

email: [contact@biometricscommissioner.scot](mailto:contact@biometricscommissioner.scot)

Date: 24 July 2026

**Sent by e-mail only.**

**Dear Requester,**

Request for Information – FOI/012

We acknowledge your request for the following information:

Any correspondence dating from between 1 January 2025 and now.

Specifically, can you provide:

- a) Any correspondence, including letters, e-mails, or app messages, from your SG sponsor team, Ministers, or other SG officials, directing your organisation to meet or not exceed a specified headcount, or to reduce headcount by a specified amount.
- a) Any correspondence similar to the above which does not specify a particular headcount but which provides other direction in terms of savings or efficiency expectations, e.g. to payroll.
- b) The employee headcount your organisation is aiming to meet or maintain at or by 1 April 2027, whether that number was set by SG or internally.
- c) Whether this number represents individuals or Full Time Equivalent.
- d) Whether this number is inclusive or exclusive of staff on fixed term contracts, secondees, agency workers, and workers of other irregular status.
- e) If available, a breakdown of this headcount by grade.

Your request was received on date 17 July 2026 and has been handled in accordance with the Freedom of Information (Scotland) Act 2022 (FOI(S)A)

Responding to each part of your request in turn the position is as follows:

The Scottish Biometrics Commissioner (SBC) is an independent officeholder of the Scottish Parliament appointed by the Monarch on the nomination of the Parliament. As an independent officeholder, the Commissioner cannot be directed by Scottish Ministers except for an account's direction in relation to the preparation and publication of annual accounts. Accordingly, there is no SG sponsor body for the SBC and SBC does not participate in SG staff targets.

The staffing levels for the SBC are determined solely by the Commissioner. The current Commissioner was appointed in 2021 and determined that he required 3 full time staff as his authorised establishment to enable him to discharge his legal functions. The financial memoranda prepared by Scottish Government that had accompanied the founding legislation had suggested that the Commissioner might employ 4 staff. However, the Commissioner operates a shared services arrangement with the Scottish Public Sector Ombudsman re the provision of finance and HR support so recruited only 3 FTE staff.

The Commissioner is funded entirely by the Scottish Parliament Corporate Body (SPCB) who under section 5 of the Scottish Biometrics Commissioner act may give directions to the Commissioner on such matters as the location of his office and the sharing of staff. No such directions have been given to the Commissioner by the SPCB and the shared services with the SPSO was entered voluntarily.

The Commissioner currently has only 2 employed staff. These are a Director (Grade 6) and a Business Support Officer (Grade 3). The Operations Manager post (Grade 5) is currently vacant. The Commissioner currently has a member of staff from the SPA Forensic Services on temporary secondment with an overall headcount of employed and seconded staff of 3 FTE.

## **Annex A**

### **REQUESTS MADE UNDER THE FREEDOM OF INFORMATION (SCOTLAND) ACT 2002**

#### **How we handle FOI requests**

Information on how we handle FOI requests is available on the Scottish Biometric Commissioners website at: [Scottish Biometrics Commissioner | Privacy Notice | Scottish Biometrics Commissioner](#)

#### **Review**

If you are dissatisfied with the way in which we have dealt with your request for information, you can ask us to review our decision and actions. You must do this in writing (or other permanent form) within 40 working days of the date of this letter, stating the reasons for your dissatisfaction, and we will respond within 20 working days of receipt. A request for a review should be made to the Commissioner:

Post: Scottish Biometrics Commissioner  
Bridgeside House  
99 McDonald Road  
Edinburgh  
EH7 4NS

E-mail: [contact@biometricscommissioner.scot](mailto:contact@biometricscommissioner.scot)

#### **Application to the Scottish Information Commissioner**

If, on the outcome of any review, you are still dissatisfied, or if we are unable to resolve any other complaint, then you can contact the Scottish Information Commissioner:

Post: The Office of the Scottish Information Commissioner  
Kinburn Castle  
Doubledykes Road  
St Andrews  
Fife  
KY16 9DS

Email: [www.itspublicknowledge.info/Appeal](http://www.itspublicknowledge.info/Appeal)

Telephone: 01334 464610

Website: [www.itspublicknowledge.info](http://www.itspublicknowledge.info)

A decision by the Scottish Information Commissioner may be appealed on a point of law to the Court of Session.

### **Copyright in relation to information provided.**

The supply of information under FOI does not constitute permission for its use in a way that would infringe copyright. Where relevant you should obtain permission from the copyright holder before any such use.

### **Feedback or comment**

We would welcome feedback or comment on how we handled your request. Please contact the Business Support Officer at [contact@biometricscommissioner.scot](mailto:contact@biometricscommissioner.scot).

### **Data Protection**

If you wish to find out more about how we use your personal data then you can access our Privacy Notice at the following link: [Scottish Biometrics Commissioner | Privacy Notice | Scottish Biometrics Commissioner](#)

### **How to contact us**

Post: Scottish Biometrics Commissioner  
Bridgeside House  
99 McDonald Road  
Edinburgh  
EH7 4NS

Telephone: 0131 2021043

E-mail: [contact@biometricscomssioner.scot](mailto:contact@biometricscomssioner.scot)