



INTEGRITY IN PUBLIC LIFE

BUSINESS PLAN

2019 / 2020

Strategic Objective 1: 'GUIDANCE & SUPPORT'

To provide guidance and support to assist councillors and members of devolved public bodies to act in accordance with the Codes of Conduct.

Actions (Taken from Strategic Plan)	Activities 2019/20	Measurement / Target
<p>1. Providing advice on the content of the Codes of Conduct and how their provisions should be interpreted to members of the public and stakeholders, including officers of councils and staff of devolved public bodies.</p>	<p>Respond to enquiries and requests for dispensations within timescales outlined in Service Charter.</p> <p>Include information on how provisions have been interpreted at Hearings or appeal decisions in Standards Briefings or via standalone communications.</p> <p>Record any trends or issues arising from enquiries, and requests for advice, to determine whether any further general guidance or advice should be issued or changes made to clarify Codes.</p>	<p>Record enquiries and respond within timescales outlined in Service Charter. Report on performance to be included in Annual Report. Ongoing and Q2.</p> <p>Acknowledge any requests for dispensations within three working days and respond substantively within one month of receipt. Dispensations granted to be issued and published on website within one week of being agreed.</p> <p>Publish and disseminate a Standards Briefing at the end of each quarter.</p> <p>Publish and disseminate standalone news items in respect of any high-profile or potentially controversial Hearings or appeal decisions.</p> <p>Undertake review of record of enquiries received each quarter.</p>
<p>2. Supporting induction and training programmes to help councils and public bodies promote awareness and understanding of the Codes of Conduct among their councillors and members.</p>	<p>Hold two regional training events for councillors on the Councillors' Code of Conduct.</p> <p>Discuss possibility of holding training event with Health Board Members with Scottish Government / Cabinet Secretary for Health & Sport.</p> <p>Publish updated standard training presentations and supply officers of Councils and Devolved Public Bodies with notes on these on request.</p> <p>Hold training event for Provosts / Committee Chairs on the declarations of interest requirements in the Councillors' Code and associated Standards Commission Guidance and Advice Notes. Support the Scottish Government with development of content for its Governance Hub for members of Devolved Public</p>	<p>One regional training event to be held in Q2 and other in Q3.</p> <p>Training presentations and case illustrations to be updated and published when Codes revised or in Q2 (if Codes not revised by then).</p> <p>Support training event for Provosts / Committee Chairs – aim for this to be held in Q4.</p> <p>Ongoing discussions with Scottish Government's Public Bodies Unit. Formal meeting between Executive Director and Unit about training to be arranged and held in Q1.</p>

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	<p>Bodies and its training sessions and induction material on the Model Code of Conduct.</p> <p>Support Scottish Government with its training of Chairs of Devolved Public Bodies on the ethical standards framework.</p>	
<p>3. Developing, producing, issuing and promoting relevant, accessible and comprehensive guidance and educational materials for councillors and members of devolved public bodies in light of any trends and emerging issues or developments.</p>	<p>Review and revise as appropriate the Guidance on the Councillors' Code of Conduct following the Scottish Government's review of the Code.</p> <p>Review and revise as appropriate the Guidance on the Model Code of Conduct following the Scottish Government's review of the Code.</p> <p>Update illustrations in Guidance, Advice Notes and standard presentations in light of decisions made at Hearing in 2019/20 and any relevant queries / requests for advice.</p> <p>Produce advice note on adherence on the Model Conduct of Conduct for Members of Health and Social Care Integration Joint Boards.</p> <p>Continue to develop, consult on and publish Advice Notes in light of any emerging trends or feedback (including that requested by Monitoring and Standards Officers at their respective workshops).</p>	<p>Participate in Joint Working Group established by the Scottish Government to review the Codes of Conduct.</p> <p>Review Standards Commission's Guidance and undertake consultation with stakeholders on any substantive revisions within two months of any changes to the Codes being agreed.</p> <p>Illustrations to be updated and published on ongoing basis following Hearings.</p> <p>Draft Advice Note for Members of IJB's to be circulated in Q2 and finalised in Q3.</p> <p>Workshop with Monitoring Officers to be held in Q3 (November).</p> <p>Workshop with Standards Officers to be held in Q4 (March).</p> <p>Ongoing review of all sources of intelligence including complaints, enquiries, information gathering at workshops and training events, information gathering from the media, parliamentary committee reports and Audit Scotland reports to identify any topics which would benefit from new training material.</p>

Strategic Objective 2: 'PROMOTION'
To promote the Ethical Standards Framework and recognition and understanding of the Standards Commission's role among the public and stakeholders.

Actions	Activities	Measurement / Target
<p>4. Promoting the ethical standards framework and, in particular, the respect provisions in the Codes of Conduct.</p>	<p>Issue quarterly standards briefings outlining work being undertaken by the Standards Commission and reporting on any issues relating to the ethical standards framework in Scotland.</p> <p>Promote respect provisions in Codes and Standards Commission's role in improving the level of public debate through the media and social media outlets.</p> <p>Promote revised Guidance on Codes and any Advice Notes issued / consultations undertaken by the Standards Commission through the media and social media outlets.</p> <p>Promoting Hearings to be held and Hearings decisions in media, on website and on social media platform.</p> <p>Publishing Hearings decisions within timescales in Rules.</p> <p>Actively engaging with local media about Hearings and issuing press releases to them at conclusion of each Hearing.</p> <p>Discuss how best to promote the highest standards of ethical standards within community councils with the Scottish Government.</p>	<p>One Standards Briefing to be published each quarter.</p> <p>Use 'pot of hours' contract with public relations company to issue news releases / opinion pieces to media as and when appropriate and to produce targeted fact sheets on specific issues and work being undertaken relating to the ethical standards framework in Scotland.</p> <p>Release a minimum of three posts on the ethical standards framework on social media per week.</p> <p>Publish outcome of Hearing within 5 working days and full written decisions within 20 days of the conclusion of the Hearing.</p> <p>Report on compliance with timescales in Hearing Rules and Process Guide provided in Annual Report Q2.</p> <p>Include learning points from Hearings and summaries of cases in quarterly Standards Briefings, news items on website and social media posts.</p> <p>Case review to be undertaken in Q4 with outcome reported to Members.</p> <p>Liaise with any media in attendance at Hearings. Issue media releases in advance and press releases after each Hearing. Publish on website.</p> <p>Seek meeting with the Scottish Government to discuss how best to promote the highest standards of ethical standards within community councils in Q1.</p>

Strategic Objective 2: 'PROMOTION'

To promote the Ethical Standards Framework and recognition and understanding of the Standards Commission's role among the public and stakeholders.

Actions	Activities	Measurement / Target
<p>5. Developing effective working relationship with new Commissioner for Ethical Standards in Public Life (ESC).</p>	<p>Provide induction on work of Standards Commission, including future plans.</p> <p>Discuss and try to reach mutual understanding in respect of threshold for referral of cases under Sections 16 and 21 of the Ethical Standards in Public Life (Scotland) Act 2000.</p> <p>Consult ESC on any proposed changes to the Hearing Rules and associated procedural documents.</p> <p>Consult ESC on any proposed changes to the Standards Commission's Guidance and Advice Notes and on any potential new guidance / training material.</p>	<p>Executive Director to arrange induction meeting with new ESC and Senior Investigating Officer in Q1.</p> <p>Executive Director to hold monthly meetings with ESC. Standards Commission Members to meet with ESC four times per year.</p> <p>Ongoing consultations as appropriate.</p>
<p>6. Further develop relationships with Scottish Government and other stakeholders.</p>	<p>Hold discussions with Scottish Government about potential improvements to ethical standards framework such as changes to either Section 16 or Section 19 of the 2000 Act to expand options available to Standards Commission in potential breach cases where it may not be in the public interest or proportionate hold a Hearing or impose a censure, suspension of disqualification.</p> <p>Actively engage with Committee on Standards in Public Life, Northern Ireland Ombudsman and Standards Commissioner for Wales.</p> <p>Continue contact with other key stakeholders including SOLACE, Audit Scotland, COSLA, the College</p>	<p>Prepare and supply the Scottish Government with examples of types of cases where might be / have been useful to have had other options available under Sections 16 and 19 in Q2.</p> <p>Executive Director to have regular contact, and one meeting per year, with each of the Committee on Standards in Public Life, Northern Ireland Ombudsman and Standards Commissioner for Wales.</p> <p>Executive Director to attend SOLAR liaison group meetings in Q2 and Q4.</p> <p>Standards Commission to hold one meeting per annum with SOLACE officeholders, Audit Scotland and COSLA.</p> <p>Consult with other key stakeholders on changes to Guidance / any new Advice Notes within one month of these being agreed by the Standards Commission.</p> <p>Approach Appointed for Scotland and the Scottish Government in Q1.</p> <p>Approach the Institute of Directors and COSLA in Q2.</p>

Strategic Objective 2: 'PROMOTION'**To promote the Ethical Standards Framework and recognition and understanding of the Standards Commission's role among the public and stakeholders.**

Actions	Activities	Measurement / Target
	<p>Development Network and the Improvement Service and consult with all on any substantive changes to Guidance and any new Advice Notes as appropriate.</p> <p>Consult Appointed for Scotland and the Scottish Government about the possibility of including information about the Standards Commission in its advertising and recruitment material for members of devolved public bodies.</p> <p>Seek to engage with the Institute of Directors and COSLA to discuss any possible ways of working together to promote the highest ethical standards in public life.</p>	

Strategic Objective 3: 'ENFORCEMENT'

To enforce the Codes of Conduct in a fair, impartial and efficient manner.

Actions	Activities	Measurement / Target
<p>7. Ensuring Hearings conducted fairly and efficiently as possible.</p>	<p>Hold pre-Hearing meetings and discussions with parties before Hearings to determine which facts / matters are in dispute and to resolve any procedural matters.</p> <p>Ensure parties are fully aware of, and comply with, timescales under Hearing Rules and the contents of the Standards Commission's Guidance on Relevancy of Evidence at Hearings.</p> <p>Ensure Hearing Panel Chairs and Members are fully briefed on facts / matters are in dispute before Hearings.</p>	<p>Offer pre-Hearing meetings within 14 days of Section 16 decision notification letters being issued in all cases where it appears any of the facts or ESC's conclusions are in dispute.</p> <p>Ensure timescales clearly stated within Section 16 decision notification letters and send parties the Guidance on Relevancy of Evidence at Hearings. Chase parties within two days of expiry of any deadline if response not received.</p> <p>Briefing to be issued / provided to Panel Chair and Members at least seven days before Hearings.</p>
<p>8. Obtaining feedback and undertaking regular reviews to ensure Hearings conducted in the most transparent and accessible manner.</p>	<p>Circulate feedback forms at every Hearing and request feedback in decision letters and via standards briefings and social media.</p> <p>Seek feedback from Panel Members on management of all activity relating to each Hearing, including administrative arrangements, communications and the preparation of written decisions.</p> <p>Update Hearing Rules, procedures and processes as appropriate in light of any feedback and reviews.</p> <p>Provide updates on feedback and any improvements and changes made in standards briefings, via social media and in Annual Report.</p>	<p>Feedback to be sought on Standards Commission's Rules, Hearings related Guidance, communications / correspondence, how it conducts Hearings and the clarity of its public information and decisions. Overall feedback to be collated and circulated to Members for consideration in Q4.</p> <p>Review of each Hearing undertaken as standing agenda item at the Standards Commission meeting which follows the conclusion of each Hearing. This to include analysis and discussion on what went well or otherwise, and what could have been done differently.</p> <p>Report on compliance with timescales in Hearing Rules and Process Guide provided in Annual Report published in Q2.</p> <p>Review of Rules and procedures on ongoing basis. If no changes before then, conduct formal annual review in Q3.</p> <p>Review and update Sanctions Guidance in Q1.</p> <p>Review Hearings in Private Policy in Q4.</p> <p>Publish Guidance under Section 19(8) of the 2000 Act in Q2.</p> <p>Review Interim Suspension Policy if used.</p>

Strategic Objective 3: 'ENFORCEMENT'

To enforce the Codes of Conduct in a fair, impartial and efficient manner.

Actions	Activities	Measurement / Target
		Issue draft written decision to be circulated to Hearing Panel Members within five working days of conclusion of Hearing.
<p>9. Ensuring all decisions made and procedures followed at Hearings are consistent with the Standards Commission's Rules, case law and good practice.</p>	<p>Undertake review of each Hearing held at the following Standards Commission meeting. Undertake full annual review of all Hearings at end of the year.</p> <p>Ensure new Standards Commission Member is fully trained on procedures, Rules and all Hearings related guidance.</p> <p>Update Rules, procedures and decision-making templates in light of relevant case law, appeal decisions and cases / or work in analogous organisations / jurisdictions. Ensure Panel Members receive training accordingly.</p>	<p>Formal annual review of all decisions undertaken at Standards Commission meeting in Q4, including decisions taken under Section 16 and at Hearings.</p> <p>Arrange for new Standards Commission Member to observe one Hearing before being included on a Panel and to observe one pre-Hearing meeting before becoming a Panel Chair.</p> <p>Ongoing research to be undertaken in respect of relevant case law, appeal decisions and cases / or work in analogous organisations / jurisdictions. Updates and training to be provided accordingly.</p> <p>Undertake a full review format of written decisions in Q1 in light of research on analogous organisations and outcome of appeal case.</p>

Strategic Objective 4: 'GOVERNANCE'

To operate in accordance with the principles of good governance and best value.

Actions	Activities	Measurement / Target
<p>10. Developing the skills and competencies of Members and staff of the Standards Commission through a programme of continuous professional development, knowledge management and shared learning.</p>	<p>Full induction to be provided to new Standards Commission Member.</p> <p>Arrange a Members' Strategy and Development programme.</p> <p>Ensure any appropriate training and development opportunities are identified and arranged for all Standards Commission Members and staff.</p>	<p>Induction of new Member appointed in February 2019 to be completed by end of Q2.</p> <p>Members' Strategy and Development programme to be finalised in Q1 so that dates for discussions about developing the Strategic Plan 2020-2024 are agreed.</p> <p>Induction on Human Resources Committee to be provided to Members appointed to Committee in Q1.</p> <p>Feedback on training and induction to be sought from new member and induction pack and plan amended as appropriate in Q3.</p> <p>Convener to discuss individual training / skills development requirements with each member in Q1. All activities identified to be undertaken by end of Q4.</p> <p>Staff personal development plans developed as part of performance review in Q1. All activities identified to be undertaken by end of Q4.</p> <p>Obtain confirmation that Standards Commission is recognised as a Carer Positive employer in Scotland in Q1.</p>
<p>11. Being accountable, effective and efficient in our use of our resources in order to support sustainability and ensure value for money.</p>	<p>Identifying and taking forward opportunities to work jointly or in partnership with other public bodies in order to ensure the efficient delivery of the Standards Commission's role, to eliminate duplication and to obtain best value in terms of shared services.</p> <p>Implement recommendations and action points arising from external and internal audits.</p> <p>Review all shared service / service level agreements.</p> <p>Consider varying usual Hearing procedures when appropriate to do so if possibility of reducing costs arises.</p>	<p>Participation in Commissioners and Ombudsman's Group, FOISA Network Group and Data Protection Officer meetings. Ongoing research and <i>ad hoc</i> contact with other public bodies.</p> <p>Programme of audits and associated improvement actions to be completed Q4.</p> <p>Full review of all shared service agreements including ones with SPCB's BIT, Internal Audit and provision of DPO services to be undertaken in Q3 and Q4.</p> <p>Ensure Standards Commission is named in any relevant SPCB and Officeholders' procurement contracts.</p> <p>Actively consider all opportunities, and any requests, to vary normal Hearings procedures if possibility of reducing costs arises (provided there is no adverse impact in terms of access, openness and fairness).</p>

