

Scottish Biometrics Commissioner – Strategic Management Team Meeting

24 July 2025 on MS Teams

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| Attendees | Brian Plastow - Scottish Biometrics Commissioner (Chair) Cheryl Glen – Director & Corporate Services Manager Robin Davidson – Data Protection Officer Joanna Milne - Business Support Manager (Minutes) |
| Apologies | Diego Quiroz - Operations Manager |

| Item | Subject | Discussion | Actions | Lead |
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| | Welcome | The Chair welcomed our DPO and attendees to the Strategic Management Team Meeting. | | |
| 1 | Review of Minutes, Actions and Matters Outstanding from Previous meeting | Minutes from the previous Monthly Management Team Meeting were reviewed, accepted as accurate and approved for publication. The action log was reviewed and updated. No matters outstanding from previous meeting. | Minutes from previous meeting to be published on our website. | BSO |
| 2 | Ratification of governance decisions taken between meetings | None | | |

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| 3 | Update from Data Protection Officer | <p>The Commissioner thanked the DPO for his help over the last year and for making time to attend out SMT.</p> <p>The DPO provided an update on the new Data Use and Access Bill. The main changes which were highlighted included amendments to data protection complaints, SAR's, and Cookie policies.</p> <p>Complaints about data protection will now be handled by the organisation in the first instance. Organisations will now be required to have an online complaint form for data protection complaints.</p> <p>SAR's can now be declined on the basis that they are not reasonable and proportionate.</p> <p>Organisations are no longer required to obtain consent for Cookies where intrusion on privacy is limited.</p> <p>The Information Commissioner's Office (ICO) has been renamed to the Information Commission.</p> | <p>Online form to be created for data protection complaints.</p> <p>Privacy notice to be updated to include a link to DP complaint online form.</p> <p>Where documents name the ICO this should be replaced with Information Commissioner</p> | <p>BSO</p> <p>BSO / Director</p> <p>BSO</p> |
| 4 | Strategic Plan | <p>The Commissioner confirmed there are only two deliverables left in the current Strategic Plan. These are the ARA and the first statutory review of the Code of Practice.</p> <p>The Operations Manager has completed the first draft of the new Strategic Plan which is currently with Police Scotland, the SPA, and the PIRC for their comments.</p> <p>Once the comments have been received the new Strategic Plan will be sent to the SPCB for approval. This will be complete by mid-September to allow time for a published version to be laid in late October.</p> | | |

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| 5 | Strategic Risk Register | <p>The Director confirmed the current SRR is still relevant but slight changes will need to be made.</p> <p>SR3 – Stakeholder engagement to include wider groups who may have their biometrics taken by Police Scotland.</p> <p>SR6- language to be changed to reflect where we are now.</p> <p>Once the new Strategic Plan has been laid the SRR will be updated later this year.</p> | SRR to be updated once the new Strategic Plan has been laid | Director |
| 6 | Business Plan | <p>There are currently 15 x KPI's but only seven need to be discussed quarterly.</p> <p>KPI 1- The Director and the Operations Manager have been meeting with the SPA, PS, and the PIRC on a regular basis.</p> <p>KPI 2 – Our next Advisory Group meeting will be held in November.</p> <p>KPI 3 – No update provided.</p> <p>KPI 4 – The next newsletter will be issued in December.</p> <p>KPI 5 – The website footfall has remained steady.</p> <p>KPI 6 – No compliance issues.</p> <p>KPI 7 – Section 31 and 32 reports to be issued to Audit Scotland this week.</p> | | |
| 7 | Stakeholder Engagement | <p>The OM organised and attended a workshop with COLSA on our new Strategic Plan and Code of Practice.</p> <p>The Commissioner attended monthly meetings with Police Scotland, the PIRC, and the SPA.</p> <p>The Director joining the SPA on 7 August to interview for our seconded subject matter expert.</p> | | |

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| 8 | Data Protection incl. Records Management | <p>After discussions with the NRS the Director has decided following our ICT changes a new Records Management Plan should be produced.</p> <p>Parts of the RMP will be added to the SRR.</p> | New Records Management Plan to be created following ICT changes. | Director |
| 9 | Budget & Finance | <p>Director confirmed we are tracking within Budget.</p> <p>Our next budget bid is to be submitted by 19 August.</p> | | |
| 10 | Audit(s) | <p>Our ARA and accounts have been sent to our external auditor for the audit which will start on Monday 28 July.</p> <p>The clearance meeting will take place by 15 August.</p> <p>Our internal auditors have confirmed the outcomes reporting internal audit with take place on 4 and 5 December. The cyber security internal audit will take place 23 to 26 March 2026.</p> | | |
| 11 | Business Continuity | The Director wills update the Business Continuity Plan to reflect the ICT changes. | Business Continuity to be updated to reflect ICT changes. | Director |
| 12 | Complaints <ul style="list-style-type: none"> ▪ Code of Practice ▪ Customer Service | No complaints received. | | |
| 13 | FOI and SAR | The quarterly submission to the Scottish Information Commissioner confirming FOI and EIR requests has been submitted. | | |
| 14 | ICT / Cyber Resilience | Nothing to update | | |

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| 15 | Wellbeing, Health & Safety, Employment Matters | Revised job descriptions have been issued to the team. They are to be sent to Director for future discussion at 121's. | Team to send revised job descriptions to Director for inclusion in staff files. | Director, OM and BSO |
| 16 | AOCB | <p>BSO to work with ICT provider to investigate other email encryption options. The current option has quite a few limitations.</p> <p>BSO to work with ICT provider to understand mobile Wi-Fi options.</p> <p>Thematic Assurance Review Internal Guidance Handbook to be reviewed at MMT on 25 Sept.</p> | <p>BSO to work with ICT provider on email encryption options and mobile Wi-Fi options.</p> <p>Assurance Review Handbook to be reviewed prior to the Sept MMT it then to be added to the agenda for the Sept MMT</p> | <p>BSO</p> <p>Operations Manager / BSO</p> |