

# Operational Plan 2023-24

Scottish Information Commissioner





## Introduction

This document sets out the Scottish Information Commissioner's operational plan for the period from 1 April 2023 to 31 March 2024. 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. And are 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 2023-24.



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 Documents C7 Performance and Quality Framework 2023-24 and C1 Governance Reporting Arrangements.

## Resources

---

The Commissioner's budget for 2023-24 is:

|                     | £         | £                |
|---------------------|-----------|------------------|
| Total staff costs   | 1,850,000 |                  |
| Total running costs | 166,000   |                  |
| Total revenue costs |           | 2,213,000        |
| Capital expenditure |           | 19,000           |
| <b>Total</b>        |           | <b>2,232,000</b> |

The following matters have been taken into account when preparing the draft Operational Plan 2023-24:

- how we can achieve strategic priorities in 2023-24 - what can we achieve, how can we deliver strategic priorities
- workforce capacity, planning, deployment and wellbeing
- quality, efficiency, effectiveness and response/s to changing demands
- our resources - workforce, property and digital
- sustainability in our operational work

### COVID-19 pandemic

Our priority as an organisation has been to continue to provide key services and guidance within available resource while safeguarding the health, safety and wellbeing of our members of staff.

The office premises re-opened on 3 May 2022 and a hybrid working trial is taking place.



## 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      | 01/04/2023 | 31/10/2024          |                     |   |   |   |   | X        | H            | HOCS                                |
| 2        | Learning & Development Plan 2023-24 (internal)        | Annual      | 01/04/2023 | 31/10/2023          |                     |   |   |   |   | X        | H            | HOCS                                |
| 3        | Review Human Resources Strategy                       | Annual      | 01/04/2023 | 31/10/2023          |                     |   |   |   |   | X        | M            | HOCS                                |
| 4        | Apply & monitor Performance & Development Framework   |             | 01/04/2023 | 31/03/2024          |                     |   |   |   |   | X        | H            | HOCS                                |
| 5        | Security & Vetting scheme- monitoring and application |             | 01/04/2023 | 31/03/2024          |                     |   |   |   |   | X        | H            | HOCS                                |
| 6        | Recruitment – planned and approved                    | As approved | 01/04/2023 | 31/03/2024          |                     |   |   |   |   | X        | H            | HOCS                                |
| 7        | Workforce Plan – monitoring                           | Quarterly   | 01/04/2023 | 31/03/2024          |                     |   |   |   |   | X        | H            | Commissioner<br>HOCS<br>HOE<br>HOPI |

| 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 - review interim human resources policies and processes                  | 01/04/2023 | 31/03/2024          |   |                     |   |   |   |          | X            | H        | HOCS         |
| 2        | Hybrid working – office premises and remote working – human resources policies and processes | 01/04/2023 | 31/03/2024          |   |                     |   |   |   |          | X            | H        | HOCS         |
| 3        | Workforce Plan – departmental review project (in accordance with Human Resources Strategy)   | 01/04/2023 | 31/03/2024          |   |                     |   |   |   |          | X            | H        | HOCS         |
| 4        | Workforce Plan – departmental review project (in accordance with Human Resources Strategy)   | 01/04/2023 | 31/03/2024          |   |                     |   |   |   |          | X            | H        | HOE          |
| 5        | Workforce Plan – departmental review project (in accordance with Human Resources Strategy)   | 01/04/2023 | 31/03/2024          |   |                     |   |   |   |          | X            | H        | HOPI         |
| 6        | Review recruitment costs 2022-23   | 01/04/2023 | 31/10/2023          |   |                     |   |   |   |          | X            | M        | HOCS         |



|           |  |            |            |  |  |  |  |  |   |   |      |
|-----------|--|------------|------------|--|--|--|--|--|---|---|------|
| <b>7</b>  | HR data base – replacement   | 01/04/2023 | 31/03/2024 |  |  |  |  |  | X | H | HOCS |
| <b>8</b>  | Review – Employee Handbook   | 01/04/2023 | 30/06/2024 |  |  |  |  |  | X | H | HOCS |
| <b>9</b>  | Review security vetting procedures   | 01/04/2023 | 30/09/2023 |  |  |  |  |  | X | M | HOCS |
| <b>10</b> | Pandemic policies – general (overarching) – in connection with business continuity | 01/04/2023 | 30/09/2023 |  |  |  |  |  | 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 |            | 01/04/2023 | 31/03/2024          |                     | X | X | X |   | X        | H            | HOPI         |
| 2        | Public sector FOI practitioner peer support mechanisms and networks - support and develop  |            | 01/04/2023 | 31/03/2024          |                     | X | X | X |   |          | M            | HOPI         |
| 3        | Prepare and circulate learning points from decisions   | Monthly    | 01/04/2023 | 31/03/2024          |                     | X | X | X |   | X        | H            | HOE          |
| 4        | Collaborate with/involve authority representatives to inform best practice   |            | 01/04/2023 | 31/03/2024          |                     | X | X | X |   | X        | M            | HOPI         |
| 5        | FOI/EIRs statistics portal data from public authorities - collect, collate and publish   | Quarterly  | 01/04/2023 | 31/03/2024          | X                   |   | X |   |   |          | S/H          | HOPI         |
| 6        | New public authorities - support to prepare for FOI duties   |            | 01/04/2023 | 31/03/2024          |                     | X | X | X |   |          | H            | HOPI         |
| 7        | Good practice resources, guidance and case studies for authorities – maintain, develop, promote, and report on use                                   |            | 01/04/2023 | 31/03/2024          |                     | 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        | Statistics Portal – review and develop new collection and dissemination method.            | 01/04/2023 | 31/03/2024          |   | X                   |   |   |   |          | X            | M        | HOPI         |
| 2        | Research, design and pilot bitesize online webinars for practitioners.                     | 01/04/2023 | 31/03/2024          |   | x                   | x | x |   |          |              | M        | HOPI         |
| 3        | Establish network group for Further/Higher Education                                       | 01/04/2023 | 31/03/2024          |   | x                   | x | x |   |          |              | M        | HOPI         |
| 4        | Review and refine current self-assessment toolkits – pilot with section 14                 | 01/04/2023 | 31/03/2024          |   | x                   | x | x | x | x        |              | M        | HOPI         |
| 5        | SIC to engage directly with senior staff of public authorities - roadshows/webinar/podcast | 01/04/2023 | 01/10/2023          | x | x                   | 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  |            | 01/04/2023 | 31/03/2024 | X                   |   | X |   |   | X | S/H      | HOCS         |
| 2        | IRM assurance report to SMT   | Annual     | 01/04/2023 | 30/09/2023 | X                   |   | X |   |   | X | S/H      | HOCS         |
| 3        | Maintenance of secure and reliable IT network   |            | 01/04/2023 | 31/03/2024 |                     |   |   |   |   | X | S/H      | HOCS         |
| 4        | Manage Key Documents as per the Review Programme  |            | 01/04/2023 | 31/03/2024 | X                   | X | X |   |   | X | H        | HOCS         |
| 5        | Monitor compliance with data protection legislation and the UK General Data Protection Regulation   |            | 01/04/2023 | 31/03/2024 |                     |   | X |   |   | X | S        | HOCS         |
| 6        | UK GDPR/Data protection – SMT update  | Quarterly  | 01/04/2023 | 31/03/2024 |                     |   | X |   |   | X | S        | HOCS         |
| 7        | Maintain a compliant publication scheme and guide to information  |            | 01/04/2023 | 31/03/2024 | X                   |   | X |   | X | X | H        | HOCS         |
| 8        | Commissioner's Publication Scheme - assurance report to SMT   |            | 01/01/2023 | 31/03/2024 |                     |   |   |   |   | X | S        | HOCS         |
| 9        | Monitor Commissioner's compliance in responding to RFIs and reviews – compliance with statutory timescales, policy and procedures and quality assurance |            | 01/04/2023 | 31/03/2024 |                     | X |   |   |   | X | S        | HOCS         |
| 10       | Monitor Commissioner's compliance in responding to SARs – compliance with statutory timescales, policy and procedures                                   |            | 01/04/2023 | 31/03/2024 |                     |   |   |   |   | X | S        | HOCS         |



|    | Project<br>Activity  | Start Date | End Date   | Strategic Objective |   |   |   |   |   | Priority | Lead<br>Manager |
|----|--|------------|------------|---------------------|---|---|---|---|---|----------|-----------------|
|    |  |            |            | 1                   | 2 | 3 | 4 | 5 | 6 |          |                 |
|    |  |            |            |                     |   |   |   |   |   |          |                 |
| 1  | Business continuity --hybrid working – interim policies  | 01/04/2023 | 31/03/2024 |                     |   |   |   | X | X | H        | HOCS            |
| 2  | Virtual Cabinet – upgrade  | 01/04/2023 | 31/03/2024 | X                   |   | X |   | X | X | S/H      | HOCS            |
| 3  | Digital and IT Strategy  | 01/04/2023 | 31/03/2024 |                     |   |   |   |   | X | S/H      | SIC /<br>HOCS   |
| 4  | Information and Records Management (IRM) – consider and recommend way forward as regards review, retention and assurance | 01/04/2023 | 31/03/2024 |                     | X |   |   |   | X | H        | HOCS            |
| 5  | IRM – review and update File Plan  | 01/04/2023 | 31/03/2024 |                     | X |   |   |   | X | H        | HOCS            |
| 6  | IRM – review and update Retention Schedule   | 01/04/2023 | 31/03/2024 |                     | X |   |   |   | X | H        | HOCS            |
| 7  | Data Protection Policy and Handbook – review   | 01/04/2023 | 31/03/2024 |                     |   |   |   |   |   |          |                 |
| 8  | Case Management System (CMS) - RFI/RFR/workflow  | 01/04/2023 | 31/03/2024 |                     | X |   |   |   | X | M/H      | HOCS            |
| 9  | CMS – SAR workflow   | 01/04/2023 | 31/03/2024 |                     | X |   |   |   | X | M/H      | HOCS            |
| 10 | CMS – access protection – approval processes   | 01/04/2023 | 31/03/2024 |                     | X |   |   |   | X | M/H      | HOCS            |
| 11 | Website Manual – approval by SMT   | 01/04/2023 | 31/07/2023 |                     | X | X | X | X | X | H        | HOPI            |



## 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) 2022-23: Statutory reporting and 3Es   | Annual                | 01/04/2023 | 31/12/2024 |                     |   |   |          |              | X | S | HOCS        |
| 2  | AR 2022-23: Accountability Report and Financial Statements - ensure compliance with FReM, SPFM, prepare and obtain approval   | Annual                | 01/04/2023 | 31/12/2024 |                     |   |   |          |              | X | S | HOCS        |
| 3  | AR 2022-23: Performance Report – ensure compliance with FReM, SPFM prepare and obtain approval  | Annual                | 01/04/2023 | 31/12/2024 |                     |   |   |          |              | X | S | HOPI / HOCS |
| 4  | AR 2022-23: Annual Statement of Assurance to Commissioner   | Annual                | 01/04/2023 | 31/10/2023 | X                   | X | X |          |              | X | H | HOCS        |
| 5  | AR 2022-23: Auditor's Report – liaise with Auditor and Advisory Audit Board (AAB)   | Annual                | 01/04/2023 | 31/12/2024 |                     |   |   |          |              | X | H | HOCS        |
| 6  | AR 2022-23: AAB meeting 2023  | Annual                | 01/08/2023 | 31/12/2024 |                     |   |   |          |              | X | H | HOCS        |
| 7  | Audit Planning Report – AR 2022-23 liaise with auditor and AAB  | Annual                | 01/08/2023 | 31/10/2024 |                     |   |   |          |              | X | H | HOCS        |
| 8  | Performance and statistical reporting operational (relating to finance, payment of invoices, requests for information, subject access requests, equalities monitoring, sickness absence, workforce trends, performance and development framework) | As set out in the GRA | 01/04/2023 | 31/03/2024 | X                   | X | X |          |              | X | S | HOCS        |
| 9  | Manage and report on Enquiries Service  | Six monthly           | 01/04/2023 | 31/03/2024 | 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                | 01/04/2023 | 31/03/2024 |                     |   |   |          |              | X | S | HOCS        |
| 11 | Operational Plan 2023-24 – monitor and report progress  | Two monthly           | 01/04/2023 | 31/03/2024 | X                   | X | X |          |              | X | H | SMT         |
| 12 | Key Documents – reviews due and overdue reviews - monitor   | Two Monthly           | 01/04/2023 | 31/03/2024 | X                   | X | X |          |              | X | H | SMT         |
| 13 | Operational Plan 2024-25 - coordinate and prepare   | Annual                | 01/01/2024 | 30/06/2024 | X                   | X | X |          |              | X | H | HOCS        |



|    |  |             |            |            |   |   |   |   |   |   |   |                       |
|----|--|-------------|------------|------------|---|---|---|---|---|---|---|-----------------------|
| 14 | Governance Reporting Arrangements (GRA) – reporting against cycle  |             | 01/04/2023 | 31/03/2024 | X | X | X |   |   | X | H | HOCS/<br>HOPI/<br>HOE |
| 15 | GRA - compliance report to SMT   | Annual      | 01/04/2023 | 31/03/2024 | X | X | X |   |   | X | H | HOCS                  |
| 16 | Case Management System (CMS) – reporting (manual and automatic) for IPM/end of year Enforcement statistics | Monthly     | 01/04/2023 | 31/03/2024 |   |   |   |   |   | X | M | HOCS                  |
| 17 | Prescribed Persons (Reports on Disclosure of Information) Regulations 2017                                 | Annual      | 01/04/2023 | 31/08/2023 |   |   |   |   |   | X | S | HOE                   |
| 18 | Report on biodiversity (as required by the Nature Conservation (Scotland) Act 2004)                        | As required | 01/04/2023 | 31/03/2024 |   |   |   |   |   | X | S | HOCS                  |
| 19 | Sustainable Development - monitor and report on carbon footprint   | Annual      | 01/04/2023 | 31/03/2024 |   |   |   |   |   | X | S | HOCS                  |
| 20 | C2 British Sign Language (BSL) Plan 2018-2023 – reporting  | Annual      | 01/04/2023 | 31/12/2023 | 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        | Business continuity –enquiries - interim revised arrangements and reporting procedures | 01/04/2023 | 31/03/2024          |   |   |   |   | X | X        |              | H | HOCS    |
| 2        | Enquiries procedures – review of outcome codes and assurance reporting                 | 01/04/2023 | 31/03/2024          | X | X | X |   | X | X        |              | H | HOCS    |
| 3        | Equalities Monitoring and Reporting – service users - revised system                   | 01/04/2023 | 31/03/2024          |   |   |   |   | X | X        |              | H | HOCS    |
| 4        | CMS – review of in-house reporting   | 01/04/2023 | 31/03/2024          |   |   |   |   | X | X        |              | H | HOCS    |
| 5        | Strategic Plan 2024-2028   | 01/04/2023 | 31/10/2024          | x | x | x | x | x | x        |              | H | SIC/SMT |



## Communications, Engagement and Policy (External)

|    | BAU<br>Activity   | Frequency | Start Date | End Date   | Strategic Objective |   |   |   |   |   | Priority | Lead Manager |
|----|---|-----------|------------|------------|---------------------|---|---|---|---|---|----------|--------------|
|    |   |           |            |            | 1                   | 2 | 3 | 4 | 5 | 6 |          |              |
| 1  | Communications and engagement framework 2021 - 2024 - report on for 2023-24   | Annually  | 01/04/2023 | 31/03/2024 | X                   | X | X | X | X | X | H        | HOPI         |
| 2  | News media - manage and maintain news media enquiry service and ongoing media engagement                              |           | 01/04/2023 | 31/03/2024 | X                   | X | X | X | X | X | M        | HOPI         |
| 3  | News media - manage and maintain media monitoring service   |           | 01/04/2023 | 31/03/2024 | X                   | X | X | X | X | X | M        | HOPI         |
| 4  | Email newsletters - prepare, promote and circulate regularly and as required  | Bimonthly | 01/04/2023 | 31/03/2024 | X                   | X | X | X | X | X | M        | HOPI         |
| 5  | Social media - monitor, maintain and develop in line with Communications Framework/as required                        |           | 01/04/2023 | 31/03/2024 | X                   | X | X | X | X | X | M        | HOPI         |
| 6  | Events - support and participate in key relevant conferences/events   |           | 01/04/2023 | 31/03/2024 | 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)             |           | 01/04/2023 | 31/03/2024 | X                   |   |   |   |   | X | M        | HOPI         |
| 8  | Website – manage website support and development service  |           | 01/04/2023 | 31/03/2024 | X                   | X | X | X |   | X | H        | HOPI         |
| 9  | Website - maintain and promote content, ensuring it is up to date and relevant, and reporting progress                | Quarterly | 01/04/2023 | 31/03/2024 | X                   | X | X | X | X | X | H        | HOPI         |
| 10 | Website – maintain, develop and report on accessibility compliance via accessibility statements                       |           | 01/04/2023 | 31/03/2024 |                     |   |   |   |   | X | S        | HOPI         |
| 11 | BSL Action plan 2019-2023 – implement   |           | 01/04/2023 | 31/03/2024 | X                   | X | X | X |   | X | S        | SMT          |
| 12 | Annual report 2022-23 - coordinate design and promotion where required  | Annually  | 01/04/2023 | 30/09/2023 |                     |   |   |   |   | X | H        | HOPI         |
| 13 | Content and communications planning – maintain and implement, delivering communications campaigns on FOI as required  |           | 01/04/2023 | 31/03/2024 | X                   | X | X | X | X | X | M        | HOPI         |
| 14 | FOI Policy monitoring systems and policy positions – maintain as required (includes parliamentary monitoring service) |           | 01/04/2023 | 31/03/2024 | X                   | X | X | X | X | X | H        | HOPI         |
| 15 | Key stakeholder relationships/ partnerships – maintain, develop and support as required                               |           | 01/04/2023 | 31/03/2024 | X                   | X | X | X | X | X | M        | HOPI         |



|           |   |  |            |            |   |   |   |   |   |   |   |      |
|-----------|---|--|------------|------------|---|---|---|---|---|---|---|------|
| <b>16</b> | Input to Legislative change and consultations - monitor and respond to relevant consultations / inform legislative change processes as required |  | 01/04/2023 | 31/03/2024 | 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 |          |              |      |
| <b>1</b> | Review 'Your Right to Know' and related resources, text and approach |            |            | X                   |   |   |   |   |   |          | H            | HOPI |
| <b>2</b> | Promoting FOI awareness to young people project                      | 01/10/2022 | 31/03/2024 | X                   |   |   |   |   |   | X        | H            | HOPI |
| <b>3</b> | LinkedIn Account- scope and research                                 | 01/04/2023 | 31/03/2024 | x                   | x | x | x | x | x |          | H            | HOPI |
| <b>4</b> | LinkedIn Account – approval and launch                               | 01/04/2023 | 31/03/2024 | x                   | x | x | x | x | x |          | H            | HOPI |
| <b>5</b> | FOI Awareness Poll research  | 01/04/2023 | 31/03/2024 | X                   | X |   | X | X |   |          | H            | HOPI |
| <b>6</b> | Engage as appropriate with Scottish Open Government Partnership      |            |            | X                   | X | X | X | X | X |          | M            | SIC  |
| <b>7</b> | Improve accessibility of website content (Briefings and Guidance)    | 01/04/2023 | 31/03/2024 | X                   | X | X | X | X | X |          | H            | HOPI |
| <b>8</b> | Scope promotional events for 20 years of commencement (2025)         | 01/04/2023 | 31/03/2024 | X                   |   |   | X | X | X |          | M            | HOPI |
| <b>9</b> | BSL Plan 2023-2028 – prepare and SMT approval                        | 01/04/2023 | 23/10/2023 | x                   | x | x | x | x | x |          | H            | HOPI |



## 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  | Quarterly  | 01/04/2023 | 31/03/2024          |                     |   |   |   |   | X        | S            | HOCS         |
| 2        | Information Requests to Commissioner:<br>(a) record, analyse and monitor performance in accordance with the Section 60 Code of Practice<br>(b) upload details to the FOI/EIRs statistics portal  | Quarterly  | 01/04/2023 | 31/03/2024          |                     | X | X |   | X | X        | S            | HOCS         |
| 3        | Subject access requests to Commissioner - record, analyse and monitor performance  | Quarterly  | 01/04/2023 | 31/03/2024          |                     | X | X |   | X | X        | S            | HOCS         |
| 4        | Information Requests to Commissioner – provide assurance to HOCS that responses to information requests comply with relevant legislation and related guidance  | Annual     | 01/04/2023 | 31/03/2024          |                     | X | X |   | X | X        | S            | HOE          |
| 5        | Investigation targets and Key Performance Indicators - monitor and review to ensure appropriate and fit for purpose  | Monthly    | 01/04/2023 | 31/03/2024          |                     |   |   |   | X | X        | H            | HOE          |
| 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 |            | 01/04/2023 | 31/03/2024          | X                   | X | X |   | X | X        | S/H          | SMT          |
| 7        | Communication targets and key performance indicators - monitor and review to ensure appropriate and fit for purpose  |            | 01/04/2023 | 31/03/2024          | 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              | 01/04/2023 | 31/10 /2023         |   |                     |   |   |   | X        | H            | HOCS     |              |
| 2        | Unacceptable Actions Policy - review to take account | 01/04/2023 | 31/10/2023          |   |                     |   |   |   | X        | H            | HOCS     |              |







## Regulation and Enforcement

|    | BAU<br>Activity  | Frequency | Start Date | End Date   | Strategic Objective |   |   |   |   |   | Priority | Lead Manager |
|----|--|-----------|------------|------------|---------------------|---|---|---|---|---|----------|--------------|
|    |  |           |            |            | 1                   | 2 | 3 | 4 | 5 | 6 |          |              |
| 1  | Enforce FOI in line with Enforcement Policy  |           | 01/04/2023 | 31/03/2024 |                     | X | X |   | X |   | S        | HOE          |
| 2  | Register, validate, investigate and decide applications in line with approved procedures   | Monthly   | 01/04/2023 | 31/03/2024 |                     | X |   |   | X |   | S        | HOE          |
| 3  | Ensure Investigations Handbook remains up to date and effective  |           | 01/4/2023  | 31/03/2024 |                     | X |   |   |   | X | S/H      | HOE          |
| 4  | Monitor investigation and enforcement performance  | Monthly   | 01/04/2023 | 31/03/2024 |                     |   | X |   |   | X | S/H      | HOE          |
| 5  | Report on investigation and enforcement performance  | Quarterly | 01/04/2023 | 31/03/2024 |                     | X | X | X | X | X | S/H      | HOE          |
| 6  | 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 |           | 01/04/2023 | 31/03/2024 |                     | X |   | X |   | X | H        | HOE          |
| 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 | 01/04/2023 | 31/03/2024 |                     | X | X | X |   |   | S        | HOPI         |
| 8  | Interventions - report on intervention performance and publish updates on intervention activity  | Quarterly | 01/04/2023 | 31/03/2024 |                     | X |   |   |   |   | S        | HOPI         |
| 9  | Publication schemes - manage and monitor notifications from new authorities re: compliance with publication scheme duty  |           | 01/04/2023 | 31/03/2024 |                     |   | X |   | X |   | S        | HOPI         |
| 10 | Regulatory guidance for authorities – maintain and develop as required   |           | 01/04/2023 | 31/03/2024 | X                   | X | X | X |   |   | S        | HOE          |
| 11 | Maintain a list of bodies suitable for consideration for inclusion in Schedule 1 of FOISA or for designation under Section 5 and report on proposed list to be submitted to the Scottish   |           | 01/04/2023 | 31/03/2024 |                     | X | X |   |   | X | S        | HOPI         |



|    |                                       |         |          |           |   |   |  |  |  |   |   |     |
|----|---------------------------------------|---------|----------|-----------|---|---|--|--|--|---|---|-----|
|    | Ministers                             |         |          |           |   |   |  |  |  |   |   |     |
| 12 | Circulate internal Decisions Round-Up | Monthly | 01/04/23 | 31/03/024 | X | X |  |  |  | X | H | HOE |

| 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 | 01/04/2023 | 01/10/2023 |                     | X |   |   |   | X |          | H            | HOPI |



## 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 2024-25   | Annual                         | 01/06/2023 | 31/10/2023 | X                   | X | X |   | X |   | H        | HOCS         |
| 2        | Budget monitoring and control – 2023-24  | Quarterly                      | 01/04/2023 | 31/03/2024 | X                   | X | X |   | X |   | H        | HOCS         |
| 3        | Monitor and report on payment of invoices  | Annual                         | 01/04/2023 | 31/03/2024 | X                   | X | X |   | X |   | H        | HOCS         |
| 4        | Workforce monitoring and planning  | Annual                         | 01/04/2023 | 31/03/2024 | X                   | X | X |   | X |   | H        | HOCS         |
| 5        | Maintenance of premises  |                                | 01/04/2023 | 31/03/2024 |                     |   |   |   |   | X | H        | HOCS         |
| 6        | Maintenance of remote working facilities   |                                | 01/04/2023 | 31/03/2024 |                     |   |   |   |   | X | H        | HOCS         |
| 7        | Contracts – procurement and management (as required) – where HOCS/CST indicated as lead                                  | As agreed in relevant contract | 01/04/2023 | 31/03/2024 |                     |   |   |   |   | X | H        | HOCS         |
| 8        | External provision of legal services: contract management  | As agreed in contract          | 01/04/2023 | 31/03/2024 |                     |   |   |   |   | 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         | 01/04/2023 | 31/03/2024 |                     |   |   |   |   | X | H        | HOPI         |
| 10       | IT - replacement hardware – as per annual programme  |                                | 01/04/2023 | 31/03/2024 |                     |   |   |   |   | X | H        | HOCS         |
| 11       | Cyber resilience – monitor and implement work required   |                                | 01/04/2023 | 31/03/2024 |                     |   |   |   |   | X | H        | HOCS         |

| Project  |  |            |            |   | Strategic Objective |   |   |   |   |   | Priority | Lead Manager |
|----------|--|------------|------------|---|---------------------|---|---|---|---|---|----------|--------------|
| Activity | Start Date   | End Date   | 1          | 2 | 3                   | 4 | 5 | 6 |   |   |          |              |
| 1        | Telephone system/s – office premises and remote working – scope operational, technical and resource requirements | 01/04/2023 | 31/03/2024 |   |                     |   |   |   | X | H | HOCS     |              |
| 2        | Telephone system/s – office premises and remote working (subject to (1))   | 01/04/2023 | 31/03/2024 |   |                     |   |   |   | X | H | HOCS     |              |
| 3        | Cyber Resilience Action Plan 2023-2024   | 01/04/2023 | 31/03/2024 |   |                     |   |   |   | X | H | HOCS     |              |
| 4        | Cleaning Services Contract – review of arrangements  | 01/04/2023 | 31/03/2024 |   |                     |   |   |   | X | H | HOCS     |              |



|   |   |            |            |  |  |  |  |  |   |   |      |  |
|---|---|------------|------------|--|--|--|--|--|---|---|------|--|
|   | and procurement of contract                                 |            |            |  |  |  |  |  |   |   |      |  |
| 5 | Operating system upgrade – scope requirements and implement | 01/04/2023 | 31/03/2024 |  |  |  |  |  | X | H | HOCS |  |
| 6 | Cloud computing - scope options and requirements            | 01/10/2022 | 31/03/2024 |  |  |  |  |  | X | M | HOCS |  |
| 7 | Cyber resilience project                                    | 01/04/2023 | 31/03/2024 |  |  |  |  |  | X | H | HOCS |  |



## 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 | 01/04/2023 | 31/03/2024 | X |          |              |
| 2   | Review of strategic risk  | Quarterly                  | 01/04/2023 | 31/03/2024 | X                   | X                          | X              |            | X          | X | H        | SMT          |
| 3   | Updating risk registers   | Every 2 months / quarterly | 01/04/2023 | 31/03/2024 | X                   | X                          | X              |            | X          | X | H        | HOCS         |
| 4   | Annual assessment and review of risk and report to SMT                                  | Annual                     | 01/04/2023 | 31/10/2024 | X                   | X                          | X              |            | X          | X | H        | HOCS         |
| 5   | Internal Audit Plan 2021-22 to 2023-24 – review and update (see below for projects)     | Annual                     | 01/04/2023 | 31/03/2024 | X                   | X                          | X              |            | X          | X | H        | HOCS         |
| 6   | Business Continuity Plan – maintenance of plan and testing (as required)                |                            | 01/04/2023 | 31/03/2024 | X                   | X                          | X              |            | X          | X | H        | HOCS         |
| 7   | Health and Safety – monitoring  | monthly                    | 01/04/2023 | 31/03/2024 | X                   | X                          | X              |            | X          | X | H        | HOCS         |
| 8   | Health and Safety – reporting   | Six Monthly                | 01/04/2023 | 31/03/2024 | X                   | X                          | X              |            | X          | X | H        | SMT          |
| 9   | AAB – reports on external and internal audits, risk policy and review of strategic risk | Annual                     | 01/04/2023 | 31/12/2024 | 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 | Internal audit – project (details to be confirmed following review of Internal Audit Plan) | 01/04/2023 | 31/03/2024 | X | X |   |          | X            |
| 2       | Internal audit – project (details to be confirmed following review of Internal Audit Plan) | 01/04/2023 | 31/03/2024 | X | X  | X          | X          | X | X | H | HOCS     |              |
| 3       | Health and safety audit 2023-24  | 01/04/2023 | 31/03/2024 |   |  |            |            |   | X | H | HOCS     |              |
| 4       | Internal auditor service – engage/procure  | 01/04/2023 | 31/03/2024 |   |  |            |            |   | 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 2023-24 CURRENT ISSUE |
| VC No.   | 188902                                    |
| Type   | Plan                                      |
| Approver   | SMT                                       |
| Responsible Manager  | HOCS                                      |
| Date of next planned review  | Annual                                    |
|  |   |
| Approval Date of current major version   | 24 May 2023                               |
| For publication (Y/N)  | Y   |
| Date published   | 06/07/2023                                |
| Name of document in website file library   | OperationalPlan202324                     |
| Technical Changes / Unplanned or Ad hoc reviews (see Summary of changes below for details)                           |   |
| Last updated   | 05/07/2023                                |

| Summary of changes to document |                                |  |  |   |
|--------------------------------|--------------------------------|--|--|---|
| Date                           | Action by<br><i>(initials)</i> | Version updated<br><i>(e.g. v01.25-36)</i> | New version number<br><i>(e.g. v01.27, or 02.03)</i> | Brief description<br><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> |
| 15/06/23                       | BOW                            | 01.00                                      | 01.01  | New document created following approval of draft  |
| 15/06/23                       | BOW                            | 01.01                                      | 01.02  | DCS updated, published on website   |
| 21/06/23                       | LB                             | 01.02                                      | 01.03  | Dates corrected on page 4, 9 & 15   |
| 05/07/23                       | LB                             | 01.03                                      | 01.04  | Dates corrected on page 17  |
| 05/07/23                       | HGS                            | 01.04                                      | 01.05  | Corrected dates approved and DCS updated  |
| 06/07/23                       | LB                             | 01.05                                      | 01.06  | DSC updated and document published  |
|                                |                                |  |  |   |
|                                |                                |  |  |   |
|                                |                                |  |  |   |
|                                |                                |  |  |   |

© Scottish Information Commissioner 2023

You may use and re-use this information (not including logos) free of charge in any format or medium, under the terms of the Open Government Licence v3.0. To view this licence, visit <http://www.nationalarchives.gov.uk/doc/open-government-licence/version/3/>