

Operational Plan 2024-25 Monitoring Report

Scottish Information Commissioner

Introduction

Introduction

This document sets out the Scottish Information Commissioner's operational plan for the period from 1 April 2024 to 31 March 2025. The operational plan explains how we will realise the Commissioner's vision and strategic objectives, as set out in the Strategic Plan 2024-28, 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 aims

To realise this vision:

The Commissioner's office will:

1. increase knowledge and understanding of FOI rights
2. enable and develop high standards of FOI law, policy and practice
3. develop Scottish public sector culture and practice where the disclosure of information is routine, valued and increasingly proactive
4. deliver fair defensible decisions in a timely and efficient manner
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 2024-25 is:

- Total staff costs: £2,005,000
- Total gross revenue costs: £2,396,000
- Capital expenditure: £17,000
- Total: **£2,413,000**

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: Relative priority - Statutory, High, Medium, Low

SMT: Senior Management Team

Human Resources Management

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim						Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
						1	2	3	4	5	6							
1	Learning & Development Plan 2024-25 (internal)	BAU	Annual	01/04/2024	31/12/2024						X	H	OT	Slip	Slip	OT	HOCS	
2	Apply & monitor Performance & Development Framework	BAU	Ongoing	01/04/2024							X	H	OT	OT	OT	OT	HOCS	
3	Security & Vetting scheme - monitoring and application	BAU	Ongoing	01/04/2024							X	H	OT	OT	OT	OT	HOCS	

1	Hybrid working – review human resources and pandemic policies and processes	Project		01/10/2024	31/03/2025						X	H	OT	OT	OT	C/f new	HOCS	c/f to 25/26
2	Workforce Plan - review	Project		01/04/2024	30/09/2024						X	H	OT	OT	OT	OT	SMT	
3	HR data base – replacement	Project		01/06/2024	30/09/2024						X	H	OT	Comp	Comp	Comp	HOCS	

Improving Authority Practice

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim						Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
						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	BAU	Ongoing	01/04/2024			X	X	X		X	H	OT	OT	OT	OT	HOPI	
2	Public sector FOI practitioner peer support mechanisms and networks - support and develop	BAU	Ongoing	01/04/2024			X	X	X			M	OT	OT	OT	OT	HOPI	
3	Prepare and circulate learning points from decisions	BAU	Monthly	01/04/2024			X	X	X		X	H	OT	OT	OT	OT	HOE	
4	Collaborate with/involve authority representatives to inform best practice	BAU	Ongoing	01/04/2024			X	X	X		X	M	OT	OT	OT	OT	HOPI	
5	FOI/EIRs statistics portal data from public authorities - collect, collate and publish	BAU	Quarterly	01/04/2024		X		X				S/H	OT	OT	OT	OT	HOPI	Internal review actions complete - new collection method in design.
6	New public authorities - support to prepare for FOI duties	BAU	As required				X	X	X			H	OT	OT	OT	OT	HOPI	
7	Good practice resources, guidance and case studies for authorities – maintain, develop, promote, and report on use	BAU	Ongoing	01/04/2024			X	X	X	X	X	H	OT	OT	OT	OT	HOPI	

1	Statistics Portal – review and develop new collection and dissemination method.	Project		01/04/2024	01/09/2025		X				X	M	OT	OT	OT	OT	HOPI	New collection method under design
2	Research, design and pilot bitesize online webinars for practitioners.	Project		01/04/2024	31/03/2025		x	x	x			M	OT	OT	Comp	Comp	HOPI	
3	Establish network group for Further/Higher Education	Project		01/04/2024	31/03/2025		x	x	x			M	Slip	Slip	OT	C/f new	HOPI	Awaiting date/invite to meeting
4	SIC to engage directly with senior staff of public authorities - roadshows/webinar/podcast	Project		01/04/2024	31/03/2025	x	x	x	x			M	OT	OT	OT	OT	HOPI	Achieved through intervention work

Information Management

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim						Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
						1	2	3	4	5	6							
1	Coordinate on-going Information and Records Management (IRM) controls and procedures and ensure they are applied	BAU	Ongoing	01/04/2024		X		X			X	S/H	OT	Slip	OT	Slip	HOCS	
2	Maintenance of secure and reliable IT network	BAU	Ongoing	01/04/2024							X	S/H	OT	OT	OT	OT	HOCS	
3	Manage Key Documents as per the Review Programme	BAU	Quarterly	01/04/2024		X	X	X			X	H	OT	Slip	OT	OT	HOCS	Revision of process agreed.
4	Monitor compliance with data protection legislation and the UK General Data Protection Regulation	BAU	Ongoing	01/04/2024				X			X	S	OT	OT	OT	OT	HOE	
5	Maintain a compliant publication scheme and guide to information and provide an assurance report to SMT	BAU	Ongoing	01/04/2024		X		X		X	X	H	OT	OT	OT	OT	HOP1	Moved from HOCS to HOP1 Q2
6	Monitor Commissioner's compliance in responding to all rights requests – compliance with statutory timescales, policy and procedures and quality assurance	BAU	Ongoing	01/04/2024			X				X	S	OT	OT	OT	OT	HOE	Moved from HOCS to HOE Q2
1	Information and Records Management (IRM) – consider and recommend way forward as regards review, retention and assurance	Project		01/10/2024	31/03/2025		X				X	H	OT	OT	Slip	C/f new	HOCS	Consultant to be considered and c/f to 25/26

Planning & Reporting

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim						Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
						1	2	3	4	5	6							
1	AR 2023-24: Accountability Report and Financial Statements - ensure compliance with FReM, SPFM, prepare and obtain approval	BAU	Annual	01/04/2024	31/10/2024						X	S	OT	Comp	Comp	Comp	HOCS	
2	AR 2023-24: Performance Report – ensure compliance with FReM, SPFM prepare and obtain approval	BAU	Annual	01/04/2024	31/10/2024						X	S	OT	Comp	Comp	Comp	HOPI	
3	Operational Plan 2024-25 – monitor and report progress	BAU	Quarterly	01/04/2024	31/03/2025	X	X	X			X	H	OT	OT	OT	OT	SMT	
4	Governance and Quality Assurance Reporting Arrangements – monitor and report against cycle	BAU	Monthly, Quarterly and Annually	01/04/2024	31/03/2025	X	X	X			X	H	OT	OT	OT	OT	SMT	GRA under review 2024/25
5	Case Management System (CMS) – reporting (manual and automatic)	BAU	Quarterly and Annually	01/04/2024	31/03/2025						X	M	OT	OT	OT	OT	HOCS	
6	Strategic Plan 2024-28 review	BAU	Annual	01/01/2025	31/03/2025	x	x	x	x	x	x	H	NS	NS	OT	Comp	SMT	
1	CMS – review of in-house reporting	Project		01/10/2024	31/03/2025					X	X	H	OT	OT	OT	OT	SMT	

Comms, Engage. & Policy (Ext)

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim						Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ update
						1	2	3	4	5	6							
1	Communications and engagement framework 2021 - 2024 - report on for 2023-24	BAU	Annually			X	X	X	X	X	X	H	OT	OT	Comp	Comp	HOPI	
2	News media - manage and maintain news media enquiry service and ongoing media engagement	BAU	Ongoing			X	X	X	X	X	X	M	OT	OT	OT	OT	HOPI	
3	News media - manage and maintain media monitoring service	BAU		01/04/2024	31/03/2025	X	X	X	X	X	X	M	OT	OT	OT	OT	HOPI	
4	Email newsletters - prepare, promote and circulate regularly and as required	BAU	Bimonthly			X	X	X	X	X	X	M	OT	OT	OT	OT	HOPI	
5	Social media - monitor, maintain and develop in line with Communications Framework/as required	BAU	Ongoing			X	X	X	X	X	X	M	OT	OT	OT	OT	HOPI	
6	Events - support and participate in key relevant conferences/events	BAU	Ongoing			X	X	X	X	X	X	L/M	OT	OT	OT	OT	HOPI	
7	Events - deliver events to promote effective use of FOI rights (such as to civil society, MSPs and media)	BAU	Ongoing			X					X	M	OT	OT	OT	OT	HOPI	
8	Website - maintain and promote content, ensuring it is up to date and relevant, accessibility compliance via accessibility statements and reporting progress	BAU	Ongoing			X	X	X	X	X	X	H	OT	OT	OT	OT	HOPI	
9	Publication Scheme – review and develop guidance to support proactive publication	BAU		01/04/2024	31/03/2025	x	x	x	x	x	x	M	OT	OT	Slip	Slip	HOPI	Due to potential reform
10	BSL Action plan 2024-2028 – implement	BAU		01/04/2024	31/03/2025	X	X	X	X		X	S	Slip	OT	OT	OT	SMT	
11	Annual report 2023-24 - coordinate design and promotion where required	BAU	Annually	01/06/2024	31/10/2024						X	H	OT	Comp	Comp	Comp	HOPI	
12	Content and communications planning – maintain and implement, delivering communications campaigns on FOI as required	BAU	Ongoing			X	X	X	X	X	X	M	OT	OT	OT	OT	HOPI	
13	FOI Policy monitoring systems and policy positions – maintain as required (includes parliamentary monitoring service)	BAU	Ongoing			X	X	X	X	X	X	H	OT	OT	OT	OT	HOPI	
14	Key stakeholder relationships/ partnerships – maintain, develop and support as required	BAU	Ongoing			X	X	X	X	X	X	M	OT	OT	OT	OT	HOPI	
15	Input to Legislative change and consultations - monitor and respond to relevant consultations / inform legislative change processes as required	BAU	Ongoing			X	X	X	X	X	X	H	OT	OT	OT	OT	HOPI	

1	Review 'Your Right to Know' and related resources, text and approach	Project		01/04/2024	31/03/2026	X						H	NS	NS	NS	NS	HOPI	
2	Promoting FOI awareness to young people project	Project		01/04/2024	30/06/2025	X					X	H	OT	Slip	Slip	Comp	HOPI	
3	Improve accessibility of website content (Briefings and Guidance)	Project		Ongoing		X	X	X	X	X	X	H	OT	OT	OT	OT	HOPI	
4	Scope promotional events for 20 years of commencement (2025)	Project		01/04/2024	31/12/2025	X			X	X	X	M	OT	OT	Comp	Comp	HOPI	
5	BSL Plan 2023-2028 – prepare and SMT approval	Project		01/04/2024	31/12/2024	x	x	x	x	x	x	H	OT	Slip	OT	Comp	HOPI	

Regulation & Enforcement

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim						Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
						1	2	3	4	5	6							
1	Ensure Investigations Handbook remains up to date and effective	BAU	Ongoing	01/04/2023	31/03/2024		X				X	S/H	OT	OT	OT	OT	HOE	
2	Investigation targets and Key Performance Indicators - monitor and review to ensure appropriate and fit for purpose	BAU	Monthly	01/04/2023	31/03/2024					X	X	H	OT	OT	OT	OT	HOE	More comprehensive review required on completion of Project Blue
3	Interventions - monitor intervention intelligence, record non-compliance and report to quarterly intervention meeting, enabling action in line with procedures and as resources permit Interventions - report on intervention performance and publish updates on intervention activity and lessons learned – dissemination of learning more widely.	BAU	Quarterly	01/04/2023	31/03/2024		X	X	X			S	OT	OT	OT	OT	HOPI	
4	Publication schemes - manage and monitor notifications from new authorities re: compliance with publication scheme duty	BAU	As required	01/04/2023	31/03/2024			X		X		S	OT	OT	OT	OT	HOPI	
5	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 Ministers	BAU	Ongoing	01/04/2023	31/03/2024		X	X			X	S	OT	OT	OT	OT	HOPI	
6	Circulate internal Decisions Round-Up	BAU	Monthly	01/04/2023	31/03/2024	X	X				X	H	OT	OT	OT	OT	HOE	

1	Monitor, review and adapt Project Blue strategy report to Parliament	Project		01/01/2024	30/04/2025				X			H	OT	OT	OT	OT	HOE	
---	--	---------	--	------------	------------	--	--	--	---	--	--	---	----	----	----	----	-----	--

Resource Management

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim						Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
						1	2	3	4	5	6							
1	Set and profile budget for 2025-26	BAU	Annual	01/08/2024	31/10/2024	X	X	X		X		H	OT	Comp	Comp	Comp	HOCS	
2	Budget monitoring and control – 2024-25	BAU	Quarterly	01/04/2024	31/03/2025	X	X	X		X		H	OT	OT	OT	OT	HOCS	
3	Maintenance of premises	BAU	Ongoing								X	H	OT	OT	OT	OT	HOCS	
4	Contracts – procurement and management	BAU	Ongoing								X	H	OT	OT	OT	OT	SMT	
5	Cyber resilience – monitor and implement work required	BAU	Ongoing								X	H	OT	OT	OT	OT	HOCS	
1	Telephone system/s – office premises and hybrid working – scope operational, technical and resource requirements and implement change	Project		01/10/2024	31/03/2025						X	H	OT	OT	OT	C/f new	HOCS	c/f to 25/26
2	Cloud computing - scope and implement	Project		01/12/2023	30/08/2025						X	M	OT	OT	OT	OT	HOCS	ongong into 25/26
3	Cleaning Services Contract – review of arrangements and procurement of contract	Project		01/10/2024	31/01/2025						X	H	NS	OT	Slip	Slip	HOCS	advice from SG procurement team
4	Review existing budget monitoring and forecasting processes	Project		01/10/2024	31/03/2025						X	H	OT	OT	Slip	Comp	HOCS	

Risk Management

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim						Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
						1	2	3	4	5	6							
1	Review and update operational risk	BAU	Monthly	01/04/2024	31/03/2025	X	X	X		X	X	H	OT	OT	OT	OT	SMT	
2	Review and update strategic risk	BAU	Quarterly	01/04/2024	31/03/2025	X	X	X		X	X	H	OT	OT	OT	OT	SMT	
3	Internal Audit Plan 2023-24 to 2025-26 – review and update	BAU	Annual	01/04/2024	30/09/2024			X		X	X	H	OT	Slip	OT	OT	HOCS	
4	Health and safety – ongoing monitoring and reporting	BAU	Ongoing							X		H	OT	OT	OT	OT	HOCS	
5	Health and safety audit	BAU	Annual	01/03/2025	31/03/2025					X		H	OT	OT	OT	Disc	HOCS	no audit for 24/25
6	AAB – reports on external and internal audits, risk policy and review of strategic risk	BAU	Annual	01/08/2024	30/09/2024	X	X	X		X	X	H	OT	OT	OT	OT	HOCS	
1	Business Continuity Plan, including cyber resilience arrangements - review and testing	Project		01/01/2024	30/09/2025					X		H	Slip	OT	Slip	OT	HOCS	reviews underway