

**Scottish Information Commissioner**  
**Minutes of the Monthly Senior Management Team Meeting**  
**23 February 2022 – by video conference**

**NOTE TO READER:**

The Scottish Information Commissioner publishes the minutes of Senior Management Team (SMT) meetings and the papers considered at the monthly and quarterly meetings, unless he considers, at the time of publication, that the minutes and/or papers are exempt from disclosure under the Freedom of Information (Scotland) Act 2002 or the Environmental Information (Scotland) Regulations 2004 (FOI law). Where minutes or documents are not published, the minutes will make it clear why not.

Under FOI law, everyone has the right to request any information held by the Commissioner. This includes minutes or papers which have not been published. If you want to request copies of minutes or documents which haven't been published, make a request (in writing, by e-mail or in any other recordable form) to:

Scottish Information Commissioner, Kinburn Castle, Doubledykes Rd, St Andrews, Fife, KY16 9DS

Tel: 01334 464610

Fax: 01334 464611

[enquiries@itspublicknowledge.info](mailto:enquiries@itspublicknowledge.info)

Present: Scottish Information Commissioner - Daren Fitzhenry (DF) (Chair),  
 Head of Corporate Services - Helen Gardner-Swift (HGS),  
 Head of Enforcement - Margaret Keyse (MK),  
 Head of Policy & Information - Erin Gray (EMG),  
 Finance and Administration Manager – Kim Berry (KB)  
 Finance and Administration Manager - Liz Brown (LB) (Minutes)

Apologies:

Details	Action By	Target Completion Date	Publish Yes / No	Comments
---------	-----------	------------------------	------------------	----------

**1. Minutes, action points update and matters outstanding**

<p><b>1.1 Review of minutes – 03/02/2022</b></p> <ul style="list-style-type: none"> <li>○ The minutes were approved and will be published with the relevant papers, subject to KB checking that the relevant changes have been made to the Operational Plan monitoring report</li> </ul> <p><b>1.2 Action points update</b></p> <ul style="list-style-type: none"> <li>○ No action points outstanding</li> </ul> <p><b>1.3 Matters outstanding</b></p> <ul style="list-style-type: none"> <li>○ No matters outstanding</li> </ul>			Yes	
---	--	--	-----	--

**2. Key Documents – outstanding, due and not completed**

<ul style="list-style-type: none"> <li>• Updates were noted and the following areas were discussed:           <ul style="list-style-type: none"> <li>○ The Covid-19 and Internal Communications documents have been reviewed and may no</li> </ul> </li> </ul>			Partial	Report published with the exception of comments column –
--	--	--	---------	--

<p>longer be required – a committee report will be submitted to the SMT in due course</p> <ul style="list-style-type: none"> <li>○ The review of self-assessment toolkits will be delayed and undertaken as an operational plan project in 2022-23</li> <li>○ The review of the Strategic Plan 2020-24 review will take place in Q1 2022-23 following the re-opening of the office premises</li> <li>○ SMT agreed that the document should be published with the exception of the column that sets out the additional comments</li> </ul>				Exemptions s30(b)(ii) and s38(1)(b)
---	--	--	--	-------------------------------------

### 3. Quality Assurance – Investigations

<ul style="list-style-type: none"> <li>• The SMT note the issues raised in the Committee Report (CR) and agreed the recommendations, whilst noting that the application approval process already includes a degree of quality assurance</li> <li>• The SMT agreed the amendment to the Governance Reporting Arrangements (GRA) which HGS will update</li> <li>• The SMT agreed the publication recommendation</li> </ul>	HGS	23/03/22	Yes	CR published in full
--	-----	----------	-----	----------------------

### 4. Internal Audit – Governance and Risk Management Arrangements

<ul style="list-style-type: none"> <li>• The SMT noted the CR and agreed the recommendations.</li> <li>• The publication recommendations were agreed</li> </ul>			Partial	CR published in full  Internal Audit Report withheld s30(b)(ii)
---	--	--	---------	---

### 5. Key document ad hoc review – Interventions Procedures

<ul style="list-style-type: none"> <li>• The SMT noted the CR and approved the changes to the Intervention Procedures</li> <li>• The publication recommendations were agreed</li> </ul>			Partial	CR published in full  Interventions: our approach and procedures withheld – Exemption s27(1)
---	--	--	---------	--

## 6. New key document – Communications and Engagement Framework

<ul style="list-style-type: none"> <li>The SMT approved the Scottish Information Commissioner's Communications and Engagement Framework 2021-24 but acknowledged that the formatting of the document needs to be reviewed to improve accessibility</li> <li>The SMT agreed this new document supersedes the Scottish Information Commissioner's Communication Strategy 2016 – 2020</li> <li>The publication recommendations were agreed</li> </ul>			Partial	<p>CR published in full</p> <p>Communications and Engagement Framework 2021-24 withheld – Exemptions s27(1)</p>
--	--	--	---------	---

## 7. Review of Key Documents – Recruitment and Selection Policy and Procedures

<ul style="list-style-type: none"> <li>The SMT approved the:             <ul style="list-style-type: none"> <li>Recruitment and Selection Policy</li> <li>Recruitment and Selection Procedures</li> <li>key document actions</li> </ul> </li> <li>The SMT agreed that the CR- Recruitment template should be set up as a new template in our document management system</li> <li>The publication recommendations were agreed</li> </ul>			Partial	<p>CR published in full</p> <p>Recruitment and Selection Policy and Procedures withheld – Exemption s27(1)</p>
---	--	--	---------	--

## 8. Review of Temporary Closure of Office Premises

<ul style="list-style-type: none"> <li>The SMT agreed that the temporary closure of the office premises continue until the anticipated gradual re-opening week beginning 12/04/2022</li> <li>This re-opening of the office premises will be subject to the required work on the relevant risk assessments and consultation with staff being carried out</li> </ul>			N/A	
--	--	--	-----	--

## 9. Operational Risk Register 2021-22

<ul style="list-style-type: none"> <li>The Operational Risk Register 2021-22 (ORR) was reviewed and updates agreed</li> <li>HGS will update the ORR following the review</li> </ul>	HGS	23/03/21	No	<p>Operational Risk Register withheld – Exemptions s30(b)(ii), s30(c) and s39(1)</p>
---	-----	----------	----	--

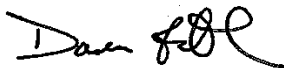
### 10. Strategic Risk Register 2021-22

<ul style="list-style-type: none"> <li>The Strategic Risk Register 2021-22 (SRR) was reviewed and updates agreed</li> <li>HGS will update the SRR following the review</li> </ul>	HGS	23/03/21	No	Strategic Risk Register withheld – Exemptions s30(b)(ii), s30(c) and s39(1)
---	-----	----------	----	---

### 11. AOB

<ul style="list-style-type: none"> <li>A discussion took place around the images used on the new Phase 1 website</li> </ul>			N/A	
---	--	--	-----	--

Signed off by:



Date: 29/03/2022