

Strategic Plan 2023 to 2025



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Foreword

Message from the Chief Information Commissioner

The Information Commission enters the decade of the 2020's with purpose, energetic determination and hope for transformative changes. New legislations such as the Access to Information Act, 2018 which the Information Commission is mandated to enforce as an independent, neutral body serves a fundamental role to deepen our democratic institutions, foster good governance, and line the way for a better society. Access to information is innate in Article 28 of our Constitution as a basic right and recognized as a fundamental principle of the Universal Declaration of Human Rights.

The issues we face today are numerous, complex and dynamic. We are conscious of the necessity for balance and distinction between promoting public access to information, citizens' rights in relation to their personal data and other governance regulations in the wider landscape we operate in; to act for what is truly necessary, proportionate and legitimate. In our digital age, information and personal data move at borderless, intrusive, and extraordinary speed. To remain relevant and keep pace, new proposed legislation is under development by the Government of Seychelles and intended to be administered under the Information Commission namely, the Data Protection Act. This legislation is connected to Article 8 of the Human Rights Convention aligned with best global practices and intends to offer some safeguards to ensure people's right to a private life. These regulations serve as starting point. The success and collective onus remains on all of us in our respective public governmental and private non-governmental roles to engage, collaborate, support to bring about a culture of good governance as the normal everyday way.

This strategic plan is the first for the Information Commission. It is a roadmap on how we seek to accomplish our medium term goals and remain agile to the upcoming challenges in front of us, bearing in mind to contribute practically. Ultimately, we aim to positively impact the development of a progressive, just, secure, and equitable society aligned with our national strategies. The Information Commission strives to act in good faith to enforce the regulations we have been entrusted to. In doing so, we pledge to lead our efforts in the service of all people and aspire to do our lawful duties to a high professional standard, with integrity, impartiality, transparency and accountability.

Ms. Mumtaz Hasan

Executive Summary

Message from the Chief Executive Officer

The Information Commission's Strategic Plan 2023 - 2025 highlights our areas of focus for the three-year period ending December 2025. It is organized to cover:

1. *History, Change and Impact*
2. *Strategic Direction*
3. *Operational Direction*

This strategic plan has been formulated on the best practices and guiding principles, by:

- Starting small, identify critical elements and plan for steady growth;
- Develop shared vision;
- Setting clear, measurable, and specific goals and operating structure – map infrastructure and tools;
- Communicate frequently, widely and educate stakeholders – governance practitioner's lessons learned is that communication is the most critical part of the landscape.

I believe the legislation and an effective regulator such as the Information Commission can make a difference to how much trust people have in what happens when the decision is taken on their lives. Having the trust in both Access to Information and the new Data Protection regulations is fundamental to democracy. Open government, access to information and data innovation are all dependent on a transparent approach to information management. This strategic plan sets out the mission to increase the trust that the public has in government, hence this will create the three important aspect of Transparency, Accountability and Integrity in the public bodies sector.

The Commission will be able to do that by encouraging good information rights practices, providing advice and guidance and, where necessary, taking proportionate enforcement action. We will continue to work proactively with the public sectors and will promote and uphold the public's rights to privacy, access to information and transparency in government decision making.

As we embark on our journey, the IC also has to consider that we must grow and maintain the capacity and competence of our workforce as our regulatory responsibilities increase in the mandate and complexity. We anticipate significant growth in our workforce during the implementation of this Strategic Plan.

Ms. Thereza Dogley

Acknowledgements

The Information Commission is grateful to the Commissioners, Mr. Desire Payet and Mr. Antonio Lucas, Legal Counsellor, Mr. Jean-Marc Lablache, and diligent team at the Information Commission, Mrs. Dina Antoine, Ms. Mina Labiche, Ms. Rashikah Didon, Mr. Aldrick Freminot and Ms. Mina Accouche, for their valuable input and ongoing support.

The Information Commission would like to express its sincere appreciation to the Government of Seychelles for the positive governance initiatives and furthering its commitment as we accelerate our progress. Thank you to all the dedicated Information Officers, Head of Information Holders, public bodies, civil society organizations, commercial entities, active partners and courageous citizens who have stepped forward to participate and contribute in a collective effort for good citizenship change.



Part 1

Introduction

1.1 Background

The Information Commission officially came into existence in 2018 in conjunction with and guided by the Seychelles Access to Information Act, 2018 (ATIA hereafter). It began to function in 2019 with the initial phase focused on establishing its operations and instituting the ATIA. Together, the Information Commission and ATIA function to promote good governance and are the primary tools to aid the access of information held by public authorities performing a governmental function in Seychelles. Since the inception phase, the scope of the Information Commission has grown to encompass new legislation on Data Protection in the private and public sector.

The 2023-2025 Strategic Plan is the first of its kind for the Information Commission since its inception. It aligns with the Government of Seychelles new policies introduced to further a Results Based Management (RBM) approach aimed at improving the operational efficiencies of the public sector. The Information Commission's 2023-2025 Strategic Plan supports the statutory responsibilities of the Information Commission to regulate and promote good practices in line with a range of access to information and data protection related legislation.

The three-year plan is a broad roadmap for how the Information Commission will set about achieving its mandate. It outlines the overall long term vision, broader strategic priority goals, specific medium term objectives and targeted results, resource structure, monitoring of performance, challenges and path to sustainable change. It is intended as both, a functional internal guidance document to inform other detailed policies and processes as well as an external document to advance knowledge on the mission of the Information Commission.

1.2 Vision

Actively and responsibly support the people of Seychelles realize their constitutional rights to information and collectively advance a culture of good governance.

1.3 Mandate for Access to Information Act

To foster good governance through enhancing transparency, accountability, integrity in public service and administration, participation of persons in public affairs, including exposing corruption, to recognise the right of access to information envisaged in Article 28 of the Constitution and for matters connected therewith and incidental thereto (as per preamble ATIA).

1.4 Mandate for Data Protection Act (Based on preliminary draft stage non-assented legislation)

To strengthen the protection of individuals with regards to the processing of personal data. To recognise the right to privacy envisaged in Article 20 of the constitution and to promote and facilitate the responsible and transparent flow of information by private and public entities while ensuring respect to individual privacy (as per draft legislation).

1.5 Our Core Values

- To safeguard and serve
- To inspire integrity and good citizenship
- To be impartial and accountable
- To foster open, innovative and systematic practices
- To work collaboratively and with respect



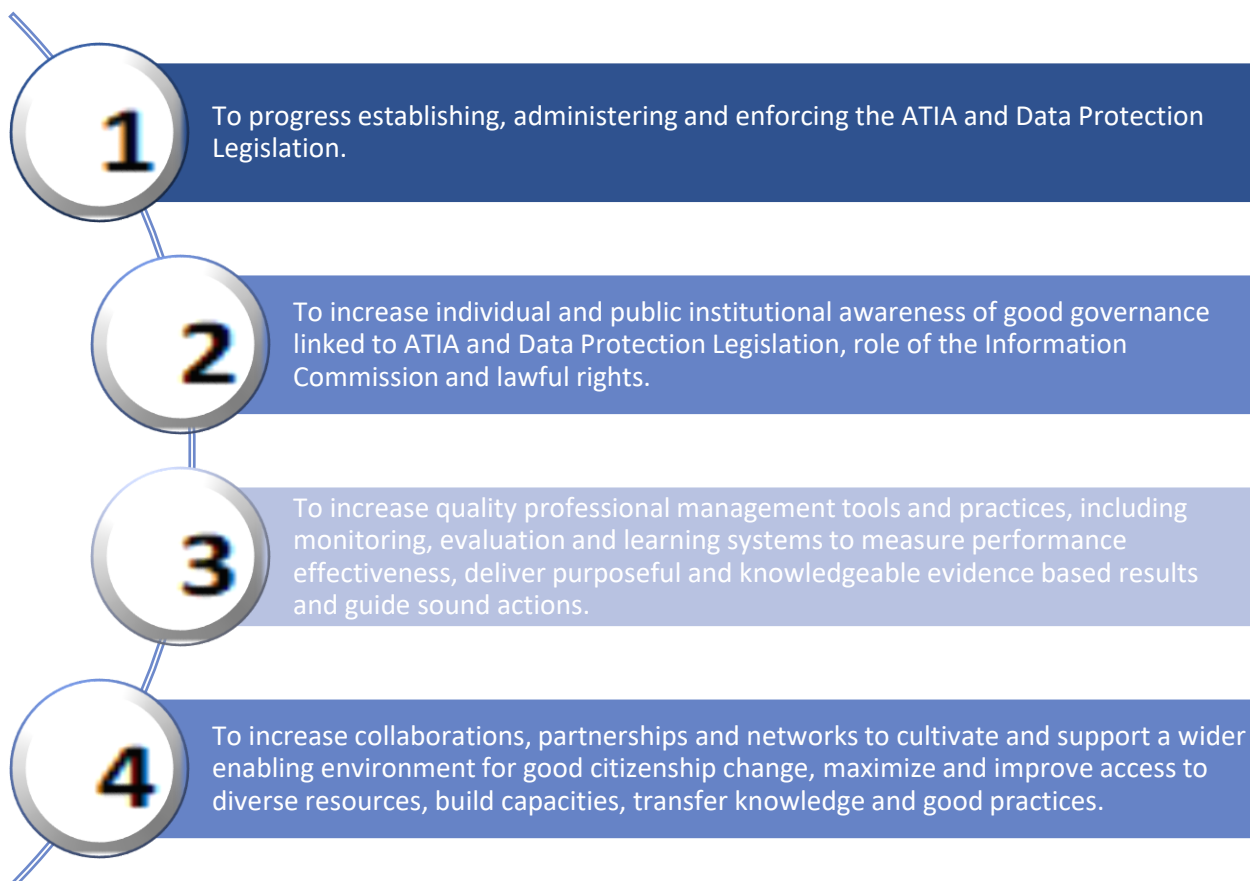
Part 2

Strategic Goals and Objectives

2.1 Strategic Goal

Effective implementation of the Access to Information Act, 2018 and the Data Protection Act, 2022.

2.2 Strategic Objectives



Note: As of September 2022 when this document was finalized, the data protection legislation was in final draft form, anticipated to be passed and ascended as the Data Protection Act in the latter end of 2022 and thus referred to as such in the goal. In the event of unforeseen circumstances and for the sake of accuracy, we may adjust parts of the document relating to this if needed in the future.

2.3 Strategic Objectives – Approach to Achieving Success

Objectives 1: To progress establishing, administering and enforcing the ATIA and Data Protection Legislation.

Accountability and transparency are universally recognised as key elements for enabling participatory governance, rule of law and peaceful societies. The Information Commission has a twofold mandate to establish, administrate and enforce good governance through the ATIA and DPA. This involves ensuring that the following are developed systematically and holistically during this 3-year period.

Ways of Working:

- Setting up of office operations and structure.
- Engaging adequate administrative and technical staff.
- Appointing independent governing board for operations oversight and special appeals.
- Partnering with public bodies for maintaining Information Officers and Head of Information Holders.
- Partnering with public and private sector bodies for initiating and maintaining Data Controller, Data Protection Officer and Data Processors.
- Supporting public bodies proactively disclosing information on public access websites.
- Facilitating types of periodical and annual reporting publically available free of charge.
- Performing types of investigative and compliance monitoring.

The ATIA having been established earlier in 2018 started operating fully in late 2019 with the CEO recruited in August 2019. In the inception phase, some small group outreach workshops and Information Officer trainings have been conducted to promote awareness of the ATIA. As well, some SOPs have been developed and advising of appeal cases. In this stage of implementation, the IC endeavours to organize its actions to expand on these activities in a quality way using technology for cost effective and wider reaching mass dissemination. Actions will entail ensuring that all types of documentation and reporting are delivered as required, more complex investigative monitoring carried out, boosting a culture of learning and planning for sustained steady growth.

The DPA is expected as a new legislation and will be at inception stage in this 3-year Strategic Plan period. In the infancy stage, expected actions involve establishing operations and staffing, developing SOPs, and evolving the current internal and external capacity and knowledge. Providing adequate education to staff across the IC is critical to understanding and embedding roles, starting positively and synergizing cascading impacts in educating others. We recognize the need to seek expert resources experienced in such domains and explore exchange with other countries for optimal results.

The Information Commission intends to enforce both these regulations in the simplest form, to be practicable and easy for all types of stakeholders to access and use, conscious to avoid imposing cumbersome administrative burden overall.

Objectives 2: To increase individual and public institutional awareness of good governance linked to ATIA and Data Protection Legislation, role of the Information Commission and lawful rights.

We recognize that communication and education is key to achieving this objective; not only to increase awareness and provide knowledge to citizens to access their rights but also cultivating a wider accountable and transparent mindset, culture and environment.

Ways of Working:

- Embrace the use of technology in our daily work.
- Build coalitions and leverage existing organizations websites to share information.
- Use planning tools such as annual communication plan with the resources available to us with formal and informal approaches such as meeting presentations, energizing campaigns, social media.
- Use analysis tools such as mapping can help guide targeting active groups and early adopters to cascade messages with their networks.
- Be inclusive in our processes; to work with influential, marginalized and diverse groups for example the youth preparing to enter the workforce, who currently have lower levels of access to information awareness or awareness on rights in relation to processing personal data.

Objectives 3: To increase quality professional management tools and practices, including monitoring, evaluation and learning systems to measure performance effectiveness, deliver purposeful and knowledgeable evidence based results and guide sound actions.

One of the key challenges identified across the wider interlinked landscape is quality delivery of services. This has led to a recent concerted and targeted public effort in developing Performance and Monitoring Evaluation Policies and measurement techniques for encouraging Performance Results Based Management. The direct benefits being improved services and facilitation of better decision making and indirect benefits being assisting in the promotion of good governance, accountability, and transparency across all sectors.

Ways of Working:

- The Information Commission recognizes the value of such management processes, systems and practices and fully endorse developing this internally and externally.
- Information Officers of public bodies are the frontline for responding to requests and they largely depend on many others in their organization responsible to keeping records to successfully respond to public requests for information.
- Our experiences while supporting the public with access to information have shown that often no records are found or are incomplete, or lack of knowledge by personnel on upkeep and

standards, or disorganized records costing time, effort and resources to locate. It would aid all to maintain professional management systems in some form.

- We recognize that different organizations are at different stages of development, have differing capacities, some more advanced and regularised while others not. It will require time, repetitive long term support to sensitise and uptake. We will focus on coordination and joint cooperation for enabling ownership of all stakeholders to achieve together.

Objectives 4: To increase collaborations, partnerships and networks to cultivate and support a wider enabling environment for good citizenship change, maximize and improve access to diverse resources, build capacities, transfer knowledge and good practices.

The Information Commission appreciates that there are many organizations involved in good governance each with unique strengths. One of the key strategies we will employ will be to link, coordinate and innovate jointly in order to contribute with more efficiency and impact.

Ways of Working:

- Collaborate widely with local and international identified stakeholders for joint programs, learning and exchanges, developing expertise and exploring avenues for human and financial resources.
- Connect regularly and visibly with focal government departments to attain efficiencies throughout our mandate.
- Consider capacity building as a long term investment for the Seychelles workforce for staff, Information Officers, Data Protection Officers and those involved in supporting roles.



Part 3

Implementation

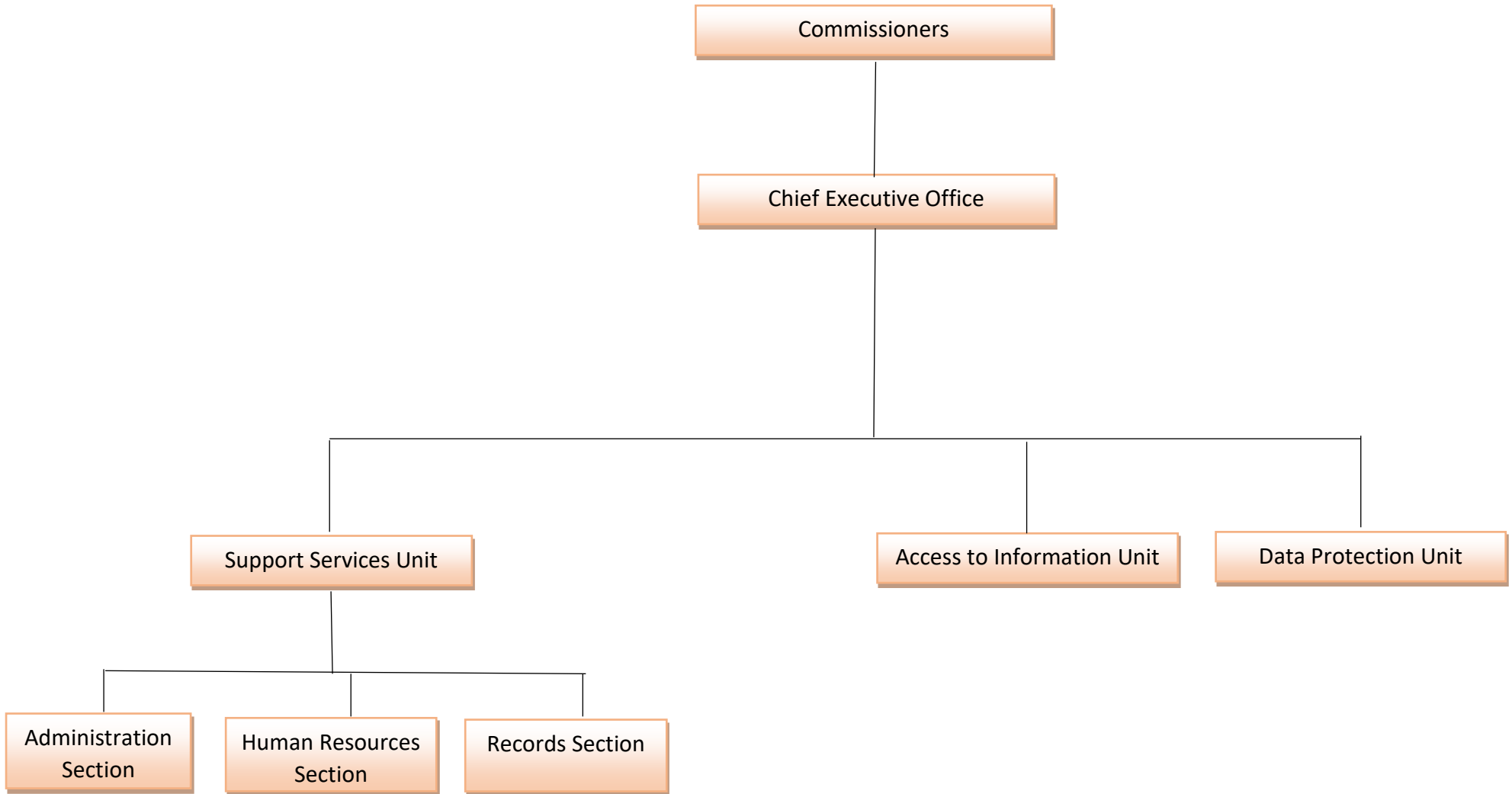
3.1 Organization Structure and Resources

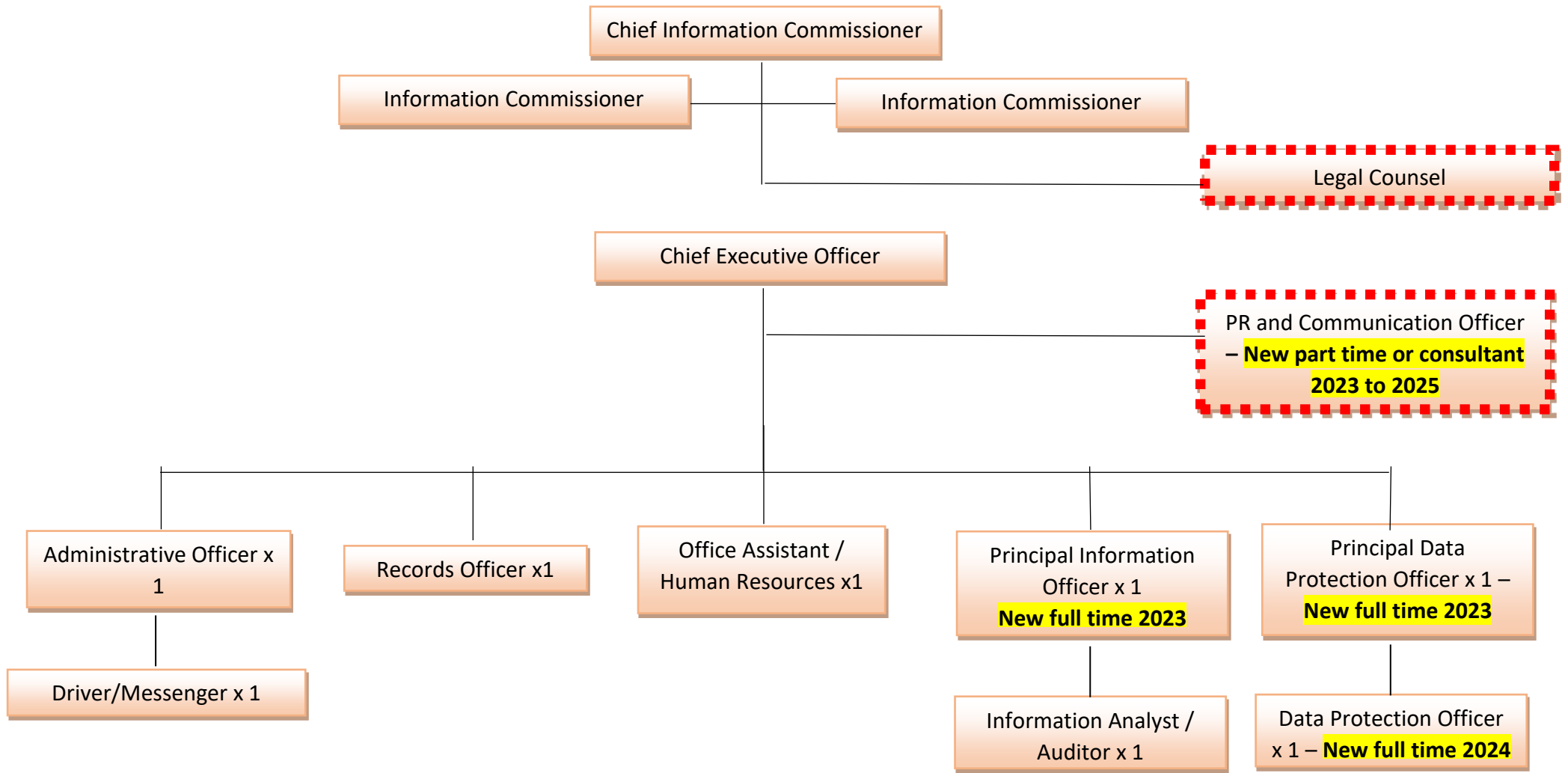
In order to achieve the strategic goals and objectives set out in the plan, the Information Commission has assessed its organizational resources and structure, currently emphasized to deliver towards the ATIA. To accommodate growth for the data protection legislation, an organogram structure impended below as Figure 1 is proposed in a phased staffing approach as a minimum standard.

The main structural changes will include the creation of two new units named the Access to Information Unit and the Data Protection Unit. Based on stakeholder consultations with organizations involved in the development of the data protection legislation such as the Central Bank of Seychelles and Department of Information Communications Technology, the Information Commission forecasts an additional three (3) staff posts will be required within this strategic period to professionally administer its responsibilities fully. A part time role or consultancy arrangement has been included for a communications specialist to assist deliver critical existing gaps based on internal needs assessment, external stakeholder feedback and global lessons learned from governance practitioners that quality and frequent communication is the most vital part of successfully implementing such good governance initiatives.

The Information Commission wherever possible will work to identify partnerships and secure alternative sources to fund in kind and cash co-financing of core support. It will foster a culture of learning and view of long term capacity development. Staff will be cross trained and knowledgeable in multiple functions to mitigate gaps and risks. A rotational formal capacity development plan will be in place focused on enhancing skills, cultivating a professional and ethical mindset to deliver duties efficiently, increasing employee satisfaction and worth.

3.2 FIGURE 1: INFORMATION COMMISSION STRUCTURE





3.2 Change Management

The Information Commission recognizes the need to be relevant and embrace growth; moving forward with the full support and cooperation of all affected stakeholders. Change management is a critical consideration in ensuring that internal and external stakeholders understand the rationale for necessary improvements, change as well as be inspired to cooperate. We will employ a strategy to have clear communications, engage constructively and drive awareness to be able to successfully adapt to transitions. We will work to involve representatives internally and externally across diverse stakeholder organizations at every stage of change processes from:

- Identifying challenges
- Planning improvements
- Implementation
- Reflection

A key component of many of our activities is communication and outreach. We will work practically to develop and provide timely, formal and informal communication to all stakeholders; via trainings, workshops, consultative meetings, newspaper notices, website publications and social media updates. We will strategically seek to collaborate with like and open-minded stakeholders, to nurture partnerships, networks and leverage synergies effectively. We will work to create a more adaptable and innovative workplace.

Action Points:

- Strategic planning review exercise every 3 years i.e. next plan 2026 to 2028 started and completed by 2025.
- Coordinating and supporting annual learning forums, see further linked Part 5, MEL action points.

3.3 Awareness Raising

Awareness raising is a crucial element of both the ATIA and data protection legislation. Further internal development strategies will be considered and tools designed, at a minimum, standards to ensure that staff are able to achieve the goals and objectives set forth.

Some key considerations to be expanded on:

- Engage communications specialist(s) to support visibility, branding, awareness raising, communications plan, and creation of effective and vital outreach messages.
- Implement communication plan with key elements focused on effective awareness raising to highlight the two legislations, and complementary timing of activities.
- Carry out stakeholder mapping and analysis, form targeted partnerships and coalitions with other Public Entities and stakeholders.
- Develop easy to use digital platforms and train all staff how to maintain.

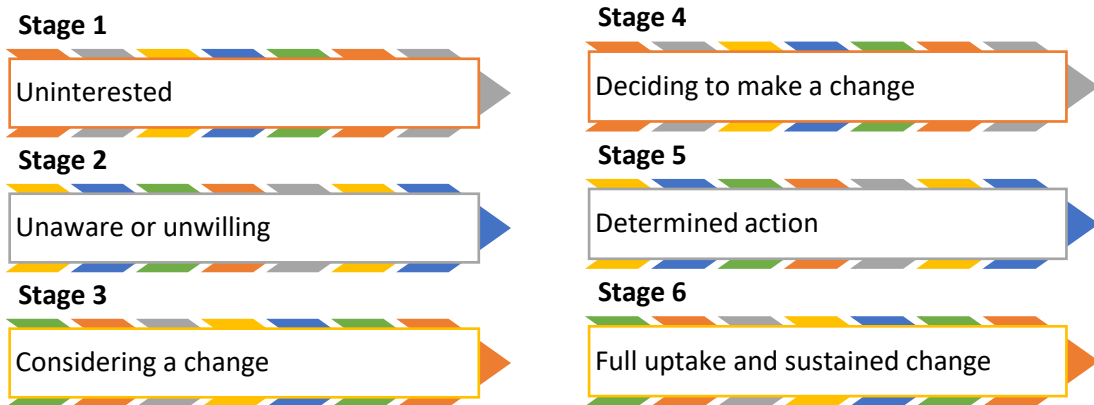
3.4 Stakeholder Engagement

Stakeholder Category	Engagement Strategy	Direct Number of Beneficiaries			Indirect Number of Beneficiaries		
		2023	2024	2025	2023	2024	2025
Ministries, Department and Public Agencies	Correspondence, meetings, website, media, newspaper publications						
Information Officers	Annual forum, formal correspondence						
Head of Information Holder	Annual forum, formal correspondence						
Civil Society Organizations	Personal meetings and correspondence, networking programs, joint activities						
Private Sector Organizations	Personal meetings and correspondence, networking programs, joint activities, Website, media, newspaper publications, meetings						
Community	Website, media, newspaper publications, meetings, appeal case hearings, interactive activities and promotional campaigns						
International Donor Organizations	Personal meetings and correspondence, networking programs, joint activities						
Educational Institutions	Personal meetings and correspondence, networking programs, joint activities						
Media	Proactive update calls, meetings, joint programs						

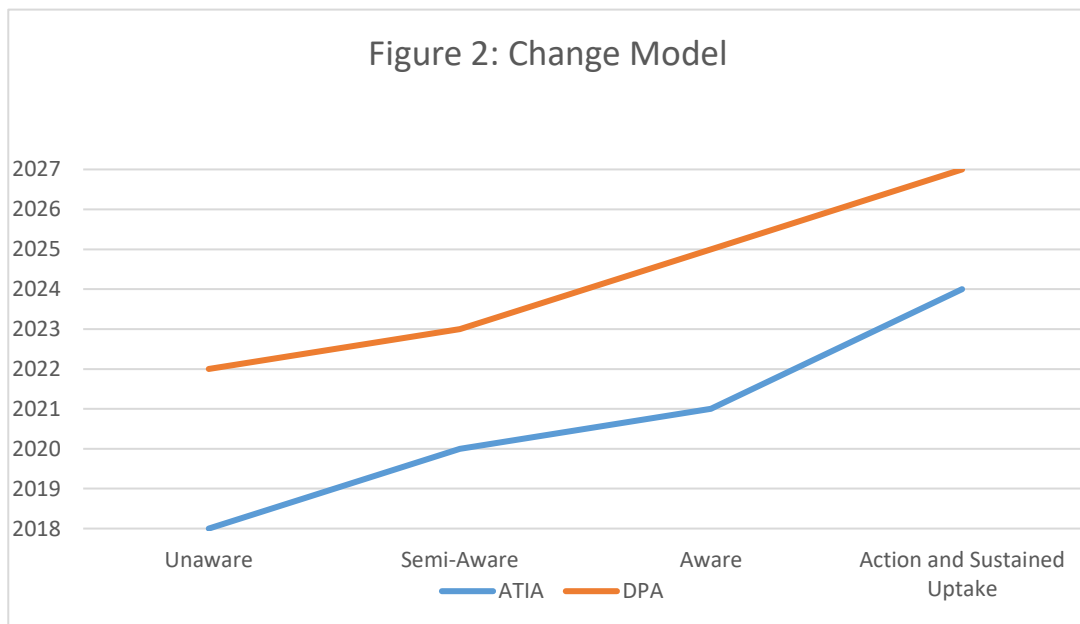
* Conduct mapping exercises and power analysis to inform detailed annual engagement plan

3.5 Change Model

Based on lessons learned, the Information Commission recognizes that change is a gradual process and has planned its strategic goals and objectives accordingly. The baseline starts at zero, stage 1, uninterested and ultimately the goal is stage 6, full uptake and sustained change. The stages of awareness raising are as follows:



The ATIA and data protection legislation are planned for in the different timelines as illustrated in Figure 2 below.



3.6 Analysis of Challenges and Opportunities

The below SWOT analysis provides a better understanding of the landscape in which the Information Commission operates in, key concerns and opportunities from which priorities can be identified and guided.

Strengths

- SOPs in place and well used.
- Operational and efficient office set up for ATIA.
- Timely responses to public requests.
- Good communication and cooperation with different bodies.
- Employees progressively developed with job training, rotational capacity building and exposed to networks.

Weaknesses

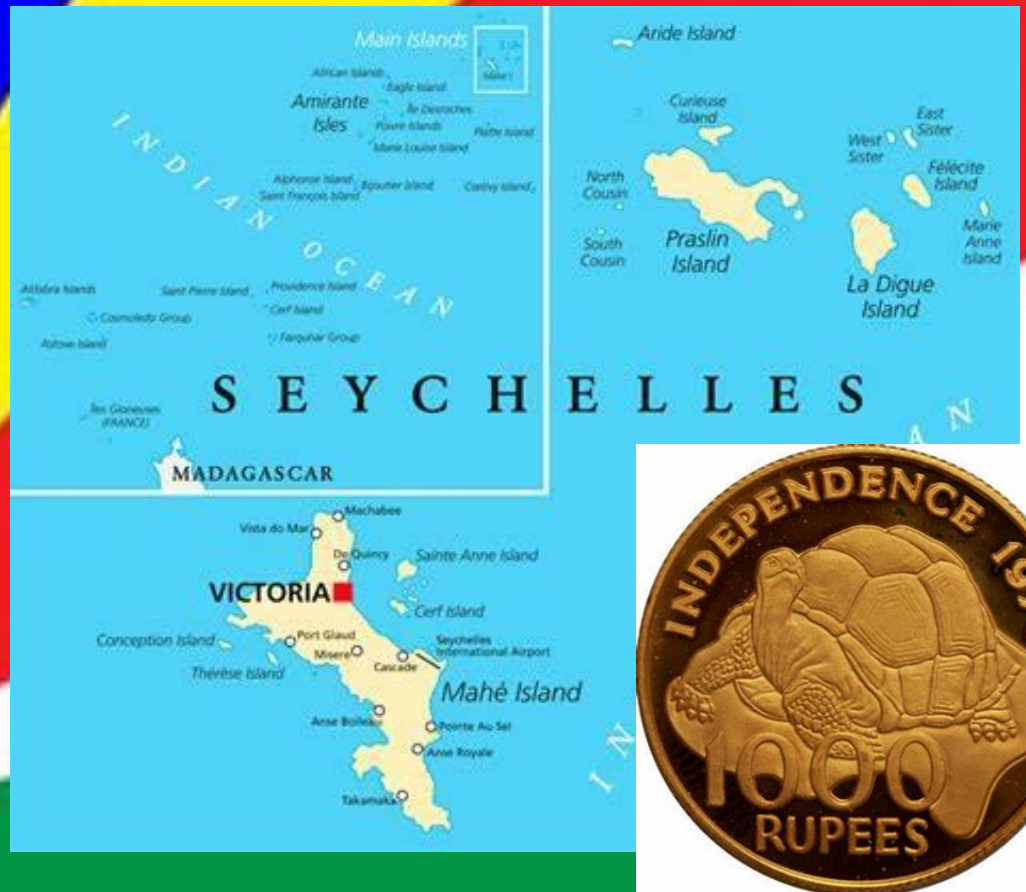
- Lack of specialized technical resources to carry out full monitoring functions, communications and backup staff for unforeseen emergencies.
- Limited manpower and knowledge for quick and full enforcement of regulations.
- Funding constraints and dependency on sole source GOS.
- Information Officers or Public Body have other competing priorities and lack capacity/knowledge.

Opportunities

- Citizens, agencies, watchdogs derive transformative benefits from regulations.
- Evolving enhanced digital platforms with practical uses and for compliance, sustainable record keeping and mass dissemination/outreach.
- Advancing communities with sensitization, knowledge of ATIA and DPA and culture of good governance.
- Innovative training and e-learning.
- Engagement with other international agencies for capacity building (technical assistance/training).

Threats

- Sustainable and autonomous funding.
- Changes in laws/ ministries/ national level.
- Private sector offers more competitive remuneration staff packages.
- Obsolete technology and systems to manage data.
- Uncertainty about new laws governing the use of data.
- Expansion of office to cater for more staff for ATIA and DPA.
- Difficulty in adjusting the mindset of organisations and people who hold the information.
- A lack of capacity and less importance in relation to record keeping and record making.



Part 4 Budget and Economic Impact

Sustainable funding is an integral component of consideration to the delivery of Information Commission’s Strategic Plan. The main sources of core funding during this strategic period is via the Government of Seychelles. As the Information Commission matures, it seeks to develop feasible ways to collect alternative autonomous revenues to contribute to administrative financing and explore partnerships and grants to complement in kind support of specific activities.

The budget planning process conducted jointly with the Ministry of Finance sets out the funding available for the next three years and how the Information Commission plans to finance its overall operations to meet its mandate presently and in the future. The Information Commission’s Program Performance-Based Budgeting (PPBB) statement summarizes the targets, the key performance indicators and the funding available over a three-year period to achieve its strategic objectives. The table below provides a snapshot of the consolidated expenditure estimates for the planned period by program. The projected figures for the budget are likely to change due to the impact of Covid-19 on the Seychelles’ economy and the new data protection legislation.

The projected figures for the budget are likely to increase in 2023 onwards to accommodate the establishment of the proposed Data Protection Act, anticipated to take effect from 2023.

Consolidated Position	2022				2023	2024	2025
	Total to be appropriated	Compensation of Employees	Use of Goods and Services	Capital	Forecast without NSP	Forecast without NSP	Forecast without NSP
P1:Information, Management and Administration	2,584	931	1,653	-	2,834	2,838	2,842
Total	2,584	931	1,653	-	2,834	2,838	2,842

Action Points:

As part of its strategic objective, the Information Commission will:

- Continue efforts to identify additional areas of saving and efficiency; and
- Continue to work closely with local stakeholders and international stakeholders for opportunities to obtain funding.



Part 5

Performance Monitoring, Evaluation, and Learning (MEL)

The Information Commission will continue with a Monitoring, Evaluation and Learning (MEL) approach in its processes to measure results, inform decision making for constructive changes, and learning during the period of implementation. The MEL approach will consider the following tiers of measurement:

1. Organization level
2. Unit level

A framework will be designed and maintained mid-year and annually to capture and measure quantitative data which in combination with qualitative measures, feedback, lessons learned and good practises, form evidence based communications for the Information Commission.



There are no specialized MEL staffing resources planned at the Information Commission for this strategic period. Limited availability of resources has been prioritized towards enforcing awareness and audit assurance areas. The framework is intended to be simple and designed in a practical, organic manner to respond to the needs and capacities of the organization. Efforts will be led by Commissioners for guidance and staff for day to day implementation. Wherever possible and available, staff will be encouraged to learn more via external workshops or self-development.

Action Points:

- Design and maintain an internal logical framework that can be linked to practically guide annual operational plans and GOS annual reporting requirements such as MTES.
- Produce standardized internal and external templates for Information Officers to enable consistent and clear reporting on an annual basis.
- Maintain individual and organization work plans.
- Conduct periodic audit to various public bodies to ensure reported implementation conforms to ATIA and DPA.
- Coordinate various meetings, visits and consultations to review progress and resolve issues that may arise during implementation.
- Engage in capacity development and learning programs; organize and support trainings or collaborative forums annually.

Abbreviations & Acronyms

ATI	Access to Information
ATIA	Access to Information Act, 2018
DPA	Data Protection Act
GOS	Government of Seychelles
IC	Information Commission
MTES	Medium Term Expenditure Strategy

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