

# Scottish Information Commissioner

## Scheme of Delegation

I, David Hamilton, appointed by His Majesty on the nomination of the Scottish Parliament, as Scottish Information Commissioner, authorise, under section 42(10) of the Freedom of Information (Scotland) Act 2002 the following persons to exercise the following functions on my behalf, to the extent so authorised:

### **Note:**

The post title Head of Enforcement includes Acting Head of Enforcement.

The post title Head of Policy and Information includes Acting Head of Policy and Information.

The post title Deputy Head of Enforcement includes Acting Deputy Head of Enforcement.

### **Finance**

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| ITEM                                                                                                       | AUTHORISED SIGNATORY<br>(OR ANY MORE SENIOR OFFICER)                                                                                                                                                                                                                                                  |
|------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Requests for goods and services, up to and including £4,999, signed in the first instance by the requester | To be authorised by one of the following budget-holders, as appropriate (see below): <ul style="list-style-type: none"><li>• Head of Enforcement</li><li>• Head of Policy and Information</li><li>• Head of Business Support</li><li>• Business Support Manager</li></ul>                             |
| Requests for goods and services for £5,000 and over, signed in the first instance by the budget-holder     | <ul style="list-style-type: none"><li>• Head of Business Support</li></ul>                                                                                                                                                                                                                            |
| Business Continuity - appropriate emergency expenditure to secure the premises up to a maximum of £1,000   | <ul style="list-style-type: none"><li>• Emergency key holders as detailed in VC217747 (key holder information)</li></ul>                                                                                                                                                                              |
| Variation in amount of invoice to requisition (details to be noted on the requisition form)                | Invoice agrees with requisition or small variation (the lesser of 10% or £500): <ul style="list-style-type: none"><li>• Requester countersigned by the budget-holder</li></ul><br>Invoice amount differs from requisition by £500 or more:<br>Budget-holder countersigned by Head of Business Support |
| Invoice payment authorisation signed in first instance by requester to confirm receipt of goods / services | Any one of: <ul style="list-style-type: none"><li>• Head of Enforcement</li><li>• Head of Policy and Information</li><li>• Head of Business Support</li></ul>                                                                                                                                         |

| ITEM                                                                                                                                                                                                                                                 | AUTHORISED SIGNATORY<br>(OR ANY MORE SENIOR OFFICER)                                                                                                                              |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                      | <ul style="list-style-type: none"> <li>Business Support Manager,</li> </ul> <p>other than who authorised the requisition</p> <p><b>See requester absence provision</b></p>        |
| Authorised signatories for payments from bank account, including cheque book, and authorised authenticators for Bankline transactions. Payments must be authorised by the Scottish Information Commissioner and/or his authorised list of delegates. | <ul style="list-style-type: none"> <li>Head of Enforcement</li> <li>Head of Business Support</li> <li>Head of Policy and Information</li> <li>Business Support Manager</li> </ul> |
| SIC Credit Cards                                                                                                                                                                                                                                     | <ul style="list-style-type: none"> <li>Account holder only</li> </ul>                                                                                                             |
| Petty cash account                                                                                                                                                                                                                                   | <ul style="list-style-type: none"> <li>Business Support Manager</li> <li>Business Support Administrator</li> </ul>                                                                |
| Approval of travel / expenses claims                                                                                                                                                                                                                 | <ul style="list-style-type: none"> <li>Claimant's first line manager</li> </ul>                                                                                                   |

## Staffing

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| ITEM                                                                                                                                                             | AUTHORISED SIGNATORY<br>(OR ANY MORE SENIOR OFFICER)                                                                                                                              |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Annual leave (including other leave / Flexi leave)                                                                                                               | <ul style="list-style-type: none"> <li>Requester's first line manager</li> </ul>                                                                                                  |
| Special Leave – requests for up to five days in any 12 month period                                                                                              | <ul style="list-style-type: none"> <li>Requester's second line manager</li> </ul>                                                                                                 |
| Requests for References                                                                                                                                          | <ul style="list-style-type: none"> <li>Head of Business Support</li> </ul>                                                                                                        |
| Letters of appointment (*to be signed only following the receipt of the Scottish Information Commissioner's written authority that the appointment is confirmed) | <ul style="list-style-type: none"> <li>Head of Business Support*</li> </ul>                                                                                                       |
| Letters of regret                                                                                                                                                | <ul style="list-style-type: none"> <li>Head of Enforcement</li> <li>Head of Business Support</li> <li>Head of Policy and Information</li> <li>Business Support Manager</li> </ul> |

## General correspondence

| ITEM                                                                                                   | AUTHORISED SIGNATORY<br>(OR ANY MORE SENIOR OFFICER)                                                                                                                                                                                    |
|--------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Non-sensitive                                                                                          | <ul style="list-style-type: none"><li>• All Staff</li></ul>                                                                                                                                                                             |
| Potentially sensitive                                                                                  | <ul style="list-style-type: none"><li>• Head of Enforcement</li><li>• Head of Business Support</li><li>• Head of Policy and Information</li><li>• Deputy Heads of Enforcement</li><li>• Deputy Head of Policy and Information</li></ul> |
| Letters to MPs, MSPs or MEPs (except where party to investigation or routine P&I contact) <sup>1</sup> | <ul style="list-style-type: none"><li>• Head of Enforcement</li><li>• Head of Policy and Information</li><li>• Deputy Head of Policy and Information</li></ul>                                                                          |

## Official documents and related correspondence

| ITEM                                                                                                   | AUTHORISED SIGNATORY<br>(OR ANY MORE SENIOR OFFICER)                                                                                                                                                                                                     |
|--------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Any contract                                                                                           | <ul style="list-style-type: none"><li>• Head of Business Support</li></ul>                                                                                                                                                                               |
| Formal deeds and agreements (to be signed only with the Scottish Information Commissioner's authority: | <ul style="list-style-type: none"><li>• Head of Business Support</li></ul>                                                                                                                                                                               |
| Validation of adoption of a model publication scheme                                                   | <ul style="list-style-type: none"><li>• Head of Policy and Information</li><li>• Freedom of Information Officers (P&amp;I)</li><li>• Administration Officer (P&amp;I)</li></ul>                                                                          |
| Formal approvals of publication schemes                                                                | <ul style="list-style-type: none"><li>• Head of Policy and Information</li><li>• Head of Enforcement</li><li>• Deputy Heads of Enforcement</li><li>• Deputy Head of Policy and Information</li><li>• Freedom of Information Officers (P&amp;I)</li></ul> |
| Formal refusals of publication schemes                                                                 | <ul style="list-style-type: none"><li>• Head of Policy and Information</li><li>• Head of Enforcement</li></ul>                                                                                                                                           |

<sup>1</sup> SIC to be made aware of correspondence

| ITEM                                                                              | AUTORISED SIGNATORY<br>(OR ANY MORE SENIOR OFFICER)                                                                                                                                                                                                                                                                                                                                      |
|-----------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Open a Level 1 intervention                                                       | <ul style="list-style-type: none"> <li>• Head of Enforcement</li> <li>• Deputy Heads of Enforcement</li> <li>• Head of Policy and Information</li> <li>• Deputy Head of Policy and Information</li> <li>• Freedom of Information Officers (P&amp;I)</li> <li>• Freedom of Information Officers (E)</li> </ul>                                                                            |
| Open a Level 2 intervention or move a Level 1 intervention to Level 2             | <ul style="list-style-type: none"> <li>• Head of Enforcement</li> <li>• Deputy Head of Enforcement</li> <li>• Head of Policy and Information</li> <li>• Deputy Head of Policy and Information</li> </ul>                                                                                                                                                                                 |
| Open a Level 3 intervention or move an existing intervention to Level 3           | <ul style="list-style-type: none"> <li>• Head of Enforcement</li> <li>• Head of Policy and Information</li> </ul>                                                                                                                                                                                                                                                                        |
| Information notices                                                               | <ul style="list-style-type: none"> <li>• Head of Enforcement</li> <li>• Deputy Heads of Enforcement</li> <li>• Head of Policy and Information</li> <li>• Deputy Head of Policy and Information</li> </ul>                                                                                                                                                                                |
| Enforcement notices (in relation to failure to comply with s.23(1) of FOISA only) | <ul style="list-style-type: none"> <li>• Head of Enforcement</li> <li>• Deputy Head of Enforcement</li> </ul>                                                                                                                                                                                                                                                                            |
| Decision notices                                                                  | <ul style="list-style-type: none"> <li>• Head of Enforcement</li> <li>• Deputy Heads of Enforcement</li> <li>• Head of Policy and Information</li> <li>• Deputy Head of Policy and Information</li> </ul>                                                                                                                                                                                |
| Notices under s.49(1) – frivolous or vexatious                                    | <ul style="list-style-type: none"> <li>• Head of Enforcement</li> <li>• Deputy Head of Enforcement</li> </ul>                                                                                                                                                                                                                                                                            |
| Notices under s.49(2) – withdrawn                                                 | <ul style="list-style-type: none"> <li>• Head of Enforcement</li> <li>• Deputy Heads of Enforcement</li> <li>• Freedom of Information Officers (E)</li> <li>• Validation Officers (for cases not yet allocated to an FOIO(E))</li> <li>• Head of Policy and Information</li> <li>• Deputy Head of Policy and Information</li> <li>• Freedom of Information Officers (P&amp;I)</li> </ul> |
| Notices under s.49(2) – abandoned                                                 | <ul style="list-style-type: none"> <li>• Head of Enforcement</li> <li>• Deputy Heads of Enforcement</li> </ul>                                                                                                                                                                                                                                                                           |
| Accepting a late application in terms of s.47(6)                                  | <ul style="list-style-type: none"> <li>• Head of Enforcement</li> <li>• Deputy Head of Enforcement</li> </ul>                                                                                                                                                                                                                                                                            |

## SIC absence provision

| ITEM                                                                                                                                                                                                  | AUTHORISED SIGNATORY<br>(OR ANY MORE SENIOR OFFICER)                             |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|
| Where SIC is un-contactable or unavailable, e.g. on sick or prolonged leave, for a period beyond which it would be impracticable for a decision to be delayed, the authority is delegated as follows: | <ul style="list-style-type: none"><li>• Head of Policy and Information</li></ul> |

## HOBS absence provision

| ITEM                                                                                                                                                                         | AUTHORISED SIGNATORY<br>(OR ANY MORE SENIOR OFFICER)                                                                                        |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|
| Where HOBS is un-contactable or unavailable, e.g. on sick or prolonged leave, for a period beyond which a decision cannot be delayed, the authority is delegated as follows: | On the joint decision of: <ul style="list-style-type: none"><li>• Head of Enforcement or</li><li>• Head of Policy and Information</li></ul> |

## HOPI absence provision

| ITEM                                                                                                                                                                         | AUTHORISED SIGNATORY<br>(OR ANY MORE SENIOR OFFICER)                  |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------|
| Where HOPI is un-contactable or unavailable, e.g. on sick or prolonged leave, for a period beyond which a decision cannot be delayed, the authority is delegated as follows: | <ul style="list-style-type: none"><li>• Head of Enforcement</li></ul> |

## HOE absence provision

| ITEM                                                                                                                                | AUTHORISED SIGNATORY<br>(OR ANY MORE SENIOR OFFICER)                             |
|-------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|
| Where HOE is un-contactable or unavailable, e.g. on sick or prolonged leave, for a period beyond which a decision cannot be delayed | <ul style="list-style-type: none"><li>• Head of Policy and Information</li></ul> |

## Requester absence provision

| ITEM                                                                                                                                                                           | AUTHORISED SIGNATORY<br>(OR ANY MORE SENIOR OFFICER)                                                                                                                                                                                                                     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Where requester is unavailable to approve an invoice e.g. on sick or prolonged leave, for a period beyond which it is unacceptable to delay further the payment of an invoice: | <p>A member of the requester's team who can confirm receipts of goods or services</p> <p>Failing which any one of:</p> <ul style="list-style-type: none"><li>• Head of Business Support</li><li>• Head of Enforcement</li><li>• Head of Policy and Information</li></ul> |

## Budget holders

The overall budget is delegated to the Head of Business Support.

Further delegation to budget-holders is specified below:

| ITEM                                                                                                                     | AUTHORISED SIGNATORY<br>(OR ANY MORE SENIOR OFFICER)                                                       |
|--------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"><li>• Legal Advisers (Enforcement)</li><li>• Legal Fees re Appeals to Courts</li></ul> | <ul style="list-style-type: none"><li>• Head of Enforcement</li><li>• Deputy Head of Enforcement</li></ul> |
| <ul style="list-style-type: none"><li>• Professional Advisors (Business Support)</li></ul>                               | <ul style="list-style-type: none"><li>• Head of Business Support</li></ul>                                 |

| ITEM                                                                                                                                                                                                                                                                                                                                              | AUTHORISED SIGNATORY<br>(OR ANY MORE SENIOR OFFICER)                                                                                |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>• Printing</li> <li>• Publicity and Promotion</li> <li>• Research</li> </ul>                                                                                                                                                                                                                               | <ul style="list-style-type: none"> <li>• Head of Policy and Information</li> <li>• Deputy Head of Policy and Information</li> </ul> |
| <ul style="list-style-type: none"> <li>• Library / Subscriptions</li> <li>• Rent</li> <li>• Rates</li> <li>• Utilities</li> <li>• Cleaning</li> <li>• Recruitment</li> <li>• Training</li> <li>• Maintenance</li> <li>• Administration</li> <li>• Insurance</li> <li>• Telephones</li> <li>• Postage</li> <li>• IT</li> <li>• Auditors</li> </ul> | <ul style="list-style-type: none"> <li>• Business Support Manager</li> </ul>                                                        |

## List of abbreviations

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|      |                                   |
|------|-----------------------------------|
| SIC  | Scottish Information Commissioner |
| E    | Enforcement                       |
| HOBS | Head of Business Support          |
| HOE  | Head of Enforcement               |
| HOPI | Head of Policy and Information    |
| P&I  | Policy and Information            |

Signed



**David Hamilton, Scottish Information Commissioner**

Dated - 13/11/2025

## Authorised signatories (as provided for in the Scheme of Delegation)

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| Name / Position                                        |
|--------------------------------------------------------|
| David Hamilton<br>Scottish Information Commissioner    |
| Lynn Balfour<br>Head of Business Support               |
| Claire Stephen<br>Head of Policy and Information       |
| Euan McCulloch<br>Head of Enforcement                  |
| Callan Richardson<br>Deputy Head of Enforcement        |
| Jennifer Ross<br>Deputy Head of Enforcement            |
| Jill Walker<br>Deputy Head of Enforcement              |
| Paul Mutch<br>Deputy Head of Policy and Information    |
| Calum Kitching<br>Freedom of Information Officer (E)   |
| Colin MacFadyen<br>Freedom of Information Officer (E)  |
| Dawn Fraser<br>Freedom of Information Officer (E)      |
| Karin Killington<br>Freedom of Information Officer (E) |
| Khaled Abusini<br>Freedom of Information Officer (E)   |
| Kirsten Lindsay<br>Freedom of Information Officer (E)  |

|                                      |
|--------------------------------------|
| Lyn Farmer                           |
| Freedom of Information Officer (E)   |
| Nick Murton                          |
| Freedom of Information Officer (E)   |
| Ross McEwen                          |
| Freedom of Information Officer (E)   |
| Sally Dow                            |
| Freedom of Information Officer (E)   |
| Wendy Snedden                        |
| Freedom of Information Officer (E)   |
| Andrea McEwan                        |
| Enforcement Team Support Assistant   |
| Pauline Keith                        |
| Validation Officer (E)               |
| Suzanne Jenkins                      |
| Validation Officer (E)               |
| Alex Bezverkhnia                     |
| Validation Officer (E)               |
| Alexander Stirling                   |
| Administration Officer (P&I)         |
| Bethan Owen                          |
| Freedom of Information Officer (P&I) |
| Elaine Moffat                        |
| Freedom of Information Officer (P&I) |
| Liz Brown                            |
| Business Support Manager             |
| Sam Letham                           |
| Business Support Administrator       |
| Tanya Gardner                        |
| Business Support Administrator       |

## Document Control Sheet

| <b>Document Information</b>                                                                 |                                           |
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