

Operational Plan 2026-27

Scottish Information Commissioner



Scottish Information
Commissioner

Introduction

This document sets out the Scottish Information Commissioner's operational plan for the period from 1 April 2026 to 31 March 2027. 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 2026-27.

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 2026-27 is:

	£
Total staff costs (including contingency staff costs)	£2,437,800
Other costs	£449,200
Total revenue costs	£2,887,000
Capital expenditure	£3,000
Total capital and revenue costs	£2,890,000

The following matters have been taken into account when preparing the draft Operational Plan 2026-27:

- how we can achieve strategic priorities in 2026-27 - 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	Strategic Objective						Priority	Lead Manager
			1	2	3	4	5	6		
1	Learning & Development Plan 2026-27 (internal)	Annual						X	H	HOBS
2	Apply & monitor Performance & Development Framework	Ongoing						X	H	HOBS
3	Security & Vetting scheme - monitoring and application	Ongoing						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								X	H	SMT
2	Performance & Development Framework - implementation of new scheme	01/08/2026	01/11/2027						X	M	HOBS
3	Develop staff benefits scheme	01/01/2027	31/03/2027						X	M	HOBS
4	Recruitment function improvement programme	01/04/2026	31/03/2027						x	M	HOBS
5	HR employee lifecycle templates standardisation	01/04/2026	31/03/2027						x	M	HOBS
6	Employee handbook & employment policy framework	01/04/2026	31/03/2027						x	H	HOBS

Improving authority practice

	BAU									
	Activity	Frequency	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		X	X	X		X	H	HOPI
2	Public sector FOI practitioner peer support mechanisms and networks - support and develop	Ongoing		X	X	X			M	HOPI
3	Prepare and circulate learning points from decisions	Monthly		X	X	X		X	H	HOE
4	Collaborate with/involve authority representatives to inform best practice	Ongoing		X	X	X		X	M	HOPI
5	FOI/EIRs statistics portal data from public authorities - collect, collate and publish	Quarterly	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		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	Research and collate data on AI usage and its impact on FOI regulation	01/04/2026	31/03/2027	x	x	x	x				H	HOPI
2	Creation and dissemination of 'FOI and AI' Guidance for Public Authority and Requester	01/04/2026	01/09/2027		X				X		M	HOPI
3	Research, design and deliver bitesize online webinars for requesters and practitioners – make recordings an online resource	01/04/2026	31/03/2027		x	x	x				M	HOPI
4	Support and lead ENTR1 group on AI			x	x	x	x				H	SIC
5	Practitioner’s survey	01/04/2026	31/03/2027	x	x	x	x				H	HOPI
6	Creation and circulation of Easy Read version of YRTK	01/04/2026	31/07/2026	x	x	x	x				H	HOPI
7	Creation of webinar resources	01/04/2026	31/03/2027	x	x	x	x				H	HOPI

Information and records management

	BAU									
	Activity	Frequency	Strategic Objective						Priority	Lead Manager
			1	2	3	4	5	6		
1	Coordinate on-going Information and Records Management (IRM) controls and procedures and ensure they are applied	Ongoing	X		X			X	S/H	HOBS
2	Maintenance of secure and reliable IT network	Ongoing						X	S/H	HOBS
3	Review key documents process	Quarterly	X	X	X			X	H	HOBS
4	Monitor compliance with data protection legislation and the UK General Data Protection Regulation	Ongoing			X			X	S	HOE
5	Maintain a compliant publication scheme and guide to information and provide an assurance report to SMT	Ongoing	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		X				X	S	HOE

	Project										
	Activity	Start Date	End Date	Strategic Objective						Priority	Lead Manager
				1	2	3	4	5	6		
1	Review and apply retention schedule to current records before migration	01/04/2026	01/11/2026						x		SMT
2	Design of new system for record storage	01/04/2026	01/11/2026						x		SMT
3	Migration of existing records to new system	01/09/2026	01/12/2026						x		SMT
4	National Records of Scotland Performance Update Review (PUR)	01/06/2026	01/10/2026						x		SMT

Planning and reporting

BAU										
	Activity	Frequency	Strategic Objective						Priority	Lead Manager
			1	2	3	4	5	6		
1	AR 2025-26: Accountability Report and Financial Statements - ensure compliance with FReM, SPFM, prepare and obtain approval (dissemination of accessible version of report/report highlights)	Annual						X	S	HOPI
2	AR 2025-26: Performance Report – ensure compliance with FReM, SPFM prepare and obtain approval	Annual						X	S	HOBS
3	Operational Plan 2026-27 – monitor and report progress	Quarterly	X	X	X			X	H	SMT
4	Governance and Quality Assurance Reporting Arrangements – monitor and report against cycle	Monthly, Quarterly and Annually	X	X	X			X	H	SMT
5	Case Management System (CMS) – reporting (manual and automatic)	Monthly, Quarterly and Annually						X	M	HOBS

	Project											
	Activity	Start Date	End Date	Strategic Objective						Priority	Lead Manager	
				1	2	3	4	5	6			
1	Review SMT meeting schedule and agenda structure incorporating GRA cycle	01/07/2026	01/09/2026						x	H	HOBS	

Communications, Engagement and Policy (External)

	BAU Activity	Frequency	Strategic Objective						Priority	Lead Manager
			1	2	3	4	5	6		
1	News media - manage and maintain news media enquiry service and ongoing media engagement	Ongoing	X	X	X	X	X	X	M	HOPI
2	News media - manage and maintain media monitoring service		X	X	X	X	X	X	M	HOPI
3	Email newsletters - prepare, promote and circulate regularly and as required	Bimonthly	X	X	X	X	X	X	M	HOPI
4	Social media - monitor, maintain and develop in line with Communications Framework/as required	Ongoing	X	X	X	X	X	X	M	HOPI
5	Events - support and participate in key relevant conferences/events	Ongoing	X	X	X	X	X	X	L/M	HOPI
6	Events - deliver events to promote effective use of FOI rights (such as to civil society, MSPs and media)	Ongoing	X					X	M	HOPI
7	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
8	Publication Scheme – review and develop guidance to support proactive publication		x	x	x	x	x	x	M	HOPI
9	BSL Action plan 2024-2029 – implement actions		X	X	X	X		X	S	SMT
10	Annual report 2026-27 - coordinate design and promotion where required	Annually						X	H	HOPI
11	Content and communications planning – maintain and implement, delivering communications campaigns on FOI as required	Ongoing	X	X	X	X	X	X	M	HOPI
12	FOI Policy monitoring systems and policy positions – maintain as required (includes parliamentary monitoring service)	Ongoing	X	X	X	X	X	X	H	HOPI
13	Key stakeholder relationships/ partnerships – maintain, develop and support as required	Ongoing	X	X	X	X	X	X	M	HOPI
14	Input to Legislative change and consultations - monitor and respond to relevant consultations / inform legislative change processes as required	Ongoing	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	Review 'Your Right to Know' and related resources, text and approach	01/04/2026	31/03/2027	X						L	HOPI
2	Improve web accessibility and resources			X					X	H	HOPI
3	MSP/Researcher training in collaboration with SPiCE			X	X	X	X	X		H	HOPI

Regulation and Enforcement

	BAU									
	Activity	Frequency	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. Establish measurable impact of intervention resource on operational efficiencies.	Quarterly and Monthly		X	X	X			H	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	Develop non-corporate messaging tools guidance	01/07/2026	01/09/2026	x	x	x	x	x	x	H	HOPI
2	Review Interventions procedures and reporting methods	01/04/2026	31/03/2027						x	H	HOPI
3	Cyber recovery playbook for Public Authorities	01/04/2026	31/03/2027							H	HOPI

Resource management

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

	Project										
	Activity	Start Date	End Date	Strategic Objective						Priority	Lead Manager
				1	2	3	4	5	6		
1	Telephony & communications modernisation project	01/04/2026	01/11/2026						X	H	HOBS
2	Case management procurement exercise	01/04/2027	01/12/2026						x	H	HOBS
3	Case management implementation project	04/01/2027	31/03/2027						x	H	HOBS
4	End to end internal procurement process review project	01/10/2026	01/02/2027						x	M	HOBS
5	Embedding Xero – updating workflows, processes, permissions & finance policies	01/04/2026	01/10/202						x	H	HOBS
6	IT infrastructure refresh	01/02/2027	31/03/2027						x	M	HOBS
7	AI use policy and implementation	01/04/2026	01/10/2027						x	H	SMT

Risk management

	BAU									
	Activity	Frequency	Strategic Objective						Priority	Lead Manager
			1	2	3	4	5	6		
1	Review and update operational risk	Monthly	X	X	X		X	X	H	SMT
2	Review and update strategic risk	Quarterly	X	X	X		X	X	H	SMT
3	Internal Audit Plan 2026-27 (1 audits)	Annual			X		X	X	H	SMT
4	Health and safety – ongoing monitoring and reporting	Ongoing						X	H	HOBS
5	AAB – reports on external and internal audits, strategic risk		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 & organisational resilience review (to include IT disaster recovery & digital resilience, building & facilities continuity, operational continuity & service resilience)	01/07/2026	31/03/2027						X	H	HOBS
2	Internal Audit 1 – implement recommendations	01/11/2026	01/03/2027						X	M	HOBS
3	Risk assessment review and gap analysis	01/08/2026	01/02/2026						x	M	HOBS

Document Control Sheet

Document Information	
Full name of current version: Class, Title, Version No and Status.	C1 Operational Plan 2026-27 CURRENT ISSUE
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Technical Changes / Unplanned or Ad hoc reviews (see Summary of changes below for details)	
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Summary of changes to document				
Date	Action by (initials)	Version updated (e.g. v01.25-36)	New version number (e.g. v01.27, or 02.03)	Brief description (e.g. updated paras 1-8, updated HOPI to HOBS, reviewed whole section on PI test, whole document updated, corrected typos, reformatted to new branding)
21/08/2026	LB	01.00	01.02	Creation new document and DCS updated
21/08/2026	TG	01.02	01.03	Budget figures added
27/08/2026	LB	01.03	01.04	DCS updated and document published

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