

Operational Plan 2021-22

Scottish Information Commissioner



Introduction

This document sets out the Scottish Information Commissioner's operational plan for the period from 1 April 2021 to 31 March 2022. The operational plan explains how we will realise the Commissioner's vision and strategic objectives, 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 objectives

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 objective(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 Key Document C7 Performance and Quality Framework 2021-22.

Resources

The Commissioner's budget for 2021-22 is:

| | £ | £ |
|---------------------|-----------|------------------|
| Total staff costs | 1,649,535 | |
| Total running costs | 357,465 | |
| Total revenue costs | | 2,007,000 |
| Capital expenditure | | 23,000 |
| Total | | 2,030,000 |

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 are in place. 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. The impact of the COVID-19 pandemic has been taken account of 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 the 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 recommendations of the report, insofar as not resulting in action in the previous financial year continue to 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)
- Communications, Engagement and Policy (External) (CEP)
- 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

Commissioner/SIC Scottish Information Commissioner

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)

SMT: Senior Management Team



Human resource management

| BAU | | | | | Strategic Objective | | | | | | Priority | Lead Manager |
|----------|---|------------|------------|---------------------|---------------------|---|---|---|---|----------|--------------|--------------|
| Activity | Frequency | Start Date | End Date | Strategic Objective | | | | | | Priority | Lead Manager | |
| | | | | 1 | 2 | 3 | 4 | 5 | 6 | | | |
| 1 | Report to SMT on Performance & Development Framework | Annual | 01/04/2021 | 30/09/2021 | | | | | | X | H | HOCS |
| 2 | Learning & Development Plan 2021-22 (internal) | Annual | 01/04/2021 | 30/09/2021 | | | | | | X | H | HOCS |
| 3 | Review Human Resources Strategy | Annual | 01/04/2021 | 31/10/2021 | | | | | | X | M | HOCS |
| 4 | Apply & monitor Performance & Development Framework | | 01/04/2021 | 31/03/2022 | | | | | | X | H | HOCS |
| 5 | Carers Accreditation – monitoring and application | | 01/07/2021 | 31/03/2022 | | | | | | X | M | HOCS |
| 6 | Security & Vetting scheme- monitoring and application | | 01/04/2021 | 31/03/2022 | | | | | | X | H | HOCS |

| Project | | | | | Strategic Objective | | | | | | Priority | Lead Manager |
|----------|--|------------|---------------------|---|---------------------|---|---|---|----------|--------------|----------|--------------|
| Activity | Start Date | End Date | Strategic Objective | | | | | | Priority | Lead Manager | | |
| | | | 1 | 2 | 3 | 4 | 5 | 6 | | | | |
| 1 | Business continuity arrangements - COVID -19 pandemic – interim human resources policies and processes | 01/04/2021 | 31/03/2022 | | | | | | | X | H | HOCS |
| 2 | Business continuity arrangements - COVID -19 pandemic – re-opening of office premises - health and safety requirements, physical distancing and hygiene requirements | 01/04/2021 | 31/03/2022 | | | | | | | X | H | HOCS |
| 3 | Hybrid working – office premises and remote working | 01/04/2021 | 31/03/2022 | | | | | | | X | H | HOCS |
| 4 | Payroll service – review of arrangements and procurement of new service | 01/04/2021 | 30/09/2021 | | | | | | | X | H | HOCS |
| 5 | Equalities Monitoring and Reporting – staff – revised system | 01/04/2021 | 31/03/2022 | | | | | | | X | H | HOCS |
| 6 | Recruitment procedures – review and revision | 01/04/2021 | 30/09/2021 | | | | | | | X | H | HOCS |
| 7 | Induction procedures – review and revision | 01/04/2021 | 30/09/2021 | | | | | | | X | H | HOCS |
| 8 | Employee Handbook – review | 01/04/2021 | 31/10/2021 | | | | | | | X | H | HOCS |
| 9 | Carer Positive Scheme - Accreditation | 01/04/2021 | 30/06/2021 | | | | | | | X | M/H | HOCS |
| 10 | HR data base – replacement | 01/04/2021 | 31/03/2022 | | | | | | | X | H | HOCS |



Improving authority practice

| BAU | | | | | Strategic Objective | | | | | | Priority | Lead Manager |
|----------|--|------------|------------|---------------------|---------------------|---|---|---|---|----------|--------------|--------------|
| Activity | Frequency | Start Date | End Date | Strategic Objective | | | | | | Priority | Lead Manager | |
| | | | | 1 | 2 | 3 | 4 | 5 | 6 | | | |
| 1 | Prepare, deliver and report on programme of events and learning opportunities (on or offline) for FOI practitioners – prepare, deliver and report on | | 01/04/2021 | 31/03/2022 | | X | X | X | | X | H | HOPI |
| 2 | Public sector FOI practitioner peer support mechanisms and networks - support and develop | | 01/04/2021 | 31/03/2022 | | X | X | X | | | M | HOPI |
| 3 | Prepare and circulate learning points from decisions and interventions | Monthly | 01/04/2021 | 31/03/2022 | | X | X | X | | X | H | HOE/HOPI |
| 4 | Collaborate with/involve authority representatives to inform best practice | | 01/04/2021 | 31/03/2022 | | X | X | X | | X | M | HOPI |
| 5 | FOI/EIRs statistics portal data from public authorities - collect, collate and publish | Quarterly | 01/04/2021 | 31/03/2022 | X | | X | | | | S/H | HOPI |
| 6 | New public authorities - support to prepare for FOI duties | | 01/04/2021 | 31/03/2022 | | X | X | X | | | H | HOPI |
| 7 | Good practice resources, guidance and case studies for authorities – maintain, develop, promote, and report on use | | 01/04/2021 | 31/03/2022 | | X | X | X | X | X | H | HOPI |

| Project | | | | | Strategic Objective | | | | | | Priority | Lead Manager |
|----------|--|------------|---------------------|---|---------------------|---|---|---|----------|--------------|----------|--------------|
| Activity | Start Date | End Date | Strategic Objective | | | | | | Priority | Lead Manager | | |
| | | | 1 | 2 | 3 | 4 | 5 | 6 | | | | |
| 1 | Coronavirus (Scotland) Act - update authorities on changes to FOI law and promote guidance | 01/04/2021 | 31/03/2022 | | X | X | X | | | | H | HOPI |
| 2 | Researching FOI practitioner views and attitudes - develop and conduct model, including survey, for repeat use | 01/07/2021 | 31/12/2021 | | X | X | X | | X | | H | HOPI |
| 3 | Statistics Portal – implement recommendations from 2020-21 review | 01/04/2021 | 31/12/2021 | | X | | | | X | | M | HOPI |



Information and records management

| BAU | | | | | Strategic Objective | | | | | | 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 | | 01/04/2021 | 31/03/2022 | X | | X | | | X | S/H | HOCS |
| 2 | IRM assurance report to SMT | Annual | 01/04/2021 | 30/09/2022 | X | | X | | | X | S/H | HOCS |
| 3 | Maintenance of secure and reliable IT network | | 01/04/2021 | 31/03/2022 | | | | | | X | S/H | HOCS |
| 4 | Manage Key Documents as per the Review Programme | | 01/04/2021 | 31/03/2022 | X | X | X | | | X | H | HOCS |
| 5 | Monitor compliance with data protection legislation and the General Data Protection Regulation | | 01/04/2021 | 31/03/2022 | | | X | | | X | S | HOCS |
| 6 | UK GDPR/Data protection – SMT update | Quarterly | 01/04/2021 | 31/03/2022 | | | X | | | X | S | HOCS |
| 6 | Maintain a compliant publication scheme and guide to information | | 01/04/2021 | 31/03/2022 | X | | X | | X | X | H | HOCS |
| 7 | Commissioner's Publication Scheme - assurance report to SMT | | 01/01/2022 | 31/03/2022 | | | | | | X | S | HOCS |
| 8 | Monitor Commissioner's 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) | | 01/04/2021 | 31/03/2022 | | X | | | | X | S | HOCS |
| 9 | Monitor Commissioner's compliance in responding to SARs – compliance with statutory timescales, policy and procedures | | 01/04/2021 | 31/03/2022 | | | | | | X | S | HOCS |
| 10 | Cyber Resilience Action Plan – implement and monitor | | 01/10/2021 | 31/03/2022 | | | | | | X | H | HOCS |



| | Project Activity | Start Date | End Date | Strategic Objective | | | | | | Priority | Lead Manager |
|----|---|------------|------------|---------------------|---|---|---|---|---|----------|-----------------|
| | | | | 1 | 2 | 3 | 4 | 5 | 6 | | |
| 1 | Business continuity arrangements - COVID -19 pandemic – remote working – interim policies | 01/04/2021 | 31/03/2022 | | | | | X | X | H | HOCS |
| 2 | Secure file sharing platform – scope need and resource required | 01/04/2021 | 31/08/2021 | X | | | | | X | H | HOCS |
| 3 | Secure file sharing platform – procure | 31/08/2021 | 31/03/2022 | X | | | | | X | H | HOCS |
| 4 | Residual work to implement/update re: UK GDPR/data protection | 01/04/2021 | 31/03/2022 | X | | X | | X | X | S/H | HOCS |
| 5 | Digital and IT Strategy | 01/04/2021 | 31/03/2022 | | | | | | X | S/H | SIC / HOCS |
| 6 | Cyber Resilience Action Plan 2021-2022 | 01/04/2021 | 30/09/2021 | | | | | | X | H | HOCS |
| 7 | Cyber Essentials 2021-22 reaccreditation | 01/12/2021 | 31/03/2022 | | | | | | X | H | HOCS |
| 8 | Cyber Essentials Plus 2021-22 reaccreditation | 01/12/2021 | 31/03/2022 | | | | | | X | H | HOCS |
| 9 | Information requests and requests for reviews – review of procedures | 01/04/2021 | 31/03/2022 | | | | | X | X | H | HOE/HO CS |
| 10 | Information and Records Management (IRM) – revision of Records Management Plan | 01/04/2021 | 30/09/2021 | | X | | | | X | H | HOCS |
| 11 | IRM – consider and recommend way forward as regards review, retention and assurance | 01/04/2021 | 31/03/2022 | | X | | | | X | H | HOCS |
| 12 | IRM – Review and update File Plan and Retention Schedule | 01/04/2021 | 31/03/2022 | | X | | | | X | H | HOCS |
| 13 | Case Management System (CMS) - RFI/RFR/workflow | 01/04/2021 | 31/03/2022 | | X | | | | X | M/H | HOCS |
| 14 | CMS – SAR workflow | 01/04/2021 | 31/03/2022 | | X | | | | X | M/H | HOCS |
| 15 | CMS – access protection – approval processes | 01/04/2021 | 31/03/2022 | | X | | | | X | M/H | HOCS |
| 16 | Review of ACT | 01/04/2021 | 31/03/2022 | | X | | | | X | M/H | HOCS |



Planning and reporting

| | BAU | | | | | | | Priority | Lead Manager | | | |
|----|---|-----------------------|------------|------------|---------------------|---|---|----------|--------------|---|---|-------------|
| | Activity | Frequency | Start Date | End Date | Strategic Objective | | | | | | | |
| | | | | | 1 | 2 | 3 | | | 4 | 5 | 6 |
| 1 | Annual Report (AR) 2020-21: Statutory reporting and 3Es | Annual | 01/04/2021 | 31/10/2021 | | | | | | X | S | HOCS |
| 2 | AR 2020-21: Accountability Report and Financial Statements - ensure compliance with FReM, SPFM, prepare and obtain approval | Annual | 01/04/2021 | 31/10/2021 | | | | | | X | S | HOCS |
| 3 | AR 2020-21 Performance Report – ensure compliance with FReM, SPFM prepare and obtain approval | Annual | 01/04/2021 | 31/10/2021 | | | | | | X | S | HOPI / HOCS |
| 4 | AR 2020-21 Annual Statement of Assurance to SIC | Annual | 01/04/2021 | 31/10/2021 | X | X | X | | | X | H | HOCS |
| 5 | AR 2020-21 Auditor's Report – liaise with Auditor and Advisory Audit Board (AAB) | Annual | 01/07/2021 | 31/10/2021 | | | | | | X | H | HOCS |
| 6 | AR 2020-21 AAB meeting 2021 | Annual | 01/08/2021 | 30/09/2021 | | | | | | X | H | HOCS |
| 7 | Audit Planning Report – AR 2021-22 liaise with auditor and AAB | Annual | 01/10/2021 | 01/02/2022 | | | | | | X | H | HOCS |
| 8 | Performance and statistical reporting - operational | As set out in the GRA | 01/04/2021 | 31/03/2022 | X | X | X | | | X | S | HOCS |
| 9 | Manage and report on Enquiries Service | Six monthly | 01/04/2021 | 31/03/2022 | 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 | 01/04/2021 | 31/03/2022 | | | | | | X | S | HOCS |
| 11 | Operational Plan 2021-22 – monitor and report progress | Two monthly | 01/04/2021 | 31/03/2022 | X | X | X | | | X | H | SMT |
| 12 | Key Documents – reviews due and overdue reviews - monitor | Two Monthly | 01/04/2021 | 31/03/2022 | X | X | X | | | X | H | SMT |
| 13 | Operational Plan 2022-23 - coordinate and prepare | Annual | 01/01/2022 | 01/06/2022 | X | X | X | | | X | H | HOCS |
| 14 | Governance Reporting Arrangements (GRA) – | | 01/04/2021 | 31/03/2022 | X | X | X | | | X | H | HOCS/ |



Communications, Engagement and Policy (External)

| | BAU Activity | Frequency | Start Date | End Date | Strategic Objective | | | | | | Priority | Lead Manager |
|----|--|-------------|------------|------------|---------------------|---|---|---|---|---|----------|--------------|
| | | | | | 1 | 2 | 3 | 4 | 5 | 6 | | |
| 1 | Communications and engagement framework 2021 - 2024 - deliver and report on for 2021-22 | Annually | 01/04/2021 | 01/03/2022 | X | X | X | X | X | X | H | HOPI |
| 2 | News media - manage and maintain news media enquiry service and ongoing media engagement | | 01/04/2021 | 31/03/2022 | X | X | X | X | X | X | M | HOPI |
| 3 | News media - manage and maintain media monitoring service | | 01/04/2021 | 31/03/2022 | X | X | X | X | X | X | M | HOPI |
| 4 | Email newsletters - prepare, promote and circulate regularly and as required | | 01/04/2021 | 31/03/2022 | X | X | X | X | X | X | M | HOPI |
| 5 | Social media - monitor, maintain and develop in line with Communications Framework/as required | | 01/04/2021 | 31/03/2022 | X | X | X | X | X | X | M | HOPI |
| 6 | Events - support and participate in key relevant conferences/events | | 01/04/2021 | 31/03/2022 | X | X | X | X | X | X | L/M | HOPI |
| 7 | Events - deliver events to promote effective use of FOI rights (such as to civil society, MSPs and media) | | 01/04/2021 | 31/03/2022 | X | | | | | X | M | HOPI |
| 8 | Website – manage website support and development service | | 01/04/2021 | 31/03/2022 | X | X | X | X | | X | H | HOPI |
| 9 | Website - maintain and promote content, ensuring it is up to date and relevant, and reporting progress | Six monthly | 01/04/2021 | 31/03/2022 | X | X | X | X | X | X | H | HOPI |
| 10 | Website – maintain, develop and report on accessibility compliance via accessibility statements | | 01/04/2021 | 31/03/2022 | | | | | | X | S | HOPI |
| 11 | BSL Action plan 2019-2023 – implement and report on | Annually | 01/04/2021 | 31/03/2022 | X | X | X | X | | X | S | SMT |
| 12 | Annual report 2020-21 - coordinate design and promotion where required | Annually | 01/04/2020 | 31/09/2021 | | | | | | X | H | HOPI |
| 13 | Content and communications planning – maintain and implement, delivering communications campaigns on FOI as required | | 01/04/2021 | 31/03/2022 | X | X | X | X | X | X | M | HOPI |
| 14 | Research public awareness of FOI rights across society – including omnibus poll | Annually | 01/04/2021 | 31/12/2021 | X | | | | | X | H | HOPI |
| 15 | Collaborate with/involve people from identified target groups in our work, to ensure best practice | | 01/04/2021 | 31/03/2022 | X | | | | | X | M | HOPI |
| 16 | FOI Policy monitoring systems and policy positions – | | 01/04/2021 | 31/03/2022 | X | X | X | X | X | X | H | HOPI |



| | | | | | | | | | | | | |
|----|--|--|------------|------------|---|---|---|---|---|---|---|------|
| | maintain as required (includes parliamentary monitoring service) | | | | | | | | | | | |
| 17 | Key stakeholder relationships/ partnerships – maintain, develop and support as required | | 01/04/2021 | 31/03/2022 | X | X | X | X | X | X | M | HOPI |
| 18 | Legislative change and consultations - monitor and respond to relevant consultations / inform legislative change processes as required | | 01/04/2021 | 31/03/2022 | X | X | X | X | X | X | H | HOPI |

| | Project Activity | Start Date | End Date | Strategic Objective | | | | | | Priority | Lead Manager |
|----|--|------------|-----------------------------|---------------------|---|---|---|---|---|----------|--------------|
| | | | | 1 | 2 | 3 | 4 | 5 | 6 | | |
| 1 | Maintain Covid-19 information hub to ensure information available on relevant changes to FOI law | 01/04/2021 | 31/03/2022 | X | X | X | X | X | X | H/S | HOPI |
| 2 | Impact of Covid-19 on FOI – follow-up to 2020 Special Report | 01/06/2021 | 01/11/2021 | X | X | X | | X | X | H | HOPI |
| 3 | Review ‘Your Right to Know’ and related resources, text and approach | 01/08/2021 | 01/03/2022 | X | | | | | | H | HOPI |
| 4 | Promoting FOI awareness to young people project | 01/04/2021 | 31/03/2022 | X | | | | | X | H | HOPI |
| 5 | Social media – launch LinkedIn channel use to target FOI practitioners and specialists (including relevant updates to social media and other procedures) | 01/04/2021 | 30/06/2022 | X | X | X | | | X | M | HOPI |
| 6 | Website – consideration of website discovery findings | 01/04/2021 | 31/07/2022 | X | X | X | X | X | X | H | SMT / HOPI |
| 7 | Website – development and build of potential new website | 01/07/2021 | TBD | X | X | X | X | X | X | H | HOPI /HOCS |
| 8 | Active membership of International Conference of Information Commissioners’ Executive Committee | 01/04/2021 | End of tenure or 31/06/2021 | | | | | X | X | M | SIC |
| 9 | Engage as appropriate with Scottish Open Government Partnership | 01/04/2021 | 31/03/2022 | X | X | X | X | X | X | M | SIC |
| 10 | British Sign Language translation of two resources | 01/10/2021 | 30/02/2022 | X | | | | | X | S | HOPI |
| 11 | UN Convention on the Rights of the Child (Incorporation) (Scotland) Act - Research and prepare to implement any changes required | 01/05/2021 | 30/12/2021 | X | | | | | X | S | HOPI/ HOCS |



Quality Assurance

| BAU | | | | | Strategic Objective | | | | | | Priority | Lead Manager |
|----------|--|-------------|------------|---------------------|---------------------|---|---|---|---|----------|--------------|--------------|
| Activity | Frequency | Start Date | End Date | Strategic Objective | | | | | | Priority | Lead Manager | |
| | | | | 1 | 2 | 3 | 4 | 5 | 6 | | | |
| 1 | Compliments and complaints – record, analyse and report | Six monthly | 01/04/2021 | 31/03/2022 | | | | | | 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 | 01/04/2021 | 31/03/2022 | | 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 | 01/01/2022 | 31/03/2022 | | X | X | | X | X | S | HOE |
| 4 | Investigation targets and Key Performance Indicators - monitor and review to ensure appropriate and fit for purpose | Monthly | 01/04/2021 | 31/03/2022 | | | | | X | X | H | HOE |
| 5 | 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 | | 01/04/2021 | 31/03/2022 | X | X | X | | X | X | S/H | SMT |
| 6 | Communication targets and key performance indicators - monitor and review to ensure appropriate and fit for purpose | | 01/04/2021 | 31/03/2022 | X | X | X | X | X | X | H | HOPI |

| Project | | | | | Strategic Objective | | | | | | Priority | Lead Manager |
|----------|--|------------|---------------------|---|---------------------|---|---|---|----------|--------------|----------|--------------|
| Activity | Start Date | End Date | Strategic Objective | | | | | | Priority | Lead Manager | | |
| | | | 1 | 2 | 3 | 4 | 5 | 6 | | | | |
| 1 | Complaints Policy and Handbook – review to take account of revised Model complaints Scheme issued 31/01/2020 | 01/04/2021 | 31/07/2022 | | | | | | | X | H | HOCS |
| 2 | Unacceptable Actions Policy - review to take account of revised Model complaints Scheme issued | 01/04/2021 | 31/07/2022 | | | | | | | X | H | HOCS |



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|----------|--|------------|------------|--|---|---|--|---|---|---|----------|
| | 31/01/2020 | | | | | | | | | | |
| 3 | Interventions – develop monitoring and quality assurance mechanism | 01/10/2021 | 01/03/2022 | | X | X | | | X | H | HOPI |
| 4 | Review of procedures for handling requests for information | 01/04/2021 | 31/03/2022 | | X | X | | X | X | H | HOE/HOCS |
| 5 | Review of procedures for handling subject access requests | 01/04/2021 | 31/03/2022 | | X | X | | X | X | H | HOE/HOCS |



Regulation and Enforcement

| BAU | | | | | Strategic Objective | | | | | | Priority | Lead Manager |
|----------|--|------------|------------|------------|---------------------|---|---|---|---|---|----------|--------------|
| Activity | Frequency | Start Date | End Date | 1 | 2 | 3 | 4 | 5 | 6 | | | |
| 1 | Enforce FOI in line with Enforcement Policy | | 01/04/2021 | 31/03/2022 | | X | X | | X | | S | HOE |
| 2 | Register, validate, investigate and decide applications in line with approved procedures | Monthly | 01/04/2021 | 31/03/2022 | | X | | | X | | S | HOE |
| 3 | Monitor investigation and enforcement performance | Monthly | 01/04/2021 | 31/03/2022 | | | X | | | X | S/H | HOE |
| 4 | Report on investigation and enforcement performance | Quarterly | 01/04/2021 | 31/03/2022 | | 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 affected by other areas of law) and ensure that the legal advice is recorded and the record kept up to date | | 01/04/2021 | 31/03/2022 | | 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. | | 01/04/2021 | 31/03/2022 | | 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 | Quarterly | 01/04/2021 | 31/03/2022 | | X | X | X | | | S | HOPI |
| 8 | Interventions - report on intervention performance and publish updates on intervention activity | Quarterly | 01/04/2021 | 31/03/2022 | | X | | | | | S | HOPI |
| 9 | Publication schemes - manage and monitor notifications from new authorities re: compliance with publication scheme duty | | 01/04/2021 | 31/03/2022 | | | X | | X | | S | HOPI |
| 10 | Regulatory guidance for authorities – maintain and develop as required | | 01/04/2021 | 31/03/2022 | X | X | X | X | | | S | HOE |
| 11 | Maintain a list of bodies suitable for consideration for inclusion in Schedule 1 of FOISA or for | | 01/04/2021 | 31/03/2022 | | X | X | | | X | S | HOPI |



| | | | | | | | | | | | | | | | | | | | | |
|---|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|
| designation under Section 5 and report on proposed list to be submitted to the Scottish Ministers | | | | | | | | | | | | | | | | | | | | |
|---|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|

| | Project | Activity | Start Date | End Date | Strategic Objective | | | | | | Priority | Lead Manager |
|---|---------|---|------------|------------|---------------------|---|---|---|---|---|----------|--------------|
| | | | | | 1 | 2 | 3 | 4 | 5 | 6 | | |
| 1 | | Scottish Government intervention - assessment and report to Parliament | 01/04/2021 | 31/09/2021 | | X | | | X | | H | HOPI |
| 2 | | Review Investigations Handbook to ensure remain efficient in the light of the impact of the Covid-19 pandemic | 01/10/2021 | 31/12/2021 | | X | | | | X | H | HOE |



Resource management

| BAU | | | | | Strategic Objective | | | | | | Priority | Lead Manager |
|----------|--|--------------------------------|------------|------------|---------------------|---|---|---|---|---|----------|--------------|
| Activity | Frequency | Start Date | End Date | 1 | 2 | 3 | 4 | 5 | 6 | | | |
| 1 | Set and profile budget for 2022-23 | Annual | 01/06/2021 | 31/10/2021 | X | X | X | | X | | H | HOCS |
| 2 | Budget monitoring and control – 2021-22 | Quarterly | 01/04/2021 | 31/03/2022 | X | X | X | | X | | H | HOCS |
| 3 | Monitor and report on payment of invoices | Annual | 01/04/2021 | 31/03/2022 | X | X | X | | X | | H | HOCS |
| 4 | Workforce monitoring and planning | Annual | 01/04/2021 | 31/03/2022 | X | X | X | | X | | H | HOCS |
| 5 | Maintenance of premises | | 01/04/2021 | 31/03/2022 | | | | | | X | H | HOCS |
| 6 | Maintenance of remote working facilities | | 01/04/2021 | 31/03/2022 | | | | | | X | H | HOCS |
| 7 | Contracts – procurement and management (as required) – where HOCS/CST indicated as lead | As agreed in relevant contract | 01/04/2021 | 31/03/2022 | | | | | | X | H | HOCS |
| 8 | External provision of legal services: contract management | As agreed in contract | 01/04/2021 | 31/03/2022 | | | | | | X | H | HOE |
| 9 | Contracts relevant to policy and information – procurement and management (as required) where HOPI/P&I indicated as lead | As agreed in contracts | 01/04/2021 | 31/03/2022 | | | | | | X | H | HOPI |
| 10 | IT - replacement hardware – as per annual programme | | 01/04/2021 | 31/03/2022 | | | | | | X | H | HOCS |

| Project | | | | | Strategic Objective | | | | | | Priority | Lead Manager |
|----------|---|------------|------------|---|---------------------|---|---|---|---|---|----------|--------------|
| Activity | Start Date | End Date | 1 | 2 | 3 | 4 | 5 | 6 | | | | |
| 1 | Case management system – upgrade | 01/04/2021 | 31/03/2022 | | | | | | X | H | HOCS | |
| 2 | IT Support and Maintenance Contract – review arrangements (dependent on Digital and IT Strategy being put in place) | 01/04/2021 | 31/03/2022 | | | | | | X | H | HOCS | |
| 3 | Hybrid working – office working and remote working (following on from the impact of the COVID-19 pandemic) | 01/04/2021 | 31/03/2022 | | | | | | X | H | HOCS | |
| 4 | Procurement of legal services contract: issue tender | 01/04/2021 | 31/03/2022 | | | | | | X | H | HOE | |
| 5 | Website - renewal of current website supported | 01/04/2021 | 31/07/2022 | | | | | | X | H | HOPI / | |



Risk management

| BAU | | | | | Strategic Objective | | | | | | Priority | Lead Manager |
|-----|--|----------------------------|------------|------------|---------------------|----------------------------|----------------|------------|------------|---|----------|--------------|
| | Activity | Frequency | Start Date | End Date | 1 | 2 | 3 | 4 | 5 | 6 | | |
| | | | | | 1 | Review of operational risk | Every 2 months | 01/04/2021 | 31/03/2022 | X | | |
| 2 | Review of strategic risk | Quarterly | 01/04/2021 | 31/03/2022 | X | X | X | | X | X | H | SMT |
| 3 | Updating risk registers | Every 2 months / quarterly | 01/04/2021 | 31/03/2022 | X | X | X | | X | X | H | HOCS |
| 4 | Annual assessment and review of risk and report to SMT | Annual | 01/04/2021 | 31/10/2021 | X | X | X | | X | X | H | HOCS |
| 5 | Internal Audit Plan 2021-22 to 2023-24 – implementation and reports (see below for projects) | Annual | 01/04/2021 | 31/03/2022 | X | X | X | | X | X | H | HOCS |
| 6 | Business Continuity Plan – maintenance of plan and testing (as required) | | 01/04/2021 | 31/03/2022 | X | X | X | | X | X | H | HOCS |
| 7 | Health and Safety – reporting | Six monthly | 01/04/2021 | 31/03/2022 | X | X | X | | X | X | H | HOCS |
| 8 | Health and Safety – monitoring | Six Monthly | 01/04/2021 | 31/03/2022 | X | X | X | | X | X | H | SMT |
| 9 | AAB – reports on external and internal audits, risk policy and review of strategic risk | Annual | 01/04/2021 | 30/09/2022 | X | X | X | | X | X | H | HOCS |

| Project | | | | | Strategic Objective | | | | | | Priority | Lead Manager |
|---------|--|------------|------------|---|---|------------|------------|---|---|---|----------|--------------|
| | Activity | Start Date | End Date | 1 | 2 | 3 | 4 | 5 | 6 | | | |
| | | | | 1 | Business continuity arrangements - COVID -19 –office re-opening- health and safety, physical distancing and hygiene arrangements – management of risk | 01/04/2021 | 31/03/2022 | X | X | | | X |
| 2 | Internal audit – Governance and risk | 01/04/2021 | 31/03/2022 | X | X | X | X | X | X | H | HOCS | |
| 3 | Internal audit – UK GDPR and data protection compliance – external audit to assess implementation process and compliance | 01/04/2021 | 31/03/2022 | X | X | X | X | X | X | H | HOCS | |
| 4 | Health and safety audit | 01/04/2021 | 31/03/2022 | | | | | | 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 2021-22 v01 CURRENT ISSUE |
| VC No. | 152060 |
| Type | Plan |
| Approver | SMT |
| Responsible Manager | HOCS |
| Date of next planned review | N/A – new plan issued each year |
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| 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> |
| 28/05/21 | BOW | 01.00 | 01.01 | New document created following approval of draft |
| 28/05/21 | BOW | 01.01 | 01.02 | DCS updated, published on website |
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