impact and team capacity changes. Now due Jan 2021

## 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	6							
1	Compliments and complaints – record, analyse and report	BAU	Six monthly	01/04/2020	31/03/2021						X	S	OT	Comp	OT		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	BAU	Quarterly	01/04/2020	31/03/2021		X	X		X	X	S	Comp	Comp	OT		HOCS	
3	Information Requests to SIC – provide assurance to HOCS that responses to information requests comply with relevant legislation and related guidance	BAU	Annual	01/01/2021	31/03/2021		X	X		X	X	S	NS	NS	NS		HOE	
4	Equalities Statistics – Service Users – recording, analysis and reporting	BAU	Annual	01/04/2020	31/03/2021			X		X	X	H	NS	NS	OT		HOCS	Delayed due to impact of COVID-19 pandemic
5	Investigation targets and Key Performance Indicators - monitor and review to ensure appropriate and fit for purpose	BAU		01/04/2020	31/03/2021					X	X	H	OT	OT	OT		HOE	Changes agreed to two KPIs in Q1.
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		01/04/2020	31/03/2021	X	X	X		X	X	S/H	OT	OT	OT		SMT	
7	Communication targets and key performance indicators - monitor and review to ensure appropriate and fit for purpose	BAU		01/04/2020	31/03/2021	X	X	X	X	X	X	H	OT	OT	OT		HOPI	

1	Complaints Policy and Handbook – review to take account of revised Model complaints Scheme issued 31/01/2020	Project		01/04/2020	31/03/2021						X	H	NS	NS	OT		HOCS	Due in Q3/Q4
2	Unacceptable Actions Policy - review to take account of revised Model complaints Scheme issued 31/01/2020	Project		01/04/2020	31/03/2021					X		H	NS	NS	OT		HOCS	Due in Q3/Q4

## 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	6							
1	Enforce FOI in line with Enforcement Policy	BAU		01/04/2020	31/03/2021		X	X		X		S	OT	OT	OT		HOE	
2	Register, validate, investigate and decide applications in line with approved procedures	BAU	Monthly	01/04/2020	31/03/2021		X			X		S	OT	OT	OT		HOE	Recent QA work shows very high compliance with procedures.
3	Monitor investigation and enforcement performance	BAU	Monthly	01/04/2020	31/03/2021			X			X	S/H	OT	OT	OT		HOE	
4	Report on investigation and enforcement performance	BAU	Quarterly	01/04/2020	31/03/2021		X	X	X	X	X	S/H	OT	OT	OT		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	BAU		01/04/2020	31/03/2021		X			X		H	OT	OT	OT		HOE	Advice sought during Q1 on retrospective effects of Coronavirus (Scotland) Act 2020
6	Maintain a rolling programme to ensure standard/template letters on the case management system are reviewed and regularly updated, as required.	BAU		01/04/2020	31/03/2021		X				X	S	OT	OT	OT		DHOE	Wide range of letters updated to take account of effects of Covid-19 during Q1.
7	Interventions - monitor intervention intelligence, record non-compliance and report to quarterly intervention meeting, enabling action in line with procedures and as resources permit	BAU	Annual	01/04/2020	31/03/2021		X	X	X			S	Slip	OT	OT		HOPI	
8	Interventions - report on intervention performance	BAU	Quarterly	01/04/2020	31/03/2021		X					S	Slip	OT	OT		HOPI	
9	Publication schemes - manage and monitor notifications from new authorities re: compliance with publication scheme duty	BAU		01/04/2020	31/03/2021			X		X		S	OT	OT	OT		HOPI	
10	Regulatory guidance for authorities – maintain and develop as required	BAU		01/04/2020	31/03/2021	X	X	X	X			S	OT	OT	OT		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	BAU		01/04/2020	31/03/2021		X	X			X	S	OT	OT	OT		HOPI	

1	Appeal portal - review (including procedures), including feedback survey for users and develop recommendations for future models	Project		01/08/2020	01/01/2021		X	X		X	X	M	NS	NS	NS		HOPI	Delayed as exploring potential to combine with website discovery project
2	Interventions - review and revise procedures	Project		01/08/2020	31/03/2021			X	X		X	M	NS	Slip	OT		HOPI	
3	Scottish Government intervention - interim report to Parliament and on site assessment	Project		01/04/2020	31/03/2021		X			X		H	OT	OT	OT		HOPI	Publication of interim report published Sept 2020. On site assessment due 2021
4	Review Investigations Handbook to ensure remain efficient in the light of the impact of the Covid-19 pandemic	Project		01/04/2020	31/12/2020		X				X	H	Comp	Comp	Comp		HOE	Handbook reviewed - further changes may be required (e.g. if no longer able to issue formal notices electronically)

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

1	Case management system – upgrade	Project		01/04/2020	31/03/2021					X		H	NS	NS	NS		HOCS	
2	IT Support and Maintenance Contract – review arrangements (dependent on Digital and IT Strategy being put in place)	Project		01/04/2020	31/03/2021					X		H	NS	NS	Comp		HOCS	To be added to 21/22 plan
3	IT - operating system project	Project		01/04/2020	31/03/2021					X		H	OT	OT	Comp		HOCS	
4	IT – hardware project	Project		01/04/2020	31/03/2021					X		H	OT	OT	OT		HOCS	
5	Procurement of legal services contract: issue tender	Project		30/09/2020	31/03/2021					X		H	NS	NS	NS		HOE	HOE to arrange meeting with HOCS
6	Website - procurement of supported hosting and maintenance services	Project		01/05/2020	31/03/2021					X		H	Comp	Comp	Comp		HOPI/HOCS	Completed June 2020
7	Cleaning Services Contract – review of arrangements and procurement of contract	Project		01/04/2020	31/03/2021					X		H	OT	OT	Comp		HOCS	To be added to 21/22 plan
8	Website - procurement of website discovery / roadmap / specification	Project		01/08/2020	31/12/2020	X	X	X	X	X	X	H	NS	NS	OT		HOPI	
9	Media monitoring/press cuttings - secure service to meet new requirements	Project		01/03/2020	30/09/2020	X	X	X	X	X	X	M	OT	OT	Comp		HOPI	
10	Webinar/online events platform - scope need for service and secure contract if required	Project		01/07/2020	01/09/2020	X	X	X	X	X	X	H	NS	NS	OT		HOPI	
11	Internal communications (including bulletin alternative) - scope need for service and secure contract if required	Project		01/07/2020	01/02/2021					X		M	NS	NS	C/f new		HOPI/HOCS	Agreed to carry forward to 2021-22

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

1 Internal audit – procurement of contract for internal audit services	Project		01/04/2020	30/09/2020	X	X	X	X	X	X	H	OT	Comp	Comp		HOCS	
2 Internal audit – GDPR compliance – external audit to assess implementation process and compliance	Project		01/04/2020	31/03/2021	X	X	X	X	X	X	H	Disc	Disc	Disc		HOCS	Due to be carried out in 2021-22
3 Business continuity arrangements - COVID -19 pandemic –office re-opening- health and safety, physical distancing and hygiene arrangements	Project		01/04/2020	31/10/2020						X	H	OT	OT	OT		HOCS	
4 Health and safety audit	Project		01/04/2020	31/03/2021						X	H	OT	OT	OT		HOCS	
5 Business Continuity arrangements – review	Project		01/04/2020	31/03/2021					X	X	H	OT	OT	OT		HOCS	