

Scottish Biometrics Commissioner
Coimiseanair Biometrics na h-Alba

4-Year Strategic Plan 2025/29

For period 01/12/2025 to 30/11/2029

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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Laid before the Scottish Parliament on 10 November 2025, under Section 28(1) of the Scottish Biometrics Commissioner Act 2020 SBC/2025/04
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Our strategy

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[1]

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. 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.[2]
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 strategic outcomes aligned to each priority[3]

1. The acquisition, retention, use and destruction 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.
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.[4]
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.
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.

Our values: **Independent** **Transparent** **Proportionate** **Accountable**

[1] Our strategic priorities are directly aligned to the statutory functions of the Commissioner as established in Section 2(3), Scottish Biometrics Commissioner Act 2020
[2] Section 7, Scottish Biometrics Commissioner Act 2020
[3] SBC Theory of Change Logic Model and New Outcomes Framework
[4] Section 15, Scottish Biometrics Commissioner Act 2020

The role of the Scottish Biometrics Commissioner

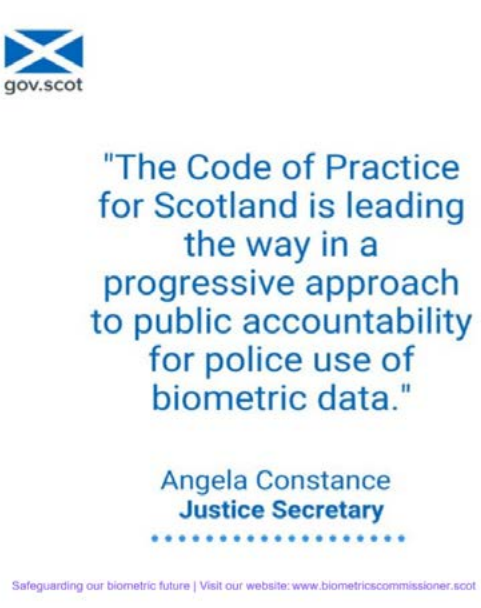
The Scottish Biometrics Commissioner Act 2020 established the office of the Scottish Biometrics Commissioner (SBC) and provides for its functions. The Commissioner is independent of Scottish Government and is appointed by the Monarch on the nomination of the Scottish Parliament. The Commissioner's general 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).[5] 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. Since this date, the Commissioner has conducted two formal compliance assessments on the Scottish Biometrics Commissioner's Code of Practice for the years 2023/24 and 2024/25.

We found that Police Scotland, the SPA and the PIRC are compliant with the Code of Practice. The Commissioner must keep the approved Code of Practice under review, prepare and publish and 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 Parliament no later than 3 years after the date on which the first Code of Practice comes into effect. For this purpose, we will lay the first report to Parliament in October 2025.

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. In 2024, the Commissioner produced an easy read version of both the Code and the complaints procedure to increase engagement and accessibility.

[5] See Section 34 of Scottish Biometrics Commissioner Act 2020 for full definition of 'biometric data'





Section 20 of the Act provides that if the Commissioner determines that a person who is required by Section 9(1) to comply with the Code of Practice has not done so or is not doing so, the Commissioner must prepare and publish a report about that failure unless the Commissioner considers that it is sufficiently minor not to merit it. Such reports must be laid before the Scottish Parliament.

Section 23(1) of the Act provides that where the Commissioner considers that Police Scotland, the SPA, or PIRC has not complied or is not complying with the Code of Practice then the Commissioner may issue a compliance notice. A 'compliance notice' is a notice requiring the person to whom it is issued to take the steps set out in the notice to address the person's failure to comply with the Code of Practice. To date, no compliance notices have been issued by the Commissioner. Further detail on compliance notices can be found in Sections 23 to 26 of the Act.

Section 27 of the Act provides that when a person to whom a compliance notice has been issued refuses or fails, without reasonable excuse, to comply with the notice, the Commissioner may report the matter to the Court of Session.

Foreword



This Strategic Plan represents the second and final four-year plan under my leadership. The Plan sets out how I propose to discharge my functions for the period from 01 December 2025 until I demit office no later than 11 April 2029. The plan itself runs until 30 November 2029, meaning that my successor will inherit the final seven months of the plan allowing her/him a period of grace before developing a subsequent four-year plan of their own. In accordance with the provisions of Section 28 of the Scottish Biometrics Commissioner Act 2020, I include a timetable with my objectives and priorities, detail of how I will achieve them, a timetable for doing so and estimated costs.

As we conclude the inaugural Strategic Plan, we now turn to the future. This new plan ensures continuity of my general function 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 purpose by Police Scotland, the Scottish Police Authority and the Police Investigations and Review Commissioner. It also strengthens the foundations established in the current Strategic Plan and facilitates the transition to the next Commissioner.

Over the next four years, we will focus on:

- ensuring that the use of biometric data by policing bodies is lawful, effective, and ethical to improve criminal justice outcomes
- supporting and promoting the bodies to whom our functions extend to remain in compliance with the Statutory Code of Practice
- strengthening democratic accountability by focusing on equalities and human rights' impacts of biometric technologies in policing
- strengthening public confidence through transparency, independence, and robust oversight



In early 2025, we developed a theory of change logic model and an outcomes' framework relative to our function to shape this Strategic Plan. The framework articulates our intended impact, including on the bodies to whom our functions extend to the benefit of those bodies and in turn to the people of Scotland. With this Strategic Plan, we aim to deliver measurable outcomes that support public safety, protect individual rights, and uphold the integrity of biometric practices across Scotland.

Biometric data such as fingerprints and photographs have been used in policing and criminal justice in Scotland as a means of verification, identification, and exclusion for more than one hundred years. In the last decade there has been an exponential growth in the range of new biometrics and a proliferation of databases operating and exchanging biometric data over different legal and functional jurisdictions within the UK and globally, including the application of artificial intelligence (AI) to those databases to develop algorithms for biometric matching.

These issues raise important questions for society, including how best to balance our need for public safety and security with broader privacy, ethical, human-rights, and equality considerations. The principles of proportionality and necessity, and the long-established principle of policing by consent in Scotland, suggest the need to be careful about the extent of future encroachment. With this in mind, we will produce assurance reviews in relation to the acquisition, retention, use, and destruction of a) fingerprints; b) forensic imaging[6], c) biometric data (mainly images and voice) obtained by Police Scotland through the application of digital forensics techniques and open-source methods and d) body worn cameras. The areas in which we propose to conduct our thematic assurance reviews are linked to our duty to support and promote and take cognisance of areas of risk with a preventative focus.

Against this context, this new Strategic Plan laid before the Scottish Parliament on 10 November 2025 sets out how I will perform my statutory functions during the 4-year period from 01 December 2025 until 30 November 2029.[7] In accordance with the requirements of Section 28(3) of the Scottish Biometrics Commissioner Act 2020, and Scottish Statutory Instrument 2020/250.[8]

It is a privilege to continue to serve as the Scottish Biometrics Commissioner and to lay my second and final four-year Strategic Plan before the Scottish Parliament.



Dr Brian Plastow
Scottish Biometrics Commissioner
www.biometricscommissioner.scot
10 November 2025

[6] Forensic imaging - we will examine how biometric data comprising of forensic images such as photographs of the injuries of victims of crime as well as audio and video of accused, witnesses or victims are managed

[7] The duration of this Strategic Plan extends beyond the date on which the current Commissioner is scheduled to demit office

[8] The commencement period of the previous Strategic Plan was amended during the Covid-19 Pandemic by the commencement order (S.S.I. 2020/250) from 1 April 2021 to 01 December 2021, therefore the period of this Strategic Plan no longer aligns with the provisions of Section 29(1) of the Scottish Biometrics Commissioner Act 2020, which requires budgetary arrangements to align with the fiscal year

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 the Monarch 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 in which we deliver 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.

Our National Assessment Framework for biometric data outcomes



The Scottish Biometrics Commissioner has developed a National Assessment Framework of forty-two quality indicators for biometric data outcomes. This Assessment Framework is based on the Public Sector Improvement Framework in Scotland (PSIF) and has been independently validated by the Improvement Service in Scotland. The framework is included as an appendix to our Statutory Code of Practice and serves as a self-assessment tool for Police Scotland, SPA Forensic Services and the Police Investigations and Review Commissioner.

Our Statutory Code of Practice together with our National Assessment Framework for biometric data outcomes has provided a substructure through which to assess compliance with the guiding principles contained within our Code of Practice and more generally in the evaluation of overall direction, execution, and results. This will help improve independent oversight, governance, and scrutiny.

Our Assessment Framework mirrors the 6 PSIF framework domains most applicable to criminal justice and policing. These framework domains have been used by HM Chief Inspector of Constabulary in Scotland (HMICS) and are illustrated as follows:

- Leadership and governance
- Planning and process
- People
- Resources
- Partnerships
- Outcomes

PSIF allows people to understand and manage the relationship between what their organisation does and the outcomes it achieves. This framework guides our work and together with our Code of Practice can serve as a self-evaluation model for policing and criminal justice agencies when considering their approach to biometric data and technologies.

PSIF is a recognised management framework endorsed by Scottish Government which allows organisations to achieve success and to understand gaps and viable solutions, empowering them to progress.

To ensure synergy within the wider policing family in Scotland, the Scottish Biometrics Commissioner has also adopted the six framework themes from PSIF previously used by HMICS[9] and Police Scotland that are of most relevance to the policing and criminal justice context in Scotland. Those themes are:

Outcomes

We focus on the overall performance of the organisation in relation to biometric data and technologies and seek to examine success in delivering demonstrable, high quality and improved outcomes in support of statutory functions and national outcomes.

Leadership and governance

We examine strategic leadership and governance, scrutiny, and accountability arrangements for biometric data and technologies to assess whether the organisation is delivering its overall vision in support of statutory functions and national outcomes.

Partnerships

We assess how well partners work together to support the delivery of criminal justice, community safety, and policing outcomes in relation to biometric data and technologies. This includes an assessment of partnership working in Scotland, and where appropriate, to the functions of the organisation, the wider UK, and international partnerships in connection with biometric data sharing and the operation of shared biometric databases and technologies.

Planning and process

We examine the effectiveness of strategy and planning processes in relation to the acquisition, retention, use, and destruction of biometric data. We consider whether processes comply with the Code of Practice developed by the Scottish Biometrics Commissioner and consider safeguards and special arrangements when collecting biometric data from children, young people, and vulnerable persons.

People

We assess whether staff working with biometric data and technologies have the skills and competencies required to deliver on agreed outcomes and priorities. This includes an assessment of familiarity with the concept of unconscious bias, and how well staff understand the reliability and validity of technologies and how human interaction with such technologies can impact on equalities, human-rights, ethical and privacy considerations. We look for evidence of respect for human- rights through all the themes of our Assessment Framework.

Resources

A key element of resourcing is the consideration of best value. We assess whether organisations collecting biometric data for criminal justice and policing purposes in Scotland have the resources to manage and control Scottish biometric data in accordance with Scottish legislation, operational policies, and any Codes of Practice in terms of its use.

[9] HMCS new inspection framework | HM Inspectorate of Constabulary in Scotland

Strategic objectives and priorities 2025/29

Our strategic objectives and priorities for 2025/29 are directly aligned with the exercise of our general functions as specified in Section 2(3) of the Scottish Biometrics Commissioner Act 2020. As per Section 28(4) of the Act, the Commissioner can amend the Strategic Plan at any time – it will be kept under ongoing review and may be amended in future to include additional work. These objectives, priorities, and our envisaged outputs in each year for the period of this Strategic Plan are illustrated on a year-by-year basis on the following pages:



Year 1 Priorities from 01 December 2025 to 30 November 2026

Our four strategic objectives	How our priorities will be achieved	Our strategic outcomes
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.	Conduct a review of policy and practice in relation to the acquisition, retention, use, and destruction of fingerprints for criminal justice and police purposes. Maintain Advisory Group to give advice and information to the Commissioner about matters relating to the Commissioner's functions.	The acquisition, retention, use and destruction 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. **Output 1:** Thematic Assurance Report on fingerprints to Scottish Parliament (March 2026).
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.	Engage stakeholders in the decision-making process and the provision of capacity building materials to the public through the website of the Scottish Biometrics Commissioner.[10] Maintain complaints procedure in parallel with the Code of Practice. Conduct investigations into any complaints received from data subjects.	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. **Output 2:** Engagement session with MSPs at the Scottish Parliament (January 2026).
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.	Maintain statutory substructure and compliance framework through a Code of Practice approved by the Parliament and Scottish Ministers through regulations, which balance ethical public interest considerations with democratic freedoms and the privacy and human rights of data subjects.	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. **Output 3:** Revised Code of Practice under Section 7 of the SBC Act to Scottish Parliament (Autumn 2026)
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.	Prepare Annual Report & Accounts under Section 31 and Section 32 of the SBC Act to report to Parliament for fiscal year 2025/26.	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 **Output 4:** Retrospective report on outcomes and achievement of the previous Strategic Plan (Summer 2026) **Output 5:** Annual Report & Accounts to Parliament and publication on our website (October 2026)

[10] E.g. Guide to Biometric Data and the various reports and news articles published on our website

Year 2 Priorities from 01 December 2026 to 30 November 2027

Our four strategic objectives	How our priorities will be achieved	Our strategic outcomes
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.	Conduct a review of policy and practice on the acquisition, use, retention, and destruction of biometric data in relation to forensic imaging for criminal justice and policing purposes. Maintain Advisory Group to give advice and information to the Commissioner about matters relating to the Commissioner's functions.	The acquisition, retention, use and destruction 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. **Output 1:** Thematic Assurance Report on forensic imaging to Scottish Parliament (March 2027).
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.	Continue to build trust and credibility with stakeholders and the provision of capacity building materials to the public through the website of the Scottish Biometrics Commissioner. Maintain complaints procedure in parallel with the Code of Practice. Conduct investigations into any complaints received from data subjects.	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. **Output 2:** Review of the complaints mechanism under Section 15 of SBC Act 2020 (Autumn 2027)
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.	Maintain statutory substructure and compliance framework through a Code of Practice approved by the Parliament and Scottish Ministers through regulations, which balance ethical public interest considerations with democratic freedoms and the privacy and human rights of data subjects.	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. **Output 3:** Code Compliance Assessment report for the PIRC (Spring 2027) **Output 4:** Code Compliance Assessment report for the SPA (Spring 2027) **Output 5:** Code Compliance Assessment report for Police Scotland (Spring 2027)
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.	Prepare Annual Report & Accounts under Section 31 and Section 32 of the SBC Act to report to Parliament for fiscal year 2026/27. Scottish Government report on the Commissioner's functions to the Scottish Parliament.[11]	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. **Output 6:** Annual Report & Accounts to Parliament and publication on our website (October 2027).

[11] The Scottish Government (SG) must prepare, publish and lay before the Scottish Parliament a report on the Commissioner's functions under Section 6 of the SBC Act within one year of the expiry of the period covered by the Commissioner's first Strategic Plan. SBC anticipates servicing any/all information requests from SG to enable them to report with recommendations to Parliament

Year 3 Priorities from 01 December 2027 to 30 November 2028

Our four strategic objectives	How our priorities will be achieved	Our strategic outcomes
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.	Conduct a review of policy and practice on the acquisition, use, retention, and destruction of biometric data (images and voice) obtained by Police Scotland through the application of digital forensics techniques and other open-source methods for criminal justice and policing purposes. Maintain Advisory Group to give advice and information to the Commissioner about matters relating to the Commissioner's functions.	The acquisition, retention, use and destruction 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 **Output 1:** Thematic Assurance Report on biometric data (images and voice) obtained by Police Scotland through digital forensics techniques and other open-source methods to Scottish Parliament (March 2028)
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	Keep stakeholders informed trough newsletters, reports, or meetings and the provision of capacity building materials to the public through the website of the Scottish Biometrics Commissioner Maintain complaints procedure in parallel with the Code of Practice Conduct investigations into any complaints received from data subjects.	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.
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.	Maintain statutory substructure and compliance framework through a Code of Practice approved by the Parliament and Scottish Ministers through regulations, which balance ethical public interest considerations with democratic freedoms and the privacy and human rights of data subjects.	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.
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.	Prepare Annual Report & Accounts under Section 31 and Section 32 of the SBC Act to report to Parliament for fiscal year 2027/28.	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 **Output 2:** Annual Report & Accounts to Parliament and publication on our website (October 2028)

Year 4 Priorities from 01 December 2028 to 30 November 2029

Our four strategic objectives	How our priorities will be achieved	Our strategic outcomes
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.	Conduct a review of policy and practice in relation to the acquisition, retention, use, and destruction of biometric data through body worn cameras for criminal justice and police purposes. Maintain Advisory Group to give advice and information to the Commissioner about matters relating to the Commissioner's functions.	The acquisition, retention, use and destruction 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 **Output 1:** Thematic Assurance Report on body worn cameras to Scottish Parliament (March 2029)
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	Engage stakeholders in the decision-making process and the provision of capacity building materials to the public through the website of the Scottish Biometrics Commissioner Maintain complaints procedure in parallel with the Code of Practice Conduct investigations into any complaints received from data subjects.	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
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.	Maintain statutory substructure and compliance framework through a Code of Practice approved by the Parliament and Scottish Ministers through regulations, which balance ethical public interest considerations with democratic freedoms and the privacy and human rights of data subjects.	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. **Output 2:** Second review report under Section 14(2) of the SBC Act on Code of Practice to Scottish Parliament (October 2029) **Output 3:** Code Compliance Assessment report for the PIRC (Spring 2029) **Output 4:** Code Compliance Assessment report for the SPA (Spring 2029) **Output 5:** Code Compliance Assessment report for Police Scotland (Spring 2029)
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.	Prepare Annual Report & Accounts under Section 31 and Section 32 of the SBC Act to report to Parliament for fiscal year 2028/29.	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 **Output 6:** Annual Report & Accounts to Parliament and publication on our website (October 2029)

Budget

During the period of our first Strategic Plan, the Commissioner's office successfully operated within our allocated budget in each of the four years as validated by external audit by Audit Scotland. In 2025, the Commissioner also published a Medium-Term Financial Strategy which gives confidence in the sustainability of the function through a low cost shared-services model with the Scottish Public Sector Ombudsman. We also work extensively in partnership on our assurance reviews to maximize our impact and achieve value for the public purse.

The forecast is based on the baseline of our 2025/26 budget award with salary projections incorporating anticipated increments and with inflation based on the projections of the Office of Budget Responsibility (OBR) factored over the period.

We are a small organisation with a total staff of 4 FTE including the officeholder. On inception, the Scottish Biometrics Commissioner was allocated an annual budget based on a policy assumption in the legislative planning phase that there would be no significant expansion of the Commissioner's functions. As previously approved by the Parliament Corporation (SPCB) between September 2025 and September 2027, our core staffing is supplemented by the temporary two-year secondment of a Forensics Subject Matter Expert (SME) from the SPA Forensic Services.

The two-year temporary secondment straddles three financial years and is shown as 'seconded staff' in the table below.

The Commissioner's budget requirement to discharge this Strategic Plan is as follows:

	2025/26 Annual Budget	2026/27 Annual Budget	2027/28 Annual Budget	2028/29 Annual Budget
Staffing*	422,030	455,110	468,139	482,274
Staff Related Costs	15,000	15,000	15,759	16,153
Property Costs	0	0	0	0
Professional Fees	20,000	22,000	22,950	23,250
Running Costs	72,000	73,000	74,000	74,500
Seconded Staff	35,000	65,000	35,000	
Total Budget	**564,030**	**630,110**	**615,848**	**596,177**

*Projected staffing costs are based on assumed inflation based on OBR projections, plus known increments

Accountability

The projected costs associated with the delivery of this 4-year Strategic Plan take account of the Commissioner's responsibilities under Section 29(3) of the Scottish Biometrics Commissioner Act to ensure that resources are used economically, efficiently, and effectively.

The Commissioner must also comply with the provisions of Sections 31 and 32 of the Act and is accountable to the Parliament Corporation for the signing of the accounts, expenditure and receipts of the Commissioner and ensuring propriety and regularity of finances.[12] The Commissioner must keep proper accounts and accounting records, prepare in respect of each financial year a statement of accounts, and send a copy of the statement to the Auditor General for Scotland for auditing.

The Commissioner must comply with any directions which the Scottish Ministers give the Commissioner in relation to the keeping of accounts and accounting records and for of the annual statement of accounts.

[12] The Parliamentary Corporation has designated the Commissioner as the Accountable Officer for the purposes of the provisions of Section 30 of the Scottish Biometrics Commissioner Act 2020

Scottish Biometrics Commissioner
Coimiseanair Biometrics na h-Alba

Safeguarding our biometric future