



INTEGRITY IN PUBLIC LIFE

## **BUSINESS PLAN**

**2020 / 2021**

## Strategic Aim 1: 'IMPACT'

We will have a positive impact on ethical standards in public life.

Actions (Taken from Strategic Plan)	Activities 2020/21	Measurement / Target
<p><b>1.</b> Providing thought leadership by driving collaboration between organisations who seek to ensure integrity in public life.</p>	<p>Host round table meeting with other public bodies to discuss ways of promoting integrity and of improving the public perception of the conduct of those in public life.</p> <p>Produce an Advice Note for Councillors on Gifts and Hospitality, in conjunction with Police Scotland and the Scottish Government.</p>	<p>Relevant public bodies identified in Q1, with view to issuing invitation and holding initial discussions by end of Q3.</p> <p>Advice Note to be produced, issued and published in Q2 (when likely provisions concerning gifts and hospitality in the Councillors' Code of Conduct are known).</p>
<p><b>2.</b> Improving our profile and developing an effective communications strategy so that we can take all opportunities to be a strong and consistent voice for the importance of the ethical standards framework and compliance with the Codes of Conduct.</p>	<p>Work with public relations company to develop communications plan that outlines a strategy for identifying the most appropriate method, timing and audience (i.e. specific media outlets, other public bodies or politicians) for communicating messages about the ethical standards framework and Codes of Conduct.</p> <p>Include information / articles on current issues arising in respect of the ethical standard framework and how provisions in the Code have been interpreted at Hearings or in appeal decisions in Standards Updates or via standalone communications.</p> <p>Publish and disseminate standalone news items in respect of any high-profile or potentially controversial Hearings and any appeal decisions.</p> <p>Promote Hearings to be held and Hearings decisions in media, on website and on social media platforms.</p>	<p>Communications Plan and how success will be measured to be developed and agreed in Q1 and thereafter implemented on an ongoing basis. Review of effectiveness of Plan to be undertaken in Q4.</p> <p>Publish and disseminate a Standards Update at the end of each quarter.</p> <p>Publish and disseminate standalone news items in respect of any high-profile or potentially controversial issues, Hearings and appeal decisions.</p> <p>Advise local and, if appropriate national, media of Hearings to be held. Liaise with any media in attendance at Hearings. Issue and publish on website media releases in advance, and press releases after, each Hearing. Publish information about Hearings to be held on website and social media platforms. Publish decision and press releases on website within five days, and full written decision within 20 working days, of conclusion of a Hearing and promote these on social media.</p> <p>Release a minimum of three posts on the ethical standards framework on social media per week.</p>

## Strategic Aim 1: 'IMPACT'

We will have a positive impact on ethical standards in public life.

Actions (Taken from Strategic Plan)	Activities 2020/21	Measurement / Target
	Actively engage with local media about Hearings and issuing press releases to them at conclusion of each Hearing.	
<p><b>3.</b> Conducting research and assisting with programmes to train and educate on best practice to drive up standards.</p>	<p>Publish and share training presentations on Codes of Conduct and case illustrations.</p> <p>Continue to develop, consult on, publish and disseminate Advice Notes in light of any emerging trends or feedback (including those identified by Monitoring and Standards Officers at their respective workshops).</p> <p>Respond to enquiries and requests for assistance within timescales outlined in Service Charter.</p> <p>Research alternative formats for Guidance and Advice Notes.</p>	<p>Training presentations and case illustrations to be updated and published in Q1 and again when Codes revised.</p> <p>Respond to all requests for assistance with training, on how to interpret provisions in the Codes of Conduct, and on how to make a complaint or resolve an issue concerning the ethical standards framework within timescales outlined in the Service Charter.</p> <p>Record enquiries and report on performance against timescales in Annual Report. Ongoing and Q2.</p> <p>Undertake research into potential different formats for the presentation and publication of Guidance and Advice Notes by end of Q3.</p>
<p><b>4.</b> Obtaining and undertaking detailed analysis of qualitative and quantitative evidence on our work to promote the Codes of Conduct so that we evaluate our impact in a meaningful way.</p>	<p>Develop and implement strategy to evaluate impact of both the promotional and adjudication work undertaken.</p> <p>Maintain a record of nature of all enquiries and feedback received and about cases referred on an ongoing basis.</p>	<p>Undertake research on the types of qualitative and quantitative data other analogous organisations collect in order to measure, and report on success. Discuss this this at a development day in Q2.</p> <p>Agree what data should be collect and how to measure this by end of Q4, with a view to reporting on progress in Annual Report for 2020/21 (to be laid and published in Q2 of 2021/22).</p>

## Strategic Aim 2: 'IMPROVEMENT'

We will pursue continuous improvement in the ethical standards framework and the way we do our work.

Actions	Activities	Measurement / Target
<p><b>5.</b> Making recommendations to amend the governing legislation so that we can deal with breaches of the Codes of Conduct in the most effective and proportionate manner.</p>	<p>Review, and try to reach consensus, with the Ethical Standards Commissioner (ESC) over potential amendments to Section 16 of the Ethical Standards in Public Life etc. (Scotland) Act 2000 to ensure potential breaches of the Codes can be dealt with in the most effective and proportionate manner, and so that a recommendation can thereafter be made to the Scottish Government via the Scottish Parliamentary Corporate Body (SPCB).</p> <p>Discuss and try to reach mutual understanding with the ESC in respect of threshold for referral of cases under Sections 16 and 21 of the Ethical Standards in Public Life (Scotland) Act 2000 and on conjoining complaints / dealing with complaints that concern a course of conduct by a Respondent.</p> <p>Consider varying usual Hearing procedures when appropriate to do so if possibility of reducing costs arises.</p>	<p>Hold discussions with the ESC by end of Q4, with a view to trying to put a joint proposal to the SPCB in Q4.</p> <p>Hold joint meeting with ESC to discuss threshold, conjoined cases and how to deal with alleged courses of conduct in Q1.</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>
<p><b>6.</b> Working with others to ensure there is consistency in terms of the standards expected of all individuals in public life.</p>	<p>Hold annual workshops with Monitoring and Standards Officers to discuss emerging trends and issues and how best to deal with these. Invite the ESC, Audit Scotland, Scottish Government, the Colleges Development Network and the Improvement Service to these.</p> <p>Update illustrations in Guidance, Advice Notes and standard presentations in light of</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>Illustrations to be updated and published on ongoing basis following Hearings.</p> <p>Request a meeting with Scottish Government Local Government's Division in Q1 to discuss how best to promote (voluntary) adherence to the key principles and Code for Community Councillors.</p>

## Strategic Aim 2: 'IMPROVEMENT'

We will pursue continuous improvement in the ethical standards framework and the way we do our work.

Actions	Activities	Measurement / Target
	<p>decisions made at Hearings in 2020/21 and receipt of any relevant queries / requests for advice.</p> <p>Discuss how best to promote the highest standards of ethical standards within Community Councils with the Scottish Government.</p>	
<p><b>7.</b> Helping to resolve or mitigate any tensions in the ethical standards framework arising from the design of public bodies, including any inherent conflicts of interests.</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 that would benefit from new educational material.</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>Undertake review of record of enquiries received each quarter.</p> <p>Acknowledge any requests for dispensations within three working days and respond substantively within one month of receipt (following consultation with the ESC and Scottish Government). Dispensations granted to be issued and published on website within one week of being agreed.</p> <p>Continue to contribute to the Working Group established to review the Codes of Conduct (including ensuring they were fit for purpose and did not impede the statutory purpose of new public bodies established to facilitate joint working between various public sector organisations, such as regional transport partnerships and health and social care integration joint boards.)</p>
<p><b>8.</b> Influencing the content and format of the Codes of Conduct to ensure they remain fit for purpose and are as accessible and user-friendly as possible.</p>	<p>Use intelligence received to actively participate in Joint Working Group established by the Scottish Government to review the Codes of Conduct.</p> <p>Assist the Scottish Government with its consultation process on the draft revised versions by promoting the consultation, the changes proposed and the reasons for them.</p>	<p>Executive Director to attend monthly meetings of Joint Working Group and MO sub-group and to provide feedback on progress to Standards Commission members at their monthly meetings.</p> <p>Promote consultation in correspondence to MOs, SOs and in articles on website and social media.</p>

## Strategic Aim 2: 'IMPROVEMENT'

We will pursue continuous improvement in the ethical standards framework and the way we do our work.

Actions	Activities	Measurement / Target
<p><b>9.</b> Reviewing and revising our Guidance, Advice Notes and other educational material to ensure they continue to add value and assist councillors and members to adhere to the provisions in the Codes.</p>	<p>Revise all Guidance, Advice Notes, standard presentations and case studies in light of agreed changes to the Councillors' and Model Codes of Conduct to ensure they remain relevant and fit for purpose.</p> <p>Review format of all Guidance and Advice Notes. Consider creating digital, Braille and BSL versions where possible.</p> <p>Update illustrations in Guidance, Advice Notes and standard presentations in light of decisions made at Hearings in 2020/21 and receipt of any relevant queries / requests for advice.</p>	<p>Review Standards Commission's Guidance and educational material and undertake consultation with stakeholders on any substantive revisions within three months of any changes to the Codes being agreed.</p> <p>Undertake research on different available formats and costs of these in Q1.</p> <p>Illustrations to be updated and published on ongoing basis following Hearings.</p>

## Strategic Aim 3: 'STAKEHOLDERS'

We will pursue and develop strong relationships with our stakeholders.

Actions	Activities	Measurement / Target
<p><b>10.</b> Identifying and seeking ways of working with all individuals and organisations who are potentially affected by the ethical standards framework.</p>	<p>Hold two regional training events for councillors on the Councillors' Code of Conduct.</p> <p>Consult ESC on any proposed changes to the Hearing Rules and associated procedural documents.</p> <p>Circulate feedback forms at every Hearing and request feedback in decision letters and via Standards Updates and social media.</p>	<p>One regional training event to be held in Q2 and the other in Q3.</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>Feedback to be sought on Standards Commission's Hearing 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>

### Strategic Aim 3: 'STAKEHOLDERS'

We will pursue and develop strong relationships with our stakeholders.

Actions	Activities	Measurement / Target
	<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 Updates, via social media and in Annual Report.</p> <p>Following consultation with COSLA and SOLACE, issue and publish a Guidance Note on Section 19(8) of the 2000 Act (outlining the activities in which a councillor could engage in during a period of suspension).</p>	<p>Consult with COSLA and SOLACE on S19(8) Guidance Note in Q1 and issue and publish thereafter.</p>
<p><b>11.</b> Improving our engagement with devolved public bodies to help them increase awareness amongst their members of the provisions in the Codes of Conduct and how to complain about any failure to adhere to these.</p>	<p>Work with NHS Education Scotland, the Chair of the Integration Joint Boards (IJBs) Chairs and Vice Chairs Group, and the Scottish Government's Health and IJB Directorates to promote and increase awareness of the ethical standards framework.</p> <p>Update standard presentation, guidance and training material on Model Code once revised, and send to Standards Officers for circulation to members (with offer to assist with any induction or training events they intend to hold).</p>	<p>Provide content in Q1 on ethical standards framework, provisions in the Codes and how to make a complaint for inclusion on NHS Education Board Member's Improvement Hub.</p> <p>Update standard presentation and Guidance and send within two months of any changes to the Codes being agreed.</p>

### Strategic Aim 3: 'STAKEHOLDERS'

We will pursue and develop strong relationships with our stakeholders.

Actions	Activities	Measurement / Target
<p><b>12.</b> Working with chairs and conveners of devolved public bodies and local authority committees to try to prevent issues and breaches of the Codes from arising at meetings.</p>	<p>Support or hold training event(s) for Conveners / Committee Chairs on respect and identifying and dealing with conflicts of interests (and any other issues that arise).</p> <p>Support the Scottish Government with development of further content for its Governance Hub for members of Devolved Public 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>Support training event for Provosts / Committee Chairs – aim for this to be held in Q4.</p> <p>Arrange a meeting in Q2 with Scottish Government’s Public Bodies Unit to discuss how Standards Commission can assist with its Governance Hub and Chair induction / training.</p>
<p><b>13.</b> Actively seeking feedback on our educational material, policies and procedures and collaborating with other regulators and partner bodies across the UK to share experiences and inform best practice.</p>	<p>Consult with stakeholders on any substantive changes made to Standards Commission’s Guidance and Advice Notes in light of any agreed amendments to the Codes of Conduct.</p> <p>Actively engage and collaborate with Committee on Standards in Public Life, Northern Ireland Ombudsman and Standards Commissioner for Wales on emerging trends arising from complaints and Hearings and on best practice.</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. Executive Director to have regular contact, and if possible 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. Standards Commission to hold one meeting per annum with SOLACE officeholders, Audit Scotland and COSLA.</p>



### Strategic Aim 3: 'STAKEHOLDERS'

We will pursue and develop strong relationships with our stakeholders.

Actions	Activities	Measurement / Target
	<p>Continue contact with other key stakeholders including ESC, SOLACE, Audit Scotland, COSLA, the College 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><b>14.</b> Seeking to share services where possible, to ensure best value.</p>	<p>Migrate all files to the SharePoint platform provided by the Scottish Parliament's Business and Information Technology Team.</p> <p>Identify and take forward opportunities to work jointly or in partnership with other public bodies to ensure the efficient delivery of the Standards Commission's functions, 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>Ensure Standards Commission is named in any relevant SPCB and Officeholders' procurement contracts.</p>	<p>Complete migration and training of all staff and Members on SharePoint in Q1.</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>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>

## Strategic Aim 4: 'CLARITY'

We will ensure that all stakeholders, including members of the public, have easy access to high quality information about the organisation, its work and any initiatives it is undertaking.

Actions	Activities	Measurement / Target
<p><b>15.</b> Promoting the ethical standards framework, the Codes of Conduct and how to make a complaint so that everyone is aware of the standards expected of those in public life, and able and confident to report poor behaviour.</p>	<p>Ensure website meets accessibility requirements as outlined in the Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations 2018.</p> <p>Create, publish and issue Guidance for the public on the Codes of Conduct and how to make a complaint.</p> <p>Promote ethical standards framework on website, in media and on social media platforms.</p>	<p>Complete work to ensure website meets accessibility requirements by October 2020.</p> <p>Guidance for public to be issued by end of Q4 (after codes revised).</p> <p>Communications Plan and how success will be measured to be developed and agreed in Q1 and thereafter implemented on an ongoing basis. Review of effectiveness of Plan to be undertaken to be reviewed in Q4.</p>
<p><b>16.</b> Ensuring all case related decisions are clearly explained and well-reasoned.</p>	<p>Ensure Hearing Panel Chairs and Members are fully briefed before Hearings on facts / matters that are in dispute and any relevant legislation or case law.</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>Send draft decisions to Panel Members for review within two working days of conclusion of Hearing / decision to impose an interim suspension.</p>	<p>Briefing to be issued / provided to Panel Chair and Members at least seven days before Hearings.</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>Panel Members to provide feedback on quality of draft written decisions as part of case review at Standards Commission meeting following the conclusion of the Hearing / meeting about the imposition of an interim suspension.</p> <p><b>9</b></p>
<p><b>17.</b> Using digital technology to ensure all educational</p>	<p>Include information about how to find information about Hearings and educational</p>	<p>Undertake research on different available formats / technology (and costs) for educational material in Q1.</p>

## Strategic Aim 4: 'CLARITY'

We will ensure that all stakeholders, including members of the public, have easy access to high quality information about the organisation, its work and any initiatives it is undertaking.

Actions	Activities	Measurement / Target
<p>material and information about good practice and Hearings are published and disseminated as widely as possible.</p>	<p>materials in Standards Updates, via standalone communications, on website and via email and social media.</p> <p>Publish and disseminate standalone news items in respect of any high-profile or potentially controversial Hearings or appeal decisions.</p> <p>Encourage stakeholders to follow Standards Commission on its social media platforms.</p>	<p>Publish and disseminate standalone news items in respect of any high-profile or potentially controversial issues, Hearings and appeal decisions.</p> <p>Include information about Standards Commission's social media platforms in correspondence and Standards Updates.</p> <p><b>1</b></p>
<p><b>18.</b> Promoting the importance of good behaviour and integrity in decision-making to help attract and encourage the highest quality candidates to apply for public appointments and to seek election as local government councillors.</p>	<p>Support Electoral Commission, COSLA, the Improvement Service and Councils in providing information on the ethical standards framework and particularly the importance of the Councillors' Code of Conduct to be included in the nomination form and / or information packs and briefing notes for those seeking election as local government councillors.</p> <p>Support Scottish Government in providing information on the ethical standards framework and particularly the importance of acting with respect and integrity to be included in any adverts and information packs for prospective candidates for public appointments.</p>	<p>Contact the Electoral Commission, COSLA, and the Improvement Service in Q3.</p> <p>Arrange a meeting in Q2 with Scottish Government Public Bodies Unit to discuss how Standards Commission can provide information and content for its Appointed for Scotland website.</p> <p><b>6</b></p>