



Scottish Information  
Commissioner  
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# Operational Plan 2018-19 Monitoring Report

Scottish Information Commissioner

# Introduction

## Introduction

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This document sets out the Scottish Information Commissioner's operational plan for the period from 1 April 2018 to 31 March 2019. The plan explains how we will realise the Commissioner's vision and strategic aims, and provides a tool for on-going monitoring of outcomes and management of resources, financial and human.

## Vision

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**Freedom of Information will add demonstrable value to public services and contribute positively to the transparency and accountability of public functions in Scotland**

## Strategic aims

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To realise this vision, the Commissioner's office will:

- (1) **Support** the on-going development of Scottish public sector culture and practice where the sharing and disclosing information is routine, and which actively serves openness, transparency and the public interest
- (2) **Help** people to be familiar with their rights to access information and exercise them knowledgeably and responsibly
- (3) **Enable and support** Scottish public authorities to develop and maintain high standards of FOI policy and practice. We will do this through a combination of regulation, advice and assistance, and appropriate collaboration. This includes promoting embedding FOI in good communication, excellent customer service, creation and management of records and in supporting efficient, equitable and accountable delivery of statutory functions
- (4) **Contribute positively** to Scotland being respected as a world-leader in openness, transparency, and access to information law, policy and practice. Including supporting the development of Scottish access to information law to ensure it remains fit for purpose
- (5) **Be recognised** as an organisation of accessible experts, that is run efficiently, governed effectively and leads by example in the delivery of its statutory functions. We will ensure that delivery of our functions meets and keeps pace with recognised standards and national public service improvements, and is delivered openly and transparently.

## Structure of the operational plan

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The plan is laid out as a programme of actions listed under types of operational activity, with cross references to which strategic aim(s) it supports. The actions listed are a mixture of "business as usual" and one-off projects. Each functional area is shown on a separate tab.

This a working document which forms the basis of on-going monitoring and assessment. In general, business as usual will be managed and monitored in line with set targets, performance indicators, established reporting structures and approved policy. Project-based work will be managed according to sound project management principles and practice. Each project will be scoped, then initiated by the Senior Management Team and reported on monthly for its duration.

## Monitoring and reporting

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Progress against plan will be reviewed monthly. An update of progress against plan, using a traffic-light system, will be published quarterly. Achievement and output against individual line items will be assessed and reported in line with the organisational targets and indicators and measures set out in our Performance and Quality Framework.

## Resources

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The Commissioner's budget for 2018-19 is **£1,565,893**:

- Total staff costs: **£1,245,593**
- Total revenue costs: **£316,800**
- Capital expenditure: **£3,500**

## KEY

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**BAU:** Business as Usual  
**DHOE:** Deputy Head of Enforcement  
**HOCS:** Head of Corporate Services  
**HOE:** Head of Enforcement  
**HOPI:** Head of Policy and Information  
**Priority:** Relative priority - Statutory, High, Medium, Low  
**SIC:** Scottish Information Commissioner  
**SMT:** Senior Management Team

## Human Resources Management

Activity	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
					1	2	3	4	5							
1 Report to SMT on Performance & Development Framework	BAU	Annual	01/05/2018	31/07/2018					X	H	OT				HOCS	
2 Learning & Development Plan (internal)	BAU	Annual	01/06/2018	31/07/2018					X	H	OT				HOCS	
3 Review HR Strategy	BAU	Annual	01/06/2018	31/07/2018					X	M	OT				HOCS	
4 Apply & monitor Performance & Development Framework	BAU		01/04/2018	31/03/2019					X	H	OT				HOCS	
5 Carers Accreditation – monitoring and application	BAU		31/08/2018	31/03/2019					X	M	NS				HOCS	
6 Security & Vetting scheme- monitoring and application	BAU		01/04/2018	31/03/2019					X	H	OT				HOCS	
7 Protection of Vulnerable Groups scheme – monitoring and application	BAU		01/04/2018	31/03/2019					X	H	NS				HOCS	
1 Employee Handbook	Project		01/04/2018	31/08/2018					X	H	OT				HOCS	
2 Procurement - Employment Advice Contract	Project		01/04/2018	31/12/2018					X	H	NS				HOCS	
3 Carer Positive Scheme - Accreditation	Project		01/04/2018	31/12/2018					X	H	NS				HOCS	
4 Protection of Vulnerable Groups Designated Body Registration and Framework	Project		01/04/2018	31/08/2018					X	H	NS				HOCS	

## Improving Authority Practice

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
						1	2	3	4	5							
1	Commission and commence public authority compliance monitoring with the Model Publication Scheme	BAU	Annual	01/09/2018	31/03/2019	X		X		X	M	NS				HOPI	
2	Liaise with Holyrood Events about the annual Holyrood Conference	BAU	Annual	01/04/2018	31/12/2018	X		X		X	L	OT				HOPI	
3	Deliver a practitioners' conference for the Centre for FOI - May 2018	BAU	Annual	01/04/2018	31/05/2018	X		X		X	M	Comp				HOPI	
4	Prepare a practitioners' conference for the Centre for FOI - May 2019	BAU	Annual	01/10/2018	31/03/2019	X		X		X	M	NS				HOPI	
5	Maintain and build engagement in the Knowledge Hub group for public authorities	BAU		01/04/2018	31/03/2019	X				X	H	OT				HOPI	
6	Collect, collate and publish FOI/EIRs statistics portal data from public authorities	BAU	Quarterly	01/04/2018	31/03/2019	X		X			S/H	OT				HOPI	
7	Provide quarterly intelligence reports to IPM to inform decisions about interventions	BAU	Quarterly	01/04/2018	31/03/2019	X		X		X	H	OT				HOPI	
8	Provide monthly intervention reports to IPM	BAU	Monthly	01/04/2018	31/03/2019	X		X			S/H	OT				HOPI	
9	Intervention Procedures: ensure non-compliance is recorded and take action in line with procedures and resources	BAU		01/04/2018	31/03/2019	X		X		X	S/H	OT				HOE	
10	Provide support to new public authorities to prepare for FOI duties	BAU		01/04/2018	31/03/2019	X		X		X	H	NS				HOPI	No new s4 bodies identified.
11	Provide new advice and guidance (as required)	BAU		01/04/2018	31/03/2019	X		X		X	H	OT				HOE	
12	Complete public authority compliance monitoring with the Model Publication Scheme	BAU	Annual	01/04/2019	30/05/2019	X		X		X	M	Slip				HOPI	Report completed, publication planned mid-August
1	Publish a self assessment toolkit for public authorities on monitoring and managing FOI performance	Project		01/08/2018	31/12/2018	X		X	X		H	NS				HOPI	
2	Preparation of Registered Social Landlords and subsidiaries to meet their new FOI duties	Project		01/06/2018	31/03/2019	X		X	X		S	NS				HOPI	Section 5 order delayed - will propose revised timescales when commencement date is known
3	Decisions Round Up – evaluate, review and way forward	Project		01/01/2019	28/02/2019	X	X	X	X	X	M	NS				HOPI	
4	Promote revised Section 38/Regulation 11 guidance (when issued)	Project		01/05/2018	25/05/2018	X	X	X	X	X	S/H	OT				HOPI	

## Information Management

Activity	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
					1	2	3	4	5							
1 Coordinate on-going IRM controls and procedures and ensure they are applied	BAU		01/04/2018	31/03/2019	X	X			X	S/H	OT				HOCS	
2 IRM Assurance report to SMT	BAU	Annual	01/04/2018	31/07/2018	X	X			X	S/H	NS				HOCS	
3 Maintenance of secure and reliable IT network	BAU		01/04/2018	31/03/2019					X	S/H	OT				HOCS	
4 Review Programme for Key Documents	BAU	Annual	01/05/2018	31/07/2018 <span style="color: red;">*31/10/18</span>	X	X	X	X	X	H	Slip				HOCS	
5 Manage Key Documents as per the Review Programme	BAU		01/04/2018	31/03/2019	X	X	X	X	X	H	OT				HOCS	
6 Monitor compliance with data protection legislation and the General Data Protection Regulation	BAU		01/04/2018	31/07/2018	X				X	S	OT				HOCS	
7 Maintain a compliant publication scheme and guide to information	BAU		01/04/2018	31/03/2019	X	X		X	X	H	OT				HOCS	
8 SIC Publication Scheme Assurance report to SMT	BAU		01/01/2019	30/04/2019					X	S	NS				HOCS	
9 Monitor SIC compliance in responding to RFIs and reviews – compliance with statutory timescales, policy and procedures and quality assurance (quality assurance report to be provided by HOE to HOCS)	BAU		01/04/2018	31/03/2019			X		X	S	NS				HOCS	
1 Deliver implementation plan to ensure SIC is GDPR compliant	Project		01/04/2018	31/03/2019	X		X	X	X	S/H	OT				HOCS	
2 IT and Digital Strategy	Project		01/04/2018	31/07/2018					X	S/H	Slip				HOCS/SIC	
3 Cyber Resilience Action Plan	Project		01/04/2018	31/03/2019					X	H	OT				HOCS	
4 Cyber Essentials Accreditation	Project		01/04/2018	31/05/2018					X	H	Comp				HOCS	
5 Cyber Essentials Plus Accreditation	Project		31/05/2018	31/10/2018					X	H	OT				HOCS	
6 IRM – consider and recommend way forward as regards review, retention and assurance	Project		01/04/2018	31/03/2019	X	X			X	H	OT				HOCS	

## Planning & Reporting

Activity	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
					1	2	3	4	5							
1 Incorporation of 3Es statement in Annual Report & Accounts	BAU	Annual	01/04/2018	01/09/2018					X	S	Comp				HOCS	
2 Annual Report & Accounts: Accountability Report and Financial Statements - ensure compliance with FReM, prepare and obtain approval	BAU	Annual	01/04/2018	30/09/2018					X	S	OT				HOCS	
3 Annual Report & Accounts: Performance Report – ensure compliance with FReM, prepare and obtain approval	BAU	Annual	01/04/2018	30/09/2018					X	S	OT				HOPI/HOCS	
4 Annual Statement of Assurance to SIC	BAU	Annual	01/04/2018	31/07/2018 *31/08/18	X	X	X	X	X	S/H	Slip				HOCS	
5 Performance and statistical reporting	BAU		01/04/2018	31/03/2019	X	X	X	X	X	S	OT				HOCS	
6 Manage and report on Enquiries Service	BAU	Six monthly	01/04/2018	31/03/2019	X	X	X	X	X	H	OT				HOCS	
7 Public Service Reform (Scotland) Act 2010 – annual expenditure reporting	BAU	Quarterly	01/04/2018	31/03/2019					X	S	OT				HOCS	
8 Operational Plan 2018-19 – monitor and report progress	BAU	Quarterly	01/04/2018	31/03/2019	X	X	X	X	X	H	OT				SMT	
9 Operational Plan 2018-19 Projects – monitor and review progress	BAU	Monthly	01/04/2018	31/03/2019	X	X	X	X	X	H	OT				SMT	
10 Key Documents – reviews due and overdue reviews - monitor	BAU	Monthly	01/04/2018	31/03/2019	X	X	X	X	X	H	OT				SMT	
11 Operational Plan 2019-20 - coordinate and prepare	BAU	Annual	01/01/2019	31/03/2019	X	X	X	X	X	H	NS				HOCS	
12 Governance Reporting Arrangements – reporting against cycle	BAU		01/04/2018	31/03/2019	X	X	X	X	X	H	OT				HOCS/HOPI/HOE	
13 Governance Reporting Arrangements- compliance report to SMT	BAU	Annual	01/04/2018	31/07/2018	X	X	X	X	X	H	NS				HOCS	
14 Case Management System – reporting (manual and automatic)	BAU								X	M	OT				HOCS	
15 Prescribed Persons (Reports on Disclosure of Information) Regulations 2017	BAU	Annual	01/04/2018	31/07/2018					X	S	Comp				HOCS	
16 Report on biodiversity (as required by the Nature Conservation Act 2004)	BAU	Annual	01/04/2018	31/07/2018					X	S	Comp				HOCS	
17 Sustainable Development - monitor and report on carbon footprint	BAU	Annual	01/04/2018	31/03/2019					X	S	OT				HOCS	
1 Case Management System – implementation of recommendations following internal audit of performance	Project		01/04/2018	31/03/2019	X	X	X	X	X	H	OT				HOCS	
2 Case Management System – development of additional reporting	Project		01/04/2018	31/03/2019					X	M	OT				HOCS	
3 Case Management System – publication scheme reporting	Project		01/04/2018	31/03/2019					X	H	OT				HOCS	
4 Enquiries Service – review reporting arrangements	Project		01/04/2018	31/07/2018 *31/10/18	X	X	X	X	X	H	Slip				HOCS	
5 Strategic Plan – revision	Project		01/04/2018	31/03/2019	X	X	X	X	X	H	NS				SIC	

## Promotion and Communications

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ update
						1	2	3	4	5							
1	Communication Strategy Report	BAU	Annual	01/04/2018	31/03/2019	X	X	X	X	X	H	OT				HOPI	
2	Manage and maintain press and media enquiry service	BAU		01/04/2018	31/03/2109	X	X	X	X	X	H	OT				HOPI	
3	Deliver training and briefing events to promote effective use of FOI rights to civil society and media organisations	BAU		01/04/2018	31/03/2019		X		X	X	S	NS				HOPI	
4	Research public awareness of FOI rights through omnibus poll	BAU	Annual	01/04/2018	31/03/2019		X				H	NS				HOPI	Awaiting date for omnibus survey
5	Report on website usage and social media reach against performance targets	BAU	Quarterly	01/04/2018	31/03/2019	X	X	X		X	H	OT				HOPI	
6	Maintain website content, ensuring it is up to date and relevant and reporting progress	BAU	Quarterly	01/04/2018	31/03/2019	X	X	X		X	H	OT				HOPI	
7	Maintain and support standing advisory group of practitioners, e.g. development of resources and learning	BAU		01/04/2018	31/03/2019	X		X		X	M	OT				HOPI	
1	Raise awareness of young people of their FOI rights through a workshop	Project		01/04/2018	31/08/2018		X		X		S/H	Comp				HOPI	Anticipate further spin-off opportunities
2	Produce and publish a case study to promote FOI rights to young people	Project		01/08/2018	31/12/2018		X		X		S/H	NS				HOPI	
3	Review of website and signposting	Project		01/04/2018	31/03/2019	X	X	X		X	H	NS				HOPI	Delayed due to staff shortage
4	British Sign Language – Action Plan	Project		01/04/2018	31/10/2018		X		X		H	OT				SIC	Attendance at consultation session hosted by Sc Parl. Plan drafted and to

## Quality Assurance

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ update
						1	2	3	4	5							
1	Compliments and complaints – record, analyse and report	BAU	Six monthly	01/04/2018	31/03/2019					X	S	OT				HOCS	
2	Information Requests to SIC: (a) record, analyse and monitor performance in accordance with the Section 60 Code of Practice (b) upload details to the FOI/EIRs statistics portal	BAU	Quarterly	01/04/2018	31/03/2019	X		X	X	X	S	OT				HOCS	
3	Information Requests to SIC – provide assurance to HOCS that responses to information requests comply with relevant legislation and related guidance	BAU	Quarterly	01/04/2018	31/03/2019	X		X	X	X	S	OT				HOE	
4	Equalities Statistics – Service Users – recording, analysis and reporting	BAU	Annual	01/04/2018	31/03/2019			X		X	H	OT				HOCS	
5	Investigation targets and Key Performance Indicators - monitor and review to ensure appropriate and fit for purpose	BAU		01/04/2018	31/03/2019					X	H	OT				HOE	Targets and KPIs continue to be monitored at monthly IPMs and are still considered fit for purpose. However, for a number of different reasons, not all of the targets are being met.
6	Performance and Quality Framework – managers to report on performance for their areas of responsibility (including carrying out appropriate quality assurance reviews) and to review Key Performance Indicators and other targets and standards annually	BAU		01/04/2018	31/03/2019	X	X	X	X	X	S/H	OT				SMT	HOE: draft procedures for review of existing investigations QA work to be completed by the end of August.
1	Review effectiveness of appeal portal for service users to inform future developments	Project		01/10/2018	31/03/2019		X		X	X	M	NS				HOPI	



## Regulation & Enforcement

Activity	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
					1	2	3	4	5							
1 Enforce FOI in line with Enforcement Policy	BAU		01/04/2018	31/03/2019	X		X	X	X	S	OT				HOE	
2 Register, validate, investigate and decide applications in line with approved procedures and Key Performance Indicators	BAU	Monthly	01/04/2018	31/03/2019	X		X	X	X	S	Slip				HOE	We are currently failing to meet four of our KPIs. Now that we have additional validation resource, I expect that, over the next quarter, we will see a big improvement in the validation and FTR KPIs. However, the next quarter is also likely to see a worsening of the position re the substantive KPIs.
3 Monitor investigation and enforcement performance	BAU	Monthly	01/04/2018	31/03/2019	X				X	S/H	OT				HOE	
4 Report on investigation and enforcement performance	BAU	Quarterly	01/04/2018	31/03/2019	X				X	S/H	OT				HOE	
5 Provide legal advice to, or procure legal advice for, the SIC on matters including litigation, FOI law (including how this affects or is effected by other areas of law) or other corporate responsibilities and duties and ensure that the legal advice is recorded and the record kept up to date	BAU		01/04/2018	31/03/2019	X				X	H	OT				HOE	
6 Maintain a rolling programme to ensure standard/template letters on the case management system are reviewed and regularly updated, as required.	BAU		01/04/2018	31/03/2019	X				X	S	OT				DHOE	
7 Maintain a list of bodies suitable for consideration for designation under Section 4 and Section 5 and report on proposed list to be submitted to the Scottish Ministers	BAU	Annual	01/04/2018	31/03/2019	X			X	X	S	OT				HOPI	
8 Review the Model Publication Scheme, SIC guidance and support materials (including presentation of materials), publish updates and communicate updates to all public authorities	BAU	Annual	<del>01/04/2018</del> 01/08/2018	<del>30/05/2018</del> 30/09/18	X		X	X	X	S	Slip				HOPI	Delayed due to staff shortage. Revised start and end dates proposed for approval
9 Manage and monitor notifications from new authorities re: compliance with publication scheme duty	BAU		01/04/2018	31/03/2019	X		X	X	X	S	NS				HOPI	No new s4 bodies identified
1 Manage and monitor notifications by Registered Social Landlords and subsidiaries re compliance with publication scheme duty	Project		01/04/2018	31/03/2019	X		X		X	S/H	NS				HOPI/ HOE	Awaiting s5 order (delayed). Will propose revised start and end dates when commencement date is known
2 Contribute to post-legislative scrutiny of the FOISA	Project		tbc	tbc	X	X	X	X	X	S	OT				SIC	Liaising with PAPLS committee (to consider whether to proceed with post-leg scrutiny), also meeting with Min Parl Bus.

## Resource Management

	Activity	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
						1	2	3	4	5							
1	Set and profile budget for 2019/2020	BAU	Annual	01/06/2018	30/09/2018	X	X	X	X	X	H	OT				HOCS	
2	Budget monitoring and control – 2018/19	BAU	Quarterly	01/04/2018	31/03/2019	X	X	X	X	X	H	OT				HOCS	
3	Monitor and report on payment of invoices	BAU	Quarterly	01/04/2018	31/03/2019					X	H	OT				HOCS	
4	Workforce monitoring and planning	BAU	Six monthly	01/04/2018	31/03/2019	X	X	X	X	X	H	OT				HOCS	
5	Maintenance of premises	BAU		01/04/2018	31/03/2019					X	H	OT				HOCS	
6	Contracts (all except as noted below in (9), (10) (11) and (12))– procurement and management	BAU	As agreed in relevant contract	01/04/2018	31/03/2019					X	H	OT				HOCS	
7	Case management system – review reporting requirements and requisition new reports (as required)	BAU		01/04/2018	31/03/2019					X	H	OT				HOCS	
8	Governance Statement of Assurance to SIC	BAU	Annual	01/04/2018	31/03/2019					X	H	OT				HOCS	
9	External provision of legal services: contract management	BAU	As agreed in contract	01/04/2018	31/03/2019					X	H	OT				HOE	
10	External provision of website: contract management	BAU	As agreed in contract	01/04/2018	31/03/2019					X	H	Slip				HOPI	Delay in agreeing a new contract due to staff shortage
11	Contract for design and printing of Annual Report & Accounts	BAU	As agreed in contract	01/04/2018	31/03/2019					X	H	Slip				HOPI	Delay due to staff shortage
12	Contract for press cutting service	BAU	As agreed in contract	01/04/2018	31/03/2019					X	H	OT				HOPI	
1	Case management system – upgrade	Project		01/04/2018	31/08/2018					X	H	OT				HOCS	
2	IT Support and Maintenance Contract – review arrangements	Project		01/04/2018	31/08/2018					X	H	OT				HOCS	
3	Lease Renewal	Project		01/04/2018	31/03/2019					X	M	OT				HOCS	
4	Procurement of legal services contract	Project		01/04/2018	31/08/2018					X	H	OT				HOE	ITT being drafted. Waiting on confirmation of procurement timetable from SG.
5	Review website supported hosting and maintenance arrangements	Project		01/10/2018	31/03/2019					X	H	Slip				HOPI	Delay due to staff shortage
6	Recruitment of additional staff if extension of FOISA to RSL's and subsidiaries (provided additional funding allocated to the Commissioner)	Project		01/04/2018	31/03/2019					X	H	NS				HOPI/ HOCS	

## Risk Management

Activity	Type	Frequency	Start Date	End Date	Strategic Aim					Priority	Q1	Q2	Q3	Q4	Lead Mgr	Comment/ Update
					1	2	3	4	5							
1 Review of operational risk	BAU	Monthly	01/04/2018	31/03/2019	X	X	X	X	X	H	Comp				SMT	
2 Review of strategic risk	BAU	Quarterly	01/04/2018	31/03/2019	X	X	X	X	X	H	Comp				SMT	
3 Updating risk registers	BAU	Monthly/quarterly	01/04/2018	31/03/2019	X	X	X	X	X	H	Comp				HOCS	
4 Annual assessment and review of risk and report to SMT	BAU	Annual	01/04/2018	31/07/2018	X	X	X	X	X	H	NS				HOCS	
5 Internal Audit Plan - report	BAU	Annual	01/04/2018	31/01/2019	X	X	X	X	X	H	OT				HOCS	
6 Business Continuity Plan – maintenance of plan and testing (as required)	BAU		01/04/2018	31/03/2019	X	X	X	X	X	H	OT				HOCS	
7 Health and Safety – reporting and monitoring	BAU	Quarterly	01/04/2018	31/03/2019	X	X	X	X	X	H	Comp				SMT	
8 Advisory Audit Board – reports on audits and review of strategic risk	BAU	As required	01/04/2018	31/03/2019	X	X	X	X	X	H	OT				HOCS	
1 Internal audit – GDPR compliance – external audit to assess implementation process and compliance	Project		01/11/2018	31/03/2019	X	X	X	X	X	H	NS				HOCS	
2 Internal audit – investigations – external audit to review compliance with approved processes in place for undertaking	Project		01/09/2018	31/12/2018	X	X	X	X	X	M	NS				HOCS/ HOE	
3 Internal audit – planning & resources – in house audit to assess whether level of resources adequate to enable SIC to	Project		01/10/2018	31/03/2019	X	X	X	X	X	H	NS				HOCS	
4 Risk management – in-house audit using Audit Scotland toolkit - assessment of compliance with legislation, best	Project		01/04/2018	31/07/2018 *31/10/18	X	X	X	X	X	M	Slip				HOCS	
5 Investigations: review quality assurance arrangements	Project		01/06/2018	30/09/2018	X	X	X	X	X	H	NS				HOE	
6 Enquiries: review quality assurance arrangements	Project		01/04/2018	31/07/2018	X	X	X	X	X	H					HOCS	