

Scottish Biometrics Commissioner – Advisory Group Minutes

3 February 2026 on MS Teams

Members	Dr Brian Plastow (Chair) – Scottish Biometrics Commissioner Mhairi Morrison – Assist. Procurator Fiscal for Major Crime – COPFS Gillian Jones – Head of Biometrics – Police Scotland Brian McNulty – Acting Assist. Inspector - HMICS Phil Chapman – Director of Operations - PIRC Diana Miranda – Senior Lecturer – University of Stirling Fiona Douglas – Director of Forensic Services – SPA FS Jenny Brotchie – Regional Manager - ICO Scott Ross – Head of Change – SPA Professor Niamh Nic Daied – Director – Leverhulme Research Centre for Forensic Science Cheryl Glen – Director – Scottish Biometrics Commissioner Diego Quiroz – Operations Manager – Scottish Biometrics Commissioner Karen McBride – Subject Matter Expert – Scottish Biometrics Commissioner Joanna Milne (minutes) – Business Support Officer – Scottish Biometrics Commissioner
In attendance	Nicola Cowley – Head of Policy - Biometrics and Surveillance Camera Commissioner
Apologies	Denis Hamill – Chief Data Officer – Police Scotland Gina Wilson – Head of Strategy – C&YPCS Eleanor Deeming-Johnstone – Legal Officer – SHRC Shannon Vallor - Baillie Gifford Chair in the Ethics of Data and Artificial Intelligence at the Edinburgh Futures Institute (EFI) - University of Edinburgh William Webster – Biometrics and Surveillance Camera Commissioner

Item	Subject	Discussion
1	Welcome, apologies and introductions	The Chair welcomed the members to the first Scottish Biometrics Commissioner Advisory Group meeting of 2026 – introductions around the group were made
2	Declaration of Interest	None declared
3	Minutes of previous meeting and Action Log	Minutes of the meeting held on 5 November were approved with no amendments. All items on action log to be closed. Action: Operations Manager to provide update prior to actions being closed.
4	Future of the AG	The Director proposed changes to the number of future AG meetings and asked for the members' thoughts. It was agreed to reduce the number of meetings to two per year and hold them in the Spring and Autumn with the caveat that should something arise; a meeting will be timetabled. It was also established most members would appreciate one of the meetings being held in person although a dial-in option would continue to be available.
5	Fingerprint Assurance Review	▪ The Commissioner highlighted this is the first assurance review since laying our new Strategic Plan in November 2025 and that the planning of the review commenced prior to the Strategic Plan being laid. ▪ The Commissioner thanked Police Scotland, SPA Corporate, SPA Forensic Services and HMICS for their help with the field work and feedback on the report. ▪ ICO were also thanked for their feedback and help navigating the UK data protection rules. ▪ Police Scotland and SPA have welcomed the recommendations. ➤ Fiona Douglas found the report helpful and provided assurance to the Fingerprint enquiry as it looked at the system in its entirety and the recommendation will drive further improvement. ➤ Gillian Jones welcomed the recommendation and will monitor improvements. ▪ The final report will be published early March. ▪ The report will be tabled at the Forensic Services Committee.
6	Parliament engagement session with MSP's	The BSO took the AG members through the recent visit to Scottish Parliament where the BSO and Commissioner talked to MSP's and others about the work of the SBC and how our remit could be expended to include prisons and public safety cameras without any increase to our budget or staffing levels. Fiona Douglas agreed it was a useful opportunity to talk to MSPs and SPA FS and Police Scotland are both planning future events at the Scottish Parliament.
7	Proposed amendments to CoP	▪ The Operations Manager is currently collating proposed amendments to the current Code of Practice. ➤ During April marked up amendments will be made. ➤ Stakeholder and public consultation will take place between 18 May and 17 July. ➤ In August the responses to the consultation will be reviewed.

		➤ During the next AG meeting in September the proposed amendment will be discussed. ➤ The proposed amendments to the CoP will be submitted to the SG/SP in October. ▪ During the review certain areas will be strengthened including human rights. ▪ It will likely take a few months before we have final confirmation of the changes. Action: Revised CoP to be brought to AG in September
7	Public confidence in Policing Survey 2026	The poll for the Public Confidence in Policing Survey 2026 opened Monday 2 February and will close Monday 2 March. The plan is for the results to be presented to SBC at the beginning of March and to the Policing Performance Committee on 17 March 2026. The Commissioner thanked the SPA for running the poll and sharing the outputs with SBC.
8	National Physical Laboratory report re PND	The Commissioner shared a link to the Home Office summary on Independent Testing of Facial Recognition Technology: National Retrospective Facial Recognition Algorithm used to search the Police National Database. Results published showed statistically significant bias within the software. The Commissioner commended Police Scotland for suspending facial search in PND due to the biases of the system – the only UK force to take this approach. The Commissioner also highlighted that Police Scotland are to become early adopters of Strategic Facial Matcher and that Police Scotland are in the process of updating all their custody cameras. Gillian Jones confirmed Police Scotland has supplied updated custody images to become an early adopter of the new Home Office Strategic Facial Matcher system. Gillian further confirmed that Police Scotland have ceased using RFS within PND and further governance and assurance work is ongoing Scott Ross commended Police Scotland’s approach and confirmed they were on board to becoming early adopters with the HO Strategic Facial Matcher and it will follow the Rights Based Pathway and be tested against the CoP. Scott also pointed out as well as the paper the Commissioner circulated, the Home Office issued a paper on the new Strategic Facial Matcher. HMIC (England and Wales) will publish their report on the new system in April. Jenny Brochie confirmed the ICO have published a statement in December 2025 on their website asking the Home Office for further clarity on some issues – they will update the AG once they know more.
10	Outcomes report	The outcomes report, backwards looking report on what we achieved from our first Strategic Plan 2021 - 2025 will be published in June after laying before Parliament. This report will be shared with the SG while they are holding their review of SBC function.
9	AOCB	The Commissioner encouraged the AG members to suggest items for future agendas.

		Agenda items for the next meeting will include the ToR for the next assurance review on Forensic Imaging and the updates to CoP.
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Advisory Group – Actions Log

February 2026	OWNER	UPDATE	STATUS
Operations Manager to provide update prior to actions being closed	Operations Manager		Open
Revised CoP to be brought to AG in September	Operations Manager		Open
November 2025			
ICO would like to be included in the factual accuracy checking of the FPs assurance review re data protection	Jenny Brotchie & SBC	Response received from ICO 29 January.	Closed