

## Scottish Biometrics Commissioner – Monthly Management Team Meeting

9 April 2026 (9.30 – 11.00) on MS Teams

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

Item	Subject	Discussion	Actions	Lead
1	<b>Welcome and apologies</b>	The Chair welcomed attendees to the first meeting of the new financial year Apologies were received from Cheryl Glen and Diego Quiroz		
2	<b>Minutes, actions and matters outstanding</b>	Minutes from the previous Management Team Meeting were reviewed and agreed  The action log was reviewed, and all closed items are to be moved to the closed tab  The Director provided a written update to the open actions on the log  The Commissioner confirmed that due to the absence of the Operations Manager the proposed changes to the Code of Practice will be put on hold until their return	Minutes from previous meeting to be published on our website	BSO

3	<b>Governance decisions taken between meetings</b>	See agenda item 13		
4	<b>Strategic Update</b>	<ul style="list-style-type: none"> <li>▪ On the 24 February we held our in-person AAB where our external audit arrangements were agreed</li> <li>▪ The Fingerprints assurance review was laid in Parliament on 10 March</li> <li>▪ On the 11 March the Commissioner and SME attended the last CJ Committee of this Parliament. They spoke about a range of issues including the Fingerprints assurance review</li> <li>▪ The Fingerprints assurance review was also discussed at the Parliament’s Public Audit Committee where the Chief Constable assured members that all recommendations will be accepted</li> <li>▪ The Commissioner met with ACC CT on the 16 March to discuss UK live facial recognition developments</li> <li>▪ The Commissioner also held his regular monthly meeting with ACC Major Crime</li> <li>▪ The Director and Commissioner also attended the SPA’s partnership event on Promoting innovation, trust and collaboration</li> <li>▪ The Director attended the FINDS meeting in London <ul style="list-style-type: none"> <li>○ Shared our FPs review and the statutory consultation into our powers and functions currently being conducted by SG with FINDS</li> </ul> </li> <li>▪ The Operations Manager attended a stakeholder workshop, and the Director is now following up discussions re safeguards of U18s biometric data</li> <li>▪ The Commissioner and Director met with the new SPSO Ombudsman and discussed the Shared Services Agreement, particularly the HR service provided</li> </ul>		
5	<b>Audit(s)</b>	<ul style="list-style-type: none"> <li>▪ Everything planned for ARA and dates agreed with Audit Scotland</li> <li>▪ Final internal audit for 2025/26 took place last week on cyber security – currently awaiting their report</li> </ul>		
6	<b>Data Protection</b>	The BSO attend the DPO meeting where recent ICO rulings were discussed along with office holder updates		

7	<b>Operational Engagement</b>	<p><b><u>Newsletter</u></b> The BSO confirmed we have enough for the newsletter which will be published in June</p> <p><b><u>Stakeholder engagement</u></b> No update provided</p> <p><b><u>Website</u></b> The website footfall remains steady, but there was a sharp increase in numbers when the fingerprints assurance review was published</p>		
8	<b>Financial</b>	<p><b><u>Internal asset register</u></b> The BSO confirmed the internal asset register is complete, and a request has been sent to the building manager to recycle the old/broken equipment</p> <p><b><u>Monthly management report</u></b> Report shared as part of the papers (February 2026); everything on track. There are a few outstanding invoices to be processed by year-end, but our outturn should be just under our authorised budget</p> <p><b><u>SPCB (approvals/forecasting)</u></b> The financial year 2025/26 is now closed and one point of note is that SBC incurred more than £10K in unplanned/unbudgeted external HR support costs during 2025/26, the circumstances of which the SPCB are fully aware</p> <p>For that reason, the Commissioner will be exploring options to outsource the future provision of the non-standard and non-payroll aspects of HR support since the model with SPSO HR does not offer the capacity. It has already been confirmed that the Parliament HR team cannot provide this service and so we will be looking to the private sector</p>		
9	<b>Governance</b>	<p><b><u>Corporate Identity and Branding</u></b> Nothing to note</p>		

		<p><b><u>Policies and Procedures</u></b></p> <ul style="list-style-type: none"> <li>▪ The Director and BSO met with NRS regarding the File Plan and Retention Schedule. This will feed into both documents which can now be updated and shared with AvePoint so they can look to implement the RM software</li> <li>▪ Both the Director and BSO have access to Adobe InDesign and can start developing and designing our own products</li> </ul>		
10	Information Management	<p><b><u>Complaints</u></b> No complaints have been received</p> <p><b><u>FOIs &amp; EIRs</u></b></p> <ul style="list-style-type: none"> <li>▪ One FOI has been received and responded to on 3 March 2026</li> <li>▪ The stats for this quarter will be submitted shortly</li> </ul> <p><b><u>Retention of emails and records</u></b> The Commissioner reminded the team that we should not be retaining emails and records that have no corporate value. This specifically applies to sensitive policing data provided as part of an information request during an assurance review. This information should be securely deleted once factual accuracy checking is completed with the agency that provided the data and the report has been laid in Parliament. The team were also reminded of the provisions of Section 19 of the SBC Act 2020 which creates an offence for SBC staff to disclose confidential information unless it is deemed necessary by the Commissioner for the discharge of his functions</p>	FOI stats for the quarter to be submitted	BSO
11	Operational Update	<p><b><u>Recommendations tracker</u></b> No update provided</p> <p><b><u>Police Scotland, SPA, PIRC update(s)</u></b> No update provided</p> <p><b><u>Outcome Framework Indicators</u></b> Nothing to note</p>		

12	<b>Training</b>	<p>The team were reminded to complete the latest round of training disseminated by Microsys</p> <p>The Commissioner will follow up on training at the MMT in May</p>	AI and Cyber Security training to be updated on Action Log	All
13	<b>SBC Staffing Model</b>	<p>The Director position was created to provide the Commissioner with executive capacity, and it was originally filled by a seconded police officer. In May 2025 when the police officer returned to Police Scotland the role was appointed to the CSM on a temporarily basis until 31 March 2026. Following evaluation and with experience of both the seconded and employed model, the Commissioner’s decision was to permanently restructure the former CSM role into a new permanent SBC Director role that has executive authority. The Commissioner is pleased to confirm that the CSM and temporary Director has agreed to the restructure of her former role and from 1 April 2026 became the permanent SBC Director and the Commissioners official deputy</p> <p>The Commissioner confirmed as always, the SBC staffing model will be kept under ongoing review and there may be further change in the future should business needs dictate</p>		
14	<b>Annual Leave/Flexi Leave</b>	<p>The Commissioner confirmed he has no leave planned until after our ARA has been laid in September. He reminded the team to take their holidays</p>		
15	<b>AOCB</b>	<p>The Director provided the following note for the meeting</p> <p>The Director wanted to take the opportunity as we’re into our new financial year, to remind everyone that whilst we each have a personal login, any SBC data on any SBC device or SBC network is ‘SBC property’ and that the company has a legal and technical right to ask Microsys to monitor or access company data for business purposes including security and compliance. All staff should be aware of this and should avoid using SBC ICT for any personal or private matters</p>		

		The Business Plan 2026/27 was circulated for feedback and the Commissioner confirmed it will be finalised at the MMT away day in May		
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