

<b>Report to:</b>	SMT
<b>Report by:</b>	Erin Gray, Head of Policy and Information Joe Chapman, FOI Officer
<b>Meeting Date:</b>	4 February 2021
<b>Subject/ Title:</b> (and VC no)	Self-Assessment Toolkit assurance report (VC144953)
<b>Attached Papers</b> (title and VC no)	none

## Purpose of report

---

1. To provide assurance to the Senior Management Team (SMT) on the use and effectiveness of the Self-Assessment Toolkit for the period 01/01/20 to 31/12/20.

## Recommendation and actions

---

2. I recommend that:
  - (i) SMT notes the contents of this report.
  - (ii) the SMT agree the publication arrangements set out in the final paragraph of this report.

## Executive summary

---

3. This report provides summary data about the use and effectiveness of the Scottish Information Commissioner's Self-Assessment Toolkit.
4. The report shows that interest in the toolkit returned to more usual levels in 2020 after a short-term increase in the previous year. This increase in 2019 was most likely due to the designation of registered social landlords (RSLs) under the Freedom of Information (Scotland) Act 2002.

## Background

5. The Scottish Information Commissioner ('the Commissioner') has now published six modules of the Self-Assessment Toolkit:
  - (i) Module 1: Responding on time (published in October 2014)
  - (ii) Module 2: Searching for, locating and retrieving information (January 2015)
  - (iii) Module 3: Advice and assistance (June 2015)
  - (iv) Module 4: Publishing information (June 2017)
  - (v) Module 5: Conduct of reviews (December 2019)
  - (vi) Module 6: Monitoring and managing FOI performance (September 2020)
6. It is not anticipated that there any further modules will be produced in the toolkit's current form. Planned internal reviews for modules 1 – 4 are taking place in Q4 of 2020-21. Following an initial delay caused as a result of the Covid-19 pandemic, a wider review of the

toolkit approach as a whole (including stakeholder input) is anticipated in 2021-22 as part of any website development activity which may be undertaken.

7. FOI practitioners in Scottish public authorities are the target audience for the toolkit. The toolkit is regularly promoted through a range of channels, including:
  - Twitter
  - Our intervention activity
  - “Open Update” email newsletter (formerly the Decisions Round-up)
  - FOI network group meetings
  - Engagement with new bodies subject to freedom of information law
  - Other conferences, meetings and events.
8. The Self-Assessment Toolkit approach has been influential in other jurisdictions. For example, the Policy and Information Team have advised and supported staff from the UK Information Commissioner’s Office (ICO) in the development of their own toolkits, the first of which – on the subject of timeliness – was launched in July 2020.

### Use of the self-assessment tools

9. We do not collect or hold information about public authorities’ use of the toolkit. The following data from Google Analytics provides an indication of general interest in the materials. The modules are published on the Commissioner’s website. We can track the number of visits to related website pages, but system limitations mean that we are unable to track downloads of documents or interaction with resources from those pages. For this reason, we provide individual modules within separate pages linked to the [introductory page](#).

#### Pageviews

10. The table below shows the numbers of unique pageviews<sup>1</sup> for each page of the self-assessment toolkit section of the website in calendar years 2018, 2019 and 2020:

Unique pageviews	2018	2019	2020
Toolkit introduction	687	1,128	791
Module 1: Responding on time	178	225	142
Module 2: Searching for, locating and retrieving information	81	101	68
Module 3: Advice and assistance	49	62	45
Module 4: Publishing information	96	256	66
Module 5: Conduct of reviews	n/a	2*	182
Module 6: Monitoring and managing FOI performance	n/a	n/a	13*
TOTAL	1,091	1,772	1,307
Modules avg. per module per full year	101	161	101

\* Module was only available for a very limited period in the year

<sup>1</sup> Unique pageviews are the number of sessions during which the page was viewed at least once. Repeated views of the same page in the same session (e.g. by navigating away and then back again) are not counted.

11. The data shows that the toolkit pages on the website was visited much less frequently in 2020 than in 2019, but on a par with the figures for 2018.
12. As stated in the report for 2019, although the reason for the increase during that year cannot be fully established from available data, it is likely that the designation of RSLs was a major factor – supported by evidence of ‘spikes’ in pageviews around the time of our RSL workshop events.
13. Overall therefore, the level of visits to the toolkit pages remained consistent with previous years. This is despite the impact of the coronavirus Covid-19 pandemic, which is likely to have reduced authorities’ capacity to carry out self-assessments as well as reducing the opportunities we had to prompt individual authorities to consult particular modules.
14. The trend of pageviews over the course of each year shows that activity during the spring of 2020 was slightly lower than in the same period in previous years, but this was compensated for by two notable spikes:
  - (i) in mid-January, when we ran a concerted campaign to promote the toolkits on Twitter
  - (ii) in mid-December, after the toolkits featured in our first “Open Update” email newsletter
15. Not surprisingly, Module 5 attracted a particularly high level of interest over the year, as it was a new addition to the toolkit (published in December 2019 but first publicised in January 2020). More than half (101) of the unique pageviews for that page were in January alone.

#### *Other analytics*

16. In line with previous reports, the tables below show the average length of time spent on each page, and each page’s bounce rate – the proportion of all sessions where a user only viewed that page and exited without interacting with it (e.g. by clicking any links). Bounces are also considered to have a duration of 0 seconds, which can impact on the ‘average time’ statistic.
17. In the context of the toolkit pages, a high bounce rate is partly to be expected as they are ‘endpoint’ pages – they serve a specific purpose and we wouldn’t generally expect website users to navigate elsewhere on the site afterwards. On the other hand, a high bounce rate also suggests that users are viewing the page but not downloading any of the documents. Any future development of the Commissioner’s website should aim to ensure reporting on use of the toolkits provides more in-depth detail.
18. There is little in these figures that is unexpected or unusual – except for the bounce rate for Module 3, and to a lesser extent the sharp drop in the bounce rate for Module 2.

<b>Avg. time on page</b>	<b>2019</b>	<b>2020</b>
Introduction	1:30	1:21
Module 1	3:13	2:35
Module 2	2:46	2:23
Module 3	1:59	2:24
Module 4	3:53	1:48
Module 5	6:17	3:37
Module 6	n/a	3:09

<b>Bounce rate</b>	<b>2019</b>	<b>2020</b>
Introduction	60%	58%
Module 1	75%	41%
Module 2	85%	27%
Module 3	100%	100%
Module 4	77%	80%
Module 5	0%	74%
Module 6	n/a	67%

## Effectiveness of the toolkits

19. Formal evaluation of the toolkit was last undertaken in 2016/17, though at that point no survey responses were received. Anecdotal evidence from interventions and FOI network groups indicates that authorities that have used one or more of the toolkit modules find them to be a useful resource which lead to positive change within organisations.
20. However, through the same channels we also find that authorities sometimes consider the anticipated work required to complete the toolkit to be challenging, and that this may dissuade some potential users from proceeding.
21. In particular, the 'document-heavy' nature of the toolkit – including the volume of guidance to be read, the repetition of information across modules and the format of the evidence grid – may be perceived as outdated and difficult to use, compared with simple interactive web-based tools. This is reflected in the approach taken by the ICO, which has sought to streamline and digitise their toolkits to improve the ease of use.
22. Nevertheless, the Self-Assessment Toolkit as a concept and a resource continues to play a valuable role in supporting the Commissioner's interventions and wider strategic aims to improve authority practice.

## Current actions

23. We are continuing to liaise with the ICO where appropriate, to support the development of their toolkit resources and also to draw lessons from their approach and experience.
24. A workshop at the Centre for FOI Conference was planned for March 2020 to inform the future development of our own toolkit. This (and other engagement with former advisory group representatives) was postponed as a result of the pandemic, but work to review resources required to improve authority practice is continuing. An internal review of toolkits 1-4 is taking place during the current quarter, and a more comprehensive review of the toolkit approach will be proposed as part of development of any future new website which may be developed.

## Risk impact

---

25. The Commissioner is the regulator of FOI in Scotland and has functions and duties to fulfil.
26. The toolkit, as a means of driving improvements in authority practice, is a mechanism used to ensure public authority compliance with FOI legislation and good practice, and supports mitigation of relevant strategic and operational risks.

## Equalities impact

---

27. The format of the Self-Assessment Toolkit components – PDF and Word, particularly using a large number of tables and colour – may present a potential impact in the context of the Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations 2018 - specifically in relation to Modules 5 and 6 (the other modules are exempt by virtue of their date of publication).
28. This issue in relation to PDFs and other documents created after 23 September 2018 in general hosted on the Commissioner's website is noted in the relevant [accessibility statement](#). As noted in the statement, we are working to establish how our processes can

change in future to address this and will also ensure information is available by other means wherever possible.

29. No other specific equalities impact has been identified in relation to the toolkits. Equalities issues are addressed in individual modules as appropriate – for example, Module 3 includes a focus on providing advice and assistance to people who need additional support.

## **Privacy impact**

---

30. There is no direct privacy impact arising from this report.

## **Resources impact**

---

31. Self-Assessment Toolkit activity is delivered within existing planned resources.

## **Operational/ strategic plan impact**

---

32. Delivery and maintenance of the toolkit contributes to achievement of the Commissioner's strategic and operational plans, particularly in relation to improving authority performance, including the following strategic objectives as set out in the Strategic Plan 2020-2024:
- (i) enable and support high standards of FOI policy and practice (Strategic Aim 2)
  - (ii) develop Scottish public sector culture and practice where the proactive disclosure of information is routine and valued (Strategic Aim 3)
  - (iii) influence and support the development and strengthening of Scottish FOI law and practice (Strategic Aim 4)

## **Records management impact (including any key documents actions)**

---

33. No records management impacts arise from this report. The key documents comprising toolkit modules 1 – 4 are currently undergoing a planned internal review and revised versions will be submitted for approval by end of the financial year 2020-21.

## **Consultation and Communication**

---

34. This report will be published alongside the QSMTM minute.

## **Publication**

---

35. I recommend that this committee report is published in full.