

Scottish Biometrics Commissioner – Advisory Audit Board Minutes

9 September 2025 on MS Teams

Board	David Watt, Chair Steve Renwick
Attendees	External Auditor – Audit Scotland, Tommy Yule External Auditor – Audit Scotland, Neil Maclean External Auditor – Audit Scotland, Madeline Reid External Auditor – TIAA, Martin Ritchie Commissioner – Brian Plastow Director – Cheryl Glen Business Support Officer – Joanna Milne (note taker)
Apologies	Operations Manager – Diego Quiroz

Item	Subject	Discussion	Actions	Lead
1	Welcome	The Chair welcomed everyone		
2	Declarations of Interest	No new Declarations of Interest were noted		
3	Minutes of previous meeting	<ul style="list-style-type: none"> ▪ Minutes from the previous meeting on 11 March 2025 were approved ▪ All actions were discussed with updates provided 	Previous minutes to be published on our website	BSO
4	Commissioner's update	<p>Assurance Reviews</p> <ul style="list-style-type: none"> ▪ The Commissioner confirmed since our last meeting we laid two assurance reviews – DNA review was laid February 2025, and Retrospective Facial Search (RFS) was laid at the end of March <ul style="list-style-type: none"> ➤ The RFS review was conducted in partnership with HM Inspectorate of Constabulary in Scotland 	ICT to be reviewed by Internal Audit to provide assurance	Director

		<ul style="list-style-type: none"> ➤ The assurance review concluded RFS is lawful and ethical but not highly effective ➤ The review generated four recommendations for Police Scotland <ul style="list-style-type: none"> ▪ The next assurance review we will be laying in March 2026 will look at fingerprints <ul style="list-style-type: none"> ➤ This will be the first time fingerprints will have been reviewed since the 2002 Scottish Fingerprint Inquiry ➤ The review will be conducted in partnership with Police Scotland, SPA Corporate and SPA Forensic Services ▪ The Commissioner was asked by the AAB how the SBC monitor recommendations made through their assurance reviews. The Commissioner confirmed some of the recommendations from previous assurance reviews have taken some time to discharge. For example, the four recommendations from the Children’s and Young Persons and the Vulnerable Adult assurance reviews took fourteen months. The Commissioner added, some recommendations from the Laws of Retention Review will take longer to discharge but all outstanding recommendations are being monitored <p>Strategic Plan</p> <ul style="list-style-type: none"> ▪ The current Strategic Plan expires on 30 November 2025 and there is only one outstanding item which is the statutory review of the Code of Practice (CoP) which will be completed by October 2025 <ul style="list-style-type: none"> ➤ Police Scotland, the SPA and the PIRC were consulted on the new draft Strategic Plan as were the Scottish Government and the Criminal Justice Committee. The draft Strategic Plan was also made available on our website ➤ The assurance reviews outlined in the new Strategic plan include fingerprints (year 1), forensic imaging (year 2), biometric data (year 3) and body worn video (year 4) ➤ The draft plan will be sent to the Scottish Parliament Corporate Body (SPCB) late September and will be laid before the Parliament in October 2025 <p>Code of Practice</p> <ul style="list-style-type: none"> ▪ A review of the Code of Practice will take place during 2026 however under Section 14 of the Act, a review report will be laid before the Parliament no later than 15 November 2025 <p>Subject expert – secondment</p> <ul style="list-style-type: none"> ▪ Funding for a secondment of a subject expert was requested and approved by the SPCB in April 2025. Karen McBride who currently is a Senior Fingerprint Examiner will join the SBC from the SPA 		
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		<p>FS on 22 September 2025 for a period of two years. Karen will work on our next two forensic-related assurance reviews and through this approach offers the SBC the ability to retain capacity and capability from an operational perspective. Also, through this approach there are no financial liabilities.</p> <p>ICT off/on-boarding</p> <ul style="list-style-type: none"> When the SBC was set up in 2021 it made sense to go with Scottish Government ICT provision as Bridgeside House was set up for this and it served us well while we were setting up. However, over time several restrictions were identified which prompted us to change ICT provider e.g. the size limitations around sending emails. Several ICT companies were approached for bids, and the decision was taken to go with Microsys who are based in Edinburgh and currently service the Scottish Information Commissioner, and we believe may also support the Patient Safety Commissioner. Although the set-up costs were more than expected the overall hosting costs will be less over the long term and we used the opportunity to conduct a hardware refresh at the same time. <p>Evaluation Support Scotland (ESS)</p> <ul style="list-style-type: none"> The Commissioner was asked by the AAB the benefits of using ESS - the Commissioner highlighted that over three sessions the team worked with Evaluation Support Scotland to formulate strategic outcomes. Four strategic outcomes were identified and will be implemented in our next Strategic Plan where we have identified our contribution to outcomes. After the session we produced a Logic Model and Outcomes Framework which is available on our website. In 2026 a backwards looking report will be produced to highlight all we have achieved since our inception. <p>The AAB asked if a future Internal Audit could consider the ICT migration to provide assurance everything was covered and is working well</p>		
5	Governance	<p>Recommendations Tracker</p> <ul style="list-style-type: none"> Due to timeframes, there are no updates to the recommendation tracker since March, but all recommendations are on track to be progressed <p>Policies and Records Management Plan (RMP)</p> <ul style="list-style-type: none"> All policies are currently being reviewed considering the change in ICT provider. As these are developed either the full policy or an update report will be brought to the AAB for consideration and comment The records management plan is to be updated following the move to a new ICT provider 	A new records management plan to be produced	Director

6	Financial Update	<p>Finances</p> <ul style="list-style-type: none"> ▪ The financial update paper showing figures up to 31 July 2025 was discussed ▪ The budget for 2025/26 had been confirmed and contingency funding for the secondment had been agreed ▪ The 2026/27 budget bid has been submitted with the largest cost being staff salaries. The Commissioner highlighted that staff salaries are set either by the Parliament (for the Commissioner) or by the SPSO. Confirmation of the budget for 2026/27 will not be known until February or March 2026 ▪ A discussion took place about the presentation of figures in the financial paper and how to represent contingency funding 	Review presentation of figures in the Financial Paper	Director
7	External Audit	<p>Annual Report and Accounts</p> <ul style="list-style-type: none"> ▪ The Commissioner confirmed we achieved everything we set out to do <ul style="list-style-type: none"> ➤ The Laws of Retention review conducted in partnership with colleagues at the Scottish Government was published in October 2024 ➤ The DNA assurance review conducted in partnership with the SPA and Leverhulme Research Centre for Forensic Science was published in February 2025 ➤ The Retrospective Facial Search assurance review was conducted in partnership with HMICS and was published in March 2025 ➤ Between the assurance reviews - fifteen recommendations were produced ➤ The secondment of a Detective Chief Inspector from July 2024 to March 2025 provided extra capacity and capability to achieve our objectives ▪ Audit Scotland discussed the audit – two recommendations highlighted ▪ It was highlighted that AAB members provided feedback which had since been incorporated into the draft ARA ▪ The ISA 580 covering letter and the Letter of Representation were received from Audit Scotland on 29 August 2025. The Letter of Representation will be signed along with the ARA later in September or early October ▪ AAB agreed the ARA can be approved by the Commissioner 	Provide update re action(s) taken to meet external audit recommendations	Director
8	Internal Audit	<p>Audit Strategy and Annual Plan 2025/26</p> <ul style="list-style-type: none"> ▪ Final internal audit plan was shared; this was an updated version from the one presented in March 2025 <ul style="list-style-type: none"> ➤ Outcomes Reporting will be conducted in Q3 (December) ➤ Cyber Security will be conducted in Q4 (March) 	As per action above - ICT to be reviewed by Internal Audit to provide assurance	Director

		<ul style="list-style-type: none"> ▪ AAB members asked if Cyber Security could include some work on the recent ICT migration. TIAA confirmed a deeper dive re ICT changes could be discussed when looking at the memorandum of the audit ▪ AAB happy to approve the plan 		
9	AOB	<p>The Chair confirmed this was their last AAB meeting and another member has been approached to join as Chair</p> <p>The Commissioner and members thanked David for his contribution as both Chair and as an AAB member since the Office started</p>		



Advisory Audit Board – Tuesday 9 September Actions Log

September 2025	OWNER	UPDATE	STATUS
Minutes from March 2025 to be published on our website	BSO		
A new records management plan to be produced	Director		
Review presentation of figures in the Financial Paper	Director		
Provide update re action(s) taken to meet external audit recommendations	Director		
Cyber Security audit to consider ICT migration	Director		
March 2025	OWNER	UPDATE	
Minutes from 11 September 2024 to be added to the website	BSO	Complete	Closed
Complaints contact form to be amended to include a section on how the complainer heard about the SBC	OM and Director	Highlighted that this work has been put on-hold as part of all policies and procedures being reviewed an updated following ICT migration. Update to be brought to future AAB meeting	Ongoing
Internal Audit tenure to be added to the Scheme of Delegation	CSM	Highlighted that this work has been put on-hold as part of all policies and procedures being reviewed an updated following ICT migration. Update to be brought to future AAB meeting	Ongoing

Review date to be changed on the Terms of Reference and uploaded to the website	BSO	Complete	Closed
Forecasting column to be added to the financial update to show known costs	CSM	Complete – included as papers for September 2025 meeting	Closed
Revised new internal audit plan to be circulated once agreed	CSM	Complete – included as papers for September 2025 meeting	Closed