

Scottish Information Commissioner

Minutes of the Q2 2025-26 Quarterly Senior Management Team (SMT) Meeting

13 November 2025

NOTE TO READER:

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Scottish Information Commissioner, Kinburn Castle, Doubledykes Rd, St Andrews, Fife, KY16 9DS,
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)
 Business Support Manager – Liz Brown (LB) (Minutes)

Apologies:

Details	Action By	Target Completion Date	Publish Yes / No	Comments

1. Minutes and matters outstanding

Review of minutes – 23/09/2025				Yes	Publish in full
• The minutes were approved and will be published with the relevant papers					
Matters outstanding					
• Photo ID cards					
○ The DPIA has been completed and referred to our DPO who was happy with the content					
○ Next actions:					
○ EM will make an amendment to the DPIA to cover use of ID cards in the office. This will address one action from the recent building security audit	EM	30/11/25			
○ LCB will send a communication to all staff about the proposal and share the DPIA	LCB	16/12/25			
○ BST will progress the inhouse printing option	LCB	31/01/26			
• Training					
○ EM will arrange training on handling rights requests at the next ASM	EM	Jan 2026			

<ul style="list-style-type: none"> Equalities Monitoring – Staff <ul style="list-style-type: none"> LCB will review our duties under the Act and take forward any actions Key Documents <ul style="list-style-type: none"> Governance and Quality Assurance Reporting Arrangements. A draft has been created - LCB to review Performance and Quality Framework. A draft has been created - CMS to review Quality Assurance and Procedures: Enquiries – CMS will update to reflect the new procedures CMS will distribute the Internal Control Checklist for SMT to review Scheme of Delegation - review of requisition and invoice threshold <ul style="list-style-type: none"> Job titles will be updated and then republished DH will then review the requisition and invoice threshold 	LCB	30/11/25		
	CMS	30/11/25		
	CMS	30/11/25		
	CMS	30/11/25		
	LB	18/11/25		
	DH	30/11/25		

2. Finance Report

<ul style="list-style-type: none"> The SMT noted the Financial Summary – Variance Analysis as at 30 October 2025 and discussed notable areas of underspend. <ul style="list-style-type: none"> A £60k underspend is forecast in Senior Management costs. The SMT agreed to explore the option to offer staff payment for some of their unused 25/26 leave. This could make good use of the remaining budget and also help reduce the high annual leave carry forward. LCB will arrange for projections to be carried out, consider the implications and report back to the SMT. Various suggestions for the staff room and the meeting room were discussed under the capital expenditure programme. CMS is reviewing the P&I budget with her team The SMT agreed the publication of the financial summary 	LCB	19/12/25	Yes	Finance Report available here
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3. Human Resourcing

<ul style="list-style-type: none"> Workforce planning <ul style="list-style-type: none"> The SMT recorded their approval to offer two applicants from the validation officer 			N/A	N/A
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<p>recruitment, the temporary positions of Preliminary Investigations Officers to deal with the significant jump in the number of appeals</p> <ul style="list-style-type: none"> • SMT away day <ul style="list-style-type: none"> ○ Actions from the away day will be agreed via email ○ DH will share the meeting notes from the away day with all staff • Annual leave <ul style="list-style-type: none"> ○ The SMT will review the 10 days annual leave carry forward policy and send a communication to staff 	DH	30/11/25		
	ALL	16/12/25		

4. Rights Requests

• The SMT noted the FOISA and GDPR summary tables and approved for publication			Yes	Summary tables published here (Class 7)
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5. Investigations Performance

• The Committee Report was noted by the SMT			Yes	Published in full
• DH noted that output has been excellent and several initiatives are being undertaken to manage the caseload				
• The publication recommendation was agreed				

6. Operational Plan 2025/26 and Monitoring Report

• The SMT will review and approve the Operational plan via email by the 21/11/25	ALL	21/11/25	N/A	N/A
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7. Interventions

• The Committee Report was noted by the SMT			Yes	Published in full
• CMS highlighted the lack of resources to carry out intervention work				
• The publication recommendation was agreed				

8. Strategic Risk Register

• The SMT reviewed the register and agreed updates	DH	30/11/25	No	Operational Risk Register withheld – Exemptions s30(b)(ii), s30(c) and s39(1)
• DH will update the register and save a snapshot				

9. Operational Risk Register

<ul style="list-style-type: none"> The SMT reviewed the register and agreed updates DH will update the register and save a snapshot A separate meeting to discuss the review of our case management system contract will be arranged 	DH LCB	30/11/25 30/11/25	No	Operational Risk Register withheld – Exemptions s30(b)(ii), s30(c) and s39(1)
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10. Enquiries Service

<ul style="list-style-type: none"> The SMT noted the report and approved for publication 			Yes	Report published in full
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11. Services Standards

<ul style="list-style-type: none"> The SMT noted the report It was agreed that a new approach is needed to record compliments. DH will communicate the change to all staff The publication recommendation was agreed 	DH	30/11/25	Yes	Report published in full
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12. British Sign Language Action Plan

<ul style="list-style-type: none"> The action plan is published on our website and actions are on track CMS will share details with SMT via email 	CMS	30/11/25	Yes	Action plan found here
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13. Annual report, Annual Accounts, Audit and AAB review

<ul style="list-style-type: none"> DH provided an update on the Annual Report feedback received at the recent AAB meeting The SMT agreed to start looking at the structure and content of the 25/26 Performance Report sooner this year. CMS will set up a meeting Our external auditor offered to provide advice about what needs to be included in the Performance Report DH will finalise the AAB Terms of Reference 	CMS DH	30/11/25 30/11/25	N/A	N/A
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14. Internal audit report – building security

<ul style="list-style-type: none"> The SMT noted the report LCB will prepare the management response and it will be considered at the MSMTM in December 	LCB	16/12/25	N/A	N/A
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15. SIC inbox

• The SMT agreed to delete the SIC@foi.scot email account	LB	30/11/25	N/A	N/A
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16. AOB

Data Protection Handbook			Yes	Published here
<ul style="list-style-type: none"> EM proposed two changes to the Data Protection Handbook in relation to: <ul style="list-style-type: none"> manifestly unfounded/excessive requests handling minor breaches He will email the SMT details and this can be approved via email 	EM	21/11/25		
Investigations Handbook	ALL	21/11/25	Yes	Published here
HOPI's annual leave in December				
<ul style="list-style-type: none"> EM has proposed a change to section 17 of the Investigations Handbook. The SMT will approve via email 				
CMS will be taking extended leave in December so cannot be allocated review requests or complaints from today				

Signed off by:



Date: 16 December 2025