

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

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

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

Staffing

ITEM	AUTHORISED SIGNATORY (OR ANY MORE SENIOR OFFICER)
Annual leave (including other leave / Flexi leave)	<ul style="list-style-type: none"> Requester's first line manager
Special Leave – requests for up to five days in any 12 month period	<ul style="list-style-type: none"> Requester's second line manager
Requests for References	<ul style="list-style-type: none"> Head of Business Support
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"> Head of Business Support*
Letters of regret	<ul style="list-style-type: none"> Head of Enforcement Head of Business Support Head of Policy and Information Business Support Manager

General correspondence

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

Official documents and related correspondence

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

¹ SIC to be made aware of correspondence

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

SIC absence provision

ITEM	AUTHORISED SIGNATORY (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">• Head of Policy and Information

HOBS absence provision

ITEM	AUTHORISED SIGNATORY (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">• Head of Enforcement or• Head of Policy and Information

HOPi absence provision

ITEM	AUTHORISED SIGNATORY (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">• Head of Enforcement

HOE absence provision

ITEM	AUTHORISED SIGNATORY (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">• Head of Policy and Information

Requester absence provision

ITEM	AUTHORISED SIGNATORY (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">• Head of Business Support• Head of Enforcement• Head of Policy and Information

Budget holders

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

Further delegation to budget-holders is specified below:

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

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

List of abbreviations

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

A handwritten signature in black ink, appearing to read 'David Hamilton', with a stylized flourish at the end.

David Hamilton, Scottish Information Commissioner

Dated - 13/11/2025

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

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

Document Information	
Full name of current version: Class, Title, Version No and Status.	C1 Scheme of Delegation v04 CURRENT ISSUE
VC File Id	VC207910
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Responsible Manager	SIC
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Corrections / Unplanned or Ad hoc reviews (see Summary of changes below for details)	
Date of last update	13/11/2025

Summary of changes to document				
Date	Action by (initials)	Version updated (e.g. 01.25-36)	New version number (e.g. 01.27, or 02.03)	Brief description (e.g. updated paras 1-8, updated HOPI to HOCS, reviewed whole section on PI test, whole document updated, corrected typos, reformatted to new branding)
14/05/2024	DH	04.00	04.02	New document created
15/05/2024	KB	04.02	04.03	updated
15/05/2024	LB	04.03	04.04	Checked out in error
15/05/2024	DH	04.04	04.05	CSM added to scheme
16/10/2024	LB	04.05	04.06	2 leavers removed
30/10/2024	CMS	04.06	04.08	staff changes made
30/10/2024	LB	04.08	04.09	Track changes accepted after approval by SMT to allow publication
19/03/2025	LB	04.09	04.10	Staff changes
19/03/2025	CMS	04.10	04.11	HOCS changed to HOBS
08/04/2025	LB	04.11	04.12	Tracked changes accepted
08/04/2025	DH	04.12	04.13	DH updated and VI'd
09/04/2025	LB	04.13	04.14	Tracked changes accepted
12/08/2025	DH	04.14	04.15	DH updated for staff changes
28/08/2025	DH	04.15	04.16	DH updated Titles and staff change
13/11/2025	LB	04.17	04.18	Staff title updated and SMT approval for publication