

Communication Strategy 2015-20



Scottish Information
Commissioner

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Glossary and abbreviations

Term used	Explanation
FOI	Freedom of information
FOISA	Freedom of Information (Scotland) Act 2002

Cross-referenced VC documents (for internal use)

VC no	VC name
56288	C1 External Blog: principles and procedures v01 CURRENT ISSUE
	Twitter Account: principles and procedures (to be developed)
	Annual Communication Plan 2015-16 (to be developed)
	Press service procedures (to be developed)
	Website annual maintenance plan (to be developed)
35732	C2 2014-15 Communication Strategy

Introduction

1. This document sets out the strategic approach to deliver the external communication elements and activities which will contribute to the delivery of the Commissioner's Strategic Plans for the period 2015 - 2020. It replaces its predecessor Communication Strategy 2014-15.
2. A limited review of this communication strategy will be undertaken each year following the review of the Commissioner's Strategic Plan, to ensure its aims and messages remain consistent with those of the organisation.
3. Our strategy and vision aim to add value to FOI by making its application more efficient and by identifying and realising the benefits access to information can contribute to society, transparency, requesters and authorities. This communication strategy supports this by:
 - (i) ensuring our key messages reach appropriate stakeholders effectively and efficiently
 - (ii) promoting engagement, through positive and responsive communications.
4. We already have strong, well-established communication and relationships with stakeholders. This strategy seeks to both build on the channels we already have in place, and develop relationships to improve engagement or fill existing communication gaps.
5. It provides an overview of both the core communication elements we will deliver and an overview of our plans to improve our communications to stakeholders.
6. Detailed plans for our communications work are set out in the annual Communications Plan and Operational Plans.

Strategic Aims

7. Our communication activity will:
 - (i) Deliver consistent, informative messages to our stakeholders about access to information in Scotland, good practice and the role of the Commissioner.
 - (ii) Engage with stakeholders by listening, learning and working together productively.
 - (iii) Demonstrate the benefits of FOI and the value we can add, over and above our statutory functions.
8. To achieve these aims we will plan our communications to ensure they:
 - (i) Are specific and deliverable.
 - (ii) Are targeted to reach the people we want to receive them.
 - (iii) Are made through appropriate and effective communication channels.
 - (iv) Demonstrate that we are happy to share (our approach is to enable and support) and that we are listening.
9. Our communications:
 - (i) Speak with authority: our messages are based on fact.
 - (ii) Set out what we know in plain language and in a consistent and accessible style.

- (iii) Welcome the views and experiences of others.
- (iv) Are purposeful and proportionate.
- (v) Are firm and fair, collegiate, positive and enabling.

Core Communication Elements

10. This section provides an overview of each of the core elements of our communication strategy:
 - (i) Key messages
 - (ii) Communication channels
 - (iii) Measures of success

Key messages

11. Our key *strategic* communication messages are:
 - (i) FOI continues to work well in Scotland, but there are significant benefits to be realised, particularly through: understanding its contribution to transparency; authorities achieving greater efficiency in handling requests (including responding on time), and investing in staff skills and advice and assistance for requesters.
 - (ii) Open authorities are trusted authorities.
 - (iii) Effective authorities are those whose leaders take a keen interest and lead by example.
 - (iv) FOI brings positive benefits, but they are not sufficiently widely understood.
 - (v) The scope of FOI law must be kept up to date.
 - (vi) The Commissioner is independent and impartial.
12. We will promote the following *specific* messages:
 - (i) There are minimum compliance standards for public authority FOI policy and practice, and authorities that achieve the greatest benefits from FOI are those that aim to exceed them.
 - (ii) This is how openness and transparency may be achieved.
 - (iii) Requesters should use FOI rights effectively and responsibly.
 - (iv) This is how Scottish information law works in practice.
 - (v) The Commissioner works to ensure FOI law remains fit for purpose.
 - (vi) This is how our own organisation works, these are the services, knowledge and expertise we provide.

Communication channels

Website (all stakeholders)

13. The website continues to be our main communication channel to reach the widest possible audience. It is a cost-effective way to communicate and we can control its content. It provides access and signposting to our extensive resources which the public and public authorities can download when they need them.

14. Although there was growth in the number of visitors to our website in 2014-15 (almost 56,000, an increase of 14% over the previous year), our user statistics indicate a significant decline in *activity* while visitors were using the website. There was a marked increase in the proportion of users who visited the website to find specific content but left it without viewing other items. Given the importance of our website as our main communication channel, our challenge is to both attract more new visitors and to persuade more visitors to read more content.
15. Throughout 2014-15 our weekly Decisions Round Up emails achieved positive “conversions” to website page views (between 25% and 30% of subscribers followed the links provided to the full information online). Only a small number of subscribers left us during the year. The success of the Decisions Round Up indicates an appetite among our stakeholders for regular, relevant and targeted content to be provided by subscription.
16. In 2015-16 the Commissioner will deliver an online application portal which allows the public to make appeals via the internet. The new digital service will be accessible via our website and will allow the creation of new case files in our case management system. We anticipate that the new service will reduce the number of invalid applications received by approximately 20 – 25% in its first year. We expect that raising awareness of the online application portal will be a communication priority throughout the life of this strategy.
17. We will also:
 - (i) Launch our external blog to provide new, relevant and topical content, and commentary. Readers will be encouraged to follow links to further content on the main website.
 - (ii) Issue alerts to new content via twitter and build a twitter “following” to increase our audience.
 - (iii) Improve website navigation to support common “user journeys” e.g., grouping information about making an appeal so that potential applicants can easily locate additional content; updating the home page to provide links to frequently visited content.
 - (iv) Consult disability groups about the accessibility of our website and whether we could use it to promote equality proactively. Where either barriers or opportunities present, we will take appropriate action.
 - (v) Offer subscribers new opportunities to select specific updates so that we can provide them with regular emails alerting them to the content they want to see.
 - (vi) Evaluate the demand and potential for additional services being offered as “digital” services online.
 - (vii) Monitor the effectiveness of the above strategies and implement new developments as a result of lessons learned.

Social media

18. In 2015-16 we will establish two new communication channels: an external blog and regular use of a twitter account. These channels allow us to:
 - (i) Generate greater interest in FOI issues and our organisation.

- (ii) Communicate with our audience in “real time”.
 - (iii) Provide a greater range of content, suitable for a greater range of stakeholders.
 - (iv) Build “followings”: increase the number of people who are interested in, and receive our communications.
19. We will use the twitter account to:
- (i) Encourage readers to visit content on our blog and website.
 - (ii) Promote our publications and resources.
 - (iii) Share views on topical issues for example, the issue of consultation responses, highlights from keynote speeches.
 - (iv) Encourage readers to share our communications via “retweeting”, thus increasing our potential audience.
 - (v) Share news from authoritative sources e.g., Scottish Parliament, ICO, academics, where relevant to our role or remit.
20. We will use the external blog to:
- (i) Offer regular interesting content in an appealing way.
 - (ii) Encourage new visitors, converting them to frequent readers.
21. The external blog replaces the need for our bi-monthly newsletter, Inform.
22. We will close down our Facebook account.

Direct engagement

Roadshows

23. We will continue to deliver our programme of regional roadshows, organising specific events for public authorities, civil society groups and local media. This is both an efficient way to reach local areas and it generates greater interest in FOI the area. In promoting these events, we will continue to target civil society groups representing people with protected characteristics.
24. For public authorities, we deliver a programme focused on learning and exchange of experience, reaching staff who do not usually get the opportunity to attend our events in the Central Belt. For civil society groups, we provide an interactive session, increasing awareness of FOI law, how to use it effectively and when it might be useful to them. Our local media sessions focus on exchange of experience and sharing tips to increase effective use of FOI by journalists.

Conferences, meetings and events

25. Conferences, meetings and events are opportunities to share key messages with specific groups of stakeholders and to exchange views.
26. We will continue to organise and contribute to conferences. In 2015, for example, we are providing direct support to two FOI conferences:

- (i) The Centre for Freedom of Information's May conference for FOI practitioners from public authorities. This full day event promotes exchange of learning and experience, with a very practical focus.
 - (ii) Holyrood Conference's Annual FOI Conference. This commercial event attracts a wide range of participants, particularly from public authorities. We provide advice to the organisers on current developments and challenges to support their development of the programme.
27. We also provide presentations, on request, to other conferences and events. For example, this year, the Commissioner has made several key note presentations to conferences, both in Scotland and internationally. We also provide presentations to support civil society events, for example, the Scottish Environment LINK's FOI seminar.
28. We participate in relevant groups and attend associated meetings. For example, the Commissioner is a member of the Data Management Board which drives the Scottish Government's Open Data Strategy. We participate in other short-life working groups and professional events where we can contribute experience and knowledge.
29. While ideally we would like to be able to participate in all of the events to which we're invited, sometimes we have to decline. Our [policy on speaking engagements](#) sets out the considerations we may apply. During the life of this strategy we will review whether that policy could be further developed to increase our engagement with groups representing people with protected characteristics.

Public authority sector representative groups

30. We will continue to offer support to sector representative groups of FOI practitioners. This support varies according to the needs of the different groups, and can broadly be defined as:
- (i) Sharing relevant FOI news and developments
 - (ii) Learning from their experience of current issues and challenges, and working together to identify solutions
 - (iii) Explaining decisions and the impact of those decisions for future practice
 - (iv) Offering training on specific issues and responding positively to requests for training
 - (v) Consulting FOI practitioners about our work and the guidance or other support they would find useful.
31. Through a Standing Advisory Group of FOI Practitioners we will promote:
- (i) The sharing of experience, issues and solutions across all public sector groups
 - (ii) Engagement in our own work, including assurance of the guidance and other resources we make available to public authorities
 - (iii) Involvement in the delivery of learning and development across all public authorities.

Wider stakeholders

32. We have valuable external relationships with a wide range of individuals and organisations that are not subject to FOISA, for example Parliamentarians, academics from other jurisdictions and international commissioners.

33. It is important that we maintain regular communication with those stakeholders, keeping them updated about our work and promoting exchange of ideas. We will:
- (i) Make specific efforts to encourage wider stakeholders to subscribe to relevant updates on our website (and ensure that we provide relevant content to maintain their interest).
 - (ii) Provide briefings on current issues where appropriate, for example, to Parliamentary committees.
 - (iii) Respond to consultations when we have something to say, and promote our responses via twitter.
 - (iv) Publish top level findings of our user satisfaction monitoring as a way to promote wider engagement with our service.

Group written communications

34. Note: This element of the strategy applies only to group written communications i.e., communications such as news and updates that we issue to multiple stakeholders through mailing or subscription lists. It does not apply to routine correspondence in other areas of business e.g., investigations and enforcement.

Email

35. We will develop a strategic approach to ensure that public authorities and other key stakeholders are kept up to date with important FOI developments in legislation and practice, whether or not we have regular contact with them.
36. In the past we have relied on a range of strategies to contact stakeholders, from personalised letters to mail merged emails. Most recently, we have used proprietary email software to gather metrics about the number of emails opened and forwarded by recipients. This data indicates very variable uptake. Our whole communication strategy depends on our messages reaching, and being received by, our stakeholders.
37. For this reason, where we need to send communications to any group or group of stakeholders:
- (i) We will use an email service which provides read receipts.
 - (ii) Where our email service communications fail to reach recipients, we will check we have correct contact details and explore any technical problems with the system we are using.
 - (iii) We will monitor the efficacy of our group email communications and implement appropriate changes to increase our efficiency.

Letters

38. For most of our stakeholders, email is the preferred medium of contact. For a small group of stakeholders, email is not appropriate and only posted letters will be effective. For example, we do not have email contact details for a substantial proportion of publicly owned companies, so we will continue to use posted letters for this group. We will follow up undelivered mail and monitor efficacy as for emails (above).

Other formats

39. We will consult organisations representing groups with protected characteristics to assess the need for written communications to be provided in alternative formats.

Special Reports

40. The Commissioner laid two special reports before the Scottish Parliament in 2014-15 (on failure to respond and extension of FOI law). We plan to lay a further special report in 2016-17. These reports provide a very specific way to raise awareness of issues with a range of audiences. While the primary audience for these reports is Parliamentarians, it is important that we promote them widely. We will therefore continue to send notifications to stakeholders to alert them to the publication of special reports and the key points.
41. In addition, our experience suggests that to maximise the value of special reports, we must issue updates following special reports to build and sustain interest in the issues covered. For example, for the failure to respond report, our reporting progress both mid-year and again in the annual report has impacted positively on the incidence of the problem. We will therefore include future updates on special reports in our communication planning and will promote these via the external blog and twitter account.

Printed materials

42. While demand for printed materials has declined, we will continue to respond positively to requests for paper copies of *Your Right to Know*, our *Annual Report*, website pages and downloadable documents from our Guide to Information.
43. We currently provide translated copies of a summary of Your Right to Know in community languages. We will consult organisations representing groups with protected characteristics to assess whether we should provide additional materials in these, or alternative languages.

Press service

44. The Policy and Information Team provides the Commissioner's press service, responding to journalists' enquiries, providing comment where required, preparing and issuing press statements or press releases. We also provide training to local news groups on effective use of FOI.
45. We have an established media presence and our press service continues to be regularly used. The independence and impartiality of the Commissioner is widely accepted.
46. To maintain and strengthen the current press service we will:
 - (i) Develop and implement press service procedures, including approvals and document management for:
 - Press releases
 - Press statements
 - Lines to take
 - Internal communications
 - (ii) Increase promotion of our top tips for requesters directly to news teams outwith our roadshow programme.
 - (iii) Update the media resources on our website
 - (iv) Update our media contact lists.

Measures of success

47. The success of this strategy will be measured through:
 - (i) The Commissioner's FOI and EIRs statistics portal
 - (ii) Public awareness research
 - (iii) Website statistics
48. The indicators for success are, by 31 March 2020, to achieve and maintain:
 - (i) A minimum of 40% of all applications received annually to be made via the online application portal.
 - (ii) Continued reduction in failures to respond to 15% of valid applications.
 - (iii) 20% increase in the number of annual unique website page views (from 54,000 to 64,800)
 - (iv) 20% increase in the total number of subscribers to content via our website (from 1017 to 1220)
 - (v) Increase in read receipts for Commissioner emails to public authorities from 40% to 75%.
49. These measures will be reviewed annually to ensure they remain both challenging and achievable.

Scottish Information Commissioner

Kinburn Castle
Doubledykes Road
St Andrews, Fife
KY16 9DS

t 01334 464610

f 01334 464611

enquiries@itspublicknowledge.info

www.itspublicknowledge.info