

Scottish Biometrics Commissioner – Strategic Management Team Meeting

28 January 2026 (14.00-15.30) on MS Teams

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

Item	Subject	Discussion	Actions	Lead
1	Welcome	The Chair welcomed the attendees to the first Strategic Management Team Meeting of 2026 and the last of the financial year 2025/26		
2	Review of Minutes, Actions and Matters Outstanding from Previous meeting	<p>Minutes from the previous Monthly Management Team Meeting were reviewed and the following point of clarification was noted. Otherwise, the minutes were accepted as accurate and approved for publication</p> <p>The Commissioner’s point of clarification is as follows:</p> <p>To clarify the reason for the amendments to ‘who’ investigates grievances about the Commissioner was necessary because the new SPSO Ombudsman did not agree that it would be appropriate for one independent officeholder to investigate another independent officeholder should such a situation arise. So, for the record, the Commissioner clarified that ‘SPSO withdrawal’ from the previous policy arrangement was the reason for the policy change which now means</p>	<p>Minutes from previous meeting to be published on our website</p> <p>RAG status to be amended on Action Log</p> <p>Documents to be provided to OM to allow amendments</p> <p>Business Continuity and Cyber Security to be</p>	<p>BSO</p> <p>BSO</p> <p>BSO</p> <p>All</p>

		<p>that in such situations SBC will instead appoint an independent investigator who could be an HR professional and likewise any appeal would be considered by another independent person. In both cases, the independent person will decide whether the matter or any appeal is upheld, not upheld, or partially upheld, but any decision on the outcome following independent investigation remains with the legal employer or their most senior representative which would be the Director</p> <p>The action log was reviewed and the following was noted</p> <ul style="list-style-type: none"> ▪ Action 7 – review of policies in Handbook Tracker - has the incorrect RAG status as it has been outstanding since Feb 2025 ▪ Action 75 – review of Business Continuity Plan – team to confirm they have reviewed and amended any details ▪ Action 76 – Cyber Security Training – team to confirm they have completed all cyber security training <p>No matters outstanding from previous meeting</p>	updated on the Action Log once complete	
3	Ratification of governance decisions taken between meetings	HR Policy has since been updated to reflect the change in the grievance process where a grievance has been received about the Commissioner		
4	Strategic Plan	<p>Strategic Plan – Year 1 outcomes</p> <p>Fingerprints assurance review (FP)</p> <ul style="list-style-type: none"> ▪ The fieldwork for the FP review was physically conducted between 10 to 15 November by the Commissioner and the Subject Matter Expert and with Stevie Tidy from HMICS joining for the Police Scotland visits. After the fieldwork, all information that had been requested was received ▪ The first draft of the report was available prior to the Christmas break. In total the report took twenty-five working days to complete. The Commissioner confirmed this was only possible due to the subject expertise that the Subject Matter Expert holds but 	<p>HMICS to be approached to provide media support for Fingerprints Review</p> <p>Reviewed CoP document with changes and reasons for changes to be issued to statutory consultees</p> <p>First draft of the retrospective report to</p>	<p>Commissioner</p> <p>OM</p> <p>Director</p>

		<p>was quite an achievement. This also allowed the Director to review the report prior to sending it out for factual accuracy checking (FAC)</p> <ul style="list-style-type: none"> ▪ The first draft was issued for FAC to HMICS, Police Scotland, the SPA and the ICO on 29 December and to other AG members on 8 January 2026 with comments to be received by CoP 29 January. The draft will also be discussed (briefly) at the AG on 3 February ▪ The Commissioner has issued reminders to Police Scotland, HMICS, the SPA and the PIRC that all comments are to be received no later than CoP 29 January ▪ Once all comments received the final draft will be sent to the publishers by Friday 6 February. The intention is to lay the report in Parliament week commencing 2 March 2026 due to Parliament being in recess from 26 March 2026 for the elections <p>Engagement session with MSPs at Parliament On 15 January, the Commissioner and Business Support Officer attended the Scottish Parliament where they held an information stall. The stall was in the members exhibition space outside the Chamber. During the session leaflets were handed out to MSP's and others highlighting the work we have already undertaken and a request to consider an extension to our powers and functions</p> <p>Revised Code of Practice In the Section 14 report laid before Parliament the Commissioner committed to consulting with our statutory consultees before March. The Operations Manager did most of the groundwork during the summer and will issue a document to the statutory consultees highlighting the changes and the reason for the changes. The consultation will also be available on the website</p> <p>Retrospective report on outcomes As part of Strategic Plan 2025/29 which was laid in Parliament last year, we are to produce a retrospective report which explores the outcomes from our first Strategic Plan and the intention is to lay that report before the summer recess in late June. To allow us time to lay the</p>	<p>be available end of March with help from the team</p> <p>Draft Annual Audit Plan to be issued with the AAB papers</p>	<p>Director</p>
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5	Strategic Risk Register & Business Continuity	<ul style="list-style-type: none"> ▪ SR1 – No changes were made to the risk description, but changes have been made to mitigation/control actions ▪ SR2 – No changes were made to the risk description, but changes have been made to the mitigation/control actions ▪ SR3 – No changes were made but the risk was lowered ▪ SR4 – No changes were made but the risk was lowered (still moderate) The new Records Management software should help ▪ SR5- The risk description was widened to include recruitment, training, and skills ▪ SR6 – This is a new risk highlighting the need for horizon scanning around new technologies and developments 		
6	Strategic Update	<ul style="list-style-type: none"> ▪ The Commissioner confirmed we achieved everything we said we would in the last Strategic Plan. A new Strategic Plan was laid in Parliament and as part of that we will be producing a retrospective report before the summer recess in June. This report will assist the Scottish Government’s review of our remit and powers ▪ We have already achieved our first outcome from the new Strategic Plan by holding an engagement session at the Parliament for MSP’s ▪ Our first assurance review of the new SP on Fingerprints will be laid early March ▪ We will progress our review of the Code of Practice ▪ The Commissioner confirmed we have a new chair for our AAB, and the first meeting will take place in the office on 24 January ▪ The Commissioner will chair the Advisory Group until further notice, and the first meeting of the year will be held on 3 February 		

		<ul style="list-style-type: none"> ▪ The Director has set up monthly meetings with Police Scotland and the SPA and will be attending the SPA tactical groups on DNA and Fingerprints ▪ Records Management software and Adobe InDesign being purchased, the former will have an impact on our SharePoint site but will try and keep disruption to a minimum. All policies will then be amended to reflect the software implementation 		
7	Audit – recommendations	The Audit recommendations tracker is now in Teams and will be updated regularly. Of the outstanding external audit recommendations - monthly financial huddles and assurance from payroll re pension payments are already in place		
8	Outcomes Framework	The Director took the team through the outcomes framework which is available in Teams explaining the timescales and information required. There is now an expectation for the team to collate information and update the spreadsheet as required	Collate evidence and update the outcomes framework as relevant and needed	All
9	Data Protection	<p>Impact Assessments The DPIA for our new records management software will be issued to AvePoint and Microsys once ready to allow them to complete the technical aspects. Once complete it will be issued to the DPO for sign off</p> <p>Memorandum(s) of Understanding The Operations Manager has reviewed the DSAs and will update them accordingly</p> <p>Privacy Notice This will be updated once the Data Protection complaints section goes live on the website</p> <p>Register of Processing Activities This spreadsheet needs updating following our ICT migration, information from the Operations Manager will be needed – the Director will share when ready</p>	<p>DPIA to be completed and approved for records management software</p> <p>Updated DSAs to be stored within SharePoint and the Handbook tracker to be updated</p> <p>Register of Processing Activities (RoPA) to be updated</p>	<p>Director</p> <p>OM</p> <p>Director & OM</p>

10	Engagement	<p>Comms & Engagement Action Plan The plan had previously been circulated around the team, however feedback provided resulted in a further draft now being developed</p> <p>Correspondence – nothing to report</p> <p>Newsletters - next newsletter to be published in June</p>		
11	Financial	<p>Internal Asset Register The Director is in the process of updating the register</p> <p>Budget bids Our 2026/27 budget will not be known until March at the earliest. Not surrendering any monies this financial year as have some unexpected expenditure but still hopeful to come within budget</p> <p>Medium-Term Financial Strategy (MTFS) The Commissioner shared the updated MTFS with the updated figures. This will be published on our website once further amendments made by the Director</p> <p>Secondments(s) The Director confirmed the secondment of the SME is going well and relevant invoices have been received</p> <p>SPCB (approvals/forecasting) Submitted a year-end budget forecasting and confirmed we would not be surrendering monies for this financial year</p>	MTFS to be published on the website	Director
12	Governance	<p>Advisory Audit Board The next AAB will be an in-person meeting on 24 January. The agenda will include a discussion on the ToR and the Annual Audit Plan from Audit Scotland will also be issued with the papers</p>		

		<p>Certificate of Assurance Currently nothing to update</p> <p>Insurance Personal accident and travel insurance has been renewed as well as employer's liability insurance</p> <p>Policies and Procedures A range of policies and procedures are being updated and will either be circulated in full with tracked changes or if large will be provided with a 1-page summary highlighting changes</p>		
13	Information Management	<p>Complaints No complaints have been received. The BSO and SME are currently reviewing the complaints folder within SharePoint</p> <p>FOI and SAR's No FOI's or SAR's have been received but the quarterly statistics have been sent to the Scottish Information Commissioner</p>		
14	Operational Update	<p>Advisory Group (AG) The papers and agenda have been issued for the next AG meeting which will be chaired by the Commissioner and held on 3 February</p> <p>CoP compliance self-assessments No update</p> <p>National Assessment Framework No update</p> <p>Police Scotland, SPA, PIRC – update(s) The DSA's to be updated</p>		

15	Procurement	The Director is in the process of procuring a new RM system and Adobe InDesign which will allow us to produce some documents in house		
16	Records Management	The Director is working with AvePoint and Microsys to purchase a new RM system. All policies will be updated once it is in place		
17	Wellbeing, Health & Safety, staff matters, leave	<p>Staff wellbeing is important to the Commissioner and the organisation and therefore we will be repeating the annual staff engagement survey. This will take place in the new financial year once our budget has been approved. In the meantime, the Commissioner reminded the team they can raise any wellbeing/health and safety issues as normal with their line manager</p> <p>The Commissioner has received assurances from the SPSO payroll that arrangements have been reached for recovery of the underpayment of employee pension contributions with those involved. The Commissioner has asked those involved to check their payslips. Any increments will take place from April</p> <p>The Commissioner reminded all SBC employed staff that contracts of employment are with SBC as the legal employer, and we are bound by those terms and conditions of employment and related SBC policies. The 3 SBC staff are employed by the Commissioner under SPSO terms and conditions of appointment solely to facilitate the HR shared services including payroll, but otherwise SBC staff have no employment relationship with the SPSO and no employment relationship with the SPCB. Similarly, and as an independent officeholder the Commissioner is not employed by the SPCB, albeit they administer his pay and pension arrangements. Likewise, the SME is employed by the SPA and not SBC and there is a secondment agreement signed by both parties</p> <p>The Commissioner reminded the team that any holidays carried over between annual leave years need to be pre-agreed by your line manager The Commissioner has asked the Director to provide an annual report showing leave and TOIL balances, so we all have visibility</p>	Annual leave report to come to next MMT showing leave and TOIL balances	Director

		The Commissioner confirmed from the beginning of the next financial year he will be working a compressed working week and will no longer work on a Friday unless required. The Commissioner then reminded the team that this is an option for SBC employed staff and should anyone wish to do compressed hours they should seek approval through their line manager		
18	AOCB	The Director reminded everyone that the next AAB and MMTM will be held in person at the office on 24 February		