

## Scottish Biometrics Commissioner – Strategic Management Team Meeting

30 July 2026 (9.30 – 11.00) on MS Teams

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| <b>Attendees</b> | Brian Plastow - Scottish Biometrics Commissioner (Chair)<br>Karen McBride – Subject Matter Expert<br>Joanna Milne - Business Support Officer (Minutes) |
| <b>Apologies</b> | Cheryl Glen – Director                                                                                                                                 |

| Item | Subject                                                                         | Discussion                                                                                                                                                                                                                                                                      | Actions                                                                                                                            | Lead           |
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| 1    | <b>Welcome</b>                                                                  | The Chair welcomed the attendees to the Strategic Management Team Meeting.<br><br>Apologies were received from Cheryl Glen                                                                                                                                                      |                                                                                                                                    |                |
| 2    | <b>Review of Minutes, Actions and Matters Outstanding from Previous meeting</b> | Minutes from the previous Monthly Management Team Meeting were reviewed, accepted as accurate and approved for publication.<br><br>The action log was discussed and a separate action was added for creating an AI policy.<br><br>No matters outstanding from previous meeting. | Minutes from previous meeting to be published on our website<br><br>Action log updated to include an action to create an AI policy | BSO<br><br>BSO |

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| 3 | <b>Ratification of governance decisions taken between meetings</b> | No Governance decisions taken between meetings                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                           |     |
| 4 | <b>Strategic Plan – Year 1 Outcomes</b>                            | <p><b>Revised Code of Practice</b></p> <ul style="list-style-type: none"> <li>▪ The revised Code of Practice is currently out for consultation until 4 September.</li> <li>▪ We have received two responses so far, both have confirmed there are no comments.</li> </ul> <p><b>Retrospective report on Outcomes</b></p> <p>Laid in Parliament before the recess but the expectation is the report will be picked up by the Criminal Justice Committee or the Public Audit Committee on their return after summer.</p> <p><b>ARA</b></p> <p>The Draft ARA is currently with Audit Scotland and AAB members. Minor proofing amendments have been received.</p>                                                                                | Reminder to be issued to statutory consultees that responses are required by 4 September. | BSO |
| 5 | <b>Strategic Risk Register &amp; Business Continuity</b>           | <p><b>SRR</b></p> <p>The Commissioner confirmed our biggest risk to our organisation has always been our tiny scale with only 3 FTE and our exposure to sickness, leavers or staff turnover. To mitigate this risk, we have a team that can multi-task when required. We also have additional capacity with a secondment.</p> <p>As we will report in our ARA 2025/26, this risk materialised in 2025/26 when we lost 114 days to sickness last year due to a staff member being unwell. When this coincided with annual leave, sometimes that left the Commissioner with only one member of staff.</p> <p>The Commissioner thanked the team for helping to navigate successfully through another busy year where we achieved everything</p> |                                                                                           |     |

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|   |                         | <p>in our Strategic Plan and once again operated with our funding envelope.</p> <p><b>Business Continuity</b></p> <p>The absence ‘tested’ our BCP for the first time and the Commissioner confirmed that due to the addition of a secondment and everyone in the team taking on extra work and flexing between roles, the test has been successful.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |  |  |
| 6 | <b>Strategic Update</b> | <p>The Commissioner confirmed we are now in the first year of our second 4-year Strategic Plan which commenced in December 2025. In the year to 30 November 2026, we gave a commitment to:</p> <ol style="list-style-type: none"> <li>1. Host an SBC stand in session 6 of the Parliament which we did in January.</li> <li>2. Deliver a thematic assurance review on fingerprints which we did in March.</li> <li>3. Lay an Outcomes Report looking back at the achievements of the first Strategic Plan which we did in June.</li> <li>4. Prepare our 2025/26 ARA, which is now with Audit Scotland.</li> </ol> <p>We gave two other commitments which have also been initiated.</p> <ol style="list-style-type: none"> <li>1. To review the Code of Practice to encompass some minor updates. The proposed revisions are currently out for consultation until September.</li> <li>2. To conduct an assurance review on Forensic Imaging. A TOR for that work has been developed in discussion with the strategic partners for the review including HMICS and the SPA FS and Police Scotland.</li> </ol> <p>Both the proposed amendments to the Code and the TOR for Forensic Imaging will also be discussed at the next Advisory Group meeting on 01 September.</p> |  |  |

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|   |                                | <p>The Commissioner confirmed our operations manager concluded his employment with SBC on 2 July to move onto pastures new and we wish him every success for the future.</p> <p>The Commissioner and Director have agreed to gap the Operations Manager post until later in the year as the SME and Steven Tidy from HMICS are already committed to working together on the next assurance review.</p> <p>Commissioner and Director have already picked up the Code review and compliance assessments.</p> <p>Due to the current workload the Commissioner is looking to induct a new staff member when we will have more capacity in the winter months.</p> |  |  |
| 7 | <b>Audit – recommendations</b> | <p>Q3 will include an internal audit into our HR function.</p> <p>Prior to the audit a gap analysis of our policies will be undertaken by HR Staple or external HR partner.</p> <p>Q4 will include an internal audit into Records Management – intention is to have the new RMP developed by then although we may not have submitted it to NRS by the time of the audit i.e. using the audit to address any gaps</p>                                                                                                                                                                                                                                         |  |  |
| 8 | <b>Outcomes Framework</b>      | The Director, SME and BSO will meet on 11 August to discuss how best to collate data.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |  |  |
| 9 | <b>Data Protection</b>         | Nothing to report                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |  |  |

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| 10 | Engagement | <p><b>Comms &amp; Engagement Action Plan</b></p> <p>The SME has issued eleven emails to potential stakeholders and we have had two responses which will be followed up.</p> <p>The Commissioner also discussed other engagement including a banner/stall at the FutureScot conference in October or at the Forensic Service Excellence awards in September. It was also discussed approaching COSLA, Police Scotland, SPA, Police Federation and ASPS about attending future conferences to highlight the work we do. It was also discussed the potential for ordering notebooks and pens to hand out.</p> <p>The Commissioner also mentioned approaching 1919 magazine to include an article or interview on LFR.</p> <p><b>Correspondence –</b><br/>nothing to report.</p> <p><b>Newsletters</b></p> <p>The BSO confirmed the next newsletter will be issued the second week in January. The format is to be changed and articles will be written by the whole team.</p> | <p>BSO to contact FutureScot etc to find out if we can bring our banners to display at their conferences.</p> <p>BSO to contact 1919 magazine to discuss a potential article/interview on LFR.</p> | <p>BSO</p> <p>BSO</p> |
| 11 | Financial  | <p><b>Internal Asset Register</b></p> <p>The asset register has been updated.</p> <p><b>Budget bids</b></p> <ul style="list-style-type: none"> <li>▪ Deadline for 2027/28 bid is Friday 28 August, this year's submission asks for indicative budgets for 28/29, 29/30 and 30/31 (all included within our MTFS)</li> <li>▪ The Director has asked SPSO HR to confirm the salary figures for the next few years including the breakdown of NI and pension costs for each role (and including increments) – also taking cognisance of the recent changes to pension contributions</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                    |                       |

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|    |                   | <p><b>Medium-Term Financial Strategy (MTFS)</b><br/> A draft of an updated MTFS was circulated with the meeting papers. Our previous MTFS covered the period until financial year 2028/29 to coincide with the current Commissioner demitting office. However, because the SPCB are asking for indicative budget need through to 2030/31 to assist the Parliament with medium term financial planning, our MTFS has now been extended 5 years into the future.</p> <p><b>Secondments(s)</b><br/> No update</p> <p><b>SPCB (approvals/forecasting)</b><br/> The SBC budget submission for 2027/28 will be submitted to the SPCB next month and we will also include indicative budget need through to 2030/31. Our budget position is based on us being a ‘steady state’ low-cost organisation that works extensively in partnership to secure value for the public purse.</p> | <p>The BSO is to add a contents page and publish the MTFS on the website.</p> | BSO |
| 12 | <b>Governance</b> | <p><b>Policies and Procedures</b><br/> Following the approval of policies at the last team meeting, all have either been saved into SharePoint and/or added to the website</p> <p>Another 6 Policies to be reviewed and brought to next team meeting for approval:</p> <ul style="list-style-type: none"> <li>○ Complaints against SBC (internal guidance and policy)</li> <li>○ Complaints against CoP (internal guidance and policy)</li> <li>○ Development of internal guidance for DP complaints</li> <li>○ Impact Assessments related to the above policies</li> <li>○ Media Management Policy</li> <li>○ MoU between SPCB DPO &amp; SBC</li> </ul>                                                                                                                                                                                                                      |                                                                               |     |

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| 13 | <b>Information Management</b> | <p><b>Complaints</b><br/>No complaints have been received.</p> <p><b>FOI and SAR's</b><br/>One FOI has been received and a response was sent.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |  |  |
| 14 | <b>Operational Update</b>     | <p><b>Advisory Group (AG)</b><br/>The next meeting will be on 1 September.</p> <p>The agenda will include:<br/>Outcome Report<br/>Draft TOR for Forensic Imaging</p> <p>Police Scotland, the SPA and the PIRC have been approached to provide updates on any developments such as the new joint Police Scotland/SPA Biometrics Strategy or any new planned technologies.</p> <p><b>CoP compliance self-assessments</b><br/>The Commissioner and Director will be conducting the compliance self-assessments between November and February. The process will be based on exceptions reporting with discussions confined to change identified since the last self-assessment.</p> <p>The Commissioner confirmed that we have received less than two complaints a year and none have been upheld.</p> <p><b>National Assessment Framework</b><br/>As highlighted in the recent Outcomes Report, the National Assessment Framework has withstood the test of time and remains fit for purpose. It features as an Appendix to the Code of Practice and forms part of the review of the Code.</p> <p><b>Police Scotland, SPA, PIRC – update(s)</b><br/>The Commissioner has reached out to PSoS, SPA and the PIRC to provide relevant updates at the next Advisory Group meeting on 1 September.</p> |  |  |

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| 15 | <b>Procurement</b>                                          | No update                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                      |     |
| 16 | <b>Records Management</b>                                   | No update                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                      |     |
| 17 | <b>Wellbeing, Health &amp; Safety, staff matters, leave</b> | <p>HR Staple has been approached to commence work on the SBA staff survey. This will be the fourth survey and will take place in August.</p> <p>HR Staple has also been approached to review our HR policies and procedures to provide any gaps and to look at our appraisal form to see if we can improve the link between training needs analysis and staff development.</p> <p>The Commissioner is also mindful we will remain short-staffed until a new Operations Manager is recruited but this will be mitigated by buying in some ad hoc resource from HMICS to help with the Forensic Imaging Assurance Review.</p> |                                                                                                      |     |
| 18 | <b>AOCB</b>                                                 | <p>The SME and BSO met with our website provider to discuss the upgrading of our website. The upgrade will take a maximum of 5 days and the team will be given training on the new site.</p> <p>The Commissioner has offered the Patient Safety Commissioner help with their first ARA. The Director has completed the ARA for SBC and will be able to take them through the process.</p> <p>The Patient Safety Commissioner has asked for an office swap and the Commissioner will discuss the possibility the next time they meet.</p>                                                                                    | BSO to confirm to our website provider we will go ahead with the upgrade and provide suitable dates. | BSO |