Operational Plan 2021-22 Monitoring Report

Scottish Information Commissioner

Introduction

This document sets out the Scottish Information Commissioner's operational plan for the period from 1 April 2021 to 31 March 2022. The plan explains how we will realise the Commissioner's vision and strategic aims, 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 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

This plan is laid out as a programme of actions listed under types of operational activity, with cross references to which strategic aim(s) it supports. The actions listed are business as usual (BAU) and one-off projects. This a working document which forms the basis of on-going monitoring and assessment and may be updated.

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 project management principles and practice. Each project is approved by the Senior Management Team.

Monitoring and reporting

Progress against the plan will be reviewed every two months by the Senior Management Team and an update of progress will be published following this review. Achievement and output against individual line items will be also assessed and reported in line with the organisational targets and indicators and measures set out in our Performance and Quality Framework.

Resources

The Commissioner's budget for 2021-22 is £2,030,000:

 - Total staff costs: £1,649,535
 - Total gross revenue costs: £2,007,000
 - Capital expenditure: £23,000

KEY

BAU: Business as Usual
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
SIC: Scottish Information Commissioner
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	Report to SMT on Performance & Development Framework	BAU	Annual	01/04/2021	30/09/2021						X	H	OT	OT	Comp	Comp	HOCS	Report to MSMTM 07/10/21
2	Learning & Development Plan 2021-22 (internal)	BAU	Annual	01/04/2021	30/09/2021						X	H	OT	OT	Comp	Comp	HOCS	Report to MSMTM 07/10/21
3	Review Human Resources Strategy	BAU	Annual	01/04/2021	31/10/2021						X	M	OT	OT	Comp	Comp	HOCS	Report to MSMTM 07/10/21
4	Apply & monitor Performance & Development Framework	BAU		01/04/2021	31/03/2022						X	H	OT	OT	OT	Comp	HOCS	Complete for year
5	Carers Accreditation – monitoring and application	BAU		01/07/2021	31/03/2022						X	M	NS	NS	NS	NS	HOCS	Subject to Project (9) below
6	Security & Vetting scheme- monitoring and application	BAU		01/04/2021	31/03/2022						X	H	OT	OT	OT	Comp	HOCS	

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim						Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
1	Business continuity arrangements - COVID -19 pandemic – interim human resources policies and processes	Project		01/04/2021	31/03/2022						X	H	OT	OT	OT	C/f new	HOCS	Ongoing - to be carried forward to 2022-23
2	Business continuity arrangements - COVID -19 pandemic – re-opening of office premises - health and safety requirements, physical distancing and hygiene requirements	Project		01/04/2021	31/03/2022						X	H	OT	OT	OT	C/f new	HOCS	Ongoing - to be carried forward to 2022-23
3	Hybrid working – office premises and remote working	Project		01/04/2021	31/03/2022						X	H	NS	OT	OT	C/f new	HOCS	Ongoing - to be carried forward to 2022-23
4	Payroll service – review of arrangements and procurement of new service	Project		01/04/2021	30/09/2021						X	H	OT	Comp	Comp	Comp	HOCS	
5	Equalities Monitoring and Reporting – staff – revised system	Project		01/04/2021	31/03/2022						X	H	NS	NS	NS	Comp	HOCS	Planned for Q4
6	Recruitment procedures – review and revision	Project		01/04/2021	30/09/2021						X	H	OT	OT	Slip	Comp	HOCS	
7	Induction procedures – review and revision	Project		01/04/2021	30/09/2021						X	H	NS	NS	Slip	C/f new	HOCS	Ongoing - to be carried forward to 2022-23
8	Employee Handbook – review	Project		01/04/2021	31/10/2021						X	H	OT	Comp	Comp	Comp	HOCS	
9	Carer Positive Scheme - Accreditation	Project		01/04/2021	30/06/2021						X	M/H	OT	Slip	OT	C/f new	HOCS	Ongoing - to be carried forward to 2022-23
10	HR data base – replacement	Project		01/04/2021	31/03/2022						X	H	NS	NS	NS	C/f new	HOCS	Ongoing - to be carried forward to 2022-23

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	BAU		01/04/2021	31/03/2022		X	X	X		X	H	OT	OT	OT	OT	HOPI	No means to deliver own events at this time, so focused on using external events where possible. No programme as yet, pending more information on website developments.
2	Public sector FOI practitioner peer support mechanisms and networks - support and develop	BAU		01/04/2021	31/03/2022		X	X	X			H	OT	OT	OT	OT	HOPI	
3	Prepare and circulate learning points from decisions and interventions	BAU	Monthly	01/04/2021	31/03/2022		X	X	X		X	M	OT	OT	OT	OT	HOE/ HOPI	
4	Collaborate with/involve authority representatives to inform best practice	BAU		01/04/2021	31/03/2022		X	X	X		X	H	NS	NS	OT	OT	HOPI	Session at CFOI conference began this work
5	FOI/EIRs statistics portal data from public authorities - collect, collate and publish	BAU		01/04/2021	31/03/2022	X		X				M	OT	OT	OT	OT	HOPI	Move from website-based portal
6	New public authorities - support to prepare for FOI duties	BAU	Quarterly	01/04/2021	31/03/2022		X	X	X			S/H	OT	OT	OT	OT	HOPI	
7	Good practice resources, guidance and case studies for authorities – maintain, develop, promote, and report on use	BAU		01/04/2021	31/03/2022		X	X	X	X	X	H	OT	OT	OT	OT	HOPI	

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim						Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
1	Coronavirus (Scotland) Act - update authorities on changes to FOI law and promote guidance	Project		01/04/2021	31/03/2022		X	X	X			H	OT	OT	Comp	Comp	HOPI	
2	Researching FOI practitioner views and attitudes - develop and conduct model, including survey, for repeat use	Project		01/07/2021	31/12/2021		X	X	X		X	H	NS	NS	OT	Comp	HOPI	
3	Statistics Portal – implement recommendations from 2020-21 review	Project		01/04/2021	31/12/2021		X				X	M	OT	OT	OT	Comp	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		01/04/2021	31/03/2022	X		X			X	S/H	OT	OT	OT	Comp	HOCS	
2	IRM assurance report to SMT	BAU	Annual	01/04/2021	30/09/2022	X		X			X	S/H	Comp	Comp	Comp	Comp	HOCS	
3	Maintenance of secure and reliable IT network	BAU		01/04/2021	31/03/2022						X	S/H	OT	OT	OT	Comp	HOCS	
4	Manage Key Documents as per the Review Programme	BAU		01/04/2021	31/03/2022	X	X	X			X	H	OT	OT	OT	Comp	HOCS	
5	Monitor compliance with data protection legislation and the General Data Protection Regulation	BAU		01/04/2021	31/03/2022			X			X	S	OT	OT	OT	Comp	HOCS	
6	UK GDPR/Data protection – SMT update	BAU	Quarterly	01/04/2021	31/03/2022			X			X	S	Comp	Comp	Comp	Comp	HOCS	CR to QSMTM Q4 (April/May)
7	Maintain a compliant publication scheme and guide to information	BAU		01/04/2021	31/03/2022	X		X		X	X	H	OT	OT	OT	Comp	HOCS	
8	Commissioner's Publication Scheme - assurance report to SMT	BAU		01/01/2022	31/03/2022						X	S	OT	OT	Comp	Comp	HOCS	
9	Monitor Commissioner's compliance in responding to RFIs and reviews – compliance with statutory timescales, policy and procedures and quality assurance (quality assurance report to be provided by HOE to HOCS)	BAU		01/04/2021	31/03/2022		X				X	S	Comp	Comp	Comp	Comp	HOCS	CR to QSMTM Q4 (April/May)
10	Monitor Commissioner's compliance in responding to SARs – compliance with statutory timescales, policy and procedures	BAU		01/04/2021	31/03/2022						X	S	Comp	Comp	Comp	Comp	HOCS	CR to QSMTM Q4 (April/May)

	Activity	Type	Frequency	Start Date	End Date	1	2	3	4	5	6	Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
1	Business continuity arrangements - COVID -19 pandemic – remote working – interim policies	Project		01/04/2021	31/03/2022					X	X	H	OT	OT	OT	OT	HOCS	
2	Secure file sharing platform – scope need and resource required	Project		01/04/2021	31/08/2021	X					X	H	NS	NS	NS	NS	HOCS	Need detail of what is required - Enforcement Team to confirm requirements and consider implications for public authorities if required to submit documents using this. Further discussions taken place. (MK: happy to discuss whether this is feasible for 21/22.) MK to confirm if project to be deferred
3	Secure file sharing platform – procure	Project		31/08/2021	31/03/2022	X					X	H	NS	NS	NS	Disc	HOCS	Subject to (2) above being completed (MK: see above) MK to confirm if project to be deferred
4	Residual work to implement/update re: UK GDPR/data protection	Project		01/04/2021	31/03/2022	X		X		X	X	S/H	OT	OT	OT	OT	HOCS	On-going
5	Digital and IT Strategy	Project		01/04/2021	31/03/2022						X	S/H	OT	OT	C/f new	C/f new	SIC / HOCS	To be carried forward to 2022-23
6	Cyber Resilience Action Plan 2021-2022	Project		01/04/2021	30/09/2021						X	H	OT	OT	OT	OT	HOCS	
7	Cyber Essentials 2021-22 reaccreditation	Project		01/12/2021	31/03/2022						X	H	NS	NS	Comp	Comp	HOCS	
8	Cyber Essentials Plus 2021-22 reaccreditation	Project		01/12/2021	31/03/2022						X	H	NS	NS	OT	Comp	HOCS	Planned for Q4

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							
9	Information requests and requests for reviews – review of procedures	Project		01/04/2021	31/03/2022					X	X	H	OT	OT	OT	C/f new	HOE/HOCS	Ongoing - to be carried forward to 2022-23
10	Information and Records Management (IRM) – revision of Records Management Plan	Project		01/04/2021	30/09/2021		X				X	H	Comp	Comp	Comp	Comp	HOCS	
11	IRM – consider and recommend way forward as regards review, retention and assurance	Project		01/04/2021	31/03/2022		X				X	H	OT	OT	OT	C/f new	HOCS	Ongoing - to be carried forward to 2022-23
12	IRM – Review and update File Plan and Retention Schedule	Project		01/04/2021	31/03/2022		X				X	H	NS	NS	NS	C/f new	HOCS	Ongoing - to be carried forward to 2022-23
13	Case Management System (CMS) - RFI/RFR/workflow	Project		01/04/2021	31/03/2022		X				X	M/H	NS	NS	NS	C/f new	HOCS	Ongoing - to be carried forward to 2022-23
14	CMS – SAR workflow	Project		01/04/2021	31/03/2022		X				X	M/H	NS	NS	NS	C/f new	HOCS	Ongoing - to be carried forward to 2022-23
15	CMS – access protection – approval processes	Project		01/04/2021	31/03/2022		X				X	M/H	NS	NS	C/f new	C/f new	HOCS	Ongoing - to be carried forward to 2022-23
16	Review of ACT	Project		01/04/2021	31/03/2022		X				X	M/H	NS	OT	Comp	Comp	HOCS	

#	Activity	Type	Frequency	Start Date	End Date	SA1	SA2	SA3	SA4	SA5	SA6	Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
1	Annual Report (AR) 2020-21: Statutory reporting and 3Es	BAU	Annual	01/04/2021	31/10/2021						X	S	OT	OT	Comp	Comp	HOCS	
2	AR 2020-21: Accountability Report and Financial Statements - ensure compliance with FReM, SPFM, prepare and obtain approval	BAU	Annual	01/04/2021	31/10/2021						X	S	OT	OT	Comp	Comp	HOCS	
3	AR 2020-21 Performance Report – ensure compliance with FReM, SPFM prepare and obtain approval	BAU	Annual	01/04/2021	31/10/2021						X	S	OT	OT	Comp	Comp	HOPI / HOCS	
4	AR 2020-21 Annual Statement of Assurance to SIC	BAU	Annual	01/04/2021	31/10/2021	X	X	X			X	H	NS	OT	Comp	Comp	HOCS	
5	AR 2020-21 Auditor's Report – liaise with Auditor and Advisory Audit Board (AAB)	BAU	Annual	01/07/2021	31/10/2021						X	H	NS	OT	Comp	Comp	HOCS	
6	AR 2020-21 AAB meeting 2021	BAU	Annual	01/08/2021	30/09/2021						X	H	NS	OT	Comp	Comp	HOCS	
7	Audit Planning Report – AR 2021-22 liaise with auditor and AAB	BAU	Annual	01/10/2021	01/02/2022						X	H	NS	NS	OT	Comp	HOCS	
8	Performance and statistical reporting - operational	BAU	As set out in the GRA	01/04/2021	31/03/2022	X	X	X			X	S	Comp	Comp	Comp	Comp	HOCS	
9	Manage and report on Enquiries Service	BAU	Six monthly	01/04/2021	31/03/2022	X	X	X			X	H	OT	Comp	OT	Comp	HOCS	6 monthly - CR to QSMTM Q4 (April/May)
10	Public Service Reform (Scotland) Act 2010 – annual statement of expenditure and annual statement of sustainable growth report	BAU	Annual	01/04/2021	31/03/2022						X	S	OT	OT	OT	Comp	HOCS	Annual CR to QSMTM Q4 (April/May)
11	Operational Plan 2021-22 – monitor and report progress	BAU	Two monthly	01/04/2021	31/03/2022	X	X	X			X	H	Comp	Comp	Comp	Comp	SMT	Will mark as complete after MSMTM 29/03/22
12	Key Documents – reviews due and overdue reviews - monitor	BAU	Two Monthly	01/04/2021	31/03/2022	X	X	X			X	H	Comp	Comp	Comp	Comp	SMT	
13	Operational Plan 2022-23 - coordinate and prepare	BAU	Annual	01/01/2022	01/06/2022	X	X	X			X	H	NS	NS	NS	Comp	HOCS	Draft circulated to SMT
14	Governance Reporting Arrangements (GRA) – reporting against cycle	BAU		01/04/2021	31/03/2022	X	X	X			X	H	Comp	Comp	Comp	OT	HOCS/ HOPI/HOE	To complete - QSMTM Q4 (April/May) HOE QA work on compliance with investigations handbook to be cancelled until start of 2023/24 given recent changes to
15	GRA - compliance report to SMT	BAU	Annual	01/04/2021	31/03/2022	X	X	X			X	H	Comp	Comp	Comp	Comp	HOCS	
16	Case Management System – reporting (manual and automatic) for IPM/end of year Enforcement statistics	BAU	Monthly	01/04/2021	31/03/2022						X	M	Comp	Comp	Comp	Comp	HOCS	
17	Prescribed Persons (Reports on Disclosure of Information) Regulations 2017	BAU	Annual	01/04/2021	31/08/2021						X	S	OT	OT	Comp	Comp	HOE	
18	Report on biodiversity (as required by the Nature Conservation (Scotland) Act 2004)	BAU	As required	01/04/2021	31/03/2022						X	S	Comp	Comp	Comp	Comp	HOCS	
19	Sustainable Development - monitor and report on carbon footprint	BAU	Annual	01/04/2021	31/03/2022						X	S	OT	OT	OT	Comp	HOCS	

#	Activity	Type	Frequency	Start Date	End Date	SA1	SA2	SA3	SA4	SA5	SA6	Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
1	Business continuity arrangements - COVID -19 pandemic –enquiries - interim revised arrangements and reporting procedures	Project		01/04/2021	31/03/2022					X	X	H	OT	OT	OT	C/f new	HOCS	Ongoing - to be carried forward to 2022-23
2	Enquiries procedures – review of outcome codes and assurance reporting	Project		01/04/2021	31/03/2022	X	X	X		X	X	H	OT	OT	OT	C/f new	HOCS	Ongoing - to be carried forward to 2022-23
3	Equalities Monitoring and Reporting – service users - revised system	Project		01/04/2021	31/03/2022					X	X	H	NS	NS	NS	C/f new	HOCS	Ongoing - to be carried forward to 2022-23

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							
4	CMS – review of in-house reporting	Project		01/04/2021	31/03/2022					X	X	H	NS	NS	NS	C/f new	HOCS	Ongoing - to be carried forward to 2022-23
5	UN Convention on the Rights of the Child (Incorporation) (Scotland) Act - Research and prepare to implement any changes required	Project		01/05/2021	30/12/2021	X					X	S	NS	NS	Disc	Disc	HOPI/ HOCS	03/02/22 - Agreed to be discontinued and watching brief in place instead

#	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 - deliver and report on for 2021-22	BAU	Annually	01/04/2021	01/03/2022	X	X	X	X	X	X		H	OT	OT	OT	Comp	HOPI	Document approved.
2	News media - manage and maintain news media enquiry service and ongoing media engagement	BAU		01/04/2021	31/03/2022	X	X	X	X	X	X		M	OT	OT	OT	OT	HOPI	
3	News media - manage and maintain media monitoring service	BAU		01/04/2021	31/03/2022	X	X	X	X	X	X		M	OT	OT	OT	OT	HOPI	
4	Email newsletters - prepare, promote and circulate regularly and as required	BAU		01/04/2021	31/03/2022	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		01/04/2021	31/03/2022	X	X	X	X	X	X		M	OT	OT	OT	OT	HOPI	
6	Events - support and participate in key relevant conferences/events	BAU		01/04/2021	31/03/2022	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		01/04/2021	31/03/2022	X					X		M	NS	OT	OT	OT	HOPI	Limited due to lack of events platform, but delivered session for RSL tenants, and information provided for training to new MSPs
8	Website – manage website support and development service	BAU		01/04/2021	31/03/2022	X	X	X	X		X		H	OT	OT	OT	OT	HOPI	
9	Website - maintain and promote content, ensuring it is up to date and relevant, and reporting progress	BAU	Six monthly	01/04/2021	31/03/2022	X	X	X	X	X	X		H	OT	OT	OT	OT	HOPI	
10	Website – maintain, develop and report on accessibility compliance via accessibility statements	BAU		01/04/2021	31/03/2022						X		S	OT	OT	OT	OT	HOPI	
11	BSL Action plan 2019-2023 – implement and report on	BAU	Annually	01/04/2021	31/03/2022	X	X	X	X		X		S	NS	NS	NS	C/f new	SMT	
12	Annual report 2020-21 - coordinate design and promotion where required	BAU	Annually	01/04/2020	31/09/2021						X		H	OT	OT	OT	Comp	HOPI	
13	Content and communications planning – maintain and implement, delivering communications campaigns on FOI as required	BAU		01/04/2021	31/03/2022	X	X	X	X	X	X		M	OT	OT	OT	OT	HOPI	
14	Research public awareness of FOI rights across society – including omnibus poll	BAU	Annually	01/04/2021	31/12/2021	X					X		H	OT	Slip	Slip	Comp	HOPI	Survey complete and results received.
15	Collaborate with/involve people from identified target groups in our work, to ensure best practice	BAU		01/04/2021	31/03/2022	X					X		M	NS	NS	OT	C/f new	HOPI	Begun via sessions at Practitioner conference
16	FOI Policy monitoring systems and policy positions – maintain as required (includes parliamentary monitoring service)	BAU		01/04/2021	31/03/2022	X	X	X	X	X	X		H	OT	Slip	Slip	Comp	HOPI	Monitoring service now secured.
17	Key stakeholder relationships/ partnerships – maintain, develop and support as required	BAU		01/04/2021	31/03/2022	X	X	X	X	X	X		M	OT	OT	OT	OT	HOPI	
18	Legislative change and consultations - monitor and respond to relevant consultations / inform legislative change processes as required	BAU		01/04/2021	31/03/2022	X	X	X	X	X	X		H	OT	OT	OT	OT	HOPI	New Parliamentary Monitoring service

#	Activity	Type	Frequency	Start Date	End Date	Strategic Aim							Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ update
1	Maintain Covid-19 information hub to ensure information available on relevant changes to FOI law	Project		01/04/2021	31/03/2022	X	X	X	X	X	X		H/S	OT	OT	OT	OT	HOPI	
2	Impact of Covid-19 on FOI – follow-up to 2020 Special Report	Project		01/06/2021	01/11/2021	X	X	X		X	X		H	NS	OT	OT	Comp	HOPI	Publication Dec 2021
3	Review 'Your Right to Know' and related resources, text and approach	Project		01/08/2021	01/03/2022	X							H	NS	NS	Slip	C/f new	HOPI	To be carried forward to 2022/23
4	Promoting FOI awareness to young people project	Project		01/04/2021	31/03/2022	X					X		H	NS	Slip	Disc	C/f new	HOPI	To be carried forward to 2022/23

Comms, Engage. & Policy (Ext)

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim						Priority	Q1	Q2	Q3	Q4	Lead	Comment/ update
						1	2	3	4	5	6						Mgr	
5	Social media – launch LinkedIn channel use to target FOI practitioners and specialists (including relevant updates to social media and other procedures)	Project		01/04/2021	30/06/2022	X	X	X			X	M	NS	Slip	Disc	C/f new	HOPI	New channesl to be investigated 2022-23
6	Website – consideration of website discovery findings	Project		01/04/2021	31/07/2022	X	X	X	X	X	X	H	OT	Slip	OT	OT	SMT / HOPI	Delayed as result of website issues - being undertaken in Q3/Q4 as part of web development
7	Website – development and build of potential new website	Project		01/07/2021 31/03/2022	TBD	X	X	X	X	X	X	H	NS	NS	OT	OT	HOPI /HOC S	Development and build phase now started
8	Active membership of International Conference of Information Commissioners' Executive Committee	Project		01/04/2021	End of tenure or 31/06/2021					X	X	M	OT	OT	Comp	Disc	SIC	
9	Engage as appropriate with Scottish Open Government Partnership	Project		01/04/2021	31/03/2022	X	X	X	X	X	X	M	OT	OT	OT	OT	SIC	
10	British Sign Language translation of two resources	Project		01/10/2021	30/02/2022	X					X	S	NS	NS	Slip	C/f new	HOPI	To be carried forward to 2022/23

Quality Assurance

	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	Compliments and complaints – record, analyse and report	BAU	Six monthly	01/04/2021	31/03/2022						X	S	Comp	Comp	Comp	Comp	HOCS	CR QSMTM Q4 (April/May)
2	Information Requests to SIC: (a) record, analyse and monitor performance in accordance with the Section 60 Code of Practice (b) upload details to the FOI/EIRs statistics portal	BAU	Quarterly	01/04/2021	31/03/2022		X	X		X	X	S	Comp	Comp	Comp	Comp	HOCS	CR QSMTM Q4 (April/May)
3	Information Requests to SIC – provide assurance to HOCS that responses to information requests comply with relevant legislation and related guidance	BAU	Annual	01/01/2022	31/03/2022		X	X		X	X	S	OT	OT	OT	OT	HOE	Due in Q4
4	Investigation targets and Key Performance Indicators - monitor and review to ensure appropriate and fit for purpose	BAU	Monthly	01/04/2021	31/03/2022					X	X	H	OT	OT	OT	OT	HOE	
5	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	BAU		01/04/2021	31/03/2022	X	X	X		X	X	S/H	OT	OT	OT	OT	SMT	HOE QA work on compliance with investigations handbook to be cancelled until start of 2023/24 given recent changes to Enforcement Team.
6	Communication targets and key performance indicators - monitor and review to ensure appropriate and fit for purpose	BAU		01/04/2021	31/03/2022	X	X	X	X	X	X	H	OT	OT	OT	OT	HOPI	Comunications framework approval delayed but reviewing and monitoring ongoing

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim						Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ update
1	Complaints Policy and Handbook – review to take account of revised Model complaints Scheme issued 31/01/2020	Project		01/04/2021	31/07/2022						X	H	OT	Slip	OT	C/f new	HOCS	Ongoing - to be carried forward to 2022-23
2	Unacceptable Actions Policy - review to take account of revised Model complaints Scheme issued 31/01/2020	Project		01/04/2021	31/07/2022						X	H	OT	Slip	OT	C/f new	HOCS	Ongoing - to be carried forward to 2022-23
3	Interventions – develop monitoring and quality assurance mechanism	Project		01/10/2021	01/03/2022		X	X			X	H	NS	NS	NS	C/f new	HOPI	To be carried forward to 2022/23
4	Review of procedures for handling requests for information	Project		01/04/2021	31/03/2022		X	X		X	X	H	OT	OT	OT	C/f new	HOE/HOCS	May have to be carried forward to 2022-23 given recent changes in Enforcement Team. To be carried forward to 2022-23
5	Review of procedures for handling subject access requests	Project		01/04/2021	31/03/2022		X	X		X	X	H	OT	OT	OT	C/f new	HOE/HOCS	May have to be carried forward to 2022-23 given recent changes in Enforcement Team. To be carried forward to 2022-23

	Activity	Type	Frequency	Start Date	End Date	1	2	3	4	5	6	Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
1	Enforce FOI in line with Enforcement Policy	BAU		01/04/2021	31/03/2022		X	X		X		S	OT	OT	OT	OT	HOE	
2	Register, validate, investigate and decide applications in line with approved procedures	BAU	Monthly	01/04/2021	31/03/2022		X			X		S	OT	OT	OT	OT	HOE	
3	Monitor investigation and enforcement performance	BAU	Monthly	01/04/2021	31/03/2022			X			X	S/H	OT	OT	OT	OT	HOE	
4	Report on investigation and enforcement performance	BAU	Quarterly	01/04/2021	31/03/2022		X	X	X	X	X	S/H	OT	OT	OT	OT	HOE	
5	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	BAU		01/04/2021	31/03/2022		X		X		X	H	OT	OT	OT	OT	HOE	
6	Maintain a rolling programme to ensure standard/template letters on the case management system are reviewed and regularly updated, as required.	BAU		01/04/2021	31/03/2022		X				X	S	OT	OT	OT	OT	DHOE	
7	Interventions - monitor intervention intelligence, record non-compliance and report to quarterly intervention meeting, enabling action in line with procedures and as resources permit	BAU	Quarterly	01/04/2021	31/03/2022		X	X	X			S	OT	OT	OT	OT	HOPI	
8	Interventions - report on intervention performance and publish updates on intervention activity	BAU	Quarterly	01/04/2021	31/03/2022		X					S	OT	OT	OT	OT	HOPI	
9	Publication schemes - manage and monitor notifications from new authorities re: compliance with publication scheme duty	BAU		01/04/2021	31/03/2022			X		X		S	OT	OT	OT	OT	HOPI	
10	Regulatory guidance for authorities – maintain and develop as required	BAU		01/04/2021	31/03/2022	X	X	X	X			S	OT	OT	OT	Slip	HOE	Has been some slippage with reviews due to caseload. Further sllippage likely given recent changes to Enforcement Team.
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 Ministers	BAU		01/04/2021	31/03/2022		X	X			X	S	OT	OT	OT	OT	HOPI	

	Activity	Type	Frequency	Start Date	End Date	1	2	3	4	5	6	Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
1	Scottish Government intervention - assessment and report to Parliament	Project		01/04/2021	31/09/2021		X			X		H	OT	OT	OT	C/f new	HOPI	
2	Review Investigations Handbook to ensure remain efficient in the light of the impact of the Covid-19 pandemic	Project		01/10/2021	31/12/2021		X				X	H	OT	OT	OT	Comp	HOE	

Resource Management

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim 1	2	3	4	5	6	Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
1	Set and profile budget for 2022-23	BAU	Annual	01/06/2021	31/10/2021	X	X	X		X		H	NS	Comp	Comp	Comp	HOCS	
2	Budget monitoring and control – 2021-22	BAU	Quarterly	01/04/2021	31/03/2022	X	X	X		X		H	Comp	Comp	Comp	Comp	HOCS	CR QSMTM Q4 (April/May)
3	Monitor and report on payment of invoices	BAU	Annual	01/04/2021	31/03/2022	X	X	X		X		H	OT	OT	OT	OT	HOCS	Annual - CR QSMTM Q4 (April/May)
4	Workforce monitoring and planning	BAU	Annual	01/04/2021	31/03/2022	X	X	X		X		H	OT	OT	OT	Comp	HOCS	
5	Maintenance of premises	BAU		01/04/2021	31/03/2022						X	H	OT	OT	OT	Comp	HOCS	
6	Maintenance of remote working facilities	BAU		01/04/2021	31/03/2022						X	H	OT	OT	OT	Comp	HOCS	
7	Contracts – procurement and management (as required) – where HOCS/CST indicated as lead	BAU	As agreed in relevant contract	01/04/2021	31/03/2022						X	H	OT	OT	OT	Comp	HOCS	
8	External provision of legal services: contract management	BAU	As agreed in contract	01/04/2021	31/03/2022						X	H	OT	OT	OT	OT	HOE	
9	Contracts relevant to policy and information – procurement and management (as required) where HOPI/P&I indicated as lead	BAU	As agreed in contracts	01/04/2021	31/03/2022						X	H	OT	OT	OT	OT	HOPI	
10	IT - replacement hardware – as per annual programme	BAU		01/04/2021	31/03/2022						X	H	OT	OT	OT	Comp	HOCS	

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim 1	2	3	4	5	6	Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
1	Case management system – upgrade	Project		01/04/2021	31/03/2022						X	H	NS	Comp	Comp	Comp	HOCS	
2	IT Support and Maintenance Contract – review arrangements (dependent on Digital and IT Strategy being put in place)	Project		01/04/2021	31/03/2022						X	H	NS	NS	C/f new	C/f new	HOCS	To be carried forward to 2022-23
3	Hybrid working – office working and remote working (following on from the impact of the COVID-19 pandemic)	Project		01/04/2021	31/03/2022						X	H	NS	OT	OT	C/f new	HOCS	Ongoing - to be carried forward to 2022-23
4	Procurement of legal services contract: issue tender	Project		01/04/2021	31/03/2022						X	H	OT	OT	Comp	Comp	HOE	
5	Website - renewal of current website supported hosting and maintenance services	Project		01/04/2021	31/07/2022						X	H	OT	Slip	Comp	Comp	HOPI / HOCS	
6	Cleaning Services Contract – review of arrangements and procurement of contract	Project		01/04/2021	31/03/2022						X	H	OT	OT	OT	C/f new	HOCS	Ongoing - to be carried forward to 2022-23
7	Office premises – external painting	Project		01/06/2021	31/10/2021						X	H	OT	OT	OT	Comp	HOCS	Main work carried out - one small area to be completed following some joinery work
8	Office premises – internal painting	Project		01/06/2021	31/10/2021						X	H	OT	C/f new	C/f new	C/f new	HOCS	Procurement exercise undertaken in Q1 - quoted costs significantly in excess of budgeted costs. Not sufficient budget avilable - to be C/F to 2022-23 (budget approval received)
9	Website – specification and procurement of development / build for any new website if required/agreed	Project		01/05/2021	01/11/2021	X	X	X	X	X	X	H	NS	NS	Comp	Comp	HOPI/ HOCS	Specification preparation began late Sept 2021 Tender issued 15/11/21
10	Webinar/online events platform –scope need for securing service and resource required (finance and staff resource)	Project		01/04/2021	01/09/2021	X	X	X	X	X	X	M	NS	NS	Disc	Disc	HOPI/ HOCS	Delayed due to competing priorities
11	Webinar/online events platform – procurement			01/04/2021	31/12/2021	X	X	X	X	X	X	M	NS	NS	Disc	Disc	HOPI/ HOCS	Delayed due to competing priorities

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							
12	Policy and parliamentary update service – secure service (in relation to CEP BAU 16)	Project		01/04/2021	01/06/2021			X	X	X	X	H	NS	Slip	Slip	Comp	HOPI	Delayed due to competing priorities

Risk Management

	Activity	Type	Frequency	Start Date	End Date	1	2	3	4	5	6	Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
						Strategic Aim												
1	Review of operational risk	BAU	Every 2 months	01/04/2021	31/03/2022	X	X	X		X	X	H	Comp	Comp	Comp	Comp	SMT	QSMTM Q4 (April/May)
2	Review of strategic risk	BAU	Quarterly	01/04/2021	31/03/2022	X	X	X		X	X	H	Comp	Comp	Comp	Comp	SMT	QSMTM Q4 (April/May)
3	Updating risk registers	BAU	Every 2 months/ quarterly	01/04/2021	31/03/2022	X	X	X		X	X	H	Comp	Comp	Comp	Comp	HOCS	To be updated following Q4 review (April/May)
4	Annual assessment and review of risk and report to SMT	BAU	Annual	01/04/2021	31/10/2021	X	X	X		X	X	H	Comp	Comp	Comp	Comp	HOCS	
5	Internal Audit Plan 2021-22 to 2023-24 – implementation and reports (see below for projects)	BAU	Annual	01/04/2021	31/03/2022	X	X	X		X	X	H	NS	OT	Comp	Comp	HOCS	CR to MSMTM 07/10/21
6	Business Continuity Plan – maintenance of plan and testing (as required)	BAU		01/04/2021	31/03/2022	X	X	X		X	X	H	OT	OT	OT	Comp	HOCS	
7	Health and Safety – reporting	BAU	Six monthly	01/04/2021	31/03/2022	X	X	X		X	X	H	Comp	Comp	Comp	Comp	HOCS	CR to QSMTM Q3
8	Health and Safety – monitoring	BAU	Six Monthly	01/04/2021	31/03/2022	X	X	X		X	X	H	Comp	Comp	Comp	Comp	SMT	
9	AAB – reports on external and internal audits, risk policy and review of strategic risk	BAU	Annual	01/04/2021	30/09/2022	X	X	X		X	X	H	NS	Comp	Comp	Comp	HOCS	

	Activity	Type	Frequency	Start Date	End Date	1	2	3	4	5	6	Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
1	Business continuity arrangements - COVID -19 –office re-opening- health and safety, physical distancing and hygiene arrangements – management of risk	Project		01/04/2021	31/03/2022	X	X	X	X	X	X	H	OT	OT	OT	C/f new	HOCS	Ongoing - to be carried forward to 2022-23
2	Internal audit – Governance and risk	Project		01/04/2021	31/03/2022	X	X	X	X	X	X	H	NS	NS	Comp	Comp	HOCS	
3	Internal audit – UK GDPR and data protection compliance – external audit to assess implementation process and compliance	Project		01/04/2021	31/03/2022	X	X	X	X	X	X	H	NS	NS	OT	Comp	HOCS	Internal audit completed - final report to MSMTM 29/03/22
4	Health and safety audit	Project		01/04/2021	31/03/2022					X		H	OT	OT	Comp	Comp	HOCS	CR to QSMTM Q3