

Operational Plan 2025-26 Monitoring Report

Scottish Information Commissioner

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 2025-26 (internal)	BAU	Annual	01/04/2025	30/11/2025						X	H	OT	OT	OT	Comp	HOBS	New approach to training drafted and discussed by SMT
2	Apply & monitor Performance & Development Framework	BAU	Ongoing	01/04/2025	31/03/2026						X	H	OT	OT	OT	Comp	HOBS	New approach to annual reviews agreed by SMT and implementation to be discussed at Managers' Group
3	Security & Vetting scheme - monitoring and application	BAU	Ongoing	01/04/2025	31/03/2026						X	H	OT	OT	OT	OT	HOBS	

1	Workforce Plan - review and development of policy	Project		01/04/2025	30/10/2025						X	H	OT	OT	OT	OT	SMT	Parts agreed. Plan being implemented while being finalised
2	Review of Business Support Team roles	Project		01/09/2025	31/10/2025						X	H		OT	Comp		HOBS	Completed October 2025 - new role descriptors signed off.
3	Performance & Development Framework Review	Project		01/10/2025	28/02/2026						X	M			Slip	Comp	HOBS	As above - New approach to annual reviews agreed by SMT and implementation to be discussed at Managers' Group

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	01/04/2025			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	01/04/2025			X	X	X			M	OT	OT	OT	OT	HOPI	
3	Prepare and circulate learning points from decisions	BAU	Monthly	01/04/2025			X	X	X		X	H	OT	OT	OT	OT	HOE	
4	Collaborate with/involve authority representatives to inform best practice	BAU	Ongoing	01/04/2025			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	01/04/2025		X		X				S/H	OT	OT	OT	OT	HOPI	
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	01/04/2025			X	X	X	X	X	H	OT	OT	OT	OT	HOPI	

1	Statistics Portal – review and develop new collection and method.	Project		01/04/2025	01/09/2025		X				X	M	OT	Comp	Comp	Comp	HOPI	
2	Research, design and deliver bitesize online webinars for requesters and practitioners – make recordings an online resource	Project		01/04/2025	31/03/2026		x	x	x			M	OT	OT	OT	OT	HOPI	
3	Pilot mini roadshow to disseminate training	Project		01/04/2025	31/03/2026	x	x	x	x			M	NS	NS	NS	NS	HOPI	

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	01/04/2025		X		X			X	S/H	OT	OT	OT	OT	HOBS	Progress being made but is ongoing work
2	Maintenance of secure and reliable IT network	BAU	Ongoing	01/04/2025							X	S/H	OT	OT	OT	OT	HOBS	Work ongoing including cyber security audit and follow up actions
3	Manage Key Documents as per the Review Programme	BAU	Quarterly	01/04/2025		X	X	X			X	H	OT	OT	OT	Comp	HOBS	All key docs have been updated as required.
4	Monitor compliance with data protection legislation and the UK General Data Protection Regulation	BAU	Ongoing	01/04/2025				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	01/04/2025		X		X		X	X	H	OT	OT	OT	OT	HOPI	
6	Monitor Commissioner's compliance in responding to all rights requests – compliance with statutory timescales, policy and procedures and quality assurance	BAU	Ongoing	01/04/2025			X				X	S	OT	OT	OT	OT	HOE	
1	Information and Records Management (IRM) – consider and recommend way forward as regards review, retention and assurance	Project		01/08/2025	31/03/2026		X				X	H		OT	OT	OT	HOBS	

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 2024-25: Accountability Report and Financial Statements - ensure compliance with FReM, SPFM, prepare and obtain approval (dissemination of accessible version of report/report highlights)	BAU	Annual	01/04/2025	31/10/2025						X	S	OT	Comp	Comp	Comp	HOPI	
2	AR 2024-25: Performance Report – ensure compliance with FReM, SPFM prepare and obtain approval	BAU	Annual	01/04/2025	31/10/2025						X	S	OT	OT	OT	OT	HOBS	
3	Operational Plan 2025-26 – monitor and report progress	BAU	Quarterly	01/04/2025	31/03/2026	X	X	X			X	H			OT	OT	SMT	
4	Governance and Quality Assurance Reporting Arrangements – monitor and report against cycle	BAU	Monthly, Quarterly and Annually	01/04/2025	31/03/2026	X	X	X			X	H			OT	OT	SMT	
5	Case Management System (CMS) – reporting (manual and automatic)	BAU	Monthly, Quarterly and Annually	01/04/2025	31/03/2026						X	M	OT	OT	OT	OT	HOBS	
1	CMS – review of in-house reporting	Project		01/02/2026	31/05/2026					X	X	H	OT	OT	OT	Comp	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	Develop new Communications and engagement framework 2025-2030 and report on	BAU	Annually	01/04/2025	31/03/2026	X	X	X	X	X	X	H	NS	Slip	Slip	Disc	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		01/04/2025	31/03/2026	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		01/04/2025	31/03/2026	x	x	x	x	x	x	M	OT	OT	OT	OT	HOPI	
10	BSL Action plan 2024-2029 – implement actions	BAU		01/04/2025	31/03/2026	X	X	X	X		X	S	OT	OT	OT	OT	SMT	
11	Annual report 2024-25 - coordinate design and promotion where required	BAU	Annually	01/06/2025	31/10/2025						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		01/04/2025	31/03/2026	X						L	NS	NS	NS	OT	HOPI	Easy Read version completed - further review ongoing
2	Promoting FOI awareness to young people project	Project		01/04/2025	30/06/2025	X					X	H				Disc	HOPI	
3	Promotional events for 20 years of commencement (2025)	Project		01/04/2025	31/12/2025	X			X	X	X	M	OT	OT	Comp	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				X				X	S/H	OT	OT	OT	OT	HOE	
2	Investigation targets and Key Performance Indicators - monitor and review performance	BAU	Monthly							X	X	H	OT	OT	OT	OT	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.	BAU	Quarterly				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					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				X	X			X	S	OT	OT	OT	OT	HOPI	
6	Circulate internal Decisions Round-Up	BAU	Monthly			X	X				X	H	OT	OT	OT	OT	HOE	

1	Scottish Government intervention - assessment and report to Parliament	Project		01/04/2025	31/03/2026		X			X		H	OT	Slip	Slip	Slip	HOPI	
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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 2026-27	BAU	Annual	01/08/2025	31/10/2025	X	X	X		X		H	OT	Comp			HOBS	
2	Budget monitoring and control – 2025-26	BAU	Quarterly	01/04/2025	31/03/2026	X	X	X		X		H	OT	OT	OT	Comp	HOBS	
3	Maintenance of premises	BAU	Ongoing	01/04/2025	31/03/2026						X	H	OT	OT	OT	OT	HOBS	
4	Contracts – procurement and management	BAU	Ongoing	01/04/2025	31/03/2026						X	H			OT	OT	SMT	
5	Cyber resilience – monitor and implement work required	BAU	Ongoing	01/04/2025	31/03/2026						X	H	OT	OT	OT	OT	HOBS	
1	Telephone system –scope operational, technical and resource requirements and implement change	Project		01/10/2025	31/03/2026						X	H	Slip	Slip	OT	OT	HOBS	
2	Cloud computing - Accounting software - scope operational, technical and resource requirements and implement change	Project		01/10/2025	28/02/2026						X	M	Slip	Slip	OT	Comp	HOBS	
3	Cloud computing - Case Management system - scope operational, technical and resource requirements and implement change	Project	Ongoing	01/01/2025	30/08/2025						X	H	Slip	OT	OT	OT	HOBS	Due April 2027 - roll over to next operational plan
4	Cloud computing - Document Management system - scope operational, technical and resource requirements and implement change	Project	Ongoing	01/11/2025	31/08/2026						X		Slip	OT	OT	OT	HOBS	Part of wider digital strategy moved to 365/Sharepoint - roll over to next operational plan

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	01/04/2025	31/03/2026	X	X	X		X	X	H	OT	OT	OT	OT	SMT	
2	Review and update strategic risk	BAU	Quarterly	01/04/2025	31/03/2026	X	X	X		X	X	H	OT	OT	OT	OT	SMT	
3	Internal Audit Plan 2025-26 (2 audits)	BAU	Annual	01/11/2025	31/03/2026			X		X	X	H	OT	OT	OT	Comp	SMT	
4	Health and safety – ongoing monitoring and reporting	BAU	Ongoing	01/04/2025	31/03/2026						X	H	OT	OT	OT	OT	HOBS	
5	AAB – reports on external and internal audits, strategic risk	BAU	Annual	01/04/2025	31/03/2025	X	X	X		X	X	H	OT	OT	OT	OT	SIC	
1	Business Continuity Plan, including cyber resilience arrangements - review and testing	Project		01/12/2025	30/05/2026						X	H			OT	OT	HOBS	