

## Scottish Information Commissioner

### Minutes of the Monthly Senior Management Team (SMT) Meeting (August and September)

23 September 2025

#### NOTE TO READER:

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Scottish Information Commissioner, Kinburn Castle, Doubledykes Rd, St Andrews, Fife, KY16 9DS,  
[enquiries@scot.info](mailto:enquiries@scot.info)

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

#### Apologies:

Details	Action By	Target Completion Date	Publish Yes / No	Comments
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#### 1. Minutes and matters outstanding

<b>Review of minutes – 14/08/2025</b> <ul style="list-style-type: none"> <li>The minutes were approved and will be published with the relevant papers</li> </ul>			Yes	Publish in full
<b>Matters outstanding</b> <ul style="list-style-type: none"> <li>Photo ID cards               <ul style="list-style-type: none"> <li>The DPIA has been completed and distributed to the SMT for comment.</li> <li>Further actions agreed:                   <ul style="list-style-type: none"> <li>CMS to provide comments on the DPIA</li> <li>EM will then refer to our DPO for comment</li> <li>Staff will be consulted</li> <li>BST have started to identify potential suppliers but are also looking at printing inhouse. If we use an external supplier, the DPIA will need to be reviewed.</li> </ul> </li> </ul> </li> <li>EM will arrange training on handling rights requests at the next ASM</li> </ul>	CMS EM EM LCB EM	30/09/25 10/10/25 13/10/25 30/10/25 30/10/25		

<ul style="list-style-type: none"> <li>Equalities Monitoring – Staff               <ul style="list-style-type: none"> <li>LCB will review our duties under the Act and take forward any actions</li> </ul> </li> </ul>	LCB	30/11/25		
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## 2. Finance Report

<p>2.1 Financial summary</p> <ul style="list-style-type: none"> <li>The SMT noted the Financial Summary – Variance Analysis as at 30 August 2025 and discussed notable areas of underspend.</li> <li>Staff costs – mainly due to the HOBS vacancy and regraded role. The SMT will consider making a request to the SPCB to reallocate the staff costs underspend to other areas of the business if required</li> </ul> <p>2.2 Legal costs (other)</p> <ul style="list-style-type: none"> <li>Costs seeking legal advice during the course of an investigation and legal costs associated with our corporate function will now be published monthly</li> <li>LB will produce the report at the start of the month and send to EM and LCB to review before publishing. This sits beside the cost of court appeals report, which is also published monthly</li> </ul> <p>The SMT agreed the publication of the financial summary</p>			Yes	Finance Report available <a href="#">here</a>
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## 3. Human Resourcing

<ul style="list-style-type: none"> <li>Workforce Monitoring               <ul style="list-style-type: none"> <li>DH has created a monitoring report to capture workforce gaps and actions and also incorporate the workforce plan strategy milestones which the SMT can review and update on an ongoing basis</li> <li>The SMT will discuss this new report at their away day and it will be included as a standard agenda item at the SMT monthly meetings</li> </ul> </li> <li>Sickness               <ul style="list-style-type: none"> <li>No staff sickness concerns</li> </ul> </li> <li>Recruitment               <ul style="list-style-type: none"> <li>The Validation Office interviews are taking place this week and next</li> <li>The HOBS hopes to have the FAM position advertised by the end of September / beginning of October</li> </ul> </li> </ul>	SMT	02/10/25	N/A	N/A
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<ul style="list-style-type: none"> <li>Annual leave               <ul style="list-style-type: none"> <li>The SMT recognise that everyone is very busy but Managers should be encouraging staff to book annual leave. The SMT will look at our annual leave policy at their away day</li> </ul> </li> </ul>	SMT	02/10/25		
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#### 4. Operational Risk Register

<ul style="list-style-type: none"> <li>The SMT reviewed the register and agreed updates</li> <li>DH will update the register and save a snapshot</li> </ul>	DH	20/08/25	No	Operational Risk Register withheld – Exemptions s30(b)(ii), s30(c) and s39(1)
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#### 5. Operational Plan 2025-26

<ul style="list-style-type: none"> <li>The comments in the draft plan were reviewed and updates agreed</li> <li>The draft plan will be updated and SMT will sign off via email</li> <li>A monitoring report will then be created and review quarterly</li> </ul>	ALL	30/09/25	Yes	Published in full <a href="#">here</a>
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#### 6. Key documents – outstanding, due and not completed

<ul style="list-style-type: none"> <li>Key Documents               <ul style="list-style-type: none"> <li>Governance and Quality Assurance Reporting Arrangements. A draft has been created - LCB to review</li> <li>Performance and Quality Framework. A draft has been created - CMS to review</li> <li>Quality Assurance and Procedures: Enquiries – CMS will update to reflect the new procedures</li> </ul> </li> <li>CMS will distribute the Internal Control Checklist for SMT to review</li> </ul>	LCB  CMS CMS CMS	14/11/25  14/11/25 14/11/25 30/09/25	N/A	N/A
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#### 7. Key documents – Data Protection Policy and Handbook

<ul style="list-style-type: none"> <li>EM has reviewed the Data Protection Policy and Handbook and made changes to take account of the Data (Use and Access) Act 2025</li> <li>The SMT discussed and approved the major changes.</li> <li>EM will revisit the sections on third country transfers and complaints, once the position is clearer in the light of the 2025 Act, and noted that</li> </ul>			N/A	N/A
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the legitimate interest guidance will also need to be reviewed (and probably condensed).  • Once complete (and following DPO consultation) the SMT will approve via email.	EM	14/10/25		
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## 8. Scheme of Delegation - review of requisition and invoice threshold

• It was agreed that deputy heads need to be added as authorised signatories to give the teams more resilience when heads of departments are on leave  • The SMT agreed to review this when the vacant FAM roll has been filled.	ALL	01/11/25	N/A	Published in full <a href="#">here</a> (Class 1)
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## 9. Draft Annual Report and Accounts 2024-25

• The SMT approved the Annual Report and Accounts  • A potential lay date of 27 <sup>th</sup> October has been proposed			No	Annual Report and Accounts 2024-25 (draft) withheld - Exemption s27(1)
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## 10. Timesheets

• The SMT agreed that the annual time period for staff timesheets should be aligned with the annual leave year – 01/4 to 31/03  • BST will amend the current 2025 timesheets to extend them to 31/03/26 and they will then be set annually from 01/04/26 onwards.	LB	31/10/25	N/A	N/A
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## 11. Register of Personal Data Processing & Privacy Notice

Register of Personal Data Processing				Privacy Notice published <a href="#">here</a>
• CMS has reviewed and updated the register  • EM will review and finalise for the next SMT meeting	EM	31/10/25		
Privacy Notice				
• CMS will discuss the case study work P&I are carrying out and whether updates are needed to the privacy notice	CMS/EM	31/10/25		

## 12. Learning and Development Plan

• The Committee Report was noted by the SMT  • The publication recommendation was agreed			Yes	CR published in full
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### 13. Performance and Development Framework

<ul style="list-style-type: none"> <li>The Committee Report was noted by the SMT</li> <li>The publication recommendation was agreed</li> </ul>			Yes	CR published in full
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### 14. Sexual harassment prevention

<ul style="list-style-type: none"> <li>The SMT noted the report which provided an update on the steps being taken to ensure compliance with the legal duty on employers to take reasonable steps to prevent sexual harassment in the workplace</li> <li>Approval was given to investigate the training add-on option in our HR system to deliver the mandatory training to staff</li> <li>LCB is working on the risk assessment and an action plan will be developed and implemented based on findings from the risk assessment</li> <li>A communication to all staff will be sent reinforcing the importance of this initiative and outlining expectations and next steps. LCB has produced a draft statement which the SMT will review and provide comments via email.</li> <li>The SMT agreed to publish the report in full</li> </ul>	LCB	31/10/25	Yes	CR published in full
	LCB	31/10/25		
	ALL	31/10/25		

### 15. Records management & systems

<ul style="list-style-type: none"> <li>LCB produced a paper outlining a preliminary approach to initiate discussion and gather input from the SMT</li> <li>A decision was deferred to give the SMT time to consider the options. Feedback will be provided by email and will be discussed at the SMT away day</li> </ul>	ALL	02/10/25	Partial	Report published with 3 exceptions - Exemption s30(c)
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### 16. Staff development

<ul style="list-style-type: none"> <li>LCB produced a paper outlining a preliminary approach to initiate discussion and gather input from the SMT</li> <li>A decision was deferred to give the SMT time to consider the options. Feedback will be provided by email and will be discussed at the SMT away day</li> </ul>	ALL	02/10/25	Yes	CR published in full
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### 17. Internal audit 2024-25 report

<ul style="list-style-type: none"> <li>The report from the auditor was noted</li> <li>One small error identified. LB will refer back to the auditor to ask for the correction to be made</li> </ul>			No	Exemption s30(c)
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### 18. Internal audit plan 2025-26

<ul style="list-style-type: none"> <li>The scope of the two audits proposed for 2025-26 were discussed by the SMT</li> <li>The SMT will review this further and LCB will provide feedback to the internal auditors</li> </ul>			N/A	N/A
	ALL	13/11/25		

### 19. AOB

Rent review				
<ul style="list-style-type: none"> <li>3 quotes have been obtained and the SMT agreed to go with the one that offers best value, if they can start the work in 10 days. LCB/LB to progress</li> </ul>	LCB/LB	26/09/25		

**Signed off by:**



**Date:** 13 November 2025