Item 17 iii

BUSINESS PLAN

2024 / 2025

Strategic Aim 1: PROMOTION AND EDUCATION
We 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.

Actions	Activities 2024/25	Measurement / Target
1. Use media and other public platforms to promote key principles, Codes and the standards expected of councillors and members of devolved public bodies.	Proactive engagement with local and national media, and Parliament, on current issues arising in respect of the ethical standards framework and how provisions in the Code have been interpreted. Invite local media outlets to awareness session on ethical standards framework and role of Standards Commission. Publish and disseminate standalone news items in respect of any high-profile or potentially controversial issues or when matters concerning public standards were the subject of media scrutiny and public debate. 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 or 4).	Monitor media (including social media) on ongoing basis and ensure all substantial reporting inaccuracies about Standards Commission's role, work or decisions are corrected timeously. Session held with local media outlets in Q1. Committee appearance successful in terms of its members being satisfied with answers provided and Standards Commission satisfied key points made and understood.
	Publish regular blogs on the website on any topical and pertinent news stories.	Publish a blog each month.
	Engagement with CSPL and equivalent bodies in other nations to see if joint messaging / promotional opportunities	Hold at least one meeting with CSPL, Local Government Committee for Standards in NI and Public Services Ombudsman for Wales by end of Q4.
	Publish more information on website and in educational material for public about standards expected and how to make a complaint.	Publish information on website and in educational material for public about who can make a complaint by end of Q1. Produce card on when and how the Councillors' Code applies, and the extent to which it requires councillors to engage, for members of the public and to also include information to that effect on the website by end of Q2.

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Actions	Activities 2024/25	Measurement / Target
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.	Issue revised Guidance on Councillors' and Model Codes in light of consultations, enquiries, cases and discussions with stakeholders.	Record any issues in respect of how the Codes are interpreted. Review these on a quarterly basis and, following consultation (if significant), revise and update Guidance accordingly.
	Review and update standard training presentations (and case illustrations) on the 2021 versions of the Codes in light of the revised Guidance and the Standards Commission's experience in interpreting their provisions.	Review and update standard training presentations (including case examples and illustrations) by end of Q2. Seek and review feedback from MOs and SOs to check if positive.
	Update case examples and illustrations in Guidance, Advice Notes and standard presentations in light of feedback and enquiries received and decisions made.	Review and update case examples and illustrations in Advice Notes in Q3.
	Ongoing review of enquiries and feedback from training sessions, workshops and discussions with stakeholders to determine whether any new e-Learning material, videos or Advice Notes content should be created, or any existing content amended.	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.
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.	Promote Hearings to be held and Hearings decisions in media, on website and on social media platforms.	Publish information about Hearings to be held within 2 working days of decision to hold. Publish and disseminate information about Hearing decisions within 2 working days of written decision being finalised and issued to parties.
	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.	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. Issue and publish press releases within 2 working days of written decision being finalised and issued to parties.

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Actions	Activities 2024/25	Measurement / Target
	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

We will continue to develop strong relationships with our stakeholders and work with them to resolve issues and prevent breaches of the Codes.

Actions	Activities 2024/25	Measurement / Target
4. Proactive engagement with key stakeholders to identify and / or discuss any issues that have arisen or could arise.	Write to all political parties represented on Scottish Councils asking for their assistance in promoting awareness of, and compliance with, the Councillors' Code and for them to advise of any issues with provisions.	Write to all political parties in Q1. Log and review responses and feedback in order to develop future engagement sessions and further develop business plan.
	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.

Strategic Aim 2: STAKEHOLDERS
We will continue to develop strong relationships with our stakeholders and work with them to resolve issues and prevent breaches of the Codes.

Actions	Activities 2024/25	Measurement / Target
	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.
	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 three formal joint meetings to be held in June and December 2024, and February 2025. Fortnightly informal meetings to be held between Executive Team and ESC. Make / seek changes to educational materials and 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.
5. Review and update all educational and training material.	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.	Develop and agree a communication plan by end of Q2, outlining what is to be created, along with the timescales and any costs / resources involved. Add any actions to Business Plan.
	Continue to develop, consult on, publish and disseminate new e-Learning material, videos and Advice Notes in light of any emerging trends or feedback.	Interactive content on at least two new topics to be produced and published online by end of Q4.

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Actions	Activities 2024/25	Measurement / Target
	Undertake full review of website to ensure content accessible, relevant and up to date.	Assess compatibility of website with Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018). Update the accessibility statement to make it clear which areas we are not able to address and why by end of Q1. Full review of content on website and creation of list of improvement actions to be added to Business Plan and completed by end of Q3.
6. Provision of tailored training sessions on the Codes and any ongoing issues.	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 2024.
	Provide training to boards of public bodies and to elected members of councils on request.	Respond to all requests for assistance with training within timescales outlined in the Service Charter. Consider potential options for providing more information on the requirements of the Councillors' Code to all council officers legal, governance and committee service offices by end of Q2.
	Participate in joint webinars with the Improvement Service on specific topics, such as social media.	Agree topics and dates for two webinars with Improvement Service by end of Q1.

Strategic Aim 3: ADJUDICATION
We will make clear, evidence-based and well-reasoned decisions on cases referred to us 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.

Actions	Activities 2024/25	Measurement / Target
7. Review and, if applicable, seek changes to the governing legislation to ensure the effective and proportionate disposals of complaints about breaches of the Codes of Conduct.	Seek to agree with ESC a 'wish list' of recommendations to amend the governing legislation so potential breaches of the Codes of Conduct can be dealt with in the most effective and proportionate manner. If agreed, discuss best way to progress and seek legislative change with Scottish Government.	Arrange initial meetings with ESC and Government Committee for Standards in NI in Q1 to discuss how their experience in terms of alternative actions. Consult with key stakeholders on any wish list before seeking to discuss with Scottish Government by end of Q3.
8. Proactive engagement with parties, witnesses, the Panel and others to ensure an efficient and effective adjudication process.	Actively engage with parties before Hearings to ensure: • issues are identified and resolved in advance; • deadlines for providing information are met; and • queries are answered timeously and fully. 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.	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.
	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.	Send Members requests for Section 16 decision within 1 working day of receipt of referral from ESC, with full briefing on issues that need to be considered. Report on achievement as part of report against KPIs. Send Panel Chair an aide memoire at least 2 working days before all pre-Hearing meetings, outlining matters to be discussed and resolved. Report on achievement as part of report against KPIs. 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.

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Actions	Activities 2024/25	Measurement / Target
		Panel reports at SCS meeting after Hearing that it was satisfied with assistance provided.
	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).	Send Panel Members any request to vary Hearing procedure, with a recommended course of action, within 3 working days of receipt.
9. Review and, where applicable, improve all adjudication related policies, processes and practices.	Analyse all decisions made in 2023/24, under Section 16 of the 2000 Act, and review policy, process document, templates, publication scheme and decision-making procedures. Review of any 'no action' decision as standing agenda item at the following Standards Commission meeting.	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.
	Undertake review of all decisions made at Hearings in 2024/25 to identify trends and to ensure consistency and clarity in reasoning. Review of any Hearing held as standing agenda item at the Standards Commission meeting following the conclusion of the Hearing. This to include analysis and discussion on what went well or otherwise, and what could have been done differently.	Annual review of Hearings decisions to be undertaken at a Standards Commission meeting in Q4, with any improvement actions added to Business Plan for 2025/26.

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Actions	Activities 2024/25	Measurement / Target
	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. Provide feedback to ESC on investigation reports and seek feedback from ESC on adjudicatory decisions.	Include any feedback in papers for consideration at next SCS meeting. Add any improvement actions identified to Business Plan. 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.	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 Q2. 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.

Strategic Aim 4: MEMBERS AND STAFF
We will continue to invest in, engage with and empower its Members and staff to deliver our work effectively and efficiently.

Actions	Activities 2024/25	Measurement / Target
10. Provide staff with relevant and appropriate training and development opportunities.	Agree individual annual personal development plans for staff. All staff to attend refresher training on cyber resilience and data protection. Executive Director and Case Manager to complete public speaking course.	Personal development plans to be agreed at annual appraisals in Q1. Agreed training and development to be completed by year end. Refresher training on cyber resilience and data protection to be completed by end of Q4. Public speaking course to be completed by end of Q2.
	Undertake a key person dependency risk analysis.	Key person dependency risk analysis to be undertaken by end of Q2. Actions to mitigate risks arising from the exercise to be undertaken by end of Q3 (including ensuring any written task instructions are up to date).
	Human Resources Committee Chair or Member to hold individual meetings with staff to seek their views on the work of the organisation, particularly in respect of engagement and culture.	Individual meetings to be held, and an action plan to progress any suggestions arising from these to be created, by end of Q2.
11. Training and induction of Members	Implement induction and training plan for two new Members to be appointed in Q1.	Organise mentoring and complete induction and training in Q1. Seek feedback on induction and training and update induction and training plan accordingly in Q2.
	Ensure Members receive refresher training on: • the Codes of Conduct; • relevancy of material and submissions and how to weigh and assess evidence; and • good practice in decision-making and in conducting and managing Hearings	Mock Hearing to provide general refresher training on Hearings and the Hearings process, Panel questioning and the relevancy of evidence to be held on 29.4.24.

Strategic Aim 4: MEMBERS AND STAFF
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Actions	Activities 2024/25	Measurement / Target
	Two further development sessions for Members to be held in Qs 2 and 4.	Development Session to be held on 24.6.24, with action plan to progress any suggestions arising from these to be created, by end of Q2. Development Session to be held on 4.11.24, with action plan to progress any suggestions arising from these to be created, by end of Q3.
12. Seek to share services where possible, to ensure best value.	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. Participation in Commissioners and Ombudsman's Group, FOISA Network Group and Data Protection Officer meetings. Ongoing research and ad hoc contact with other public bodies.	Review of service agreement with BIT in Q2.
	Discuss shared training opportunities with other Officeholders (particularly on data protection and cybersecurity).	Hold regular discussions with other Officeholders and include as appropriate when seeking quotes for provision of training.
	Implement recommendations and action points arising from external and internal audits.	Programme of audits and associated improvement actions to be completed by end of Q4. Audit & Risk Committee to consider and report on whether it is satisfied these have been completed.
	Regular engagement with SPCB about budget and governance arrangements.	Executive Director to meet Officeholder Services to provide an update / discuss budget and governance matters on a quarterly basis. Members to meet SPCB in Q3 or Q4. Ensure all information sought and required is provided timeously.