

Registers of Scotland

RoS Board

25th February 2020

Transparency Project Update

Purpose

1. To present to the Board an update on the activity to date of the Transparency Project, which aims to deliver greater openness and transparency for Registers of Scotland, in a phased approach.
2. RoS Board are asked to note the update in line with their role to set strategy for RoS and provide constructive challenge on activity to date.

Background

3. The Board will be aware that Audit Scotland commented on RoS current transparency practice in its 2018/19 audit report. Its outline plan for the 2019/20 external audit proposes to undertake a further review in this area.
4. FOISA requires public bodies to publish certain types of information; this is called the 'Publication Scheme duty'. Public bodies must adopt a publication scheme approved by the Office of the Scottish Information Commissioner (OSIC) and must make available the information they have committed to publish by adopting that scheme through a 'Guide to Information'.
5. The Commissioner's Model Publication Scheme (MPS), which RoS has adopted, was updated in November 2018. Changes reflect the desire for public bodies to proactively publish more information than is currently the case.
6. The current RoS Guide to Information, is based on the 2012 version of the MPS. Having compared this with the 2018 Commissioner's MPS, we concluded that RoS should publish the required additional information through its Guide to Information. Publication is a compliance requirement.
7. Further to these compliance obligations, RoS established a project to improve openness and transparency with a view to becoming an exemplar of good practice amongst public bodies. This paper sets out the activity and delivery to date of the Transparency Project, Phase 1, to close the compliance gap and create the conditions for RoS to provide greater transparency to key stakeholders.

Transparency Project // Update

8. The project has been working on delivering the agreed objectives and has made good progress against the timeline outlined in Annex A.
9. The transparency workstream has undertaken a peer review of technology used by other public sector organisations across the UK to consider improvements to our website and publications. Members of the team have also visited the Scottish parliament to experience their strong culture of openness and transparency. Recommendations have been made to the

project on how to enhance our current publications and improve accessibility. As a result a test page has been created.

10. A Publication Policy has been drafted and approved by our Policy and Practice Group. It sets out RoS commitment to promote openness and transparency and has been reviewed by EMT and BPB.

11. Following the peer review and policy, the project began to look at the way RoS staff write papers and how these are presented to governance, before potentially being published online. The project has drafted a new paper template, guidance on how to write for publication and developed a new process. These are currently being trialled as part of the RoS Board and feedback will be gathered, from RoS Board, and contributors who have drafted papers, to refine the overall process.

12. In addition to publishing papers, the workstream has reviewed and made a recommendation to project board that FOI responses which meet a public interest test will be published.

13. The workstream has reviewed the compliance gap and met with departments across the organisation to understand what documentation held by RoS should be published. Once approved by EMT, RoS will start to publish the required documentation to comply with the 2018 Commissioner's model publication scheme, including RoS Board papers, Board members expenses and Board Register of Interests.

14. Ensuring that feedback is applied after the trial run, the project anticipates that it will make recommendations to update governance group ToRs in relation to the drafting of papers, to ensure papers meet the criteria for publication should they eventually be taken by the Board.

15. Following the pilot of the publication process, feedback will be collated and used to inform the final process that will be shared with the wider business; supported by a communications plan, to inform colleagues of the new process for Board paper submissions.

16. Once the process is embedded for the Board papers, the project board will make a recommendation to EMT for next steps on what extent this new process is rolled out to other governance groups.

17. In order to track the progress and impact of the new approach to Transparency a range of measures will be used including; website feedback and analytics, reporting on FOI requests, media enquiries and MSP queries resulting from the publication of additional information. The project board will give consideration to the introduction of a KPI to monitor improvements in transparency as our approach matures.

18. As the initial Phase 1 of the project is completed and the compliance gap closed, the Project Board will draft options and make a recommendation for phase 2, which will focus on delivering against the aim to move from compliant to exemplar, for EMT approval.

Conclusion

19. The Board is asked to note the contents of this update and provide feedback for discussion.

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Business Development 6th February 2020