Communication Strategy 2015-20

Revised November 2019

Scottish Information
Commissioner

Contents

Glossary and abbreviations

Term used	Explanation
FOI	Freedom of information
FOISA	Freedom of Information (Scotland) Act 2002
EIRs	Environmental Information Regulations (Scotland) 2004

Introduction

1. This document sets out the strategic approach to deliver the external communication elements and activities which will contribute to the delivery of the Commissioner's Strategic Plan for the period 2016- 2020.

2. A limited review of this communication strategy will be undertaken each year following the review of the Commissioner's Strategic Plan, to ensure its aims and messages remain consistent with those of the organisation.

3. Our strategy and vision aim to add value to FOI by making its application more efficient and by identifying and realising the benefits access to information can contribute to society, transparency, requesters and authorities. This communication strategy supports this by:

   (i) ensuring our key messages reach appropriate stakeholders effectively and efficiently

   (ii) promoting engagement, through positive and responsive communications.

4. We already have strong, well-established communication and relationships with stakeholders. This strategy seeks to both build on the channels we already have in place, and develop relationships to improve engagement or fill existing communication gaps.

5. It provides an overview of both the core communication elements we will deliver and an overview of our plans to improve our communications to stakeholders.

Strategic Aims

6. Our communication activity will:

   (i) Deliver consistent, informative messages to our stakeholders about access to information in Scotland, good practice and the role of the Commissioner.

   (ii) Engage with stakeholders by listening, learning and working together productively.

   (iii) Demonstrate the benefits of FOI and the value we can add.

7. To achieve these aims we will plan our communications to ensure they:

   (i) Are specific and deliverable.

   (ii) Are targeted to the reach the people we want to receive them.

   (iii) Are made through appropriate and effective communication channels.

   (iv) Demonstrate that we are happy to share (our approach is to enable and support) and that we are listening.

8. Our communications:

   (i) Speak with authority: our messages are based on fact

   (ii) Set out what we know in plain language and in a consistent and accessible style

   (iii) Welcome the views and experiences of others

   (iv) Are purposeful and proportionate

   (v) Are firm and fair, collegiate, positive, informative and enabling.

Core Communication Elements

9. This section provides an overview of each of the core elements of our communication strategy:

    (i)   Key messages

    (ii)   Communication channels

    (iii)   Measures of success

Key messages

10. Our key *strategic* communication messages are:

    (i)   FOI continues to work well in Scotland, but there are significant benefits to be realised, particularly through: understanding its contribution to transparency; authorities achieving greater efficiency in handling requests (including responding on time) and investing in staff skills and advice and assistance for requesters.

    (ii)   Open authorities are trusted authorities.

    (iii)   Effective authorities are those whose leaders take a keen interest and lead by example.

    (iv)   FOI brings positive benefits, but they are not sufficiently widely understood.

    (v)   The scope of FOI law must be kept up to date.

    (vi)   The Commissioner is independent and impartial.

11. We will promote the following *specific* messages:

    (i)   There are minimum compliance standards for public authority FOI policy and practice, and authorities that achieve the greatest benefits from FOI are those that aim to exceed them.

    (ii)   Through FOI, openness and transparency may be achieved.

    (iii)   Requesters should use FOI rights effectively and responsibly.

    (iv)   How Scottish information law works in practice.

    (v)   The Commissioner works to ensure FOI law remains fit for purpose.

Audiences

12. We have five main audiences for our content:

    •   General public – potential and current users of FOI

    •   Voluntary organisations – potential and current users of FOI

    •   Media – potential and current users of FOI

    •   Practitioners/Public authorities (CEOs)

- Other stakeholders (politicians, or those in the media, academics and others interested in FOI)

13. During 2019-20 we will conduct consultation exercises to gather feedback from our various audiences, to help establish what communications work well and how our users want to hear about our work.

Audiences and communication channels

14. For each audience, we need to rely on different communications channels:

Audience	Channels
General public	Website Social media
Voluntary organisations	Website Social media Email/letter
Media	Website (news releases) Press enquiry service Social media Roadshows and events
Practitioners/Public authorities	Website (briefings/guidance) Email / letters Network groups Advisory group Conferences Roadshows and events Knowledge Hub
Wider stakeholders	Website Email/letter Social media

Website (all stakeholders)

15. The website continues to be our main communication channel to reach the widest possible audience. It is a cost-effective way to communicate and we can control its content and provide different areas for multiple user groups to go to. It provides access and signposting to easily digestible information for requesters and the general public as well as extensive resources, guidance and databases which all audiences can access.

16. Over the years, our statistics indicate a decline in numbers of users of the website (55,711 in 2014-5 to 53,156 in 2018-19) and *activity* while visitors were using the website (316,338 page views in 2014-15 to 248,520 in 2018-19).

17. We set a target to achieve a 20% increase in the number of annual unique website page views (from 54,000 to 64,800 in 2020). Although this looks unlikely to be met, we will retain this target until the end of the strategy in 2020. Our challenge remains to both attract more new visitors and to persuade more visitors to stay on our site and read more content, and we may need to conduct further analysis on the potential of the current website to attract more visitors.

18. We have previously used as a measure of success 'number of subscribers' to our website. We have ceased to encourage people to 'subscribe' to our website content, and therefore have removed this measure. Instead, we will monitor subscribers to our emails, once this service is procured (see below).

19. Evidence also shows that the greatest acquisition of new users to our site is consistently through search engine rather than by any other means. However, the numbers of those using direct links has risen from 12,702 in 2014-15 to 16,401 in 2018-19. This may be because we have users typing direct addresses of pages (e.g. via bookmarking/favouriting), clicking on social media posts or using short URL links to get to our website. These are people looking for very specific information rather than simply browsing.

20. In 2018-19, we conducted an in-house review internal audit of our website and updated a large amount of content, including our home page, to provide links to frequently visited pages. However, within the constraints of our current website structure and software, it is still a significant challenge to make our current website look uncluttered, be easily navigable and user-friendly for the modern web user. In 2019-20, we will commence the initial stages of procuring the necessary services to conduct a total refresh of our website, including meeting the latest accessibility requirements (WCAG 2.1).

Appeal portal

21. The Commissioner's online appeal portal allows the public to make appeals via the internet. The digital service is accessible via our website and allows the creation of new case files in our case management system. At the start, we anticipated that the new service would reduce the number of invalid applications received by approximately 20 – 25% in its first year.

22. Our target is to have a minimum of 40% of all applications received annually via the portal by 2020, and we are confidently moving towards this target, with 39% in 2018-19. We will retain this target.

23. Raising awareness of the online appeal portal has, and will continue to be, a communications priority throughout the life of this strategy.

Social media

24. Our primary audiences on social media range from the general public to voluntary organisations, to the media and other stakeholders. To a much lesser extent, practitioners use Twitter to receive our communications. Having previously had visibility on two social media channels (Facebook and Twitter), we have decided to focus our limited capacity on just one. Our Facebook account is now closed, but we will continue to build our Twitter audience.

25. Twitter allows us to:

    (i) Generate greater interest in FOI issues and our organisation.

    (ii) Communicate with and engage our audiences in "real time".

    (iii) Provide a greater range of content, suitable for a greater range of stakeholders.

    (iv) Build "followings": increasing the number of people who are interested in, and receive our communications.

26. We use the Twitter account to:

    (i)   Encourage readers to visit content on our website.

    (ii)   Give basic information and tips about FOI to requesters

    (iii)   Promote our publications and resources.

    (iv)   Share views on topical issues for example, the issue of consultation responses, highlights from keynote speeches.

    (v)   Create 'shareable' content, including graphics and videos, to encourage readers to "retweet", thus increasing our potential reach.

    (vi)   Share news from authoritative sources e.g., Scottish Parliament, ICO, academics, where relevant to our role or remit.

27. We will continue to maintain and build our engagement for our Twitter audiences based on our Twitter policy (VC64081).

28. In 2019-20, we will introduce a new target to increase the number of impressions on Twitter (to 450,000 in 2020).

Blog

29. In the previous edition of this strategy, we had committed to introducing a blog, which has not been completed. A blog would provide us with a public platform for opinion on a wide-range of FOI matters and allow us (and others) a space to discuss policy developments. It would also drive users to our website, increase our following on social media and allow us to reach out to a wider range of audiences such as MSPs, academics.

30. Although we have not yet done so, we remain committed to setting up a blog and will continue to explore how to do so in 2019-20.

Direct engagement

31. The primary audience for our direct engagement is practitioners and potential requesters, such as the media or voluntary organisations, who require a more bespoke approach.

Roadshows

32. In 2017-18, we ran the fourth consecutive programme of regional roadshows across the country, organising specific events for public authorities, civil society groups and local media. This is both an efficient way to reach local areas and it generates greater interest in FOI the area. In promoting these events, we will continue to target civil society groups representing people with protected characteristics.

33. For public authorities, we delivered a programme focused on learning and exchange of experience, reaching staff who do not usually get the opportunity to attend our events in the Central Belt. For civil society groups, we provided an interactive session, increasing awareness of FOI law, how to use it effectively and when it might be useful to them. Our local media sessions focussed on exchange of experience and sharing tips to increase effective use of FOI by journalists. 99% of participants rated the day 'excellent' or 'good'.

34. In 2018-19 and 2019-20, we suspended our roadshow activities in order to prepare for engaging Registered Social Landlords in 2019. We may consider starting the roadshows again in the future.

Conferences, meetings and events

35. Conferences, meetings and events are opportunities to share key messages with specific groups of stakeholders and to exchange views.

36. We will continue to organise and contribute to conferences. From 2015 onwards, we have provided direct support to two FOI conferences each year (and will continue to do so):

    (i) The Centre for Freedom of Information's May conference for FOI practitioners from public authorities. This full day event promotes exchange of learning and experience, with a very practical focus.

    (ii) Holyrood Conference's Annual FOI Conference. This commercial event attracts a wide range of participants, particularly from public authorities. We provide advice to the organisers on current developments and challenges to support their development of the programme.

37. We also provide presentations, on request, to other conferences and events. For example, the Commissioner has made several key note presentations to conferences, both in Scotland and internationally (such as the International Conference of Information Commissioners). We also provide ad hoc presentations to support civil society events, for example, the Scottish Environment LINK's FOI seminar.

38. We participate in relevant groups and attend associated meetings, such as the Open Government Forum and the Scottish Public Information Forum. We participate in other short-life working groups and professional events where we can contribute experience and knowledge.

39. We are implementing our British Sign Language Plan 2018-2023 to reach out to relevant communities.

40. While ideally we would like to be able to participate in all of the events to which we're invited, sometimes we have to decline. Our policy on speaking engagements sets out the considerations we may apply. During the life of this strategy we will review whether that policy could be further developed to increase our engagement with groups representing people with protected characteristics.

Public authority network groups

41. We will continue to offer support to sector representative groups of FOI practitioners (network groups). This support varies according to the needs of the different groups, and can broadly be defined as:

    (i) Sharing relevant FOI news and developments

    (ii) Learning from their experience of current issues and challenges, and working together to identify solutions

    (iii) Explaining decisions and the impact of those decisions for future practice

    (iv) Offering training on specific issues and responding positively to requests for training

    (v) Consulting FOI practitioners about our work and the guidance or other support they would find useful.

42. There are currently five network groups that meet regularly – NHS, Part 7 (Miscellaneous bodies), Local Government Network, Scottish Government FOI case-handlers and SOLAR FOI group. We will review whether more groups are needed over the course of this strategy.

43. Through a Standing Advisory Group of FOI Practitioners we will promote:

    (i)   The sharing of experience, issues and solutions across all public sector groups

    (ii)   Engagement in our own work, including assurance of the guidance and other resources we make available to public authorities

    (iii)   Involvement in the delivery of learning and development across all public authorities.

44. In 2016-17, we set up the Freedom of Information Forum on Knowledge Hub, the online public service community, to share news and learning with practitioners. It provides a way for practitioners to share knowledge and seek advice about good practice. At times it has been challenging to stimulate active discussion. We will review our engagement in Knowledge Hub in 2019-20.

Wider stakeholders

45. We have valuable external relationships with a wide range of individuals and organisations that are not subject to FOI, for example Parliamentarians, academics from other jurisdictions and international commissioners.

46. It is important that we maintain regular communication with those stakeholders, keeping them updated about our work and promoting exchange of ideas. We will:

    (i)   Make specific efforts to encourage wider stakeholders to subscribe to relevant updates on our website (and ensure that we provide relevant content to maintain their interest).

    (ii)   Provide briefings on current issues where appropriate, for example, to Parliamentary committees.

    (iii)   Respond to relevant consultations, and promote our responses via twitter.

Group written communications

47. Note: This element of the strategy applies only to group written communications, i.e. communications such as news and updates that we issue to multiple stakeholders through mailing or subscription lists. It does not apply to routine correspondence in other areas of business, e.g. investigations, interventions and other enforcement work. The primary audience for our group written communications is practitioners and potential requesters, who require a more bespoke approach.

Email

48. For most of our practitioner audiences, email is the preferred medium of contact. We will develop a strategic approach to ensure that public authorities and other key stakeholders are kept up to date with important FOI developments in legislation and practice, whether or not we have regular contact with them. For example, since 2012, we have been sending regular 'Decisions Round-Up' (DRU) emails to practitioners, informing them of any lessons learned from the latest decisions, which has had good uptake and feedback.

49. In 2019-20, we will gather feedback from regular readers of the DRU and use this to inform a new product that continues to provide public authority practitioners with what they need and want, to improve authority practice and practitioner learning.

50. In the past, we have relied on a range of strategies to contact stakeholders, from personalised letters to mail merged emails. Most recently, we have used proprietary email software to gather metrics about the number of emails opened and forwarded by recipients. This data indicates very variable uptake.

51. For this reason, where we have sent communications to any group or group of stakeholders:

    (i)   We used an email service which provides read receipts.

    (ii)   Where our email service communications failed to reach recipients, we checked we had correct contact details and explore any technical problems with the system we were using.

    (iii)   We monitored the efficacy of our group email communications and implemented appropriate changes to increase our efficiency.

52. It has become clear that we need a better email campaign system that enables us to provide an improved functionality, more sophisticated metrics and a more professional 'look and feel' for our emails to better monitor uptake and efficacy of our email communications. This will provide us with a more effective measure of success of our email communications than simply 'read receipts'. For this reason, in 2019-20, we have removed the 'read receipt' target in the strategy and will replace it with something else.

Letters

53. For a small group of stakeholders, email is not appropriate and only posted letters will be effective. For example, we do not have email contact details for a substantial proportion of publicly owned companies, so we will continue to use posted letters for this group. We follow up undelivered mail and monitor efficacy as for emails (above).

Other formats

54. We will consult organisations representing groups with protected characteristics to assess the need for written communications to be provided in alternative formats, for example, under our commitments in our BSL plan.

Special Reports/Annual Reports

55. The Commissioner laid two special reports before the Scottish Parliament in 2014-15 (on failure to respond and extension of FOI law). We laid a further special report in 2016-17 (on proactive publication). This is in addition to our Annual Reports. These reports provide a very specific way to raise awareness of issues with a range of audiences. While the primary audience for these reports is Parliamentarians, it is important that we promote them widely. We will therefore continue to use relevant channels to alert stakeholders to the publication of special reports and the key points.

56. In addition, our experience suggests that to maximise the value of special reports, we must issue updates following special reports to build and sustain interest in the issues covered. For example, for the failure to respond report, our reporting progress both mid-year and again in the annual report has impacted positively on the incidence of the problem. We will therefore include future updates on special reports in our communication planning and will promote these via our website and Twitter account.

Printed materials

57. While demand for printed materials has declined, we will continue to respond positively to requests for paper copies of *Your Right to Know,* our *Annual Report*, website pages and downloadable documents from our Guide to Information.

58. We currently provide translated copies of a summary of *Your Right to Know* in community languages. We will consult organisations representing groups with protected characteristics to assess whether we should provide additional materials in these, or alternative, languages.

Press service

59. The Policy and Information Team provides the Commissioner's press service, responding to journalists' enquiries, providing comment where required, preparing and issuing press releases. We also provide training to local news groups on effective use of FOI.

60. Our press service continues to be regularly used and the independence and impartiality of the Commissioner is widely accepted.

61. To maintain and strengthen the current press service we will:

    (i)   Develop and implement press service procedures, including approvals and document management for:

    - Press releases

    - Press statements

    - Communications handling plans

    (ii)   Update the media resources on our website

    (iii)   Update our media contact lists.

Measures of success

62. The indicators for success are, by 31 March 2020, to achieve and maintain:

    (i)   A minimum of 40% of all applications received annually to be made via the online application portal.

    (ii)   20% increase in the number of annual unique website page views (from 54,000 to 64,800)

    (iii)   Increase in number of annual impressions on Twitter (to 450,000 in 2020)

    (iv)   Increase in numbers of 'subscribers' to our emails – to be added in 2019-20 once email service established

63. These measures will be reviewed annually to ensure they remain both challenging and achievable.

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