

Scottish Information Commissioner

Minutes of the Joint Q1 2026-27 Quarterly Senior Management Team August and Monthly August Senior Management Team (SMT) Meeting

20th & 21st August 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.

Under FOI law, everyone has the right to request any information held by the Commissioner. This includes minutes or papers which have not been published. If you want to request copies of minutes or documents which haven't been published, make a request (in writing, by e-mail or in any other recordable form) to:

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: Business Support Manager -Tanya Gardner

Details	Action By	Target Completion Date	Publish Yes / No	Comments
---------	-----------	------------------------	------------------	----------

1. Minutes, action points update and matters outstanding

2.1 Review of minutes – 11/06/2026 <ul style="list-style-type: none"> The minutes were approved and will be published with the relevant papers 			Yes	Minutes published in full
2.2 Action points updates <ul style="list-style-type: none"> Court of Session costs – DH spoke to the SPCB who confirmed that funds should be drawn down as they are needed Applicant feedback survey report: <ul style="list-style-type: none"> EM now gets quarterly reports Statistics are published The SMT will discuss feedback from the surveys on a regular basis 				
2.3 Matters outstanding <ul style="list-style-type: none"> It has been difficult to get meetings in calendars because of annual leave. LCB will arrange meetings to discuss: 	LCB	24/09/26		

<ul style="list-style-type: none"> ○ Key documents ○ Enquiries Handling Process • Driving for work checks– advice has been sought from Worknest and LCB/LB are looking at a solution that is not burdensome to staff but also meets our H&S obligations • Records Management consultancy – will be discussed by a separate RM group due to be set up. It was also noted that SIC is due to submit a Performance Update Review (PUR) to the National Records of Scotland. This will also be considered by the RM group 	LCB/LB	01/09/26		
	LCB?	01/09/26		

2. Finance Report

<ul style="list-style-type: none"> • The 2025-26 Financial Outturn Committee Report was reviewed • SMT noted that this was very helpful in providing an overview of the 2025-26 spend • The report was approved for publishing subject to the addition of a comment in para 1 to explain that the Commissioner operates on an annualised budget so there are elements of costs recovery that are not reflected in this report • The 2026-27 Q1 Budget Analysis was reviewed and approved for publishing. <ul style="list-style-type: none"> ○ LCB will check the staff travel and expenses figure with TG ○ Senior management staff costs were discussed. LCB/TG will speak to the accountant about the coding 	LCB/TG	01/09/26	Yes	Committee Report published in full here
	LCB/TG	01/09/26		Finance Report available here
	LCB/TG	01/09/26		

3. Human Resourcing

<ul style="list-style-type: none"> • Workforce Plan 2026 <ul style="list-style-type: none"> ○ The SMT agreed that the plan provides a structure for the work to be carried out in 2026 and 2027 ○ It is a strategy document so should not be changed ○ It will be reviewed in a years' time • DH will provide a reminder on his approach to the 35-hour working week at the ASM • The SMT agreed to publish the paper in full once DH has formatted and updated 	DH	24/09/26	Yes	Published in full

<ul style="list-style-type: none"> Absence is not currently causing any concerns Annual leave continues to be monitored 				
---	--	--	--	--

4. Rights Requests

<ul style="list-style-type: none"> The SMT noted the content of the Committee Report along with the FOISA and GDPR summary tables and approved for publication The content and frequency of this report was discussed and LCB and LB will review before it is next due 			Yes	Committee Report published in full Summary tables published here (Class 7)
--	--	--	-----	---

5. Investigations Performance

<ul style="list-style-type: none"> The Committee Report was reviewed and approved for publishing Resourcing is be discussed separately 			Yes	Committee Report published in full
--	--	--	-----	------------------------------------

6. Operational Plan 2025-26 Monitoring Report

<ul style="list-style-type: none"> The Monitoring Report was reviewed. And signed off by the SMT One project needs an update for Q4. It can then be published in full 	LB	21/08/2026	Yes	Report published in full here
---	----	------------	-----	---

7. Operational Plan 2026-27

<ul style="list-style-type: none"> The draft operational plan for 26-27 was reviewed and updates were agreed. LB will update the document to reflect the following proposed changes: <ul style="list-style-type: none"> Start end dates to be removed from BAU activity PUR to be added as a project under Information Management Budget detail to be added Cyber recovery playbook for P/A added as a project under Regulation and Enforcement The plan can be published once updates are complete and the monitoring report will then be set up. 	LB	23/09/2026	N/A	N/A
	LB	23/09/2026		

8. Interventions Report

<ul style="list-style-type: none"> C/f to next meeting 			N/A	N/A
---	--	--	-----	-----

9. Strategic 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 			No	Strategic Risk Register withheld – Exemptions s30(b)(ii), s30(c) and s39(1)
---	--	--	----	---

10. 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 			No	Operational Risk Register withheld – Exemptions s30(b)(ii), s30(c) and s39(1)
---	--	--	----	---

11. Case Management Project

<ul style="list-style-type: none"> Discussion around resources and timescales for the planned role out date of April 2027 The following risks were identified: <ul style="list-style-type: none"> we may be over committing ourselves with project work in Q3 & Q4 short tender timescales may exclude some providers there will need to be a substantial resource commitment from all teams and given large caseload this might not be possible The SMT also discussed a risk of delaying the project may raise procurement compliance issues. This can be mitigated by: <ul style="list-style-type: none"> the documents for the procurement that is already underway publishing a note of intention to tender on the Public Contracts website with a timetable of work Technical issues with our current system have also been a concern but these have been less frequent, are being fixed more quickly and have had less operational impact in recent months The SMT agreed that the project should extend into 2027/28 but that the current momentum will continue with the working group The timeline will be reviewed at the next Case Management System meeting 			N/A	N/A
---	--	--	-----	-----

12. Strategic Plan Review

<ul style="list-style-type: none"> The SMT agreed no changes are required and it is still fit for purpose 			N/A	N/A
--	--	--	-----	-----

13. Compliance with Governance Reporting Arrangements

<ul style="list-style-type: none"> The content of the Committee Report was noted The SMT reviewed the draft Governance Reporting and Quality Assurance Arrangements for 2026-27 and agreed a change in approach. LCB will draft a proposal on how SMT report and provide assurances to DH at the QSMTM/MSMTM's and will discuss this with DH in the first instance It was agreed to publish the Committee Report in full 	LCB	24/09/26	Yes	Committee Report published in full
--	-----	----------	-----	------------------------------------

14. Learning and Development Plan

<ul style="list-style-type: none"> The Committee Report was reviewed and SMT agreed the new organisational approach to staff training and development Budget oversight will stay centrally with the HOBS It was agreed to publish the Committee Report in full 			Yes	Committee Report published in full
---	--	--	-----	------------------------------------

15. Performance and Development Framework

<ul style="list-style-type: none"> The Committee report was reviewed and the new process was signed off Next steps are to agree each teams objectives – DH will meet with each HOD separately LCB will then move forward with the communication around the roll out of the framework Part 2 of the Employee Handbook will be updated It was agreed to publish the Committee Report in full 	All LCB LCB	24/09/26 24/09/26 24/09/26	Yes	Committee Report published in full
---	---------------------------	--	-----	------------------------------------

16. Policy & Information Team Assurance

<ul style="list-style-type: none"> CS will circulate a paper which can be agreed by email 	CS	01/09/26	N/A	N/A
--	----	----------	-----	-----

17. Key Documents

<ul style="list-style-type: none"> The 3 documents due for review were discussed: 				
--	--	--	--	--

<ul style="list-style-type: none"> Governance and Quality Assurance Reporting Arrangements – LCB is reviewing Performance and Quality Framework 2023-24 & 2024-25 – A fundamental review is required but this is not a priority. The key document register will to be updated. Internal Audit Plan 2025-26 – This can be discontinued. The key document register will be updated 	LCB	24/09/2026		
	LB	24/09/2026		
	LB	24/09/2026		

18. Register of Personal Data Processing & Privacy Notice

<ul style="list-style-type: none"> EM has reviewed both documents and has no changes to refer to the SMT The privacy notice has recently been updated to add details about staff ID cards. 			Partial	Privacy notice published here RPDP withheld Exemption s30(c)
--	--	--	---------	---

19. Internal Audit Plan

<ul style="list-style-type: none"> The SMT approved the 2026-27 audit plan 			N/A	N/A
---	--	--	-----	-----

20. Key messages for ASM

<ul style="list-style-type: none"> The SMT agreed the key messages for the ASM including an update from the Commissioner regarding the anticipated timescales for considering any changes to the length of the working week. 			N/A	N/A
---	--	--	-----	-----

21. AAB update

<ul style="list-style-type: none"> The AAB were delighted with the annual report, and were impressed with the performance considering the increase in caseload The AAB asked if the draft annual report could be issued at least 2 weeks before the meeting next year which we will endeavour to do 			N/A	N/A
---	--	--	-----	-----

22. Electric cars

<ul style="list-style-type: none"> DH suggested investigating an EV salary sacrifice scheme. DH/LCB/TG will explore further 	DH	02/10/2026	N/A	N/A
---	----	------------	-----	-----

23. AOB

<ul style="list-style-type: none"> Smoke free zone – our workplace is currently a smoke free zone. It was agreed to make the 	LCB/LB	31/08/2026	N/A	N/A
---	--------	------------	-----	-----

<p>grounds smoke-free as well. A message will go our to staff and policies will be updated.</p> <ul style="list-style-type: none"> University student placement – this is something we can explore in the future but given our workloads at the moment the SMT agreed it was not possible. CS will respond to the request 	CS	21/08/2026		
--	----	------------	--	--

Signed off by:



Date: 25/09/2026

Report on Rights Requests

Meeting date: QSMTM 20 August 2026

Report by: Lynn Balfour, Head of Business Support and Liz Brown, Business Support Manager

Purpose of report

1. The purpose of this report is to update the Senior Management Team (SMT) on requests for information, requests for review and subjects access requests received and dealt with in Q1 2026-27

Recommendation and actions

2. I recommend that the SMT:
 - (i) note the content of this report and the summary reports in Appendix 1
 - (ii) agree that this report is published in full.

Report

3. Both summary reports in Appendix 1 provide details of all rights requests received in 2025-26 and Q1 2026-27.
4. Additional key data recorded:

Categories of requests received (RFIs)

About our functions/services	Application related	Misdirected	Other	Total
5	8	17	3	33
15%	24%	52%	9%	

Closed by Team (RFIs)

Enforcement	Business Support	Policy & information	Total closed
14	18	2	34
41%	53%	6%	

5. The number of requests, requests for reviews and subject access requests received remains stable and all requests were responded to within statutory timescales.
6. A time recording exercise began on 1 May 2026 and is due to end on 31 October.

Resources

7. Responding to information requests and reviews can be demanding on staff time due to the research that may be required to identify relevant information and the deadlines for response. However, responding to such requests, within the required timescales is an important function of the Commissioner.

Appendix 1 – Summary reports

Information Requests & Reviews to the Scottish Information Commissioner Report to 30 June 2026

Number of requests received for information held by the Commissioner	2025-26 Total	2026-27 Q1	2026-27 Q2	2026-27 Q3	2026-27 Q4	2026-27 Total
FOISA requests	173	33	0	0	0	33
EIRs requests	3	0	0	0	0	0
Requests for review	8	3	0	0	0	3
TOTAL	184	36	0	0	0	36

Number of FOISA/EIR requests closed	2025-26 Total	2026-27 Q1	2026-27 Q2	2026-27 Q3	2026-27 Q4	2026-27 Total
Information provided in full						
FOISA	21	4	0	0	0	4
EIRs	0	0	0	0	0	0
Information partially supplied						
FOISA	26	3	0	0	0	3
EIRs	0	0	0	0	0	0
Information not held by the Commissioner						
FOISA	115	20	0	0	0	20
EIRs	3	0	0	0	0	0
Information not supplied						
Clarification not provided	1	2	0	0	0	2
Request withdrawn	1	0	0	0	0	0
Excessive costs	0	0	0	0	0	0
Manifestly unreasonable (cost grounds)	0	0	0	0	0	0
Vexatious	2	0	0	0	0	0
Repeated requests	1	0	0	0	0	0
Manifestly unreasonable (other than on cost grounds)	0	0	0	0	0	0
Exempt (refusal notice issued)	2	5	0	0	0	5
Neither confirm nor deny	1	0	0	0	0	0
No response to initial request	0	0	0	0	0	0
Information request invalid	0	0	0	0	0	0
Timescale extended	0	0	0	0	0	0
TOTAL	173	34	0	0	0	34
Number of cases open at quarter/year end	4	3	0	0	0	

No of times a fee was charged	2025-26 Total	2026-27 Q1	2026-27 Q2	2026-27 Q3	2026-27 Q4	2026-27 Total
	0	0	0	0	0	0

Proportion of FOISA/EIR requests for information answered within statutory timescales	2025-26 Total	2026-27 Q1	2026-27 Q2	2026-27 Q3	2026-27 Q4	2026-27 Total
No of requests answered within statutory timescales	173	34	0	0	0	34
No of requests answered outwith statutory timescales	0	0	0	0	0	0
No of requests which received no response	0	0	0	0	0	0
% answered within statutory timescales	100%	100%				100%

Number of request for reviews closed	2025-26 Total	2026-27 Q1	2026-27 Q2	2026-27 Q3	2026-27 Q4	2026-27 Total
Internal review upholds original decision in full	7	2	0	0	0	2
Internal review partially upholds original decision	0	0	0	0	0	0
Internal review - substituted a different decision (overturned)	1	0	0	0	0	0
RFRs - reaching a decision for the first time (no response to original RFR)	0	0	0	0	0	0
RFR invalid	0	0	0	0	0	0
RFR withdrawn	0	0	0	0	0	0
TOTAL	8	2	0	0	0	2
Number of cases open at quarter/year end	0	1	0	0	0	

Proportion of request for reviews answered within statutory timescales	2025-26 Total	2026-27 Q1	2026-27 Q2	2026-27 Q3	2026-27 Q4	2026-27 Total
No of requests answered within statutory timescales	8	2	0	0	0	2
No of requests answered outwith statutory timescales	0	0	0	0	0	0
No of requests which received no response	0	0	0	0	0	0
% answered within statutory timescales	100%	100%				100%

**GDPR Rights Requests to the Scottish Information Commissioner
Report to 30 June 2026**

Number of GDPR rights requests received for information held by the Commissioner	2025-26 Total	2026-27 Q1	2025-26 Q2	2025-26 Q3	2026-27 Q4	2026-27 Total
TOTAL	21	7	0	0	0	7

Number of subject access requests closed	2025-26 Total	2026-27 Q1	2025-26 Q2	2025-26 Q3	2026-27 Q4	2026-27 Total
SAR:Granted in full	6	4	0	0	0	4
SAR:Refused - no proof of ID	0	0	0	0	0	0
SAR:Refused - manifestly unfounded/excessive	1	0	0	0	0	0
SAR:Refused - exemption applied	3	0	0	0	0	0
SAR:Partially refused	3	3	0	0	0	3
SAR:Information not held	7	0	0	0	0	0
SAR:Fee not paid	0	0	0	0	0	0
SAR:Withdrawn	1	0	0	0	0	0
Erasure:Granted	0	0	0	0	0	0
TOTAL	21	7	0	0	0	7
Number of cases open at quarter/year end	0	0	0	0	0	

Proportion of subject access requests answered within statutory timescales:	2025-26 Total	2026-27 Q1	2025-26 Q2	2025-26 Q3	2026-27 Q4	2026-27 Total
No of requests answered within statutory timescales	21	7	0	0	0	7
No of requests answered outwith statutory timescales	0	0	0	0	0	0
No of requests which received no response	0	0	0	0	0	0
% answered within statutory timescales	100%	100%				100%

Report to:	QSMTM
Report by:	Euan McCulloch, Head of Enforcement
Meeting Date:	20 August 2026
Subject/ Title: (and VC no)	Investigations performance report 2026/27 Q1
Attached Papers (title and VC no)	None

Purpose of report

The purpose of this Committee Report (CR) is

- to update the Senior Management Team (SMT), and provide it with assurance, on investigations performance in Quarter 1 of 2026/27
- to make recommendations to SMT as set out below

Recommendation and actions

1. I recommend:

- that SMT notes investigations performance in Quarter 1 of 2026/27, specifically
 - a) continuing effective performance against all measures, for cases under active investigation
 - b) the substantial – and continuing – high number of incoming cases of all kinds, with consequent challenges for caseload management at all levels
 - c) the ongoing measures to reduce the “Blue” caseload
- that SMT notes the measures being taken, where practicable, to address the various caseload handling issues identified
- that this report and accompanying papers are published in line with the “Publication” section below.

Executive summary

2. Investigations performance for the Quarter is summarised in the following reports presented to the relevant Investigations Performance Meetings

- VC 248984 (May)
- VC 250168 (June)
- VC 251376 (July)

and considered in the following minutes of those meetings

- VC 249404 (May)

- VC 250800 (June)
 - No July meeting
3. From these reports and minutes, I would highlight the following for noting by SMT
- Application numbers remain extremely high: 264 for the quarter, an average of 88 per month.
 - The number of cases awaiting validation remains a concern, with 147 in that position at the end of June. This represents a small reduction from the end of 2025/26, however, and continues to be subject to monitoring by the Inflow Group.
 - FTR cases are now effectively managed through allocation to IOs.
 - Performance against all measures has remained effective, as regards cases under active investigation. The average age of open cases has remained steady (average of 13.7 months for the quarter), although the average age of closed cases has crept up somewhat (7.8 months average for the quarter, although this reflects a drive to close older cases). For “Green” cases, average ages of open and closed cases have also crept up a little, although still in the region of five months for each.
 - Following another round of contact with applicants in “Blue” cases, we are in the process of closing a number as either withdrawn or abandoned. I am reasonably confident that what is left should be capable of allocation for investigation within 2/3 months. This will have some impact on the allocation/investigation of newer unallocated cases, but we will then be able to turn to the one backlog and give it our full attention.

Risk impact

4. The level of applications carries with it a number of risks in terms of investigations performance, as described above and considered previously, with potential impact on meeting objectives (including those agreed with Parliament), reputation and staff morale. With these in mind, we continue to pay close attention to mitigation measures already identified (including the 5-case limit for multiple applicants), while making continual efforts to identify/implement appropriate additional ones. Given that the increase now appears permanent, however, it is clear that additional resources will be required and this is being pursued through the budget process.
5. Previously untested means of dealing with challenging applications, particularly those received in substantial batches, carry with them the risk of legal challenge. This, including the prospect of a challenge being successful, needs to be considered fully in each case when determining the appropriate course of action (although the risk has not manifested itself to date, it is one we need to remain aware of).

Equalities impact

6. No impact on any of the protected characteristics has been identified.

Privacy impact

7. None: nothing in this report has privacy implications for staff or others.

Resources impact

8. The upsurge in application numbers presents inevitable challenges for the existing staffing establishment and staff morale, however effectively the incoming caseload is managed, and this requires ongoing monitoring. As indicated at 5

Operational/ strategic plan impact

9. This a key element of the performance monitoring and review required as part of Activity 2 under “Regulation and Enforcement” in the current Operational Plan. This monitoring and review also has a key contribution to make to ensuring that we meet Objective 4 (*Deliver fair defensible decisions in a timely manner*) in the 2024/28 Strategic Plan.

Records management impact (including any key documents actions)

10. None

Consultation and Communication

11. The Deputy Heads of Enforcement have been consulted in the preparation of this CR.

Publication

12. I recommend that this CR is published in full.



Scottish Information
Commissioner

Paper: Review of Governance Reporting Arrangements 2025-26 and Considerations for 2026-27

Meeting date: Merged QSMTM/MSMTM 20 August 2026

Paper prepared by: Lynn Balfour (Head of Business Support)

Purpose

The purpose of this paper is to provide SMT with an opportunity to review the governance reporting arrangements that were in place during 2025-26 (VC231697) and to consider whether any changes are required for the forthcoming reporting year.

Recommendations

SMT is asked to:

1. Review the effectiveness of the governance reporting arrangements implemented during 2025-26.
2. Consider whether any amendments are required to reporting content, frequency or presentation for 2026-27.
3. Agree any changes to be incorporated into the governance reporting framework for the coming year.

Background

The governance reporting arrangements in place for 2025-26 were designed to provide SMT and particularly the Commissioner, with regular assurance regarding organisational performance, risk, finance and strategic delivery. For 2025-26 there were 35 individual reporting arrangements.

It should be noted that this document within VC remained in draft format throughout the year. As such, the review provides an opportunity not only to consider the effectiveness of reporting arrangements implemented during 2025-26, but also to assess whether the current approach remains fit for purpose in the context of ongoing organisational development and anticipated future changes.

Points to consider

- Whether the objectives of the 2025/26 reporting framework have been achieved.
- Whether the information currently provided supports effective governance, assurance and decision making.
- The extent to which reporting arrangements remain appropriate in light of ongoing organisational change.

- Any anticipated developments in governance, quality assurance or regulatory requirements that may necessitate future changes to reporting arrangements.
- Opportunities to streamline, enhance or better align this type of reporting

Any agreed amendments would be incorporated into reporting guidance and templates for the forthcoming reporting cycle, whilst recognising that further refinement may be required as organisational arrangements continue to develop.



Scottish Information
Commissioner

Paper: Staff Training & Development

Meeting date: Merged QSMTM/MSMTM 20 August 2026

Paper prepared by: Lynn Balfour (Head of Business Support)

Purpose of paper

This paper considers the training that was undertaken across the organisation in 2025-26 and asks the SMT to consider the attached draft Staff Training and Development Policy as a new organisational approach to staff training and development.

Recommendation and actions

- SMT notes the contents of this paper.
- Agree next steps.
- SMT consider whether this paper should be published in full.

Background and rationale

The organisation already supports a range of staff training and development activity, including mandatory training, role specific learning, team development, wellbeing related learning and individual development opportunities. However, a clear policy and process would help ensure requests for training are handled consistently and that decisions are made transparently particularly for paid for training.

The proposed approach is intended to open up opportunities by making the routes for requesting and considering training visible to all staff, setting out the types of training that may be supported, and clarifying how requests will be assessed.

It also recognises that responsibility for training does not sit with one post or one part of the organisation. Employees, line managers, Heads of Department and the Senior Management Team each have a role in identifying needs, supporting learning, approving appropriate requests, monitoring compliance and ensuring training activity contributes to organisational effectiveness.

Summary of staff training delivered in 2025-26

During 2025-26, there was some uncertainty regarding the appropriate use of the staff training budget, which made it challenging to plan and utilise the available funding effectively. A key priority was to address outstanding mandatory training requirements, which are now substantially up to date. Breathe Learn has supported the organisation in coordinating and delivering this training.

Training organised and coordinated centrally during the year included sexual harassment training for all staff, reasonable adjustments training for managers, KnowBe4 cyber security training for all staff, menopause training for managers, and menopause awareness sessions for interested staff. Microsoft 365 awareness sessions were also delivered

All staff were also given the opportunity to identify and apply for relevant training and development opportunities. Uptake was relatively low; however, a number of individual requests were approved, including training in digital marketing, artificial intelligence, health and safety, and equality, diversity and inclusion.

2026-27 approach

The staff training budget is currently £20,000, an increase from £15,000 in 2025-26, when there was an underspend. Given the available budget, we need to have an approach in place that actively encourages and supports staff to make use of the funding, ensuring that it is invested effectively in training and development opportunities that meet organisational and staff needs.

A spreadsheet is already in place to record paid for training, having been introduced by HOBs in 2025-26. It is suggested that BST maintains this going forward to provide a consistent record of who has undertaken training and how much has been spent. This will enable monitoring of training expenditure at team, individual and organisational level, providing a clear picture at any point during the year of how the training budget is being utilised and helping to inform future training priorities and budget planning.

It is proposed that the new Staff Training and Development Policy is rolled out through the Managers Group, with line managers taking responsibility for communicating the policy and supporting its implementation within their teams. This will help to ensure a consistent organisational approach to staff training and development.

This content falls under Part 2 of the Employee Handbook and is non-contractual. It can therefore be implemented immediately, with the appropriate communication and rollout to staff.

Draft Staff Training and Development Policy

1. Purpose

This policy sets out how training and development is supported across the organisation. It ensures staff have the skills, knowledge and support needed to perform their roles effectively, develop professionally, and contribute to the organisation's strategic aims and workforce strategy.

2. General Principles

The organisation is committed to supporting continuous learning and development. Training opportunities will be provided fairly and prioritised based on organisational need, role requirements, strategic alignment, and available resources. In some cases, the organisation may provide enhanced training opportunities beyond statutory or minimum requirements, where this supports service delivery and workforce development priorities.

3. Scope

This policy applies to all employees.

4. Types of Training

The organisation supports a range of training and development opportunities:

Mandatory

Training required by law, regulation, or organisational policy. This must be completed by all relevant staff within required timescales (e.g. health and safety, data protection, sexual harassment prevention).

Role specific and upskilling

Training required to perform current job duties effectively or to improve performance, including digital/technical skills, systems training, and job related skills.

Manager led

Training delivered or arranged by line managers as part of supervision, induction, or performance development.

Team

Training delivered to groups or teams to improve shared practice, consistency, service delivery, or operational effectiveness.

Soft skills

Training focused on interpersonal and professional skills such as communication, teamwork, leadership, time management, and conflict resolution.

Wellbeing related

Training that supports staff wellbeing, resilience, mental health awareness, stress management, and promotes a healthy working environment.

Individually requested

Training identified by an employee as beneficial for their development or career progression, which may or may not be directly required for their current role.

External and paid for

Training delivered by external providers that may involve costs such as course fees, travel, or time away from work. Approval is required before any costs are incurred.

5. Value for Money and Strategic Alignment

All training must demonstrate value for money, particularly as training budgets are limited.

Training decisions will consider:

- affordability within available budget
- cost effectiveness and proportionality of the training
- expected benefits to the individual, team, and organisation
- whether alternative lower cost options are available and suitable

Training should also clearly align with:

- the organisation's strategic aims
- the workforce strategy objectives
- service delivery priorities and operational needs

Requests that do not demonstrate clear alignment or value may not be approved.

5. Requests for Paid for Training

Where an employee wishes to attend external or paid for training, they must:

- Discuss the request with their line manager at the earliest opportunity
- Complete the relevant training request form in full
- Provide details of the course, provider, cost, and time commitment
- Explain how the training supports their role, development, or organisational priorities
- Ensure the request is reviewed and signed off in discussion with both their line manager and Head of Department before any booking or commitment is made

Approval will be based on:

- relevance to role and organisational priorities
- alignment with the workforce strategy and strategic aims
- value for money and budget availability
- impact on service delivery
- development benefit for the employee

If approved, written confirmation will be provided, including any conditions such as completion requirements and any expectations around reporting or sharing learning with colleagues.

6. Responsibilities

Employees are responsible for:

- completing mandatory training within required timescales
- attending agreed training sessions
- applying learning in the workplace
- taking ownership of their development and discussing needs with their manager
- ensuring approval is obtained before booking paid for training

Line managers are responsible for:

- identifying training needs within their team
- supporting staff training and development through supervision and annual reviews

- approving or declining training requests within delegated authority
- ensuring mandatory training compliance
- supporting application of learning in practice
- ensuring training requests are consistent with budget and value for money principles
- ensuring training opportunities are considered and approved fairly and consistently across all team members
- Identifying when similar individual training needs across multiple staff indicate a wider requirement, and escalating or organising group training where appropriate to ensure efficiency and consistency

Heads of Department are responsible for:

- ensuring training activity aligns with organisational strategy and workforce strategy
- overseeing training budgets and ensuring value for money is achieved
- approving high cost or strategic training where required
- ensuring consistent application of this policy
- monitoring compliance with mandatory training requirements
- supporting workforce planning, capability development, and succession planning
- Identifying when similar individual training needs across multiple staff indicate a wider requirement, and escalating or organising group training where appropriate to ensure efficiency and consistency

Senior Management Team are responsible for:

- Setting and overseeing the organisation's strategic direction for learning and development, ensuring training activity aligns with organisational priorities and the workforce strategy
- Ensuring training budgets are appropriately allocated and used effectively, with clear oversight of value for money and financial sustainability
- Approving or delegating approval for high cost, high risk, or strategic training decisions
- Monitoring organisation wide training compliance, including mandatory training completion rates
- Ensuring fair and consistent access to training opportunities across departments and roles
- Reviewing workforce capability and identifying long term development needs, including succession planning and skills gaps
- Ensuring training activity supports service delivery, quality standards, and continuous improvement across the organisation
- Promoting a culture of learning, development, and continuous improvement throughout the organisation



Scottish Information
Commissioner

Paper: Annual Review and Development Process:
Revised Proposal and Rollout Timeline

Meeting date: Merged QSMTM/MSMTM 20 August 2026

Paper prepared by: Lynn Balfour (Head of Business Support)

Purpose

The purpose of this paper is to seek SMT approval for the revised Annual Review and Development documentation agreement on the proposed timeline for implementation. The Annual Review and Development process will replace the existing Performance and Development Framework.

Recommendations

SMT is asked to:

1. Approve the revised Annual Review and Development Form. [Annual Review and Development Form.docx](#)
2. Agree the proposed implementation and rollout timeline outlined below.
3. Confirm whether the report and associated papers can be published in full.

Background

SMT previously considered and endorsed the introduction of a new Annual Review and Development Process to support staff performance, development and engagement.

Following that discussion, the draft process and supporting documentation were shared with the Managers' Group for review and comment. The feedback received was constructive and helpful in identifying areas where the process and accompanying could be communicated more clearly.

Updates

A key theme emerging from this feedback was the importance of clearly positioning the Annual Review and Development Process as both a retrospective review of the previous year and a forward looking development conversation. In response, a number of refinements to the form to reflect this, mainly expanding the description of the sections so that there is clarity for reviewers and reviewees.

Rollout considerations

As this represents a refinement of a process that has already been discussed and agreed with SMT and the Managers' Group, following final approval, it is proposed that staff would be notified of the revised process via email and a brief update could also be provided at the next All Staff Meeting to reinforce the purpose of the changes and outline next steps.

It is anticipated that members of the Managers' Group will play a key role in supporting implementation, with line managers leading the rollout within their teams and ensuring staff understand the revised approach and expectations with the revised process commencing from October 2026 allowing managers and employees sufficient time to familiarise themselves with the updated approach ahead of the review cycle.

This content falls under Part 2 of the Employee Handbook and is non-contractual. It can therefore be implemented immediately.