

**Scottish Information Commissioner**  
**Minutes of the Monthly Senior Management Team Meeting**  
**16 April 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](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)  
Business Support Manager – Liz Brown (LB) (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><b>1.1 Review of minutes – 17/02/26, MSMTM</b></p> <ul style="list-style-type: none"> <li>The minutes were approved and will be published with the relevant papers</li> </ul>			Yes	Minutes published in full
<p><b>1.2 Updates and matters outstanding</b></p> <ul style="list-style-type: none"> <li>Workforce Monitoring Strategy – ongoing</li> <li>RFI time recording – Claire will distribute guidance and look to implement from 1<sup>st</sup> May</li> <li>AI/Records Management Training – carry forward</li> <li>CMS will ask for advice on domain names and the digital strategy group will review our existing domains. LB will add to the agenda.</li> </ul>	<p>DH</p> <p>CMS</p> <p>LCB/DH</p> <p>CMS</p>	<p>01/05/26</p> <p>01/05/26</p> <p>01/05/26</p> <p>21/05/26</p>		

**2. Financial Summary**

<ul style="list-style-type: none"> <li>The SMT noted the Financial Summary – Variance Analysis as at 31 March 2026 and discussed underspends in the following areas:</li> </ul>			Yes	Finance Report available <a href="#">here</a>
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<ul style="list-style-type: none"> <li>It was noted that the annual net expenditure and variance are subject to approval by our external accountant.</li> <li>Court of session cost: <ul style="list-style-type: none"> <li>DH noted that there is an important narrative for the Annual Report around costs and recovery of costs</li> </ul> </li> <li>DH and TG will discuss reporting the overspend with the SPCB</li> <li>CMS is happy with the proposal to merging the Policy and Information nominal codes</li> <li>The SMT agreed the publication of the financial summary.</li> </ul>	DH/TG	01/05//26		
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### 3. Human Resourcing

<ul style="list-style-type: none"> <li>35 hour working week <ul style="list-style-type: none"> <li>DH will provide an update at the ASM – the implementation date is yet to be decided</li> </ul> </li> <li>additional public holiday <ul style="list-style-type: none"> <li>confirmation that the additional public holiday will not be granted. LCB will communicate this to staff</li> </ul> </li> </ul>	DH	30/04/26	N/A	N/A
	LCB	30/04/26		

### 4. Operational Risk Register

<ul style="list-style-type: none"> <li>The SMT reviewed and agreed updates to the Operational Risk Register</li> <li>DH updated Register to reflect discussion.</li> <li>CMS will liaise with LCB and contact the Keeper to ask for guidance on progressing our records management project</li> </ul>	CMS/LCB	01/05/26	No	Operational Risk Register withheld – Exemptions s30(b)(ii), s30(c)
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### 5. Employment Policy Update

<ul style="list-style-type: none"> <li>The SMT noted the contents of the paper</li> <li>The Commissioner acknowledged the partial assurance provided and is confident that the proposed actions for 26/27 are appropriate.</li> <li>LCB will refer the gradual dissolution of the handbook, the development of updated standalone policies, and the creation of a more accessible repository of policies, to the SMT and communicate changes to staff.</li> <li>The SMT agreed that the paper should be published in full.</li> </ul>			Yes	Publish in full
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## 6. Draft Employee Handbook

<ul style="list-style-type: none"> <li>The SMT approved the changes</li> <li>Once the key document actions are completed LCB will communicate the changes to staff</li> </ul>	LCB	30/04/26	Yes	Publish in full
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## 7. Sharepoint / iTrain

<ul style="list-style-type: none"> <li>The SMT discussed the progress of the SharePoint project</li> <li>LCB will contact iTrain</li> <li>Guidance for the reviews of records in corporate folders in VC was agreed</li> </ul>	LCB	01/05/26	N/A	N/A
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## 8. Occupational Health Self Referral Process

<ul style="list-style-type: none"> <li>The SMT agreed the proposals to introduce an organisational self referral process</li> <li>LCB will progress this</li> <li>The SMT agreed that the paper should be published in full.</li> </ul>	LCB	01/05/26	Yes	Publish in full
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## 9. Xero Assurance

<ul style="list-style-type: none"> <li>The SMT noted the assurance provided</li> <li>LCB/TG are planning a training session to ensure we are using the workflows and functionality in Xero to its full potential</li> <li>SMT agreed that the paper should be published in full.</li> </ul>			Yes	Publish in full
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## 10. Monitoring mailboxes

<ul style="list-style-type: none"> <li>SMT discussed peer monitoring of staff mailboxes to support cover arrangements; further discussion is required.</li> </ul>			N/A	N/A
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## 11. Digital implementation strategy 26/27

<ul style="list-style-type: none"> <li>The SMT are happy with the implementation plans for 26/27</li> </ul>			No	Withheld in full - Exemption 30(c)
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## 12. Legal Services Contract

<ul style="list-style-type: none"> <li>EM made the SMT aware that the legal services contract is due to renew at the beginning of January 2027</li> <li>Procurement routes are currently being considered and the SMT will discuss further when options have been investigated</li> </ul>	All	01/05/26	N/A	N/A
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**13. Planned travel for 26/27**

<ul style="list-style-type: none"> <li>The SMT provided details about travel plans so details can be provided to the travel insurance companies</li> </ul>			N/A	N/A
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**14. AOB**

<p>AI</p> <ul style="list-style-type: none"> <li>Strategy Paper</li> </ul> <p>The SMT approved the documents subject to a final review and this can be agreed via email</p> <ul style="list-style-type: none"> <li>Accompanying Guidance Document</li> </ul> <p>The draft guidance will continue to be worked on along with the production of an AI risk assessment</p> <p>Communication and training for all staff will also be provided</p>	All	07/05/26	No	Withheld in full - Exemption 30(c)
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**Signed off by:**



**Date:** 07 May 2026