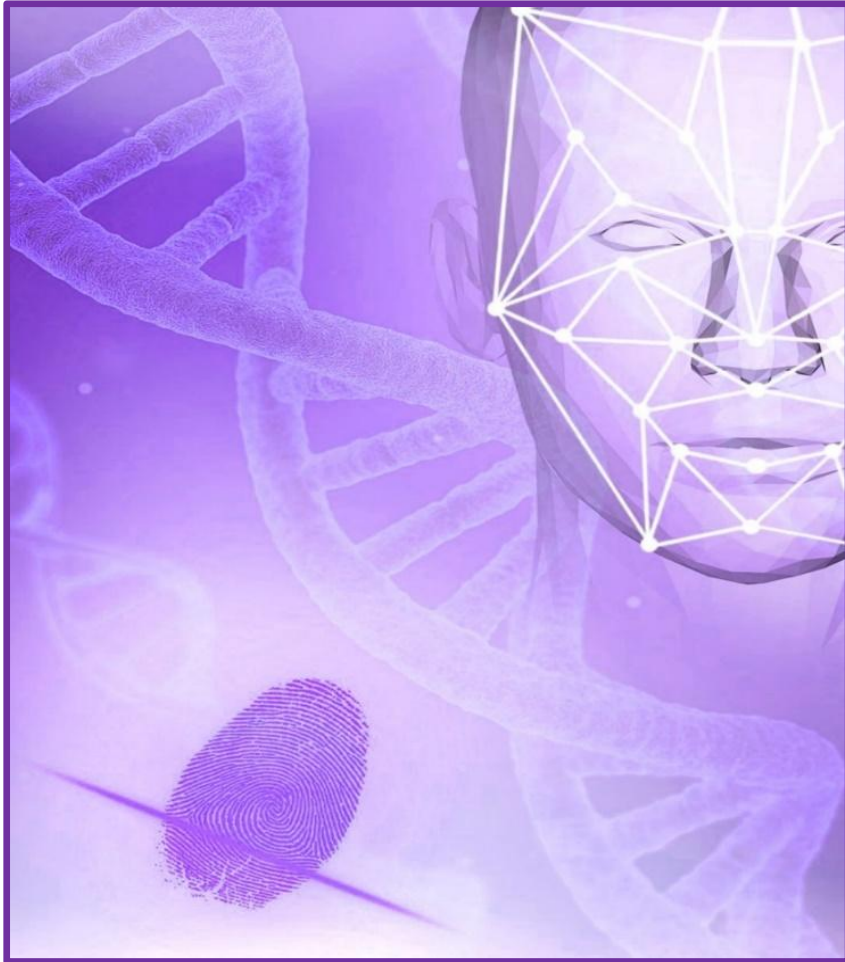




Scottish Biometrics
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Scottish Biometrics Commissioner

Theory of Change Logic Model and Outcomes Framework 2025 to 2029

(V1: Incorporating our equality duties under the Equality Act 2010)

On the acquisition, retention, use and destruction
of biometric data for criminal justice and police
purposes in Scotland

Safeguarding our biometric future



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Contents

[The role of the Scottish Biometrics Commissioner](#)

[Our values](#)

[Our Strategic Plan](#)

[Our strategy on a page](#)

[Strategic alignment](#)

[Developing a theory of change logic model & outcomes framework 2025/29](#)

[Our four strategic outcomes](#)

[Measuring our contribution to those outcomes](#)

[Evaluation constraints](#)

[Appendix A: Evaluation template and key indicators](#)

The role of the Scottish Biometrics Commissioner

The [Scottish Biometrics Commissioner Act 2020](#) established the office of Scottish Biometrics Commissioner (SBC) and provides for its functions. The Commissioner is independent of Scottish Government and is appointed by the Monarch on the nomination of the Scottish Parliament. The Commissioner's general function is to support and promote the adoption of lawful, effective and ethical practices in relation to the acquisition, retention, use and destruction of biometric data for criminal justice and police purposes by Police Scotland, the Scottish Police Authority (SPA) and the Police Investigations and Review Commissioner (PIRC).¹ The Commissioner must lay an annual report on activities each year before the Scottish Parliament and may publish other reports and research, as necessary.

[Section 7](#) of the Act provides that in furtherance of the Commissioner's general function, the Commissioner must prepare, and may from time-to-time revise, a Code of Practice on the acquisition, retention, use and destruction of biometric data for criminal justice and police purposes. The [Code of Practice](#) prepared by the Commissioner was approved by the Parliament and Scottish Ministers and took legal effect on 16 November 2022. The Commissioner must keep the approved Code of Practice under review, prepare and publish a report on the Commissioner's findings, and lay a copy of the report before the Scottish Parliament. The first such report must be laid before the Parliament no later than 3 years after the date on which the first Code of Practice comes into effect.

[Section 15](#) of the Act requires that the Commissioner must provide a procedure by which an individual, or someone acting on an individual's behalf, may make a complaint to the Commissioner that a person who is required by [Section 9\(1\)](#) to comply with the Code of Practice has not done or is not doing so in relation to the individual's biometric data. The [Complaints procedure](#) relating to the Code of Practice can be viewed on the Commissioner's website.



¹ See [Section 34 of Scottish Biometrics Commissioner Act 2020](#) for full definition of 'biometric data'

Our values

As a values-led organisation, we will conduct our activities in a way that is Independent, Transparent, Proportionate and Accountable:

Independent

We will always act independently and publish impartial and objective review reports. Our professional advice will be informed and unbiased. The Scottish Biometrics Commissioner is a juristic person, appointed by Her Majesty the Queen on the nomination of the Scottish Parliament and is independent of Scottish Government.

Transparent

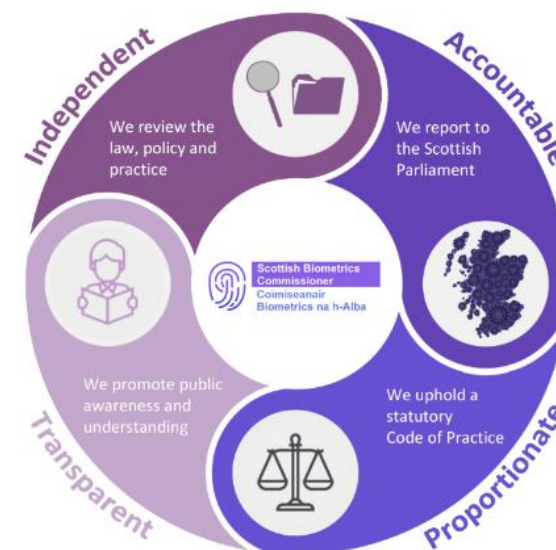
We will be open about what we do and give reasons for our decisions. We will publish our reports and findings and will not restrict information unless deemed necessary to protect the identity of data subjects, or due to wider public interest considerations.

Proportionate

We will ensure that our activity is proportionate and does not exceed what is necessary to achieve our statutory purpose. We will minimise the burden of any review activity on Police Scotland, the Scottish Police Authority and the Police Investigations and Review Commissioner. We will ensure that the way that we do what we do is proportionate, necessary, effective and efficient.

Accountable

We will be accountable for what we do, to the Scottish Parliament and will submit ourselves to whatever scrutiny is appropriate to our function. We will promote equality, diversity and human rights in everything that we do.





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Our Strategic Plan



Our current [Strategic Plan 2021/25](#) sets out how we will discharge our functions. Our Strategic Plan expires on 30 November 2025, and the Commissioner's next Strategic Plan will cover the period from 01 December 2025 to 30 November 2029. Accordingly, this Theory of Change Logic Model and Outcomes Framework is for the period 2025/29 by which time the Commissioner will have concluded his 8-year term of appointment. Our strategy is summarised on a single page (see next page) within our Strategic Plan.

Image No 1: Our 4-Year Strategic Plan



Our strategy on a page

Our purpose and vision: To support and promote the adoption of lawful, effective and ethical practices in relation to the acquisition, retention, use and destruction of biometric data for criminal justice and police purposes in Scotland ²

Our four strategic priorities	1. Keep under review and report on the law, policy and practice relating to the acquisition, retention, use and destruction of biometric data for criminal justice and police purposes in Scotland	2. Promote public awareness and understanding of criminal justice and policing sector powers and duties in relation to biometric data, how these powers are exercised, and how the exercise of these powers can be monitored or challenged ³	3. Develop, publish, promote and assess compliance with a statutory Code of Practice on the acquisition, retention, use and destruction of biometric data for criminal justice and police purposes in Scotland ⁴	4. Provide reports to the Scottish Parliament on the outcomes from the use of biometric data and technologies and highlight key issues to inform public debate, thus strengthening democratic accountability
Our outputs and intended outcomes aligned to each priority	1(a). Develop, deliver and publish, a national assessment framework to help assess the effectiveness and efficiency of biometric data outcomes. Publish annual and other reports to enhance independent oversight, transparency and public accountability	2(a). Contribute to public awareness and understanding of how biometric data and technologies are used for criminal justice and police purposes in Scotland through various mechanisms including a website information hub, public reporting and an established complaints procedure on our Code of Practice for biometric data subjects ⁵	3(a). Deliver a statutory substructure and compliance framework through a Code of Practice approved by the Parliament and Scottish Ministers through regulations, which balances ethical public interest considerations with democratic freedoms and the privacy and human rights of data subjects	4(a). Contribute towards the National Outcomes for Scotland, specifically: delivering community safety, protecting equalities & human rights, avoiding discrimination, protecting children and vulnerable adults, and making a positive contribution internationally
Our values	Independent	Transparent	Proportionate	Accountable

² Our strategic priorities are directly aligned to the statutory functions of the Commissioner as established in [Section 2\(3\)](#) of the Scottish Biometrics Commissioner Act 2020

³ A public attitudes survey was conducted in 2021/22 and again in 2024/25 to measure and baseline public attitudes, awareness and understanding of biometrics in policing in Scotland

⁴ *Ibid*, [Section 7](#), Scottish Biometrics Commissioner Act 2020

⁵ *Ibid*, [Section 15](#), Scottish Biometrics Commissioner Act 2020



Strategic alignment

Our Strategic Plan is aligned to our statutory framework in a way that also seeks to support the National Outcomes for Scotland and particularly those outcomes which seek to deliver community safety, protect equalities and human rights, avoid discrimination and making a positive contribution internationally. We are not a public service or relevant authority with specific duties under the Community Empowerment (Scotland) Act 2015 but nevertheless seek to support the outcomes relative to our mandate.

In discharging our Strategic Plan, we also seek to support the Scottish Government Strategic Policing Priorities and especially those relevant to our function including:

Crime and Security – prioritises prevention, detection, investigation, equality and human rights to support positive criminal justice outcomes; responds to threats and maintains public order, both locally and nationally.

Confidence – continues to inspire public trust by being ethical, open, transparent, person-centred and trauma informed; maintains relationships and engages with local communities, to build a positive reputation at a local, national, and international level.

Partnerships – works collaboratively with key sectors to keep communities safe, sharing a collective responsibility to deliver preventative services that improve outcomes for individuals and communities, increase resilience and address vulnerability.

Evidence – uses evidence to innovate and develop services which address the current and emerging needs of individuals and local communities, and ensure that resources, capacity, insight, and skills are in the right place to deliver outcomes.



Image No 2: National Outcomes for Scotland



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We also seek to support The Vision for Justice in Scotland which aims for a “**just, safe, resilient Scotland**” where all parts of the justice system deliver person-centred services and enshrine trauma informed practice.

The National Outcomes for Scotland, the Scottish Government Strategic Priorities for Policing and the Vision for Justice in Scotland in turn inform the joint Scottish Police Authority and Police Scotland Strategic Outcomes and the long-term policing strategy ‘Policing for a Safe, Protected and Resilient Scotland’ and the enabler strategies of the Scottish Police Authority, Police Scotland and to a lesser extent the Police Investigations and Review Commissioner’s Strategic Plan.

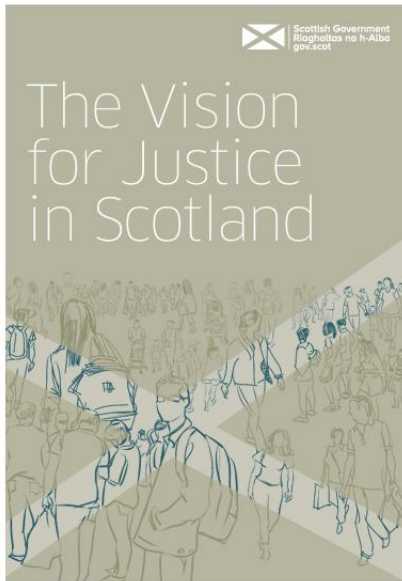


Image No 3: National Outcomes for Scotland

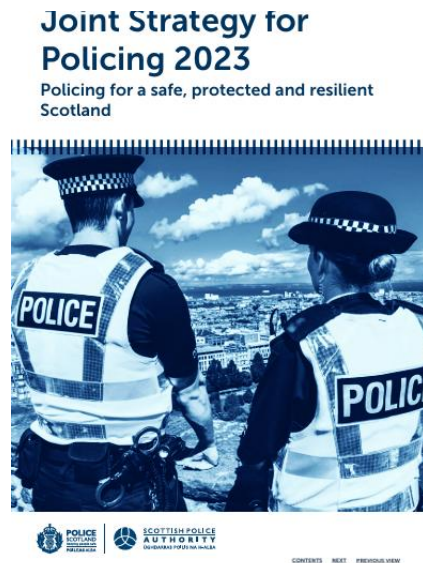
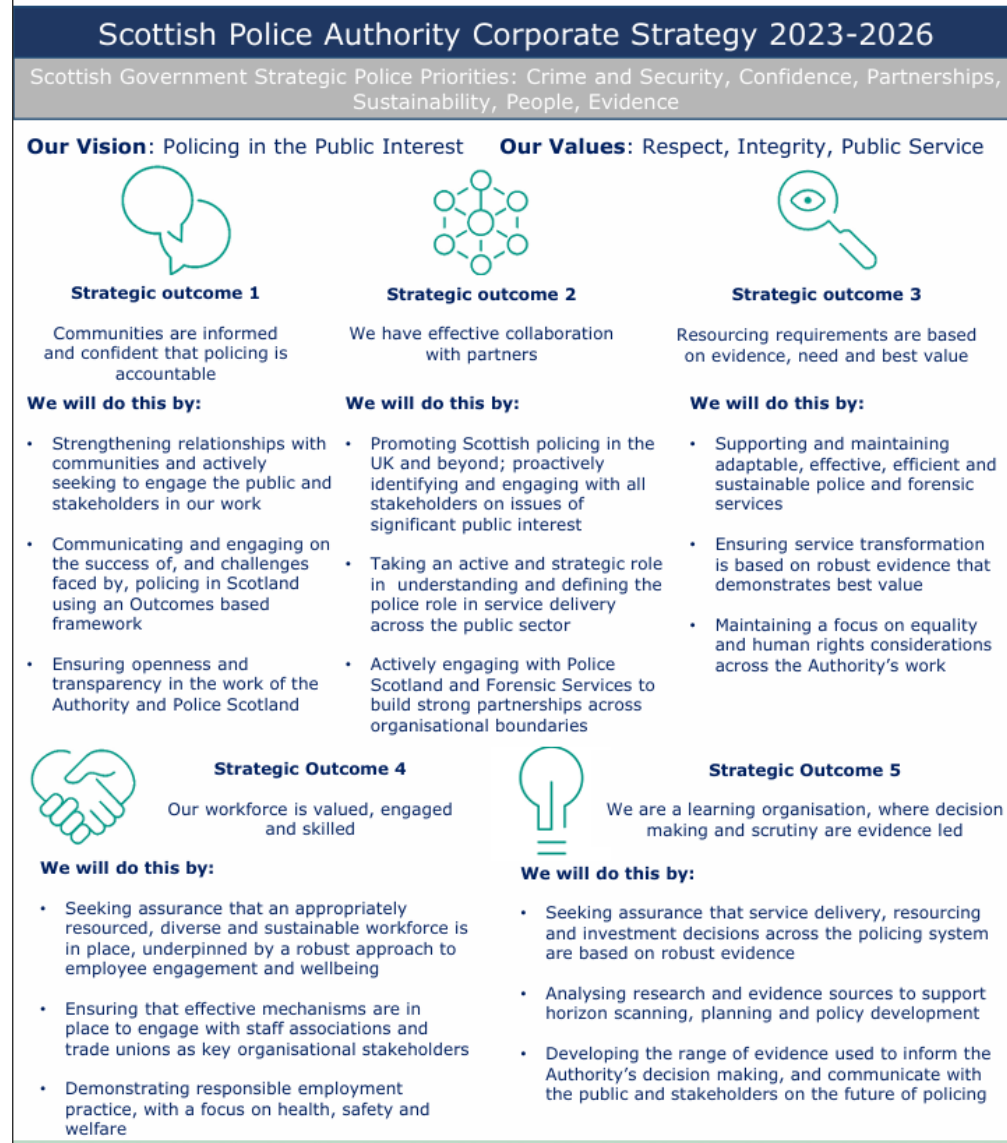


Image No 4: SPA and Police Scotland Joint Strategy for Policing



The relationship between the National Outcomes for Scotland, the Scottish Government Vision for Justice and the Joint Strategy on Policing is illustrated through five joint strategic outcomes for policing in Scotland as the diagram shows:

Image No 5: SPA and Police Scotland Joint Strategic Outcomes



In terms of the strategic alignment of our own function, it is useful to visualise how the micro-level nature of the Scottish Biometrics Commissioner function with only three employed staff and a small budget interacts with the national outcomes for Scotland and specifically through the lens of the macro-level policing and criminal justice landscape in Scotland within which it is acknowledged that we are a small but important cog in an extremely large wheel:



Image No 6: Alignment of SBC outcomes to our strategic landscape and authorising environment

Developing a theory of change logic model and outcomes framework 2025/29

In early 2025, we engaged the services of [Evaluation Support Scotland](#) to help us develop a theory of change logic model and an outcomes framework relative to our function to help us shape our next Strategic Plan.

Because the Scottish Biometrics Commissioner function was practically established between 2021 and 2022, our initial three business cycles had, out of necessity, focussed on outputs associated with building the new function and positioning ourselves as a trusted voice within the policing and criminal justice community in Scotland. However, as the outcomes from our work are now beginning to materialise in parallel with the maturity of our organisation, the time was right to enable us to work with Evaluation Support Scotland to help frame our thinking.

A logic model for a policing oversight body such as the SBC visually outlines how our resources (inputs) are used in our activities to produce outputs, ultimately leading to desired outcomes and impacts. This framework helps clarify our role, processes, and our intended impact on the bodies to whom our functions extend to the benefit of those bodies and in turn to the people of Scotland. Accordingly, the logic model also serves as a tool for planning, implementation, monitoring, evaluation and for ensuring accountability and demonstrating effectiveness.

The starting point in developing our logic model was to consider why the Scottish Parliament had legislated for a Scottish Biometrics Commissioner to exercise independent oversight and support and promote the adoption of lawful, effective and ethical practices in relation to biometric data used for policing and criminal justice purposes in Scotland. As a public authority to which [Section 149 of the Equality Act 2010](#) applies, we must have due regard to the need to eliminate unlawful discrimination, advance equality of opportunity between people who share a relevant protected characteristic and those who do not and foster good relationships between all people.⁶ Much of the background to our establishment has been outlined by the Commissioner in a recent [paper to the Scottish Parliament](#) and we (and the Scottish Parliament before us) would articulate the need as follows:



⁶ Further information on which equality duties apply to the SBC can be found in a 2025 management report prepared by the SBC Operations Manager



The Scottish Biometrics Commissioner function is needed because:

The use of biometrics for policing and criminal justice purposes in Scotland is complex, highly technical and fast changing, with primary legislation often unable to keep pace with technological advances.

Without independent oversight, there is a risk that the use of biometric data and technologies may not always be lawful, effective or ethical, and could lead to injustices, unlawful discrimination, and/or lack of public and political confidence and trust.

Equally, there is a corresponding risk to public safety and security if new and emerging technologies are denied to policing in circumstances where public and political opinion has been unduly influenced by civil liberties and privacy campaigning groups who are not accountable to the Scottish Parliament, Scottish Ministers or the Scottish public. Therefore, there is a need for impartial and independent advice to guide decisions on the effectiveness and efficiency of biometrics, including to what extent their current or future use might support the strategic policing priorities for Scotland and the duty on policing bodies to keep citizens and communities safe.

This is why the Scottish Parliament introduced legislation to appoint a Commissioner to provide advice and recommendations on legislation, policy and practice, together with providing a means of redress for biometric data subjects through the exercise of legal powers to direct improvements as well as compliance with a statutory Code of Practice.

Image No 7: Needs Statement



Our needs statement, when interpreted against our statutory remit and the wider political, economic, social, technological, legal and environmental (PESTLE) context in which we operate enables us to then develop our logic model in tabular format to consider inputs, activities, outputs, outcomes and impacts.



Image No 8: Typical stages in developing a logic model (Evaluation Support Scotland)

It is useful to explain this terminology:

- **Inputs:** These are the resources that we use such as our staff and available budget. It also includes our enabling legislation, and our mandate contained within the Scottish Biometrics Commissioner Act 2020.
- **Activities:** These are the things that we do to achieve our goals such as conducting assurance reviews and maintaining our statutory Code of Practice.
- **Outputs:** These are the tangible results from our activities such as the number of complaints investigated.
- **Outcomes:** These are the short-term and intermediate changes resulting from the outputs such as one of our recommendations being discharged in a way that makes the use of biometrics more lawful, effective or ethical.
- **Impacts:** These are the broader longer-term and lasting ripple effects of outcomes.

Against this context, the development of our logic model identified the following four strategic outcomes that we seek to achieve:

Strategic Outcome No 1	The use ⁷ of biometric data by policing bodies in Scotland is lawful, effective and ethical and improves criminal justice outcomes, responds to threats, public order, and community safety, both locally and nationally
Strategic Outcome No 2	Communities have increased confidence and trust that the use of biometric data and technology by policing bodies is lawful, proportionate and necessary and that policing is accountable. People who have biometric data taken (including victims) feel more confident that it is being managed appropriately
Strategic Outcome No 3	Policing bodies feel more supported and empowered to adopt new and emerging biometric technologies that support the strategic policing priorities for Scotland and help keep citizens safe
Strategic Outcome No 4	The use of biometric data by policing bodies in Scotland and the oversight of the Scottish Biometrics Commissioner function enhances equalities and human rights, avoids discrimination against protected characteristic groups as set out in the Equality Act 2010, better protects children and vulnerable adults, improves the strategic policing response to violence against women and girls and makes a positive contribution internationally ⁸

Image No 9: Scottish Biometrics Commissioner Four Strategic Outcomes 2025 to 2029

Measuring our contribution to those outcomes

It is widely acknowledged that there are two main types of analysis when it comes to assessing the extent to which the inputs, activities and outputs of an organisation contribute towards or lead directly to outcomes or not. Attribution analysis seeks to establish a direct cause-and-effect relationship between an intervention and an outcome. However, a major weakness of attribution analysis outside of a laboratory is that there are so many variables in the social world that it will almost never be possible to empirically demonstrate a direct cause-and-effect relationship. As both policing and the functions of the Scottish Biometrics Commissioner exist in the social world, it is unlikely that attribution analysis will assist us to any significant extent in measuring outcomes.

By contrast, contribution analysis acknowledges that multiple factors can and will contribute to an outcome and focuses on the specific role of an intervention within a broad context. Contribution analysis is therefore our chosen methodology as it is more useful in situations where an intervention, for example an SBC recommendation for improvement, is part of a larger complex system in which multiple factors may contribute to the delivery of a strategic outcome. In terms of evidence, contribution analysis will rely on a credible narrative of how an intervention contributed to an outcome, rather than providing conclusive proof

⁷ Where we say 'use' in relation to these outcomes, we mean the acquisition, retention, use and destruction of biometric data

⁸ Strategic Outcome No 4 is also our primary equality outcome



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that it did. If the focus of our evaluation is on understanding broader impacts and ripple effects, we conclude that contribution analysis offers us a richer perspective.

Evaluation constraints

The Scottish Biometrics Commissioner function is one of the smallest independent bodies supported by the Scottish Parliament and one of the smallest public authorities in Scotland. In terms of resources, the Commissioner employs only three members of staff and has a correspondingly small annual budget. For those reasons, the small scale of our operations and the limited availability of resources and finance dictates that our approach to evaluation must be proportionate to our small scale and not detract from our primary mandate. Our evaluation template for assessing progress against our four strategic outcomes can be found on the final pages of this document. The outcomes evaluation template will be maintained by our Director and will be reviewed and kept up to date on a regular basis and at least once annually.



Brian Plastow

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May 2025



Appendix A: Evaluation template and key indicators

SBC Outcomes	Key Indicators	Evaluation Methods	Responsible	When & where collected
Strategic Outcome 1 The use of biometric data by policing bodies in Scotland is lawful, effective and ethical and improves criminal justice outcomes; responds to threats, public order and community safety, both locally and nationally	1(a) Annual number of crime scene to criminal justice matches for DNA and fingerprints in Scotland expressed as a % of data recovered at crime scenes	Data available from Police Scotland biometrics website page as indicator of effectiveness	Operations Manager	At close of fiscal year from Police Scotland
	1(b) Annual number of criminal justice (custody) matches for DNA and fingerprints to a previously unsolved crime scene recovery	Data available from Police Scotland biometrics website page as indicator of effectiveness	Operations Manager	At close of fiscal year from Police Scotland
	1(c) Annual number of evidential submissions to COPFS of body worn video footage by Police Scotland and PIRC	Data available from Police Scotland and the Police Investigations and Review Commissioner as indicator of effectiveness	Operations Manager	At close of fiscal year from Police Scotland, BWV team and PIRC
	1(d) Annual number of retrospective facial matches on searches of crime scene or other images conducted by Police Scotland on the UK Police National Database (PND) including expression as a match percentage of all searches (for example 2% of searches suggest a possible match)	Data available from Police Scotland PND administration as indicator of effectiveness	Operations Manager	At close of fiscal year from Police Scotland



SBC Outcomes	Key Indicators	Evaluation Methods	Responsible	When & where collected
Strategic Outcome 1 The use of biometric data by policing bodies in Scotland is lawful, effective and ethical and improves criminal justice outcomes; responds to threats, public order and community safety, both locally and nationally	1(e) Annual number of images triaged through AI software by Police Scotland within the UK Child Abuse Image Database (CAID) which recover evidence of child abuse	Data available from Police Scotland CAID administration as indicator of effectiveness	Operations Manager	At close of fiscal year from Police Scotland
	1(f) The findings of SBC thematic assurance reviews and the successful discharge of previous recommendations leading to improved effectiveness or efficiency or better safeguarding the vulnerable and/or upholding the rights of data subjects	Qualitative and quantitative analysis as reported to Parliament through our Assurance Reviews, other reviews and in our Annual Report and Accounts with assessments of lawfulness, ethics and effectiveness	Corporate Services Manager	Annually in the preparation of our ARA
		A specific backwards looking 'Outcomes' report to Parliament after the conclusion of the period of each 4-year Strategic Plan (2026 and 2030)	Director	Once every four years (2026 and 2030) after the conclusion of the period of each 4-year Strategic Plan



SBC Outcomes	Key Indicators	Evaluation Methods	Responsible	When & where collected
Strategic Outcome 2 Communities have increased confidence and trust that the use of biometric data and technology by policing bodies is lawful, proportionate and necessary and that policing is accountable. People who have biometric data taken (including victims) feel confident that it is being managed appropriately	2(a) Annual number of custody episodes in Scotland where any biometric data type was taken as an 'indicator' of the number of biometrics information-rights leaflets given to prisoners ⁹	Data available from Police Scotland	Operations Manager	At close of fiscal year from Police Scotland
	2(b) Public attitudes/confidence survey data conducted independently on behalf of SBC or policing bodies	Quantitative and qualitative analysis of survey results to ascertain public attitudes and confidence levels	Operations Manager	Public Surveys every 4 years in 2021, 2025 and 2029
	2(c) The number of complaints made to Police Scotland, the Scottish Police Authority and the Police Investigations Commissioner which specifically complain about the acquisition, retention, use or destruction of biometric data by those policing bodies including qualitative information on any complaints which are upheld	Data available from Police Scotland, SPA and PIRC as an indicator of lawfulness	Operations Manager	At close of fiscal year from Police Scotland, SPA and PIRC
	2(d) The number of complaints made to the Commissioner relative to potential non-compliance with the SBC Code of Practice by Police Scotland, the SPA or the PIRC, including any determinations of a breach of the Code of Practice and any follow-up actions such as compliance notices	Quantitative and qualitative analysis from the SBC Code complaints data as an indicator of lawfulness	Operations Manager	At close of fiscal year for inclusion in the ARA

⁹ As a proxy for knowing how many leaflets 'should' have been distributed



SBC Outcomes	Key Indicators	Evaluation Methods	Responsible	When & where collected
Strategic Outcome 2 Communities have increased confidence and trust that the use of biometric data and technology by policing bodies is lawful, proportionate, and necessary and that policing is accountable. People who have biometric data taken (including victims) feel confident that it is being managed appropriately	2(e) The number of visits to our website from different ISP addresses (via cookies) to gauge public interest in our work including some analysis of items viewed or downloaded and the geographic spread to determine our reach and influence. As well as monitoring our social media impressions	Quantitative analysis of access to information placed on our website to help promote public confidence and trust	Business Support Officer	At close of fiscal year for potential inclusion in the Annual Report & Accounts
	2(f) The number of items of correspondence received by the SBC from members of the Scottish Parliament (MSP's) or Parliamentary Committees raising specific concerns about the acquisition, retention, use or destruction of biometric data by policing bodies and data within the jurisdiction of the SBC	SBC Correspondence data to ascertain number of concerns raised about lawful, effective or ethical use	Business Support Officer	At close of fiscal year for potential inclusion in the Annual Report & Accounts
	2(g) The number of meetings held with community justice organisations or groups representing offenders, children, vulnerable adults and victim support organisations and (if appointed) the proposed Victims Commissioner	Qualitative analysis of discussion themes and opportunities to support those organisations in supporting their client group	Operations Manager Commissioner will engage with Victims Commissioner if appointed	Stakeholder engagement reported at MMT/SMT and records kept by Operations Manager as part of our Communications and Engagement Strategy



SBC Outcomes	Key Indicators	Evaluation Methods	Responsible	When & where collected
Strategic Outcome 3 Policing bodies feel more supported and empowered to adopt new and emerging biometric technologies that support the strategic policing priorities for Scotland and help keep citizens safe	3(a) Annual requested feedback from Police Scotland, the SPA Corporate, the SPA Forensic Services, and the PIRC on the extent to which they feel that our activities are supporting and promoting their lawful, effective, and ethical use of biometric data and technologies, including how we might improve	Qualitative analysis of feedback received	Director	At close of fiscal year for inclusion in the ARA
	As part of this, we may also invite comment from other relevant stakeholders for example HMICS, ASPS and the Scottish Police Federation	Qualitative analysis of feedback received	Director	At close of fiscal year for inclusion in the ARA
	3(b) Evidence that we visibly support and promote the need for new and emerging technologies through our assurance reviews, in evidence to Parliament, through the Police Scotland Biometrics Oversight Board, in appearances before the Criminal Justice Committee, SPA Board, SPA Policing Performance Committee, SPA Forensic Services Committee and the UK FINDS Strategy Board	Qualitative analysis	All SBC staff	At close of fiscal year for inclusion in the ARA or Outcomes report



SBC Outcomes	Key Indicators	Evaluation Methods	Responsible	When & where collected
Strategic Outcome 3 Policing bodies feel more supported and empowered to adopt new and emerging biometric technologies that support the strategic policing priorities for Scotland and help keep citizens safe	3(c) Number of external speaking events such as conferences/seminars/workshops/training events where we advocate for new and emerging biometric technologies to improve the effectiveness of policing, to protect the public and to facilitate the swifter exoneration of the innocent	Quantitative and qualitative analysis	Operations Manager and Director	At close of fiscal year
	3(d) Through our publication scheme proactively place as much information as possible on our website to inform the public of new and emerging biometric technologies and to advocate for those which support the strategic policing priorities for Scotland	Qualitative and quantitative analysis of the number of related articles placed on our website, newsletters, our guide to biometric data and on the news and operations pages of our website	Corporate Services Manager	At close of fiscal year
	3(e) Maintain at statutory Advisory Group including broad representation from policing bodies, SHRC, CYPSC, ICO, HMICS and academia to facilitate deliberative discussions on new and emerging technologies	Quantitative and qualitative analysis of themes discussed at statutory advisory group via analysis of meeting minutes	Operations Manager	At close of fiscal year



SBC Outcomes	Key Indicators	Evaluation Methods	Responsible	When & where collected
Strategic Outcome 4 The use of biometric data by policing bodies in Scotland and oversight by the Scottish Biometrics Commissioner function enhances equalities and human rights, avoids discrimination against protected characteristic groups as set out in the Equality Act 2010, better protects children and vulnerable adults, improves the strategic policing response to violence against women and girls, and makes a positive contribution internationally	4(a) Qualitative and quantitative assessment of discharged recommendations from 2023 assurance reviews on biometrics pertaining to children, young people and vulnerable adults by reporting on the short-term outcomes to ascertain if they better protect the rights of children and vulnerable adults	A specific backwards looking 'Outcomes' report to Parliament after the conclusion of the period of each 4-year Strategic Plan	Director	By March 2026 after the conclusion of the period of the first 4-year Strategic Plan
	4(b) Qualitative and quantitative assessment of the fifteen open recommendations with Police Scotland. Four from the Joint Review of the Laws of Retention with Scottish Government, seven from the Joint Review of DNA with SPA/Leverhulme and four from the Joint Review of Retrospective Facial Search with HMICS including those with equality and human rights dimensions	Qualitative and quantitative analysis to establish whether improvements in policy, practice, and procedure because of SBC recommendations better protect equalities and human rights, avoid discrimination, and better protect children and vulnerable adults and women and girls since around 80% of all persons who offend are male	Operations Manager for LoR and RFS Director for DNA	By March 2026 after the conclusion of the period of the first 4-year Strategic Plan



SBC Outcomes	Key Indicators	Evaluation Methods	Responsible	When & where collected
Strategic Outcome 4 The use of biometric data by policing bodies in Scotland and oversight by the Scottish Biometrics Commissioner function enhances equalities and human rights, avoids discrimination against protected characteristic groups as set out in the Equality Act 2010, better protects children and vulnerable adults, improves the strategic policing response to violence against women and girls, and makes a positive contribution internationally	4(c) Conduct formal compliance assessments on the Code of Practice every two years from the winter of 2026/27 to ensure observance of lawful basis and on human rights and equalities	Qualitative analysis to ensure lawfulness and the protection of equalities and human rights and other dimensions specified. Assess available data from policing bodies in relation to biometrics held and the nine protected characteristics to ensure no unlawful discrimination	Corporate Services Manager	Winters of 2026/27 and 2028/29
	4(d) Analysis of SBC complaints data relative to the Code of Practice	Quantitative and qualitative analysis of complaints received relative to the Code to ensure no instances or patterns of unlawful actions or unlawful discrimination	Operations Manager	At close of fiscal year
	4(e) Public reporting in our Annual Report and Accounts of the duties of SBC as an employer under the Equality Act 2010 to maintain a fair and inclusive workplace	Fair pay disclosure and equality and diversity assurance statement in our Annual Report and Accounts which will be independently audited by Audit Scotland	Director	At close of fiscal year
		Our staff report in our Annual Report and Accounts will detail the female and male composition of employees by pay band and we will publish total staff costs	Director	At close of fiscal year