



Information strategy

Openness by design

Introduction

1. This information strategy provides a framework for action and activity in relation to the Scottish Information Commissioner's information: how it is created, managed and shared.

Strategic information aims

2. The Scottish Information Commissioner will:
 - (i) be open and transparent in the way in which functions are delivered and the organisation is managed. The aim is to be open by default by making transparency and access to our information integral to the design and delivery of services
 - (ii) make available by default as much information the organisation holds as possible. This will be in the context of statutory requirements to publish or withhold specific information (or types of information), effective use of public resources and the public interest
 - (iii) publish information in accessible formats that support and promote ease of use
 - (iv) keep published information up-to-date.

Approach

3. The SIC's approach is to prioritise activity to:
 - (i) reduce risk associated with information management
 - (ii) ensure compliance with [Re-use of Public Sector Information Regulations 2015](#)
 - (iii) ensure compliance with the Data Protection Legislation and in particular the forthcoming EU General Data Protection Regulation
 - (iv) ensure compliance with Freedom of Information legislation (Freedom of Information (Scotland) Act 2002 (FOISA), Environmental Information (Scotland) Regulations 2004 (EIRs), particularly in relation to proactive publication and dissemination of information through our Publication Scheme and supporting Guide to Information
 - (v) demonstrate good practice in publishing Open Data, and

- (vi) deliver operational and/ or resource benefits to the way in which information is managed as a strategic asset.
4. All strands will take account of restrictions placed on the Commissioner under section 45 of FOISA.

Relationship between FOISA and other access to information legislation

- 5. Commonality between the demands of the various requirements will be identified and where possible duplication removed, so as to present a clear view of what information we hold, how and in what format it is published (or withheld), and how it can be accessed.
- 6. Over time this will include identifying changes in how we manage the business to minimise the amount of preparation and manipulation of data and information needed to make it publishable, for example automatic production of anonymised data sets. At the same time we will ensure that personal data is properly protected and processed.
- 7. The diagram on the next page summarises the interdependencies between FOISA, Re-use, Open Data and DPA. The ultimate aim is to maximise the benefits of proactive publication by publishing as much as possible as open data, making as much available under re-use and FOI publication provisions and so reduce the impact of information requests.

Delivery and resources

- 8. Delivery will be through projects included in (or added to) the annual Operational Plan. A brief will be produced for each project from which project plans will identify specific resource requirements and how they are to be met, key deliverables and the timescales in which they will be delivered.

Contact us

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Data and information

Non-personal data and information

FOISA/ EIRs

Non-personal data and information available on request
Limited 3rd-party personal data accessible through FOISA
MPS Publication of information in public interest (PI)
Publication of information identified through Re-use and open data
Other information we choose to publish

Re-use Regulations

Produced as part of public function

Information asset list:

- cannot be published, some accessible through DPA or FOISA
- can be published unamended (i.e. open)
- can be published subject to redaction/ Anonymisation

Open Data

Information assets identified under Re-use

Made available in open format

Information we publish not covered by re-use

Personal Data

Data Protection

Sensitive
personal data

