

Operational Plan 2025-26

Scottish Information Commissioner



Scottish Information
Commissioner

Introduction

This document sets out the Scottish Information Commissioner's operational plan for the period from 1 April 2025 to 31 March 2026. 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 objectives

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 quarterly by the SMT and an update of progress will be published following this review in the Operational Plan Monitoring Report 2025-26.

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 and C1 Governance and Quality Assurance Reporting Arrangements.

Resources

The Commissioner's budget for 2025-26 is:

	£	£
Total staff costs (including contingency staff costs)	2,256,908	
Other costs	420,000	
Total revenue costs		2,676,908
Capital expenditure		20,000
Total		2,696,908

The following matters have been taken into account when preparing the draft Operational Plan 2025-26:

- how we can achieve strategic priorities in 2025-26 - 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

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)
- 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

HOBS: Head of Business
Support

HOE: Head of Enforcement

HOPI: Head of Policy and
Information

SMT Senior Management
Team

Priority: Statutory, High, Medium,
Low (relative)

Human resource management

	BAU											
	Activity	Frequency	Start Date	End Date	Strategic Objective						Priority	Lead Manager
					1	2	3	4	5	6		
1	Learning & Development Plan 2025-26 (internal)	Annual	01/04/2025	30/11/2025						X	H	HOBS
2	Apply & monitor Performance & Development Framework	Ongoing	01/04/2025	31/03/2026						X	H	HOBS
3	Security & Vetting scheme - monitoring and application	Ongoing	01/04/2025	31/03/2026						X	H	HOBS

	Project										
	Activity	Start Date	End Date	Strategic Objective						Priority	Lead Manager
				1	2	3	4	5	6		
1	Workforce Plan - review and development of policy	01/04/2025	30/10/2025						X	H	SMT
2	Review of Business Support Team roles	01/09/2025	31/10/2025						X	H	HOBS
3	Performance & Development Framework Review	01/10/2025	28/02/2026						X	M	HOBS
4	Develop staff benefits scheme	01/10/2025	31/03/2026						X	M	HOBS

Improving authority practice

BAU												
	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	Ongoing	01/04/2025			X	X	X		X	H	HOPI
2	Public sector FOI practitioner peer support mechanisms and networks - support and develop	Ongoing	01/04/2025			X	X	X			M	HOPI
3	Prepare and circulate learning points from decisions	Monthly	01/04/2025			X	X	X		X	H	HOE
4	Collaborate with/involve authority representatives to inform best practice	Ongoing	01/04/2025			X	X	X		X	M	HOPI
5	FOI/EIRs statistics portal data from public authorities - collect, collate and publish	Quarterly	01/04/2025		X		X				S/H	HOPI
6	New public authorities - support to prepare for FOI duties	As required				X	X	X			H	HOPI
7	Good practice resources, guidance and case studies for authorities – maintain, develop, promote, and report on use	Ongoing	01/04/2025			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	Statistics Portal – review and develop new collection and method.	01/04/2025	01/09/2025		X				X	M	HOPI	
2	Research, design and deliver bitesize online webinars for requesters and practitioners – make recordings an online resource	01/04/2025	31/03/2026		x	x	x			M	HOPI	
3	Pilot mini roadshow to disseminate training	01/04/2025	31/03/2026	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	Ongoing	01/04/2025		X		X			X	S/H	HOBS
2	Maintenance of secure and reliable IT network	Ongoing	01/04/2025							X	S/H	HOBS
3	Manage Key Documents as per the Review Programme	Quarterly	01/04/2025		X	X	X			X	H	SMT
4	Monitor compliance with data protection legislation and the UK General Data Protection Regulation	Ongoing	01/04/2025				X			X	S	HOE
5	Maintain a compliant publication scheme and guide to information and provide an assurance report to SMT	Ongoing	01/04/2025		X		X		X	X	H	HOPI
6	Monitor Commissioner's compliance in responding to all rights requests – compliance with statutory timescales, policy and procedures and quality assurance	Ongoing	01/04/2025			X				X	S	HOE

Project					Strategic Objective						Priority	Lead Manager
Activity		Start Date	End Date		1	2	3	4	5	6		
1	Information and Records Management (IRM) – consider and recommend way forward as regards review, retention and assurance	01/08/2025	31/03/2026			X				X	H	HOBS
2	Develop business case for Records Management support	01/08/2025	31/01/2026			X				X	H	HOBS

Planning and reporting

	BAU											
	Activity	Frequency	Start Date	End Date	Strategic Objective						Priority	Lead Manager
					1	2	3	4	5	6		
1	AR 2024-25: Accountability Report and Financial Statements - ensure compliance with FReM, SPFM, prepare and obtain approval (dissemination of accessible version of report/report highlights)	Annual	01/04/2025	31/10/2025						X	S	HOPI
2	AR 2024-25: Performance Report – ensure compliance with FReM, SPFM prepare and obtain approval	Annual	01/04/2025	31/10/2025						X	S	HOBS
3	Operational Plan 2025-26 – monitor and report progress	Quarterly	01/04/2025	31/03/2026	X	X	X			X	H	SMT
4	Governance and Quality Assurance Reporting Arrangements – monitor and report against cycle	Monthly, Quarterly and Annually	01/04/2025	31/03/2026	X	X	X			X	H	SMT
5	Case Management System (CMS) – reporting (manual and automatic)	Monthly, Quarterly and Annually	01/04/2025	31/03/2026						X	M	HOBS

	Project										
	Activity	Start Date	End Date	Strategic Objective						Priority	Lead Manager
				1	2	3	4	5	6		
1	CMS – review of in-house reporting	01/02/2026	31/05/2026					X	X	H	SMT

Communications, Engagement and Policy (External)

	BAU											
	Activity	Frequency	Start Date	End Date	Strategic Objective						Priority	Lead Manager
					1	2	3	4	5	6		
1	Develop new Communications and engagement framework 2025-2030 and report on	Annually	01/04/25	31/03/26	X	X	X	X	X	X	H	HOPI
2	News media - manage and maintain news media enquiry service and ongoing media engagement	Ongoing			X	X	X	X	X	X	M	HOPI
3	News media - manage and maintain media monitoring service		01/04/25	31/03/26	X	X	X	X	X	X	M	HOPI
4	Email newsletters - prepare, promote and circulate regularly and as required	Bimonthly			X	X	X	X	X	X	M	HOPI
5	Social media - monitor, maintain and develop in line with Communications Framework/as required	Ongoing			X	X	X	X	X	X	M	HOPI
6	Events - support and participate in key relevant conferences/events	Ongoing			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)	Ongoing			X					X	M	HOPI
8	Website - maintain and promote content, ensuring it is up to date and relevant, accessibility compliance via accessibility statements and reporting progress	Ongoing			X	X	X	X	X	X	H	HOPI
9	Publication Scheme – review and develop guidance to support proactive publication		01/04/25	31/03/26	x	x	x	x	x	x	M	HOPI
10	BSL Action plan 2024-2029 – implement actions		01/04/25	31/03/26	X	X	X	X		X	S	SMT
11	Annual report 2024-25 - coordinate design and promotion where required	Annually	01/06/25	31/10/25						X	H	HOPI
12	Content and communications planning – maintain and implement, delivering communications campaigns on FOI as required	Ongoing			X	X	X	X	X	X	M	HOPI
13	FOI Policy monitoring systems and policy positions – maintain as required (includes parliamentary monitoring service)	Ongoing			X	X	X	X	X	X	H	HOPI
14	Key stakeholder relationships/ partnerships – maintain, develop and support as required	Ongoing			X	X	X	X	X	X	M	HOPI
15	Input to Legislative change and consultations - monitor	Ongoing			X	X	X	X	X	X	H	HOPI

	and respond to relevant consultations / inform legislative change processes as required											
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Project											
	Activity	Start Date	End Date	Strategic Objective						Priority	Lead Manager
				1	2	3	4	5	6		
1	Review 'Your Right to Know' and related resources, text and approach	01/04/2025	31/03/2026	X						L	HOPI
2	Promoting FOI awareness to young people project	01/04/2025	30/06/2025	X					X	H	HOPI
3	Promotional events for 20 years of commencement (2025)	01/04/2025	31/12/2025	X			X	X	X	M	HOPI

Regulation and Enforcement

BAU												
Activity		Frequency	Start Date	End Date	Strategic Objective						Priority	Lead Manager
					1	2	3	4	5	6		
1	Ensure Investigations Handbook remains up to date and effective	Ongoing				X				X	S/H	HOE
2	Investigation targets and Key Performance Indicators - monitor and review performance	Monthly							X	X	H	HOE
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.	Quarterly				X	X	X			S	HOPI
4	Publication schemes - manage and monitor notifications from new authorities re: compliance with publication scheme duty	As required					X		X		S	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	Ongoing				X	X			X	S	HOPI
6	Circulate internal Decisions Round-Up	Monthly			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	01/04/2025	31/03/2026		X			X		H	HOPI	
2	Scottish Government intervention (non-corporate messaging tools) – issue report and recommendations	01/04/2025	31/03/2026	x	x	x	x	x	x	H	HOPI	
3	Develop non-corporate messaging tools guidance	01/10/2025	31/03/2026	x	x	x	x	x	x	H	HOPI	
4	Review Interventions procedures and reporting methods	01/04/2025	31/03/2026						x	H	HOPI	

Resource management

BAU												
	Activity	Frequency	Start Date	End Date	Strategic Objective						Priority	Lead Manager
					1	2	3	4	5	6		
1	Set and profile budget for 2026-27	Annual	01/08/2025	31/10/2025	X	X	X		X		H	HOBS
2	Budget monitoring and control – 2025-26	Quarterly	01/04/2025	31/03/2026	X	X	X		X		H	HOBS
3	Maintenance of premises	Ongoing	01/04/2025	31/03/2026						X	H	HOBS
4	Contracts – procurement and management	Ongoing	01/04/2025	31/03/2026						X	H	SMT
5	Cyber resilience – monitor and implement work required	Ongoing	01/04/2025	31/03/2026						X	H	HOBS

	Project											
	Activity	Start Date	End Date	Strategic Objective						Priority	Lead Manager	
				1	2	3	4	5	6			
1	Telephone system –scope operational, technical and resource requirements and implement change	01/10/2025	31/03/2026						X	H	HOBS	
2	Cloud computing Accounting software - scope operational, technical and resource requirements and implement change	01/10/2025	28/02/2026						X	M	HOBS	
3	Cloud computing Case Management system - scope operational, technical and resource requirements and implement change	01/01/2025	30/08/2025						X	H	HOBS	
4	Cloud computing Document Management system - scope operational, technical and resource requirements and implement change	01/11/2025	31/08/2026						X		HOBS	
5	Review of case management system	01/08/2025	31/12/2025						X	H	HOBS	

Risk management

	BAU											
	Activity	Frequency	Start Date	End Date	Strategic Objective						Priority	Lead Manager
					1	2	3	4	5	6		
1	Review and update operational risk	Monthly	01/04/2025	31/03/2026	X	X	X		X	X	H	SMT
2	Review and update strategic risk	Quarterly	01/04/2025	31/03/2026	X	X	X		X	X	H	SMT
3	Internal Audit Plan 2025-26 (2 audits)	Annual	01/11/2025	31/03/2026			X		X	X	H	SMT
4	Health and safety – ongoing monitoring and reporting	Ongoing	01/04/2025	31/03/2026						X	H	HOBS
5	AAB – reports on external and internal audits, strategic risk	Annual	01/04/2025	31/03/2025	X	X	X		X	X	H	SIC

Project											
	Activity	Start Date	End Date	Strategic Objective						Priority	Lead Manager
				1	2	3	4	5	6		
1	Business Continuity Plan, including cyber resilience arrangements - review and testing	01/12/2025	30/05/2026						X	H	HOBS
2	Review internal structure (building)	01/12/2025	31/03/2026						X	M	HOBS
3	Internal Audit 1 – implement recommendations	01/12/2025	28/02/2026						X	M	HOBS
4	Internal Audit 2 – implement recommendations	28/02/2026	31/03/2026						X	M	HOBS

Document Information	
Full name of current version: Class, Title, Version No and Status.	C1 Operational Plan 2025-26 CURRENT ISSUE
VC No.	240140
Type	Plan
Approver	SMT
Responsible Manager	HOBS
Date of next planned review	Annual
Approval Date of current major version	25/11/25
For publication (Y/N)	Y
Date published	25/11/25
Name of document in website file library	OperationalPlan202526
Technical Changes / Unplanned or Ad hoc reviews (see Summary of changes below for details)	
Last updated	

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