

Scottish Information Commissioner

Minutes of the Monthly Senior Management Team Meeting (November and December)

16 December 2025

NOTE TO READER:

The Scottish Information Commissioner publishes the minutes of Senior Management Team (SMT) meetings and the papers considered at the monthly and quarterly meetings, unless he considers, at the time of publication, that the minutes and/or papers are exempt from disclosure under the Freedom of Information (Scotland) Act 2002 or the Environmental Information (Scotland) Regulations 2004 (FOI law). Where minutes or documents are not published, the minutes will make it clear why not.

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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 Business Support – Lynn Balfour (LCB)
Business Support Manager – Liz Brown (LB) (Minutes)

Apologies: Head of Policy & Information – Claire Stephen (CMS)
Business Support Manager – Tanya Gardner (TG)

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

<p>1.1 Review of minutes – 13/11/25, QSMTM Q2</p> <ul style="list-style-type: none"> The minutes were approved and will be published with the relevant papers <p>1.2 Updates and matters outstanding</p> <ul style="list-style-type: none"> Photo ID cards <ul style="list-style-type: none"> LCB updated staff and no concerns were raised Work is underway to produce the cards SMT were happy with the mock-up for the front side of the card. DH proposed text for the reverse side-- authorised to act on behalf of the Commissioner with a link to the scheme of delegation. Training <ul style="list-style-type: none"> EM will arrange training on handling rights requests at the next ASM 	EM	28/01/2026	Yes	Minutes published in full
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<ul style="list-style-type: none"> • Equalities Monitoring – Staff <ul style="list-style-type: none"> ○ LCB will review our duties under the Act and bring forward any actions for consideration by SMT. • Scheme of delegation <ul style="list-style-type: none"> ○ DH will review the requisition and invoice threshold and SMT will approve via email • SMT away day <ul style="list-style-type: none"> ○ Meeting summary shared with SMT • SIC@foi.scot inbox <ul style="list-style-type: none"> ○ DH confirmed that all emails in the SIC@foi.scot inbox can be deleted ○ Once this is done, the email account can be deleted • Change to 10 days annual leave carry forward <ul style="list-style-type: none"> ○ The SMT agreed to the change in principle and DH communicated the change to all staff via email however LCB noted that policies need to be reviewed and updated 	<p>LCB</p> <p>DH</p> <p>LB</p> <p>LCB</p>	<p>20/01/2026</p> <p>20/01/2026</p> <p>19/12/2025</p> <p>20/01/2026</p>		
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2. Financial Summary

<ul style="list-style-type: none"> • The SMT noted the Financial Summary – Variance Analysis as at 30 November 2025 and discussed the following areas: <ul style="list-style-type: none"> ○ Staff training – LCB is confident the training budget will be fully utilised. There are a number of training proposals in the pipeline ○ Maintenance – there will be 2 building projects in Q4 - currently waiting on a quote for 1 and work booked in for the other in January. ○ P&I – It was noted that CMS is in discussion with her team regarding the P&I budget. ○ Court of session costs – it may be possible to contain this within our existing budget without having to ask for contingency. This position will be reviewed during Q4 ○ Staff costs – if approval for the recruitment of 2 intervention staff is given in the 26/27 budget, DH suggested recruitment could start as soon as we hear from the SPCB. • The SMT agreed the publication of the financial summary 			<p>Yes</p>	<p>Finance Report available here</p>
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3. Human Resourcing

<ul style="list-style-type: none"> • Resourcing <ul style="list-style-type: none"> ○ Business Support Administrative Officer recruitment is underway ○ 2 (temporary) Preliminary Investigation Officers have been recruited ○ Intervention Officers – if the SPCB approve these 2 new positions, recruitment will start as soon as possible. The SMT will need to consider: <ul style="list-style-type: none"> ▪ Job descriptors ▪ Line management • Training <ul style="list-style-type: none"> ○ LCB has reviewed staff learning needs and will meet with DH to discuss a draft training plan and aligning this with the Strategic Workforce Plan. • Workforce plan <ul style="list-style-type: none"> ○ DH is working on the workforce plan framework which each team will feed into. This will be considered at the February MSMTM • Staff payment for some unused 25/26 leave <ul style="list-style-type: none"> ○ SMT will meet in January to review the requests that have been submitted • Ill health <ul style="list-style-type: none"> ○ There were no sickness concerns raised • Breathe HR <ul style="list-style-type: none"> ○ BST are currently investigating the possibility of moving timesheets to Breathe ○ They will also be looking at the recruitment module • Appraisals <ul style="list-style-type: none"> ○ The performance and development framework is incorporated into the employee handbook. The SMT agreed the current process need to be reviewed 	SMT	28/02/2026	N/A	N/A
<ul style="list-style-type: none"> ○ LCB has reviewed staff learning needs and will meet with DH to discuss a draft training plan and aligning this with the Strategic Workforce Plan. 	LCB	20/01/2026		
<ul style="list-style-type: none"> ○ DH is working on the workforce plan framework which each team will feed into. This will be considered at the February MSMTM 	SMT	28/02/2026		
<ul style="list-style-type: none"> ○ SMT will meet in January to review the requests that have been submitted 	SMT	20/01/2026		

4. Operational Risk Register

<ul style="list-style-type: none"> • The SMT reviewed and agreed updates to the Operational Risk Register • Two actions arising from the review 			No	Operational Risk Register withheld – Exemptions
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<ul style="list-style-type: none"> Record Management – LB will investigate how reports in our document management system can help with record cleansing and meet with LCB in January to progress 	LCB/LB	30/01/2026		s30(b)(ii), s30(c)
<ul style="list-style-type: none"> [REDACTED] 	LCB/TG	30/01/2026		S30(c)

5. Key Documents – outstanding due and not completed

<ul style="list-style-type: none"> Governance and Quality Assurance Reporting Arrangements. A draft has been created - LCB to review 	LCB	20/01/2026		
<ul style="list-style-type: none"> Performance and Quality Framework. A draft has been created - CMS to review 	CMS	20/01/2026		
<ul style="list-style-type: none"> CMS will distribute the Internal Control Checklist for SMT to review 	CMS	20/01/2026		

6. Key documents – Quality Assurance Procedures: Enquiries

<ul style="list-style-type: none"> The SMT approved the review of the Quality Assurance Procedures: Enquiries key document via email The document has been published 			Yes	Available here
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7. Internal audit - building security management response

<ul style="list-style-type: none"> The management response in the draft audit report was discussed and agreed, subject to 1 change. LCB will update the report and send it back to the auditors to finalise BST will progress the actions in report in Q4 	LCB	24/12/2025	No	Report withheld Exemption s30(c)
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8. Applicant survey feedback

<ul style="list-style-type: none"> The survey has been running since July 2025 and the SMT reviewed the results It was agreed to review 6 monthly and publish the charts on our website 			Yes	Survey results available here
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9. External audit

<ul style="list-style-type: none"> DH is in discussion with the auditors around the date of the audit next year 			N/A	N/A
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10. Rent review

• Negotiations are underway and DH will contact the SPCB to keep them updated			N/A	N/A
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Signed off by:



Date: 20/01/2026