

Scottish Information Commissioner
Minutes of the Monthly Senior Management Team Meeting
17 February 2026

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 Policy & Information – Claire Stephen (CMS)
Head of Business Support – Lynn Balfour (LCB)
Business Support Manager – Tanya Gardner (TG) (Minutes)

Apologies: None

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 – 20/01/26, QSMTM Q3</p> <ul style="list-style-type: none"> The minutes were approved and will be published with the relevant papers 			Yes	Minutes published in full
<p>1.2 Updates and matters outstanding</p> <ul style="list-style-type: none"> BSL Action Plan – CMS to share details with SMT. Workforce Monitoring Strategy – ongoing. RFI time recording – from 1st April. Look out previous guidance and send to staff. P&D framework – separate meeting to be organised. Key Documents Programme – change lead from SMT to HOBS. AI/Records Management Training – carry forward. AAB Meeting – new date proposed for August. 	<p>CMS</p> <p>DH</p> <p>CMS</p> <p>LB</p> <p>TG</p>	<p>27/02/26</p> <p>31/03/26</p> <p>31/03/26</p> <p>31/03/26</p> <p>18/02/26</p>		

2. Financial Summary

<ul style="list-style-type: none"> • The SMT noted the Financial Summary – Variance Analysis as at 31 January 2026 and discussed underspends in the following areas: <ul style="list-style-type: none"> - Training – individual staff requests received and approved. Two Menopause sessions; follow up workshop on Sharepoint mapping and P&I training requests approved. - Maintenance – recent Reasonable Adjustment audit did not recommend any additions but agreed to consider adaptations in future. Quotes to be requested for replacement carpets in both downstairs meetings rooms and BST office. - P&I – Training approved as discussed. AI platform, pen test on website and easy read leaflet approved. • The SMT agreed the publication of the financial summary. 	TG	28/02/26	Yes	Finance Report available here
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3. Human Resourcing

<ul style="list-style-type: none"> • BST <ul style="list-style-type: none"> - New Administrator starts 2 March 2026. - BST away day in planning stage. - Ongoing audits taking up capacity. - Training session on Sharepoint complete with positive feedback. • P&I <ul style="list-style-type: none"> - Waiting on funding confirmation to progress possible new posts within P&I. • Enforcement <ul style="list-style-type: none"> - Waiting on funding confirmation for current and future contingency posts. - Feedback from hotdesking positive. BST looking at formal desk booking process. 			N/A	N/A
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4. Operational Risk Register

<ul style="list-style-type: none"> • The SMT reviewed and agreed updates to the Operational Risk Register • DH to update Register to reflect discussion. 	DH	16/03/26	No	Operational Risk Register withheld – Exemptions s30(b)(ii), s30(c)
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5. Key Documents – outstanding due and not completed

<ul style="list-style-type: none"> Discussed challenges in managing key documents due to the scale of work and limited resources. Noted the proposed approach in the policies paper will help move some of this work forward. It was agreed that strict update timelines can be relaxed to ease pressure, with progress to be made through the wider overhaul of policies and the employee handbook. Continue with ad hoc changes and website uploads. 			N/A	N/A
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6. Register of Personal Data Processing & Privacy Notice

<ul style="list-style-type: none"> Privacy Notice <ul style="list-style-type: none"> CMS updated and changes approved Register of Personal Data Processing <ul style="list-style-type: none"> EM updated and changes approved. 			Partial	Privacy Notice published here RPDP withheld Exemption s30(c)
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7. Employment Policy Update

<ul style="list-style-type: none"> Defer until Q4 meeting 			N/A	N/A
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8. Publication Scheme

<ul style="list-style-type: none"> CMS provided verbal update. 			N/A	N/A
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9. Staff Guidance & Policies Paper

<ul style="list-style-type: none"> The SMT reviewed and approved the programme of work. 			Yes	Published in full
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10. Proposal to develop Sharepoint Paper

<ul style="list-style-type: none"> The SMT reviewed and approved. Mapping session to be arranged with external facilitator. Staff to be approached to join Sharepoint focus group. Training to be booked by end March. 	EM/CMS	28/02/26	Yes	Published in full
	LCB	31/03/26		

11. Managers Group – Terms of Reference & SMT Priority Topics

<ul style="list-style-type: none"> Finalise Term of Reference at first meeting. Topics suggested: <ul style="list-style-type: none"> Performance Management, Absence & leave Management, PDR's and 1:1's. Champions for change – positive outlook for leaders. 			Yes	Published in full
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<ul style="list-style-type: none"> - Resilience – cover for each other - Training for line managers - Staff Wellbeing 				
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12. Domain Names

<ul style="list-style-type: none"> • Discussion on continuation of purchasing domain names. • Request external consultant's view. 	CMS		N/A	N/A
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13. Contracts

<ul style="list-style-type: none"> • Internal Audit – Recommendation to extend NCA for further year. Awaiting quote. • Case Management – Working group established – first meeting TBC. 			N/A	N/A
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Signed off by:



Date: 16/04/2026