

Report to:	QSMTM
Report by:	Erin Gray, Head of Policy and Information (HOPI)
Meeting Date:	12 May 2021
Subject/ Title: (and VC no)	2010-21 Communication Strategy Performance Report (VC149894)
Attached Papers (title and VC no)	Scottish Information Commissioner's Communication Strategy 2015-20 (VC127998)

Purpose of report

1. To provide the annual report of performance in 2020-2021 against the measures in the Scottish Information Commissioner's ('the Commissioner') Communication Strategy, in line with the Commissioner's governance reporting arrangements.

Recommendation and actions

2. It is recommended that:
 - (i) The Senior Management Team (SMT) notes the contents of this report
 - (ii) This report is published in full as set out in the publication section of this report.

Executive summary

3. This document reports on the Commissioner's progress during 2020-21 in relation to communication activity, measured against the four performance measures contained in the Commissioner's Communication Strategy 2015-2020 (as updated in November 2019).
4. Development of the Commissioner's 2021-2024 Communication & Engagement Framework is underway, initially delayed as a result of impact arising from the Covid-19 pandemic. In the interim, measures set out in the 2015-2020 Communications Strategy were used to measure and guide activity in this area across 2020-21.
5. A review of 2020-21 communications performance against these measures shows that three of the four were not met across the year. As set out in this document, however, it is clear that the impact of the pandemic was a significant factor in the failure to meet at least two of the measures.
6. As identified in the 2019-2020 report, the nature and focus of communications activity has changed since the Communications Strategy 2015-2020 was developed, and a number of essential tools (such as the website) have become less effective in their current form. As a result, the 2021-2024 Communications and Engagement Framework will take a new and updated approach, building on learning and refined requirements. It is intended this will include the development of an expanded and updated set of performance indicators to more effectively measure and enhance performance in this area.

2020-21 Performance: against 2015-20 strategy measures

Measures:		Status	Final performance
M1.	A minimum of 40% of all applications to be received via the online application portal	Not achieved in 2020/21	35%
M2.	A 20% increase by 2020 in the number of absolute unique website visits (from 54,000 to 64,800)	Not achieved in 2020/21	64,231 18.9% increase
M3.	Increase in number of annual impressions on Twitter (to 450,000 in 2020)	Not achieved in 2020/21	177,091 impressions
M4.	Increase in numbers of subscribers to emails	Achieved in 2020/21	356

Performance in detail

Measure 1: A minimum of 40% of all applications to be received via the online application portal

Performance against this measure

7. **35%** of all applications in 2020-21 were received through the online application portal. This represents a decline in proportion when compared to the preceding two years, as shown in the table below, though still an increase since 2017-18. As a result, this **measure was not achieved**.

Year	2017-18	2018-19	2019-20	2020-21
Percentage of applications via portal	26%	39%	38%	35%

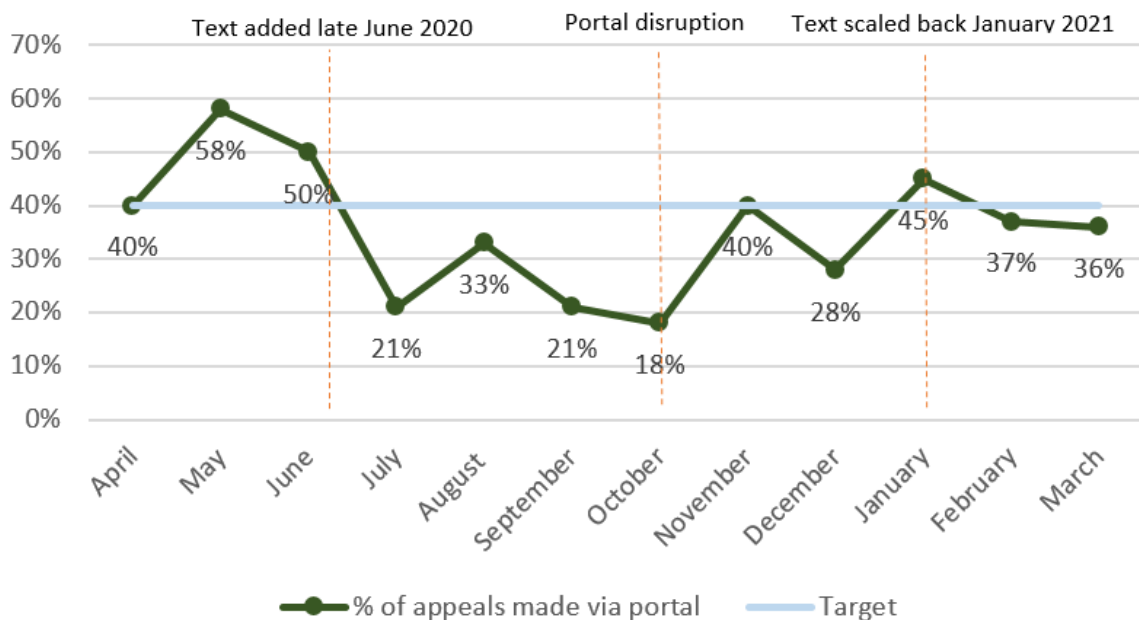
8. One of the objectives of the portal is to increase validity of applications. Appeals made via the portal have a consistently higher validity rate than those received through other routes, indicating that this objective is achieved. In 2020-2021, 84% of portal applications were valid, compared to 71% of applications via other methods. In the previous year (2019-20), 75% of applications received via the portal were valid, compared to 64% of applications received via other routes.

Factors affecting performance

9. Performance against this measure was significantly affected by the impact of the Covid-19 pandemic and, in particular, by changes to FOI response timescales introduced by the Scottish Parliament's emergency coronavirus legislation. In addition, performance was further affected by temporary technical problems during late September and early October 2020 which resulted in some portal submissions failing to transfer to WorkPro. In response, portal users were directed to submit appeals via email for a short period, to ensure these were appropriately received. It is likely that, were it not for the impact of these issues, this measure would have been achieved for the first time.
10. Under emergency coronavirus legislation, the Scottish Parliament temporarily extended the timescale within which authorities must respond to FOI requests and requests for review from 20 to 60 working days. This change applied to requests made between 7 April and 26 May 2020. The temporary extension of FOI timescales had a significant impact for the automated 'validity checks' which are built into the Commissioner's appeal portal, in that,

appeals which would be valid as a result of timescale extensions would be deemed invalid by the portal, when measured against 'normal' FOI timescales.

11. As a result, and to prevent applicants being incorrectly informed that an appeal was invalid, cautionary text was added to the appeal portal entry page during June 2020, directing requesters to guidance on the coronavirus legislation, and encouraging those who may be affected to submit appeals via another. It is likely that the relative (and unavoidable) complexity of the timescale guidance led to an increased proportion of applicants submitting appeals by other routes, regardless of whether or not their own appeal was affected, with applicants 'erring on the side of caution' rather than undertaking a process which subsequently may result in their appeal being incorrectly deemed 'out of time'.
12. In January 2021, the cautionary text on the appeal portal was revised and scaled back, on the basis that a significant proportion of appeals which would have been affected by the temporary amendment to timescales would have, by that point, been received by the Commissioner. The impact of the coronavirus cautionary text on applications via the appeal portal can be seen in the following table:



13. It is therefore anticipated that, had it not been for the temporary closure of the portal for technical reasons in October 2020, along with the addition of cautionary text to the portal entry page as a result of the pandemic, this measure would have been met or exceeded during 2020-21.

Promotion of the appeal portal

14. The appeal portal was promoted through the Commissioner's Twitter account across the year, issuing approximately 10 promotional tweets over the course of the 2020-21. It is considered however, that promotion via twitter will have limited impact on overall appeal volumes via the portal, as a result of individuals having to reach a certain point in their own FOI 'journey' before they will consider making an appeal. Circumstances where an individual both reaches that point and views a related tweet encouraging them to use the portal are likely to be rare.

15. Messaging around the value and benefit of making appeals via the portal is likely to be most effective where it can be communicated to individuals at the point where they are considering taking an FOI appeal forward. This will include, for example, within public authority response letters, or through appropriate guidance on the Commissioner’s website. Indeed, the impact of the wording of guidance on the Commissioner’s website on appeal routes can be clearly seen in the above table.

Communications activity under consideration for 2021-22:

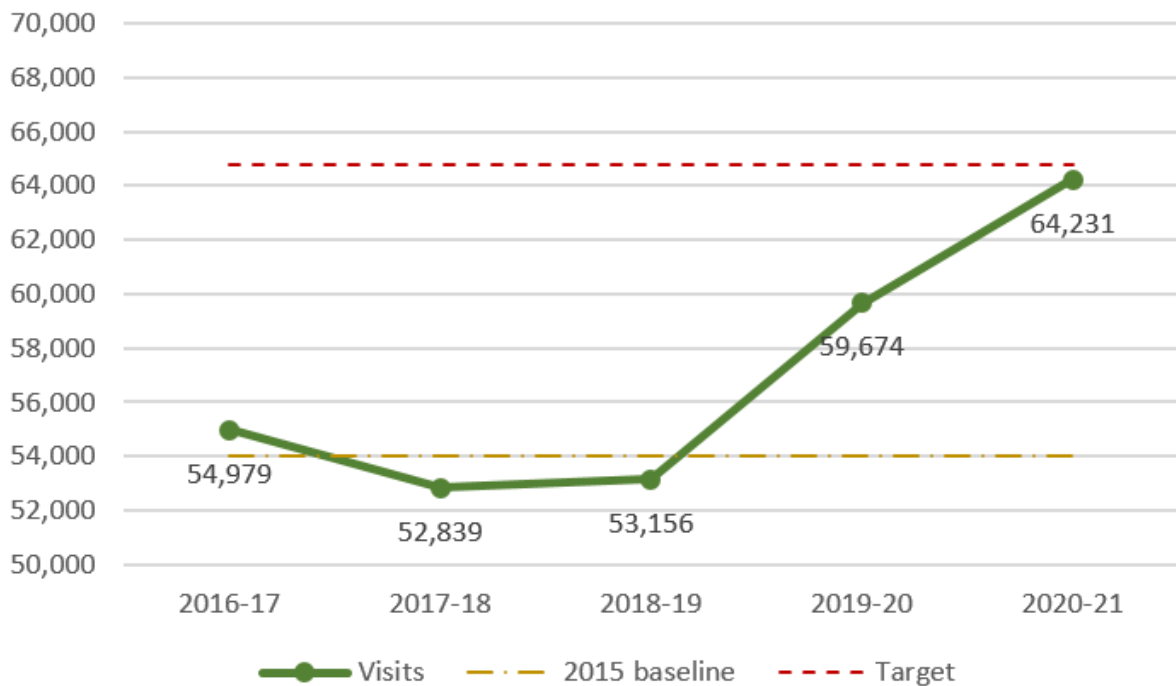
16. As a result of the limited impact that promotional communications and campaign activity will have on appeal routes, it is anticipated that this measure will be removed as a measure from the 2021-2024 Communications and Engagement Framework, which is currently being finalised. However, consideration will be given to the advice and guidance on the Commissioner’s website to ensure that individuals can be effectively directed towards the portal in all appropriate circumstances – and to ensuring that any future appeal portal development will ensure flexibility of timescale functions where possible.

Measure 2: A 20% increase in the number of absolute unique website visits (from 54,000 to 64,800)

Performance against this measure

17. This measure required a 20% increase in the number of absolute unique website visits from the 2015 baseline figure of 54,000, and as set out in the 2016-2020 Communications Strategy. This was not achieved within the lifespan of the 2016-2020 Communications Strategy, where, as reported last year, a 10.5% increase was achieved.
18. Over the course of 2020-21 this measure has also **not been achieved**. However, analytic data reported in Communications Monthly Dashboard (VC134937) shows that there has nevertheless been significant progress against this objective over the course of the year.
19. Data for 2020-21 shows that there were 64,231 absolute unique website visits over 2020-21, which represents a 18.9% increase on the 2015 baseline figure. While the objective has not been achieved, therefore, it is notable that there has been significant progress in recent months, with the 18.9% increase having been largely achieved since 2019-20, as the table and graph below show:

Year	2015 baseline	2016-17	2017-18	2018-19	2019-20	2020-21
Visits	54,000	54,979	52,839	53,156	59,674	64,231
% change against 2015 baseline		1.8% ↑	2.1% ↓	1.5% ↑	10.5% ↑	18.9% ↑



Factors affecting performance

20. During 2019-20, increases in traffic to the site across were attributed to a number of ‘events’ across the year, rather than a sustained, ongoing increase in user activity across all areas of our website. These events included recruitment, the Scottish Government intervention progress report and the publication of resources and guidance for registered social landlords.
21. During 2020-21, a similar range of short-term ‘events’ contributed to increases in website activity. 2020-21 events included the publication of guidance and resources in response to coronavirus emergency legislation, the second Scottish Government intervention progress report and the *Registered Social Landlords: One Year On* survey report. The launch of a new newsletter in December 2020 also helped to drive traffic to the website consistently and regularly.
22. In addition to these short-term events, many of our ‘core’ webpages also saw increases in activity across the last year. Visits to our homepage increasing by 6.6% when compared to 2019-20 for example, while visits to our briefings and guidance page increased by 20.7%, and the ‘Your Rights’ homepage by 13.0%. Of particular note were increases to the statistics portal homepage, which increased by 57.8% (likely as a result of the addition of RSLs), and the ‘Appealing to the Commissioner’ page, which saw visits increase by 82.5% on 2019-20.
23. As noted through the recent website discovery activity, however, the age and accessibility of the website will undoubtedly be impacting on user experiences. The dated structure, ‘busy’ display, remaining accessibility issues (set out in the [Commissioner’s accessibility statements](#)), lack of focus on user ‘journeys’ and issues with effective display on smartphones and tablets will all have a detrimental impact on user experiences. These issues are, however, being explored and addressed as part of the ongoing consideration of website development options.

Communications activity under consideration for 2021-22:

24. It is anticipated that the 2021-2024 Communications and Engagement Framework will contain a goal relating to significant increases in unique visits and pageviews across the lifespan of the framework, to guide any future development work.
25. The continued publication of monthly newsletters, promotion of dynamic content (including articles, FOI case studies, commentary, etc) and implementation of changes to respond to the findings of website discovery work will also drive improvements, traffic and enhance user experiences and engagement.

Measure 3: Increase in number of annual impressions on Twitter (to 450,000 in 2020)

Performance against this measure

26. Impressions are measured as the number of times posts on Twitter have been seen by other Twitter users. While the 2015-2020 impressions target was exceeded last year, with 502,600 annual impressions achieved in 2019-20, 2020-21 saw a significant drop in the number of impressions achieved, to 177,091. As a result, during 2020-21 this measure was **not achieved**.

	2019-20	2020-21
Twitter impressions:	502,600	177,091
Number of tweets issued:	338	154

Factors affecting performance

27. As can be seen from the table above, significantly fewer tweets were issued over the course of the year, with 54% fewer issued in 2020-21. A number of factors contributed to this reduction in Twitter activity, with these including:
 - (i) reduced staff capacity/activity as a result of the temporary office premises closure;
 - (ii) reduced interest and activity from authority stakeholders during initial period of pandemic disruption, as authorities closed offices and ways of working were disrupted
 - (iii) reduced resource and outputs within the P&I team as a result of staffing changes.
28. Each of these factors contributed to a reduced capacity and fewer opportunities to develop and issue tweets, along with less time to innovate in the development of twitter campaigns.
29. In addition, it is also worth noting that a single event significantly drove an increase in impressions in 2019-20, with the advertisement of a senior management team vacancy leading to 243,800 impressions during Q2 of that year. No equivalent event took place during 2020-21.
30. Other factors affecting performance will include tone, content types and understanding of the needs of audience groups on Twitter. Each of these will require further development in the coming year to increase engagement.

Communications activity under consideration for 2020-21:

31. Training on the development of engaging content for social media took place during 2020-21, and lessons learned will increasingly be put into effect as capacity allows.
32. The 2021-2024 Communications & Engagement Framework will aim to focus emphasis on engagement and interaction, as opposed to impressions, e.g. by focussing on engagement rate with Tweets (along with content on any other approved social medial channels utilised).

Measure 4: Increase in numbers of ‘subscribers’ to our emails

Performance

33. The Commissioner’s new ‘Open Update’ email newsletter and the associated development of a subscriber list launched in December 2020. Following the creation of service, the subscriber list has grown as follows:

	Dec 20	Jan 21	Feb 21	Mar 21
Number of subscribers:	221	No newsletter issued	318	356
% change from previous edition:	-		43.8% ↑	11.9% ↑

34. While, therefore, no specific target for an increase in subscribers has been set, the basic metric to increase our subscribers can be considered to have been **achieved** through the successful development and delivery of the newsletter and accompanying subscriber list.

Communications activity under consideration for 2020-21:

35. We plan to continue to issue 10-12 newsletters across the course of 2020-21, highlighting key areas of FOI policy, practice and guidance for recipients. We will use social media, the website, and engagement through networking, conferences and events to continue to promote the newsletter, and stimulate growth in subscriber numbers.
36. While the 2021-2024 Communications & Engagement Framework is still in development, we anticipate that this will include a target to grow subscriber numbers by a significant amount over the lifespan of the framework.

Risk impact

37. The risks associated with non-delivery of a communication strategy or framework are recognised in existing risk management frameworks, and relevant mitigations set out.
38. The development of a new Communications and Engagement Framework for 2021-24 takes in to account those issues not addressed as a result of the 2015-2020 Communications Strategy, and learning arising from this, as well as ensuring it will effectively support delivery of the Commissioner’s Strategic Plan 2020-2024.

Equalities impact

39. No new specific equalities impact identified by this report. The 2021-2024 Communications & Engagement Framework which is in development will consider any relevant equalities impacts.

Privacy impact

40. No new privacy impacts are identified or arising from this report (those relating to elements such as the new email newsletter service have been explored in the relevant development projects).

Resources impact

41. The resources for delivering the Communication Strategy are met through planned resources. There are no new impacts highlighted in this report which will not be addressed elsewhere (e.g. for future strategy or projects to be discussed further as Senior Management Team – such as potential new website).

Operational/ strategic plan impact

42. This report highlights a number of performance measures which have not been met. These measures impact on a number of elements of current operational and strategic plan components and performance must be addressed to ensure successful delivery in future – these issues are ‘known’ and relevant improvement activity is underway.
43. Evidence presented in this report has informed the development of the 2021-2024 Communications & Engagement Framework which is currently being finalised. This will address how communications performance relevant to new strategic and operational priorities will be improved where required, and how successes will be built upon.

Records management impact (including any key documents actions)

44. None identified.

Consultation and Communication

45. This report has been prepared in consultation with the relevant members of the Policy and Information Team, and communications performance data contained within it is considered each month in Policy and Information Team meetings.
46. This report will be published on the Commissioner’s website.

Publication

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