



INTEGRITY IN PUBLIC LIFE

## **BUSINESS PLAN**

**2018 / 2019**

## 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 2018/19	Measurement / Target
<p>1. Providing advice on the interpretation of the Codes to members of the public and stakeholders, including officers of councils and staff of devolved public bodies.</p>	<p>Provide accurate and timeous advice on request.</p> <p>Respond timeously to requests for dispensations.</p> <p>Ensure effective and timeous signposting to relevant advisor service / organisation if query outwith the remit of the SCS.</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>Substantive response with reasoning to requests for dispensations to be issued within one month of receipt. Dispensations granted to be issued and published on website within one week of being agreed.</p> <p>Seek feedback on service provided in respect of requests for advice and dispensations in Q4 professional briefing.</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 roadshows for elected members on how to comply with the provisions in the Councillors' Code of Conduct (subject to demand) .</p> <p>Hold a roadshow for Members of Health &amp; Social Care Integration Joint Boards focusing on topics such as identifying conflicts of interests, being clear about the capacity in which individuals appointed to different organisations are acting, and resolving any cultural clashes that arise on Boards comprising of individuals from different organisations.</p> <p>Collaborate with the College Development Network to organise provision of a workshop or roadshow for College Board Members on the ethical standards framework and compliance with the Codes of Conduct.</p> <p>Discuss with the Improvement Service, Scottish Government and Audit Scotland the possibility of producing a signposting document containing all sources of appropriate information, guidance and</p>	<p>Substantive response to any request for training event to be issued within one month of receipt.</p> <p>Canvass interest in regional events for councillors and, if sufficient demand, arrange and hold by end of Q4.</p> <p>IJB roadshow to be held in Q2.</p> <p>College roadshow / workshop to be held in Q3.</p> <p>Hold discussions with Improvement Service, Scottish Government and Audit Scotland by end of Q2.</p> <p>Update and publish standard presentations in Q2.</p>

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Actions (Taken From Strategic Plan)	Activities 2018/19	Measurement / Target
	<p>advice for elected members. Explore possibility with of producing similar document for members of devolved public bodies.</p> <p>Update and publish standard presentations on the Codes of Conduct (to include up to date case examples).</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>Produce Guidance or Advice for councillors on Harassment and Bullying.</p> <p>Produce Guidance or Advice for members of devolved public bodies on Harassment and Bullying.</p> <p>Produce / revise Guidance on revised specific exclusion for Regional Transport Partnerships.</p> <p>Produce / revise Guidance in respect of any other changes made to the Codes of Conduct.</p> <p>Produce training material for Members of IJBs</p> <p>Hold workshops with MO and SO's and regular discussions with other stakeholders e.g. CESPLS, IS, SOLAR, SOLACE, Audit Scotland to identify areas where higher risk of non-compliance with Codes of Conduct and any trends and emerging issues.</p>	<p>Guidance on harassment &amp; bullying to be produced and issued for consultation in Q1 with view to finalising and publishing Q2.</p> <p>Draft Guidance on revised specific exclusion for Regional Transport Partnerships to be produced within one month of Scottish Government issuing revised Code.</p> <p>Guidance for members of Health &amp; Social care Integration Joint Boards to be developed and published in Q3 after workshop to be held in Q2.</p> <p>Workshop with MO's to be held in Q3 (November). Workshop with SO's to be held in Q4 (March).</p> <p>ED to held regular discussions with other stakeholders throughout year, including monthly meetings with CESPLS. Stakeholders to be consulted about any revisions to Guidance.</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	Risk Register Ref	Progress Update
4. Promoting the ethical standards framework along with the work and aims of the Standards Commission through the media and social media outlets.	<p>Develop and implement PR Plan (in conjunction with Holyrood PR) to promote the ethical standards framework and role of the Standards Commission in the media, including its importance in protecting the public interest.</p> <p>Identify and implement new channels of communication including issuing and publishing video messages.</p> <p>Having in place a suite of central key messages.</p>	<p>Secure at least four substantial items of national media coverage and a minimum of 10 items of coverage in local or specialist media.</p> <p>Increase social media followers by 50% by end of Q4.</p> <p>Suite of key messages in place by end of Q1.</p> <p>Issuing and publishing two sets of video messages via the website and social media channels.</p>		
5. Increasing awareness of the role of the Standards Commission, the provisions in the Model Code of Conduct and how to make a complaint among officers and Members of Devolved Public Bodies.	<p>Undertaking research / consultation on awareness of the role of the Standards Commission, the provisions in the Model Code of Conduct and how to make a complaint among officers and Members of Devolved Public Bodies.</p>	<p>Undertaking research by end of Q2 and creating and implementing a communications strategy by end of Q4 to increase awareness if consultation demonstrates a need.</p>		
6. Promoting Scotland's 'integrity branch' and the Standards Commission's role within it amongst the public and stakeholders.	<p>Explore the possibility of holding a meeting with other stakeholders to discuss how to promote the importance of working in a culture of respect.</p> <p>Continue to develop training material and briefings in conjunction with the Improvement Service, the College Development Network and Audit Scotland.</p>	<p>Hold discussions in Q1 on possibility of a meeting with stakeholders including the Scottish Government, CESPLS, Audit Scotland, and other Commissioners and Ombudsmen such as the SPSO and Scottish Information Commissioner.</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>		

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Actions	Activities	Measurement / Target	Risk Register Ref	Progress Update
		Publish & disseminate professional briefings in each quarter.		

### Strategic Objective 3: 'ENFORCEMENT'

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

Actions	Activities	Measurement / Target
<p>7. Improving level of awareness and engagement in respect of Hearings.</p>	<p>Identify and publish learning points from complaints and Hearings in professional briefings, guidance and training materials.</p> <p>Ensure SCS is accessible and receptive to communications by stakeholders by responding to requests from both external and internal stakeholders in a timeous and effective manner.</p> <p>Implement a rolling programme to ensure standard correspondence is reviewed and updated regularly.</p> <p>Undertake review of administration of two to three sample cases to identify learning points for continuous improvement, including identifying if any areas where there is opportunities to improve efficiency in processes and case management.</p>	<p>Issue media releases in advance and press releases after each Hearing.</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 professional briefings and social media posts.</p> <p>Case review to be undertaken in Q4 with outcome reported to Members.</p> <p>Record the number of Respondents who did not attend and / or were not represented at Hearings (and of these the number who still held office. Report to Members in Q4.</p>
<p>8. Obtaining feedback and undertaking regular reviews to ensure Hearings conducted in the most transparent and accessible manner.</p>	<p>Proactively seek and analyse feedback on the conduct and management of Hearings in order to identify any improvements.</p> <p>Undertake research and engage with other bodies in order to share and inform best practice.</p> <p>Offer pre-Hearing meetings as a matter of course to enable parties to raise queries and for procedural issues to be resolved in advance of Hearings.</p>	<p>Issue feedback survey forms at each Hearing and / or send to known participants and attendees. Identify and make any improvements to Hearing Rules and / or standard procedures.</p> <p>Draft written decision to be circulated to Hearing Panel Members within five working days of conclusion of Hearing.</p> <p>Formal annual review of all decisions undertaken at SCS meeting in Q4, including decisions taken under Section 16 and at Hearings.</p> <p>Ongoing research and <i>ad hoc</i> contact with other bodies including NI Ombudsman and Standards Commissioner for Wales.</p>

### Strategic Objective 3: 'ENFORCEMENT'

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

Actions	Activities	Measurement / Target
9. Ensuring all decisions made and procedures followed at Hearings are consistent with the Standards Commission's Rules, case law and good practice.	Review decisions made to ensure they are robust, proportionate and can stand up to effective scrutiny.  Conduct review of Hearing Rules and other Hearings related procedures and literature after Hearings in order to help streamline case preparation, leaving it transparent to those involved	Review of each Hearing undertaken as standing agenda item at the SCS 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.  Report on compliance with timescales in Hearing Rules and Process Guide provided in Annual Report Q2.  Review of Rules and procedures on ongoing basis. If no changes before then, conduct formal annual review in Q3.

## 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>Continued training of new Member commencing in post in Q4 of 2017/18.</p> <p>Individual training for Members to be identified and actioned.</p> <p>Create and implement personal development plans for all staff.</p>	<p>Discuss opportunity for access to the Scottish Parliamentary staff training portal Q1</p> <p>Induction of new Member appointed in Feb 2018 to be completed by end of Q4.</p> <p>Training of new member of Audit &amp; Risk Committee Q1.</p> <p>Feedback on training and induction to be sought from new member and induction pack and plan amended as appropriate in Q2.</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>Personal development plans developed as part of performance review in Q1. All activities identified to be undertaken by end of Q4.</p>
<p>11. Being accountable, effective and efficient in our use of our resources in order to support sustainability and reflect environmental best practice.</p>	<p>Implement Plan to ensure Standards Commission is GDPR compliant</p> <p>Ensure compliance with Cybersecurity best practice requirements under the Scottish Government's Public Sector Resilience Framework</p> <p>Publish BSL plan as required under the British Sign Language (Scotland) Act 2015.</p> <p>Undertaking full review of staffing structure and requirements.</p> <p>Reviewing and developing central record of all ongoing contracts.</p> <p>Implement recommendations and</p>	<p>Agreeing and implementing shared service agreement for a Data Protection Officer as required under the GDPR.</p> <p>Training staff and members on GDPR requirements and obligations completed by end Q2.</p> <p>Ongoing discussions with website provider and SPCB's BIT Office to identify, agree and implement any actions Standards Commission requires to take to ensure compliance with best practice requirements under the Scottish Government's Public Sector Resilience Framework.</p> <p>BSL Plan in place by October 2018.</p> <p>Staffing review completed by end of Q1.</p> <p>Contract review undertaken and record created by end of Q2.</p> <p>Programme of audits and associated improvement actions to be completed Q4.</p> <p>Undertake review undertaken, submit PUR to NRS and publish revised documents on SCS website by end of Q3.</p>



## Strategic Objective 4: 'GOVERNANCE'

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

Actions	Activities	Measurement / Target
	<p>action points arising from external and internal audits.</p> <p>Review Records Management Plan and Document Retention Policy.</p>	
<p>12. 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>Attend meetings of the Commissioners and Ombudsman's Business Managers Group and FOISA Network Group 7 to share information and ensure best practice is being applied uniformly.</p> <p>Proactively engage with the Scottish Government and other stakeholders on any issues concerning the ethical standards framework to ensure the best outcome for the Scottish public.</p> <p>Explore the possibility of holding a meeting with other stakeholders to discuss how to promote the 'integrity branch' and importance of working in a culture of respect in general.</p>	<p>Participation in Commissioners and Ombudsman's Group, FOISA Network Group. Ongoing research and ad hoc contact with other bodies.</p> <p>Continue to develop training material and briefings in conjunction with stakeholders including the Improvement Service, the College Development Network, the Scottish Government and Audit Scotland.</p> <p>Potential stakeholders identified and contact made in Q1 regarding a joint training event with a view to holding such an event in Q2 or Q3.</p>