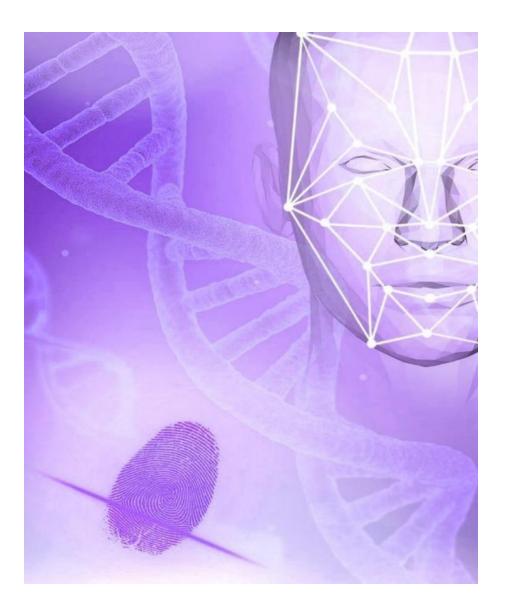


# GUIDE TO INFORMATION PUBLISHED BY THE SCOTTISH BIOMETRICS COMMISSIONER

Produced as required by the Freedom of Information (Scotland) Act 2002 (FOISA), and the Environmental Information (Scotland) Regulations 2004

Version 0.2 August 2022



Safeguarding our biometric future



# **Document Control:**

Title	Guide to Information Published by the SBC
Prepared by	Cheryl Glen
Reviewed by	Dr Brian Plastow
Version	0.2
Amendments	<ul> <li>Reformatted the document to follow corporate SBC style</li> <li>Reformatted all hyperlinks</li> <li>Link to Management Team Meetings' minutes added</li> <li>Link to Impact Assessments added</li> <li>Link to SBC's external complaints procedure added</li> </ul>
Date	August 2022



Terms Used	Explanation
FOISA	The Freedom of Information (Scotland) Act 2002
EIRs	The Environmental Information (Scotland) Regulations 2004
Model Publication Scheme	A standard framework for authorities to publish information under FOISA, approved by the Scottish Information  Commissioner
MPS	Model Publication Scheme
Classes of information	Nine broad categories describing the types of information authorities must publish (if they hold it)
Guide to information	A guide that every public authority adopting the MPS must produce to help people access the information that the authority makes available
MPS Principles	The six key principles with which all authorities adopting the MPS must comply
Notification form	The form an authority must submit to notify the Commissioner of its adoption of the MPS



## **Section 1: Introduction to the Publication Scheme**

The purpose of this Guide to Information is to:

- allow the public to see what information is and is not available in relation to each class
- state what charges may be applied
- explain how to find the information easily
- provide contact details for enquiries and to get help with accessing the information
- explain how to request information we hold that has not been published

The Freedom of Information (Scotland) Act 2002 (FOISA) provides individuals with a right to request any recorded information held by Scotland's public authorities. Anyone can use this right, and information can only be withheld where FOISA expressly permits it.

The Scottish Biometrics Commissioner (SBC) has adopted the Model Publication Scheme 2018 (updated 2021) developed and approved by the Scottish Information Commissioner.

The Scottish Information Commissioner is responsible for enforcing FOISA. The model scheme can be viewed online at:

https://www.itspublicknowledge.info/ScottishPublicAuthorities/PublicationSchemes/TheModelPublicationScheme.aspx

Section 23 of FOISA also requires that all Scottish public authorities maintain a publication scheme. A publication scheme sets out the types of information that a public authority routinely makes available. Authorities are under a legal obligation to:

- Publish the classes of information that they make routinely available
- Tell the public how to access the information they publish and whether information is available free of charge or on payment

The FOISA also allows for the development of model publication schemes which can be adopted by more than one public authority. The Scottish Information Commissioner's Model Publication Scheme was approved in 2018 and updated in 2021.

## Definition of "published" information

For the purposes of the Model Publication Scheme, to be "published," information must be:

- Already produced and prepared, and
- Available to anyone to access easily without having to make a request for it

Research and information services which involve the commissioning of new information are not "publications".



## Adopting this model scheme

It is expected that the model scheme will be adopted by any public authority which is subject to the Freedom of Information (Scotland) Act 2002. For more information about which bodies this applies to please visit:

 $\underline{https://www.itspublicknowledge.info/ScottishPublicAuthorities/PublicationSchemes/TheModelPublicationScheme.aspx}$ 

## Adoption commits a public authority to:

- Adopting the model scheme, and any updates to it, without amendment
- Publishing the information, including environmental information that it holds, and which falls within the classes of information below
- Ensuring that the way it publishes its information meets the Model Publication Scheme Principles
- Producing a Guide to Information which sets out the information the public authority publishes
  through the model scheme, how to access it, whether there is a charge for it and how to get help to
  access information
- Notifying the Scottish Information Commissioner that it has adopted the model scheme



Class	Description
1. About the public authority	Information about the public authority, who we are, where to find us, how to contact us, how we are managed and our external relations.
2. How we deliver our functions and services	Information about our work, our strategies, and policies for delivering functions and services and information for our service users.
3. How we take decisions and what we have decided	Information about the decisions we take, how we make decisions, and how we involve others.
4. What we spend and how we spend it	Information about our strategy for, and management of, financial resources (in sufficient detail to explain how we plan to spend public money and what has been spent.
5. How we manage our human, physical and information resources	Information about how we manage the human, physical and information resources of the authority.
6. How we procure goods and services from external providers	Information about how we procure goods and services and our contracts with external providers.
7. How we are performing	Information about how we perform as an organisation and how well we deliver our function and services.
8. Our commercial publications	Information packaged and made available for sale on a commercial basis and sold at market value through a retail outlet e.g., bookshop, museum, or research journal.
9. Our open data	Open data made available by the authority as described by the Scottish Government's Open Data Strategy and Resource Pack, available under an open licence.

Alongside FOISA, the Environmental Information (Scotland) Regulations 2004 (the EIR) provide a separate right of access to the environmental information that we hold. This guide to information also contains details of the environmental information that we routinely make available.

If you would like to access information that we do not publish, you can still request it from us under FOISA or, in the case of environmental information, the EIR. For further information on accessing information we do not publish, refer to Section 11.

# **Section 2: About the Scottish Biometrics Commissioner**

The Scottish Biometrics Commissioner Act 2020 (the Act) established the office of Scottish Biometrics Commissioner and provides for its functions. The first Commissioner took office on 12 April 2021. The Commissioner is Dr Brian Plastow.



This first version of our guide sets out the information that the Scottish Biometrics Commissioner has published or anticipates publishing within twelve weeks from the publication of this information guide, as catered for in Section 27 of FOISA.

This guide will be regularly updated, and we will publish as much information as possible to help people understand what we do as a public authority.

The Scottish Biometrics Commissioner is an independent public authority appointed by Her Majesty the Queen on the nomination of the Scottish Parliament. The Scottish Biometrics Commissioner was set up to support and promote the adoption of lawful, effective, and ethical practices in relation to the acquisition, retention, use and destruction of biometric data for criminal justice and police purpose The Commissioner must lay an annual report on activities each year before the Scottish Parliament and may publish other reports, as necessary. Further information on the Scottish Biometrics Commissioner Act 2020 can be accessed here: <a href="https://www.legislation.gov.uk/asp/2020/8/contents">https://www.legislation.gov.uk/asp/2020/8/contents</a>

#### **Code of Practice**

Section 7 of the Act provides that in furtherance of the Commissioner's general function, the Commissioner must prepare, and may from time-to-time revise, a Code of Practice on the acquisition, retention, use and destruction of biometric data for criminal justice and police purposes. The Commissioner must keep the approved code of practice under review, prepare and publish a report on the Commissioner's findings, and lay a copy of the report before the Scottish Parliament. The first report must be laid before the Parliament no later than three years after the date on which the first code of practice comes into effect.

We are currently consulting on a draft version of our proposed Code of Practice. Once finalised this will be published on our <u>website</u>.

## **Complaints relevant to the Code of Practice**

Section 15 of the Act requires that The Commissioner must provide a procedure by which an individual, or someone acting on an individual's behalf, may make a complaint to the Commissioner that a person who is required by section 9 (1) to comply with the code of practice has not done or is not doing so in relation to the individual's biometric data.

The complaints procedure relative to the Code of Practice will not take effect until the Code has been formally approved by Scottish Ministers under regulations. We are currently working on our proposed Complaints Procedure but once finalised this will be published on our <u>website</u>.

## **Definition of Biometrics**

Within the context of Section 34 (1) of the Scottish Biometrics Commissioner Act 2020, the term 'biometric data' means:

information about an individual's physical, biological, physiological, or behavioural characteristics which is capable of being used, on its own or in combination with other information (whether or not biometric data), to establish the identity of an individual.



#### For the purposes of subsection (1), "biometric data" may include:

- (a) Physical data comprising or derived from a print or impression of or taken from an individual's body,
- (b) A photograph or other recording of an individual's body or any part of an individual's body,
- (c) Samples of or taken from any part of an individual's body from which information can be derived, and
- (d) Information derived from such samples.

The most common types of biometric data taken from people who have been arrested in Scotland include fingerprints, photographs, and DNA. The police in Scotland have acquired fingerprints and photographs of persons who have been arrested for more than one hundred years. DNA has been in use in policing in Scotland since the late 1980s.

## **Strategic Plan 2021 - 2025**

The Commissioner is required to lay a four-year strategic plan before the Scottish Parliament setting out how he will perform his statutory functions. The first such plan was laid before the Scottish Parliament on 24 November 2021 and covers the period from 01 December 2021 to 30 November 2025. The strategic plan includes information on:

- Identified objectives and priorities for that period,
- How the Commissioner proposes to achieve those objectives and priorities,
   A timetable for doing so,
- Estimated costs.

Further information about the Scottish Biometrics Commissioner will be available from our website.

Note: Although the function of the Scottish Biometrics Commissioner extends to policing and criminal justice in Scotland and includes wide ranging powers to do anything necessary or expedient to discharge those functions, the SBC will not hold any policing or criminal justice biometric data while conducting its statutory functions.

## Section 3: About this Guide to Information

In deciding what information to publish we have also given effect to the Scottish Government's own 'six principles of FOI,' which underpin our approach to FOI matters. These principles make clear a commitment to publishing information proactively wherever possible. The SBC:

supports FOI as an essential part of open democratic government and responsive public services.
 We support the Act's underpinning principles by encouraging behaviour which is open, transparent and increases public participation



operates within the Freedom of Information (Scotland) Act
 2002 rather than proposing significant changes to it, but adjusts

the regime where it is necessary and sensible to do so

- publishes information proactively wherever possible. We will publicly demonstrate our commitment to Freedom of Information by ensuring as much information as possible is made available without having to be asked
- maintains the exemptions set out in the Act. The Act provides for responsible openness. We will use
  the exemptions in the Act where appropriate to protect, for instance, the formulation or
  development of policy, or the uninhibited provision of advice
- maintains effective relationships with the Scottish Information Commissioner and other key stakeholders. We ensure the effective operation of the Act by fostering and maintaining good working relationships on Freedom of Information with stakeholders such as other public authorities and the Scottish Public Information Forum
- creates and shares information thoughtfully with regard to the principles above. To support the effective application of the Act, we create and share information thoughtfully, deliberately and purposefully with a view to upholding the principles above

As the Scottish Biometrics Commissioner was appointed in April 2021, we are an entirely independent public authority and will consider the types of information that are requested from us on a regular basis to determine whether they could be published more proactively.

Our strategic approach to FOI, will be to publish as much information as possible to assist the public in understanding what we do, and why we do what we do.

# **Section 4: Accessing Information in this Guide**

Information available through this guide can be found by using the routes described below. Section 12 provides more details about the information available, along with additional guidance on how information falling within each "class" may be accessed.

We will offer alternative arrangements for people who do not wish to or cannot access the information online.

#### Online:

Most information listed in our guide will be available to download from our website.

## **Telephone:**

In many cases a link within Section 12 will direct you to the relevant page or document. Where no such link is present, you can use our website's "Search" function. If you are still having trouble finding any information set out in this guide, then please call our office on - **0131 202 1043.** Please note that our office will not be staffed for the duration of the ongoing COVID-19 pandemic and our preferred method of contact is via email.





#### email:

If information you seek is listed in our guide to information but is not published on our website, we can usually send it to you by email. When requesting information from us, please provide a telephone

number so that we can telephone you to clarify details if necessary. You can email us at: **contact@biometricscommissioner.scot** 

## By post:

Information in this guide is also available in paper copy, although there may be a charge for it. Please address your request to: The Scottish Biometrics Commissioner, 99 McDonald Road, Edinburgh EH7 4NS.

When writing to us to request information, please include:

- Your name and address
- Full details of the information or documents you would like to receive
- Any payment (see Section 6 for further information about fees)
- A telephone number in case we need to contact you to clarify any information

#### **Advice and Assistance:**

If you have any difficulty identifying the information you want to access, then please do not hesitate to contact us. We are here to help in any way that we can.

# Section 5: Information we may withhold

All information published in this guide can be accessed through our website, or by asking us for it (see Section 4). Our aim in maintaining this publication scheme is to be as open as possible. You should note, however, that there may be limited circumstances where information will be withheld from publication. Information will only be withheld, however, where FOISA (or, in the case of environmental information, the Environmental Information (Scotland) Regulations 2004) expressly permits it.

Information may be withheld, for example, where its disclosure would breach the law of confidentiality, harm an organisation's commercial interests, or endanger the protection of the environment. Information may also be withheld if it is another person's personal information, and its release would breach the data protection legislation.

Where we withhold information, we will remove it or redact it before publication and explain why. Even where information is withheld it may, in many cases, be possible to provide copies with the withheld information edited out. If you wish to complain about any information which has been withheld from you, please refer to Section 10.

# **Section 6: Our Charging Policy**

Unless otherwise stated in Section 12, all information contained within our scheme is available from us free of charge where it can be downloaded from our website or where it can be sent to you electronically by email. We reserve the right to impose charges for providing information in paper copy.



from

Charges will reflect the actual costs of reproduction and postage the Scottish Biometrics Commissioner, as set out below. If we

decide that a charge is to be levied, you will be advised of the charge and how it has been calculated. Information will not be provided to you until payment has been received.

#### **Reproduction costs:**

Where charges are applied, photocopied information will be charged at a standard rate of 10p per A4 side of paper (black and white copy) and 30p per A4 side of paper (colour copy).

## Postage costs:

We will pass on postage charges to the requester at the cost to the Scottish Biometrics Commissioner of sending the information by first class post.

We are required by the Equality Act 2010, to take steps to meet the needs of people who share a relevant protected characteristic. In terms of access to information, this means making reasonable adjustments to our practices to ensure that information is physically accessible. This may, for example, involve producing information in a larger script or different format where it is practicable to do so. The costs of this will be met by the Scottish Biometrics Commissioner.

# **Section 7: Our Copyright Policy**

You may use and re-use information published through this guide free of charge in any format or medium, under the terms and conditions of the Open Government License:

http://www.nationalarchives.gov.uk/doc/open-government-licence/version/3/

Provided it is reproduced accurately and not used in a misleading context. Where any of the items published through this guide are being republished or copied to others, the source of the material must be appropriately acknowledged and referenced.

#### **Exceptions:**

The above permissions do not extend to any material in this guide which is identified as being the copyright of a third party. Authorisation to reproduce such material must be obtained from the copyright holders concerned.

# **Section 8: Our Records Management and Disposal Policy**

Although independent of Scottish Government, the Scottish Biometrics Commissioner has a contractual arrangement to use the Scottish Government ICT platform as its business application.

The Scottish Biometrics Commissioner participates in the Scottish Government's records management process. The Scottish Government has in place Record Retention and Disposal Schedules in respect of all documents that it creates and holds. These Schedules set out the lengths of time for which all types of records must be held. This means that whilst FOISA is retrospective, it is only possible to provide copies of our records that are still in existence. Although the SBC participates in the Scottish Government's records



management process we have developed our own Records Management and Retention and Disposal policies which can be

found on our website.

Please note that some Scottish Government records are selected to be permanently preserved at the National Archives of Scotland. The Scottish Government's Records Management Plan sets out what types

of records will normally be preserved. Once transferred to the National Archives of Scotland, these records are made publicly available and are listed on their on-line catalogue at:

https://www.nrscotland.gov.uk/research/catalogues-and-indexes

## Section 9: Feedback

We are obliged to review our Guide To Information from time to time and this will be done on an ongoing basis as our function is fully established. However, we would also welcome feedback on how we can develop our guide further. If you would like to comment on any aspect of this guide to information, then please contact us. You may for example wish to tell us about:

- Other information that you would like to see included
- Whether you found it easy to use
- · Whether you found this guide useful
- Other ways in which our guide can be improved

Please send any comments or suggestions to our email or postal address highlighted in Section 4 of this guide.

# **Section 10: Complaints**

Our aim is to make our Guide To Information as user-friendly as possible, and we hope that you can access all the information we publish with ease. If you do wish to make a complaint, then please contact us, and we will try to resolve your complaint as quickly as possible.

Please direct any complaints to the Scottish Biometrics Commissioner, 99 McDonald Road, Edinburgh, EH7 4NS.

We will normally acknowledge your complaint within three working days and will normally respond in full within 28 days.

You have legal rights to access information under this scheme and a right of appeal to the Scottish Information Commissioner if you are dissatisfied with our response. These rights apply to information requests made in writing or other recordable format and in the case of requests for environmental information also apply where such requests are made verbally.

If you are unhappy with our response to your initial request for information you can ask us to review our decision and we will happily do this. If after that you are still dissatisfied, you can make an appeal to the Scottish Information Commissioner.

The Scottish Information Commissioner's website has a guide to this process:



https://www.itspublicknowledge.info/YourRights/Unhappywiththeresponse/AppealingtoCommissioner.aspx

The Scottish Information Commissioner's office operates an enquiry service from Monday to Friday from 9:00 am to 5:00 pm:

Scottish Information Commissioner Kinburn Castle Doubledykes Road St Andrews Fife KY16 9DS

Telephone: 01334 464610

Email: <a href="mailto:enquiries@itspublicknowledge.info">enquiries@itspublicknowledge.info</a>
Website: <a href="mailto:www.itspublicknowledge.info">www.itspublicknowledge.info</a>

# Section 11: How to access information we do not publish

If the information you are seeking is not available through this guide, then you may wish to request it from us.

#### **Data Protection Act 2018**

The Data Protection Act gives you the right to know what information is held about you and sets out rules to make sure that this information is managed properly.

## Freedom of Information (Scotland) Act 2002 (FOISA)

The Freedom of Information (Scotland) Act gives you the right to request information and for it to be given to you unless there are good reasons not to.

## **Environmental Information (Scotland) Regulations 2004**

The Environmental Information (Scotland) Regulations give you the right to request information about the environment and for it to be made available unless there are good reasons not to.

Freedom of Information requests or Environmental Information Requests should be made in writing (which includes email), but we will also accept environmental information requests by telephone.

Data protection 'subject access requests' should be made in writing and include documented evidence to confirm your identity (e.g., copies of a driving licence, passport or birth certificate). We will not retain this information after we have responded to your request. Please ensure you provide your name, an address for correspondence (which could be email), and if possible, a telephone number.



There are several ways of contacting us:

You may email us at: contact@biometricscommissioner.scot

You may telephone us on **0131 202 1043** 

You may write to us at:

#### The Scottish Biometrics Commissioner, 99 McDonald Road, Edinburgh EH7 4NS.

If you submit a request to us for information which is not available through this guide, we **may** charge you for this information based on the following calculations:

## **General Information requests**

There will be no charge for information requests which cost £100 or less to process. However, where it costs between £100 and £600 to provide you with information you **may** be asked to pay 10% of the cost. For example, if you were to ask for information that cost us £600 to provide, you may be asked to pay £50, which is calculated to include a waiver of the first £100 and 10% on the remaining £501.

We are not obliged to respond to requests which cost us over £600 to process. In calculating any fee, staff time will be calculated at actual cost per staff member hourly rate to a maximum of £15 per person per hour.

We do not charge for the time to determine whether we hold the information requested, nor for the time it takes to decide whether the information can be released. Charges may be made for locating, retrieving, and providing information to you. If we decide to impose a charge, we will issue you with notification of the charge (a fees notice) and how it has been calculated. You will have three months from the date of issue of the fees notice in which to decide whether to pay the charge. The information will be provided to you on payment of the charge. If you decide not to proceed with the request, there will be no charge to you.

In addition to refusing any request that will be too expensive to respond to, we will also refuse requests if:

- The request is vexatious
- The request repeats a previous request from the same person

#### **Charges for environmental information**

We do not charge for the time to determine whether we hold the information requested, nor for the time it takes to decide whether the information can be released.

Charges may be made for locating, retrieving, and providing information to you. If we decide to impose a charge, we will issue you with notification of the charge and how it has been calculated. If you decide not to proceed with the request, there will be no charge to you.



Charges are calculated based on the actual cost to the authority of providing the information. Photocopying is charged at 10p per A4

sheet for black and white copying, 30p per A4 sheet for colour copying. Postage is charged at actual rate for first class mail.

Staff time is calculated at actual cost per staff member hourly salary rate to a maximum of £15 per person per hour. The first £100 worth of information will be provided to you without charge. Where information costs between £100 and £600 to provide, you may be asked to pay 10% of the cost. For example, if you were to ask for information that cost us £600 to provide, you may be asked to pay £50, which is calculated to include a waiver of the first £100 and 10% on the remaining £500.

Where it would cost more than £600 to provide the information to you, we will ask you to pay the full cost of providing the information, with no waiver for any portion of the cost.

## Requests for your own personal data

Under the Data Protection Act 2018 you have the right to ask us to inform you whether we process any personal information relating to you and if so to provide you with a copy of such data. This is called a 'subject access request.' If you believe that we may hold your personal information you may make a request to us for access to any such information if we hold it. You should make your request in writing to the following address:

The Scottish Biometrics Commissioner, 99 McDonald Road, Edinburgh EH7 4NS.

Your request should include a contact address and documented evidence of who you are (e.g., copies of your driving license, passport, or birth certificate). You should also provide as much detail as possible regarding the information you wish to access. We may come back to you for additional details to locate the material you require if we hold it. There is no charge for this service, and we will respond to your request within one month.

## **Section 12: Classes of Information**

This section provides details of the information that we publish under the classes of information in the Scottish Information Commissioner's Model Publication Scheme. This section will be updated regularly. As soon as we publish information, links will be provided in this guide to relevant website pages or other sites as appropriate.

We will regularly review and, as appropriate, update terms of this publication scheme to accurately reflect the full range of information published by the Scottish Biometrics Commissioner.

At the time of the publication of this initial guide, we have published the following information on our website:



## **Class 1: About the Scottish Biometrics Commissioner**

Class description:

Information about the Scottish Biometrics Commissioner, who we are, where to find us, how to contact us, how we are managed and our external relations

Information we will publish under this class	How to access it	Cost
Scottish Biometrics Commissioner legislation	Scottish Biometrics Commissioner   What We Do   Scottish Biometrics Commissioner	None
Scottish Biometrics Commissioner: Strategic Plan 2021 to 2025	Strategic Plan 2021-2025   Scottish Biometrics Commissioner	None
Information on how to contact the Scottish Biometrics Commissioner	www.biometricscommissioner.scot/contact	None
List of our staff	Scottish Biometrics Commissioner   Who We Are   Scottish Biometrics Commissioner	None
Our Advisory Group Membership	Scottish Biometrics Commissioner   Our Advisory Groups   Scottish Biometrics Commissioner	None
Minutes from Advisory Group Meetings	www.biometricscommissioner.scot/aboutus/ouradvisorygroups	None
Minutes from Audit Advisory Board Meetings	Scottish Biometrics Commissioner   Our Advisory Groups   Scottish Biometrics Commissioner	None



Minutes from	Minutes and Papers   Scottish Biometrics Commissioner	None
Management Team		
Meetings		
News and Media	www.biometricscommissioner.scot/news	None
Statements		

# Class 2: How we deliver our functions and services

Class description:

Information about our work, our strategy, and policies for delivering functions and services and information for our service users

Information we will publish under this class	How to access it	Cost
Scottish Biometrics Commissioner: Strategic Plan 2021 to 2025	Strategic Plan 2021-2025   Scottish Biometrics Commissioner	None
Draft Code of Practice on use of biometric data for policing and criminal justice purposes	Code of Practice   Scottish Biometrics Commissioner	None
Draft Complaint procedures relating to Code of Practice and our functions	To be published on our website once approved	None
Scottish Biometrics Commissioner  - National Assessment Framework for biometric data outcomes	National Assessment Framework   Scottish Biometrics  Commissioner	None



Public information on the powers and duties of bodies within the remit of the Scottish Biometrics Commissioner about biometric data, including how those powers are exercised and how those powers and duties can be monitored or challenged	Scottish Biometrics Commissioner   Who Our Functions Extend  To   Scottish Biometrics Commissioner	None
SBC's approach to handling complaints about our service	SBC Complaints Handling Procedure - External   Scottish Biometrics Commissioner	None

# Class 3: How we take decisions and what we have decided

Class description:

Information about the decisions we take, how we involve others, and what we have decided

Information we will publish under this class	How to access it	Cost
Scottish Biometrics Commissioner: Strategic Plan 2021 to 2025	Strategic Plan 2021-2025   Scottish Biometrics Commissioner	None
Draft Code of Practice on use of biometric data for policing and criminal justice purposes	Code of Practice   Scottish Biometrics Commissioner	None
Scottish Biometrics Commissioner  - National Assessment Framework for biometric data outcomes	National Assessment Framework   Scottish Biometrics  Commissioner	None
Minutes from Professional Advisory Group Meetings	Scottish Biometrics Commissioner   Our Advisory Groups   Scottish Biometrics Commissioner	None



Minutes from Audit Advisory Group Meetings	Scottish Biometrics Commissioner   Our Advisory Groups   Scottish Biometrics Commissioner	None
Impact Assessments	Complaints Handling Procedure - Equality Impact Assessment   Scottish Biometrics Commissioner	None
	Publication Scheme - Equality Impact Assessment   Scottish Biometrics Commissioner	

# Class 4: What we spend and how we spend it

Class description:

Information about our strategy for, and management of, financial resources (in sufficient detail to explain how we plan to spend public money and what has been spent)

Information we will publish under this class	How to access it	Cost
Annual Accounts	Our Annuals Accounts shall be included in our Annual Report to Parliament and will be available on our website	None

# Class 5: How we manage our human, physical, and information resources

Class description:

Information about how we manage our human, physical, and information resources

Information we will publish under this class	How to access it	Cost
Records Management Procedures	www.biometricscommissioner.scot/publications	None
Our ICT Platform is supplied under contract	https://www.nrscotland.gov.uk/research/catalogues-and- indexes	



to Scottish Government,
although we have
developed our own
Records Management
And Retention and
Disposal Policies

<u>SBC File Type Guidance Retention - Retention and Disposal | Scottish Biometrics Commissioner</u>

## **Class 6: Procurement**

Class description:

Information about how we procure goods and services from external providers

Information we will publish under this class	How to access it	Cost
Procurement Policy	To be published on our website once produced	N/A
Contract for website build and hosting	Not published for reasons of commercial confidence	N/A

## **Class 7: How we are performing**

Class description:

Information about how we perform as an organisation, and how well we deliver our functions and services

Information we will	How to access it	Cost
publish under this class		
Annual Report to	To be published on our website once produced	None
Parliament		



Our performance against the KPI's in our 4 year Strategic Plan	To be published on our website once produced	None
Annual Accounts	Our Annuals Accounts will be audited by Audit Scotland and shall be included in our Annual Report to Parliament and will be available on our website	None

## **Class 8: Our commercial publications**

Class description:

Information packaged and made available for sale on a commercial basis and sold at market value through retail outlet e.g., bookshop, museum, or research journal

Information we will publish under this class	How to access it	Cost
We have no information	N/A	N/A
that falls within this		
category		

## Class 9: Our open data

Class description:

Open data made available by the authority as described by the Scottish Government's Open Data Strategy and Resource Pack, available under an open licence

Information we will publish under this class	How to access it	Cost
We have no information that falls within this category	N/A	N/A