



INTEGRITY IN PUBLIC LIFE

## **BUSINESS PLAN**

**2026 / 2027**

**Strategic Aim 1: PROMOTION AND EDUCATION**

The Standards Commission will take all opportunities to be a strong and consistent voice for the importance of the key principles of public life and to educate on the standards of conduct expected of councillors and members of devolved public bodies.

PROMOTION & EDUCATION	
Action 1: Use media and other public platforms to promote key principles, Codes and the standards expected of councillors and members of devolved public bodies.	
Risk Register References: 1: Promotion 2: Education 3: Stakeholders	
Activities	Measurement / Target
Promote existence of Codes and raise awareness of their provisions and the standards expected of councillors and members of devolved public bodies amongst members of the public.	<p>Publish short videos for website and social media on what Codes do and do not cover and when they apply by end of Q2.</p> <p>Publish series of social media posts on standards expected (ongoing).</p> <p>Promote card for members of public on when the Councillors' Code applies on website and social media (ongoing).</p> <p>Provide content to ESC and Scottish Government on when Codes apply for inclusion on their respective websites (by end of Q2).</p>
Proactive engagement with local and national media, and Parliament, on issues concerning the ethical standards framework and how provisions in the Code have been interpreted.	<p>Monitor media (including social media) on ongoing basis determine within 3 working days appropriate course of action (i.e. to publish news article or blog).</p> <p>Respond to any media requests for input or quote within 1 working day.</p> <p>Upon awareness of any substantial reporting inaccuracy about Standards Commission's role, work or decisions, send request for correction within 3 working days.</p> <p>Invite in Q1 local media outlets to awareness session on ethical standards framework and role of Standards Commission to be held, if sufficient interest, in Q2.</p>
Give evidence before Local Government, Housing and Planning Committee on the work of the Standards Commission and issues concerning the ethical standards framework if and when invited (likely Q3).	Committee appearance successful in terms of its members being satisfied with answers provided and Standards Commission satisfied key points made and understood. Any follow-up correspondence to be issued within the agreed or promised timescale.

**PROMOTION & EDUCATION**

**Action 1: Use media and other public platforms to promote key principles, Codes and the standards expected of councillors and members of devolved public bodies.**

**Risk Register References: 1: Promotion 2: Education 3: Stakeholders**

<b>Activities</b>	<b>Measurement / Target</b>
Publish regular blogs on the website on any topical and pertinent news stories	Publish at least one personalised blog a month.
Promote the summary of the responses to the surveys of councillors, members of devolved public bodies, Monitoring Officers and Standards Officers to be undertaken in 2026/27; and any action the Standards Commission is intending to take in light of these.	Publish summary and action plan on website and share with key stakeholders Place an opinion piece about trends observed by the Standards Commission.
Engage with Ethics and Integrity Commission and equivalent bodies in other nations to see if joint messaging / promotional opportunities.	Hold at least one meeting with EIC, Local Government Committee for Standards in NI and Public Services Ombudsman for Wales by end of Q4.

**PROMOTION & EDUCATION**

**Action 2: Seek feedback and undertake research to keep abreast of developments in respect of the ethical standards framework and developments in terms of how behaviours are perceived, in order to ensure training and educational material is relevant and up to date.**

**Risk Register References: 2: Education 3: Stakeholders 4: Training**

<b>Activities</b>	<b>Measurement / Target</b>
Update Guidance on Model Code to reflect any changes made to Guidance on Councillors' Code and any issued identified at Standards Officers' Workshop	Review Guidance in Q1 following Workshop. Issue amended draft for consultation in Q2, before finalising, issuing and publishing by end of Q3.

**PROMOTION & EDUCATION**

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**Risk Register References: 2: Education 3: Stakeholders 4: Training**

Review and update standard training presentations on the Codes in light of the revised Guidance and the Standards Commission’s experience in interpreting their provisions.	Review and, if appropriate, update standard training presentations (including case examples and illustrations) by end of Q4.
Update Advice Notes in light of feedback and enquiries received and decisions made.	<p>Review feedback and comments made in surveys to determine whether any feedback on Advice Notes. Consult upon or make any amendments as appropriate within 1 month.</p> <p>Invite feedback on Advice Notes at annual Standards Officers’ Workshop in Q1 and Monitoring Officers’ Workshop in Q3 and consult upon or make any amendments within 1 month.</p> <p>Review and update case examples and illustrations in Advice Notes in Q3.</p>

**PROMOTION & EDUCATION**

**Action 3: Ensure information about Hearings, case decisions and any learning points from these, including the impact or potential impact of the conduct being considered, are published and disseminated as widely as possible.**

**Risk Register References: 2: Education 3: Stakeholders**

<b>Activities</b>	<b>Measurement / Target</b>
Promote Hearings to be held and Hearings decisions in media, on website and on social media platforms.	<p>Publish information about Hearings to be held within 2 working days of decision to hold.</p> <p>Follow-up with media / send reminder one week before any scheduled Hearing.</p> <p>Publish and disseminate information about Hearing decisions within 2 working days of written decision being finalised and issued to parties.</p>
Advise local and, if appropriate national, media of Hearings to be held. Liaise with any media in attendance at Hearings and issue press releases at conclusion of each Hearing.	<p>Advise media of Hearings to be held within 2 working days of decision to hold. Monitor press coverage and liaise with journalists about case and Hearing arrangements.</p> <p>Issue and publish press releases within 2 working days of conclusion of Hearing.</p>

**PROMOTION & EDUCATION**

Action 3: Ensure information about Hearings, case decisions and any learning points from these, including the impact or potential impact of the conduct being considered, are published and disseminated as widely as possible.

**Risk Register References: 2: Education 3: Stakeholders**

<b>Activities</b>	<b>Measurement / Target</b>
Issue and publish a quarterly 'Standards Update' newsletter. Include information / articles on current issues arising in respect of the ethical standards framework and how provisions in the Code have been interpreted at Hearings or in appeal decisions.	Publish and disseminate a Standards Update at end of each quarter.

**Strategic Aim 2: Stakeholders and Service Users**

The Standards Commission will continue to develop strong relationships with its stakeholders and work with them to resolve issues and prevent breaches of the Codes.

STAKEHOLDERS AND SERVICE USERS	
Action 4: Proactive engagement with key stakeholders to identify and / or discuss any issues that have arisen or could arise.	
Risk Register References: 1: Promotion 3: Stakeholders 6: Service Users	
Activities	Measurement / Target
Hold meetings with Scottish Government’s Public Bodies and Local Government Teams, SOLAR, the Improvement Service, COSLA, the College Development Network, and SOLACE.	Meetings with both Public Bodies and Local Government Team in Qs 2 and 4.  Quarterly meetings with SOLAR Liaison Group.  Meetings with Improvement Service in Qs 1 and 3.  Annual meetings with COSLA, the College Development Network, and SOLACE.
Hold workshops with council Monitoring Officers and public body Standards Officers to identify any issues and trends, and to discuss how these can be addressed.	Hold annual workshop with Council Monitoring Officers in Q3. Circulate any agreed actions and add to business plan.  Hold annual workshop with public body Standards Officers in Q4. Circulate any agreed actions and add to business plan.
Respond fully to all enquiries about the Codes and how provisions should be interpreted timeously. Maintain a record of the nature of all enquiries and feedback received and about cases referred on an ongoing basis.	Respond to all enquiries within timescales outlined in the Service Charter.  Record enquiries and report on performance against timescales in Service Standards and KPIs in Annual Report. Ongoing and Q2.  General nature of enquiries and timescales for responses recorded. Report on these to be produced and considered in Q4, with any actions identified as a result being added to business plan.

## STAKEHOLDERS AND SERVICE USERS

Action 4: Proactive engagement with key stakeholders to identify and / or discuss any issues that have arisen or could arise.

Risk Register References: 1: Promotion 3: Stakeholders 6: Service Users

Activities	Measurement / Target
Regular meetings with ESC to discuss trends and issues that emerge in order to develop (as far as possible) a common understanding of how provisions in Code should be interpreted.	Invite ESC to formal joint meetings to be held in June and December 2025. Fortnightly informal meetings to be held between Executive Team and ESC.  Make / seek changes to educational materials and adjudicatory/investigative processes as agreed.
Respond to any dispensation requests timeously and publish information about any that are granted.	Acknowledge any requests for dispensations within 3 working days and respond substantively within 1 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. Report on performance against KPIs in Annual Report.

## STAKEHOLDERS AND SERVICE USERS

Action 5: Produce new educational and training material (either in terms of content or format).

Risk Register References: 1: Promotion, 3: Stakeholders, 4: Training

Activities	Measurement / Target
<p>Undertake surveys of councillors, members of devolved public bodies, Monitoring Officers and Standards Officers to identify any trends and issues in terms of interpretation of and compliance with the Codes.</p>	<p>Executive Team to contact COSLA, Improvement Service and ESC for suggestions on topics to be covered. Circulate draft questions to Members for comment and approval by end of Q3. Undertake surveys by end of Q4.</p> <p>Identify any new educational material (in terms of both content and format to be developed and agree action plan to progress work in Q4.</p>
<p>Consider creating abridged / summary, digital, video, audio, Braille and / or BSL versions of case decisions, Standards Updates, Guidance and Advice Notes, or on specific provisions in the Codes.</p>	<p>Develop and agree a communication plan by end of Q1, outlining what is to be created, along with the timescales and any costs / resources involved. Add any actions to business plan.</p> <p>Produce a verbal version of the Guidance on the Councillors' Code by end of Q4.</p>
<p>Produce and publish on website new e-Learning modules or videos for councillors.</p>	<p>Produce and publish e-Learning module or video on distinguishing between strategic and operational matters by end of Q3.</p> <p>Produce and publish e-Learning module or video on gifts and hospitality by end of Q4.</p>
<p>Ensure content on website accessible, relevant and up to date.</p>	<p>Ongoing monitoring of compatibility of website with Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018).</p> <p>Update 'FAQs' page of website by end of Q1.</p>

## STAKEHOLDERS AND SERVICE USERS

Action 6: Provision of tailored training sessions on the Codes and any ongoing issues.

Risk Register References: 1: Promotion, 3: Stakeholders, 4: Training

Activities	Measurement / Target
Assist Scottish Government with induction of new members of devolved public bodies.	Present on Model Code at Scottish Government induction workshops in May and September 2026.  Work with Scottish Gvt's IJB Team to develop training material on Code for representative members.
Provide training to boards of public bodies and elected members of councils on request.	Respond to all requests for assistance with training within timescales outlined in the Service Charter.
Conduct joint webinars with the Improvement Service on specific topics.	Agree topics and dates for two webinars with Improvement Service by end of Q2 and hold by end of Q4, including one on how to scrutinise effectively.
Provide information on the requirements of the Codes to all legal, governance and committee service officers.	Conduct an online session on Councillors' Code in Q1.  Discuss possibility of holding similar event on Model Code for legal, governance and clerking officers of public bodies with Standards Officers at Workshop in Q1 and, if so, organise and hold by end of Q4.
Seek feedback after each training event or workshop.	Issue surveys to attendees after all training events and workshops (ongoing).  Undertake research in Q2 to see if a tool can be developed to make the provision of feedback easier (such as a QR Code).

### Strategic Aim 3: ADJUDICATION

The Standards Commission will make clear, evidence-based and well-reasoned decisions on cases referred to it for adjudication to help improve standards and ensure any failure to meet those expected by the Codes is dealt with in a fair, consistent and proportionate manner.

#### ADJUDICATION

Action 7: Continue to seek changes to the governing legislation to ensure the effective and proportionate disposals of complaints about breaches of the Codes of Conduct.

Risk Register References: 3: Stakeholders, 5: Decision Making

Activities	Measurement / Target
Continue to seek amendment to governing legislation so potential breaches of the Codes of Conduct can be dealt with in the most effective and proportionate manner.	Consult with ESC on any queries from the Scottish Government on the joint proposals submitted in 2024/25 and 2025/26 within one week and respond within a month.  Liaise with Scottish Government / Ministers about request to amend the Councillors' Code and Register of Interests regulations to bring back the requirement to register gifts & hospitality (and registering offers that have been declined).  Liaise with Scottish Government / Ministers about request to amend automatic disqualification provisions in the Public Bodies (Joint Working) (Integration Joint Boards) (Scotland) Order 2014 and the Health Boards (Membership and Procedure) (Scotland) Amendment Regulations 2016
Seek feedback on changes made in 2025/26 to Policy on the Application of Sanctions and the Suspension Rules	Seek feedback from ESC, COSLA and Monitoring Officers in Q1. Make any amendments identified.

**ADJUDICATION**

**Action 8: Proactive engagement with parties, witnesses, the Panel and others to ensure an efficient and effective adjudication process.**

**Risk Register References: 6: Service Users, 8: Availability**

<b>Activities</b>	<b>Measurement / Target</b>
<p>Actively engage with parties before Hearings to ensure:</p> <ul style="list-style-type: none"> <li>• issues are identified and resolved in advance;</li> <li>• deadlines for providing information are met;</li> <li>• expectations are managed; and</li> <li>• queries are answered timeously and fully.</li> </ul>	<p>Invite parties to pre-Hearing meetings to discuss and resolve any procedural or technical issues in advance. Review any feedback from parties and Panel to check Hearings conducted smoothly with the focus on all relevant and material considerations only.</p> <p>Executive Team to review ongoing cases on weekly basis to identify actions to be undertaken, including engagement with Panel, parties, witnesses and others involved in case.</p>
<p>Ensure Members and Hearing Panels are briefed fully on issues that may arise or have arisen, to ensure they have a sound understanding of matters to be resolved and addressed in order to make evidence-based, informed and well-reasoned decisions both at referral and Hearing stages.</p>	<p>Send Members requests for Section 16 decisions within 1 working day of receipt of referral from ESC, with (if appropriate) briefing on issues that need to be considered. Report on achievement as part of report against KPIs.</p> <p>Send Panel Chair a checklist at least 2 working days before all pre-Hearing meetings, outlining matters to be discussed and resolved.</p> <p>Send Panel Members a briefing note at least 5 working days before each Hearing outlining the issues to be raised and considered at the Hearing. Report on achievement as part of report against KPIs.</p> <p>Panel reports at SCS meeting after Hearing that it was satisfied with assistance provided.</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>Send Panel Members any request to vary Hearing procedure, with a recommended course of action, within 3 working days of receipt.</p>
<p>Analyse all decisions made in 2024/25, under Section 16 of the 2000 Act, and review policy, process document, templates, publication scheme and decision-making procedures.</p>	<p>Analysis of Section 16 decisions to be completed by end of Q1, with any improvement actions then added to business plan. Review all policies, processes, publication scheme and templates for issuing of decisions under Section 16 in Q2.</p>

## ADJUDICATION

Action 8: Proactive engagement with parties, witnesses, the Panel and others to ensure an efficient and effective adjudication process.

Risk Register References: 6: Service Users, 8: Availability

Activities	Measurement / Target
Review of all case decisions as standing agenda item at the following Standards Commission meeting.	Review of any 'no action' and Hearing decisions to be included as standard agenda item, with any improvement actions to be recorded in meeting minutes and added to business plan or otherwise actioned within a month.
Undertake review of all decisions made at Hearings in 2025/26 to identify trends and to ensure consistency and clarity in reasoning.	Annual review of Hearings decisions to be undertaken at a Standards Commission meeting in Q4, with any improvement actions added to business plan for 2026/27.
Proactively seek feedback from parties, witnesses, officers and observers at Hearings on adjudicatory decisions and how Hearings are conducted by including survey link in cover email to decision letters and by handing out hard copy of survey at Hearings.	Include any feedback in papers for consideration at next SCS meeting. Add any improvement actions identified to business plan.
Provide feedback to ESC on investigation reports and seek feedback from ESC on adjudicatory decisions.	Provide any agreed feedback to ESC on investigation reports within 3 days of a written decision (Hearing or 'no action') being issued.
Collaborate with other regulators and partner bodies across the UK to share experiences and inform best practice.	<p>Hold meetings with analogous organisations in other nations to discuss experiences and any issues that have arisen. Executive Team to observe Hearing in either NI or Wales by end of Q4.</p> <p>Undertake biannual reviews (in Qs 2 and 4) of decisions, policies and procedures made and adopted by other regulators and partner bodies across the UK. Add any improvement actions identified to business plan.</p> <p>Keep SCS Members abreast of key decisions in respect of cases from other jurisdictions as standard meeting agenda item at SCS meetings.</p>

**Strategic Aim 4: GOVERNANCE**

**We will continue to invest in, engage with and empower its Members and staff to deliver our work effectively and efficiently.**

GOVERNANCE	
Action 9: Provide Standards Commission staff and Members with relevant and appropriate training and development opportunities.	
Risk Register References: 8: Availability 9: Governance	
Activities	Measurement / Target
Complete induction of fixed-term Case Manager	Case Manager’s induction completed successfully by end of Q1.
Agree individual annual personal development plans for all Standards Commission staff.	Personal development plans to be agreed at annual appraisals in Q1. Agreed training and development to be completed by year end.
All staff to attend refresher training on cyber resilience and data protection.	Refresher training on cyber resilience, data protection and fire safety to be completed by end of Q4
Three development sessions for Members to be held in Qs 1, 2 and 4.	<p>Development Session to be held in April 2026, with action plan to progress any suggestions arising from these to be created, by end of Q1.</p> <p>Development Session to be held in June 2026, with action plan to progress any suggestions arising from these to be created, by end of Q2.</p> <p>Development Session to be held in November 2026, with action plan to progress any suggestions arising from these to be created, by end of Q4.</p>
Provide training to Members on: <ul style="list-style-type: none"> <li>• Dealing with the media; and</li> <li>• Appearing before Parliamentary committees</li> </ul>	<p>Media training to be provided by the end of Q2.</p> <p>Appearing before Committee training to be provided by end of Q3.</p>

**GOVERNANCE**

Action 10: Seek to ensure strong governance arrangements and ensure best value.

**Risk Register References: 7: Budget 9: Governance**

Activities	Measurement / Target
Explore any and all 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>Participation in Officeholders Shared Services Network, FOISA Network Group and Data Protection Officer meetings.</p> <p>Discuss potential training with other Officeholders before arranging to determine whether opportunities to share arrangements or costs</p>
Ensure all policies and processes are compatible with new data related legislative provisions	<p>Draft a new policy on How to Complain to Us on data request issues (SAR and FOI).</p> <p>Update the data privacy note following the changes brought in by the Data Use and Access Act 2025.</p> <p>Ensure all data related policies are reviewed and updated as required by end of Q1.</p> <p>Ensure all Members and staff are aware of changes, requirements and policies.</p>
Implement recommendations and action points arising from external and internal audits.	<p>Programme of audits and associated improvement actions to be completed by end of Q4. Audit &amp; Risk Committee to consider and report on whether it is satisfied these have been completed.</p> <p>Prepare best value report for Audit &amp; Risk Committee meeting in Q4.</p>
Regular engagement with SPCB about budget and governance arrangements.	<p>Executive Director to meet Officeholder Services to provide an update / discuss budget and governance matters on a quarterly basis.</p> <p>Members to meet SPCB in Q3 or Q4.</p> <p>Ensure all information sought and required is provided timeously.</p>

**GOVERNANCE**

Action 10: Seek to ensure strong governance arrangements and ensure best value.

**Risk Register References: 7: Budget 9: Governance**

<b>Activities</b>	<b>Measurement / Target</b>
Undertake full review of policy register to ensure completeness and to determine whether policy review dates are appropriate.	Full policy review to be completed by Q3. Outcome to be reported to Commission members.