

**Scottish Information Commissioner**  
**Minutes of Monthly Senior Management Team Meeting**  
**12 July 2024**

**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 indicate the exemption that is applied at the time of the decision

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Scottish Information Commissioner, Kinburn Castle, Doubledykes Rd, St Andrews, Fife, KY16 9DS  
Tel: 01334 464610  
enquiries@foi.scot

Present: Scottish Information Commissioner – David Hamilton (DH) (Chair)  
Head of Policy & Information – Claire Stephen (CMS)  
Finance Head of Enforcement – Euan McCulloch (EM)  
Finance and Administration Manager – Liz Brown (LB)  
Finance and Administration Manager – Kim Berry (KB) (Minutes)

Apologies: Head of Corporate Services - Helen Gardner-Swift (HGS)

Details	Action By	Target Completion Date	Publish Yes / No	Comments
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**1. Update with Robin Davidson, Data Protection Officer**

• Deferred to MSMTM				
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**2. Minutes, action points update and matters outstanding**

<b>1.1 Review of minutes – QSMTM, 30/04/24 (Part 1) and 29/05/24 (Part 2)</b> <ul style="list-style-type: none"><li>The minutes were approved and will be published with the relevant papers.</li></ul> <b>1.2 Action points update</b> <ul style="list-style-type: none"><li>Actions complete unless noted below</li></ul> <b>1.3 Matters outstanding</b> <ul style="list-style-type: none"><li>Workforce Plan 2024-25<ul style="list-style-type: none"><li>DH will have draft report for 2024-25 available for next time on agenda</li></ul></li></ul>	DH	Next QSMTM	Yes	Minutes published in full
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<ul style="list-style-type: none"> <li>Finance Report <ul style="list-style-type: none"> <li>DH/KB to carry out review of report and agree format moving forward</li> </ul> </li> <li>Investigations Performance <ul style="list-style-type: none"> <li>SMT to review report to make sure it reflects the current work patterns</li> </ul> </li> <li>Workforce Trends <ul style="list-style-type: none"> <li>DH to incorporate into Workforce Plan 2024-25 and Governance Reporting Arrangements will be updated to reflect this</li> </ul> </li> </ul>	DH/KB	Q2		
	SMT	Next QSMTM		
	DH	Next QSMTM		

### 3. Key Documents

<ul style="list-style-type: none"> <li>The SMT considered the list of key documents due and forthcoming to 31 December 2024</li> <li>Following discussion, it was agreed that the following changes should be made to the Key Document Register: <ul style="list-style-type: none"> <li>the DPIAs relating to developing a new website would be removed as key documents</li> </ul> </li> <li>KB to update the report as discussed</li> <li>The SMT agreed that the report is published with the exception of the column containing comments</li> </ul>	KB	31/07/24	Partial	Report published with the exception of comments column – Exemptions s30(b)(ii) and s38(1)(b)
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### 4. Draft Annual Report and Accounts 2023-24 (ARA)

<ul style="list-style-type: none"> <li>The SMT reviewed the draft ARA report.</li> <li>DH thanked all involved in the preparation of the report for their hard work</li> <li>The SMT approved the report subject to minor amendments</li> </ul>			No	Annual Report and Accounts 2023-24 (draft) withheld - Exemption s27(1)
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### 5. Draft Operational Plan 2024-25

<ul style="list-style-type: none"> <li>The SMT reviewed the draft Operational Plan and noted: <ul style="list-style-type: none"> <li>this is a dynamic document to allow for work in the future and can be updated with future dates</li> <li>A number of changes were discussed and the draft Operational Plan will be updated.</li> <li>SMT will then review dates and that each activity aligns with Strategic Objectives</li> </ul> </li> </ul>	LB	19/07/24	No	Operational Plan 2024-25 (draft) withheld - Exemption s27(1)
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<ul style="list-style-type: none"> <li>○ the Operational Plan Monitoring Report 2024-25 will be prepared when the plan is approved</li> <li>• The draft Operational Plan 2024-25 will be tabled for approval at the next SMT meeting.</li> </ul>	LB	30/07/24		
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#### 6. Draft Operational Risk Register 2024-25 (ORR)

<ul style="list-style-type: none"> <li>• DH presented a revised ORR 2024-25 and explained the process.</li> <li>• SMT reviewed each risk. No changes required.</li> <li>• The SMT approved the Operational Risk Register 2024-25.</li> </ul>			No	Operational Risk Register withheld – Exemptions s30(b)(ii), s30(c) and s39(1)
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#### 7. Key Document – Governance Reporting Arrangements 2024-25

<ul style="list-style-type: none"> <li>• Deferred to Q1 QSMTM</li> </ul>				
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#### 8. Key Document – Risk Management Policy 2024-25

<ul style="list-style-type: none"> <li>• Deferred to Q1 QSMTM</li> </ul>				
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#### 9. Governance Reporting - 2023-24 Assurance

<ul style="list-style-type: none"> <li>• Deferred to Q1 QSMTM</li> </ul>				
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#### 10. Health & Safety Audit Committee Report

<ul style="list-style-type: none"> <li>• The SMT noted: <ul style="list-style-type: none"> <li>○ the Committee Report</li> <li>○ agreed the actions proposed</li> <li>○ agreed the publication recommendations</li> </ul> </li> <li>• DH expressed his thanks to LB and SL for their work in achieving such an excellent report.</li> </ul>			Yes	CR published in full
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#### 11. Interventions Report

<ul style="list-style-type: none"> <li>• CS summarised the CR and Annual Interventions Activity Report Q1</li> <li>• The SMT – <ul style="list-style-type: none"> <li>○ noted the CR</li> <li>○ agree to make a bid for designated</li> </ul> </li> </ul>			Yes	CR and Annual Interventions Activity Report Q1 published in full
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resource to carry out intervention function <ul style="list-style-type: none"> <li>○ agreed the publication arrangements as detailed in the CR</li> </ul>				
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## 12. Quality Assurance - Enquiries

<ul style="list-style-type: none"> <li>• Deferred to Q2 QSMTM</li> </ul>				
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## 13. Information and Records Management

<ul style="list-style-type: none"> <li>• Deferred to Q1 QSMTM</li> </ul>				
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## 14. Communication and Engagement Framework

<ul style="list-style-type: none"> <li>• The SMT noted – <ul style="list-style-type: none"> <li>○ the contents of the committee report</li> <li>○ agreed to extend the lifespan of the Communications and Engagement Framework 2023-24 to 31 March 2025</li> <li>○ agreed to remove the ‘FOI Understanding’ measure of public awareness from the measures for 2024-25</li> </ul> </li> <li>• The SMT agreed the publication recommendations.</li> <li>• CS expressed her thanks to PM for his work in preparing the report.</li> </ul>			Yes	CR published in full
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## 15. British Sign Language – Action Plan – Report and review

<ul style="list-style-type: none"> <li>• Deferred to Q2 QSMTM</li> </ul>				
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## 16. Employment Policy Update

<ul style="list-style-type: none"> <li>• Deferred to Q1 QSMTM</li> </ul>				
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## AOB.

<ul style="list-style-type: none"> <li>• Staffing and Recruitment <ul style="list-style-type: none"> <li>○ SMT approved recruitment of a permanent, full time, grade 2 Administrator to fill the vacancy in the Corporate Services Team.</li> </ul> </li> </ul>			N/A	
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**Signed off by:**

A handwritten signature in black ink, appearing to read 'D. H. S.', with a stylized flourish at the end.

**Date:** 06 September 2024