

Scottish Information Commissioner

Minutes of the Monthly Senior Management Team (SMT) Meeting

26 March 2025

NOTE TO READER:

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Scottish Information Commissioner, Kinburn Castle, Doubledykes Rd, St Andrews, Fife, KY16 9DS

Tel: 01334 464610

enquiries@scot.info

Present: Scottish Information Commissioner – David Hamilton (DH) (Chair)
 Head of Policy & Information – Claire Stephen (CMS)
 Head of Enforcement – Euan McCulloch (EM)
 Finance and Administration Manager – Liz Brown (LB) (Minutes)

Apologies: Finance and Administration Manager - Kim Berry (KB)

Details	Action By	Target Completion Date	Publish Yes / No	Comments
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1. Minutes, action points update and matters outstanding

1.1 Review of minutes – 19/02/2025 The minutes were approved and will be published with the relevant papers				
1.2 Matters outstanding - Photo ID cards - CMS/EM will discuss GDPR implications and prepare a pre DPIA. - Breathe HR DPIA - DH is to finalise. CMS will review and decide where it should be published on the website. - Staff Survey - DH is to meet with the working group to consider a 2nd staff survey - Egress - DH will arrange a drop in Egress training session - EM to arrange training on handling rights requests by summer 2025 - Scottish Government intervention - a key group will be established to help drive this through				
	CMS/EM	30/04/2025	Yes	Minutes published in full
	DH	30/04/2025		
	DH	30/04/2025		
	DH	30/04/2025		
	EM	30/08/2025		
	ALL	30/04/2025		

Privacy Notice - CMS will make one update in relation to social media	CMS	30/04/2025		
Register of Personal Data Processing - EM will review the register to make sure it is still fit for purpose	EM	30/04/2025		

2. Finance Report

- The SMT noted the Financial Summary – Variance Analysis as at 14 March 2025 and discussed the underspend and overspend - Contingency spend on salaries and licences will be detailed separately in 25/26 to allow core spend to be monitored independently - LB will be set up a meeting to discuss the 2025/26 reporting requirements - The SMT asked for a breakdown of the costs associated with the Professional Fees section. LB will provide - This report will be considered monthly rather than quarterly. The Governance Reporting Arrangements key document will be updated to reflect this change	LB	04/04/2025	Yes	Financial Summary available here
	LB	04/04/2025		
	LB	04/04/2025		

3. Sickness Absence

- The SMT discussed and noted the reports. - No concerns were raised.			No	Exemption s38(1)(b)
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4. Human Resourcing

Workforce planning			N/A	N/A
- Business Support Team - The Head of Business Support job has been advertised. The closing date is 02 April 2025 and the SMT will meet to shortlist on the 10 April with interviews taking place at the end of April / beginning of May 1 FAM is due to retire this year. The SMT will review the structure and an options paper will be considered at the QSMTM - Enforcement - The Enforcement team are now fully resourced - Training has been taking place and is ongoing	DH/CMS	29/04/2025		
	EM	29/04/2025		

○ EM will produce a paper on upskilling existing staff for the next QSMTM				
• Policy and Information ○ Interventions and outreach work continue, along with FOI Bill research and discussions • Training ○ Training requests and models of training were discussed and will be ongoing				

5. Operational Risk Register 2024-25

• The SMT reviewed and agreed updates to the Operational Risk Register 2024-25 • Controls to mitigate risks around staffing in the Business Support Team and budget monitoring were discussed • DH will update the register	DH	29/04/2025	No	Operational Risk Register withheld – Exemptions s30(b)(ii), s30(c)
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6. Interventions Report

• CMS provided a verbal assurance that intervention work is still ongoing and no escalations are required. • A full paper will be presented at the Q4 QSMTM	CMS	29/04/2025	N/A	N/A
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7. Employment Policy Update

• The SMT noted the report and the assurance provided • Prevention of sexual harassment in the workplace – a risk assessment will be carried out along with all staff training in Q1 25/26 • The publication recommendation was agreed			Yes	Committee Report published in full
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8. Health and Safety

• Deferred to the Q4 QSMTM			N/A	N/A
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9. Ombudsman scrutiny report – collection of performance data

• CMS raised this report as a point of interest • The SMT agreed that we should start seeking feedback from our applicants again • EM will pull together questions and refer back to the SMT	EM	06/05/2025	N/A	N/A
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10. Investigations Quality Assurance

- EM's review of the Quality Assurance (QA) procedures in the Investigations Handbook confirmed the current methodology is sound and no changes are required - The SMT agreed to start the QA of appeals towards the end of April - The Enforcement Team are aware that this will happen and EM will discuss the roll out with the DHOE's	EM	30/04/2025	N/A	N/A
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11. Digital Strategy 2025-26

- The digital strategy for 2025-26 was discussed - A framework for a digital group will be established along with regular meetings	DH	30/04/2025	No	Exemption 30(c)
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12. FMS Lite

- The SMT noted the business case and agreed to both recommendations in the report - CMS will contact the Scottish Government Procurement team to set up the service and seek advice on key contracts due for renewal in 25/26 - The SMT agreed to publish the business case subject to redactions on page 4	CMS	30/04/2025	Yes	Report published subject to redaction Exemption s33(1)(b)
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13. CST resourcing

- DH intimated that he had wanted to find an appropriate way of recognising the exceptional contribution of staff through financial reward. He had circulated a scheme that reflected the SPCB's own arrangements to the SMT. This was formally adopted and CMS was invited to make any applications in respect of Corporate Services Team staff. - Liz Brown was appointed temporary CSM with effect from 1st April 2025 and would continue until a new HOBS commenced.			N/A	N/A
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14. Christmas and new year office closure

- The dates the office will close over Christmas and New Year was discussed. - Dates proposed:				
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○ The office premises will close on Thursday 18th December 2025 and will reopen on Monday 5th January 2026 ○ Staff can work from home on Friday 19th, Monday 22nd, Tuesday 23rd and ½ day on Wednesday 24th December, before returning on Monday 5th January • This will be communicated to staff in April	LB	11/04/2025		
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Signed off by:



Date: 20/05/2025