

Scottish Information Commissioner
Minutes of the Monthly Senior Management Team Meeting
24 February 2021 – 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.

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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 – Liz Brown (LB) (Minutes)
 Data Protection Officer – Claire Turnbull (CT)

Apologies: Finance and Administration Manager - Kim Berry (KB)

Details	Action By	Target Completion Date	Publish Yes / No	Comments
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1. Welcome - Claire Turnbull, Data Protection Officer (annual meeting with the SMT)

<ul style="list-style-type: none"> DF welcomed CT to the meeting 			N/A	
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2. Minutes, action points update and matters outstanding

<p>1.1 Review of minutes – 04/02/2021</p> <ul style="list-style-type: none"> The minutes were approved and will be published with the relevant papers. <p>1.2 Action points update</p> <ul style="list-style-type: none"> DF to update the committee report for agenda item 22 <p>1.3 Matters outstanding</p> <ul style="list-style-type: none"> No matters outstanding 			Yes	
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3. Key Documents – outstanding, due and not completed

<ul style="list-style-type: none"> • Updates were provided by each Head of Department on the progress being made with the reviews • The SMT agreed that the report will be published with the exception of the comments column 			Partial	Report published with the exception of comments column – Exemptions s30(b)(ii) and s38(1)(b)
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4. UK GDPR Report Q3

<ul style="list-style-type: none"> • The committee report was noted and the following areas discussed: <ul style="list-style-type: none"> ○ SPCB online training – CT advised that the content of the online training is being reviewed to reflect the changes since the UK left the EU and will let us know when the work is complete. It was agreed that staff should continue to use the training platform as it is. ○ Data incidents – 4 incidents were recorded to the end of Q3. CT was consulted on all incidents and is happy for this to continue, even if an incident is deemed minor. This helps her to identify trends and monitor actions taken in response to incidents. ○ Adequacy decision– CT explained that an adequacy agreement may take some time to come through and, therefore, it is important to continue to monitor our internal processes until an agreement is reached. ○ Reporting - CT noted that the regular reporting to the SMT and DPO Network evidences extremely good practice and demonstrates our compliance with the ICO's 'data protection by design and by default' approach. ○ DF thanked HGS and the UK GDPR Working Party for their ongoing work ○ CT confirmed she is happy to attend one of our UK GDPR Working Party meetings in the next couple of months • The SMT agreed the publication recommendations in the committee report 			Partial	Committee Report published in full GDPR Implementation Plan 2019-20 withheld – Exemption s30(b)(ii), s30(c) and s39(1)
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5. Breastfeeding Friendly Scheme

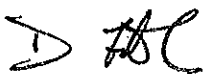
<ul style="list-style-type: none"> • The SMT noted the committee report and agreed the following recommendations: 			Yes	Committee Report published in full
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<ul style="list-style-type: none"> ○ the Commissioner joins the Breastfeeding Friendly Scotland Scheme and that the HOCS signs the related documentation on behalf of the Commissioner ○ the Administrator arranges for staff training for all members of staff (including induction for any new members of staff) to be provided before the office premises are able to re-open to the public ○ the Administrator liaises with Fife NHS board to arrange for the publication materials to be provided which will be displayed when the office premises are able to re-open • The SMT agreed the publication arrangements • It was also noted that HGS will progress the recommendations with the Administrator but this Scheme will not be able to be fully implemented until the office premises are able to re-open 				
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6. AOB

<ul style="list-style-type: none"> • Payroll Services – HGS provided the SMT with an update <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <ul style="list-style-type: none"> • [REDACTED] 				<p>Excerpt of minutes withheld – Exemptions s30(b)(i) and (ii)</p>
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Signed off by:



Date: 26/02/2021