



The Scottish Parliament
Pàrlamaid na h-Alba

Officeholders - Scottish Biometrics Commissioner's Revised Strategic Plan

By Correspondence

Reference: SPCB (2025) Paper 22

Executive summary

1. Under Section 28(4) of the Scottish Biometrics Commissioner Act 2020, the Scottish Biometrics Commissioner ("the Commissioner") is required to consult with the SPCB prior to laying a revised Strategic Plan.
2. A copy of the Commissioner's revised Strategic Plan is attached at Annex A.

Issues and options

3. Under Section 28 of the Scottish Biometrics Commissioner Act 2020, the Commissioner must, in respect of each 4-year period, prepare and publish a strategic plan and lay a copy of the plan before the Scottish Parliament before the beginning of the 4-year period to which it relates. Before publishing a strategic plan, the Commissioner must consult on a draft of it with the SPCB and such other persons as the Commissioner considers appropriate.
4. The Commissioner may, at any time, review and revise a Strategic Plan. Where the Commissioner revises a Strategic Plan, the Commissioner must consult on a draft of it with the SPCB and such other persons as the Commissioner considers appropriate.
5. Unlike the other officeholders, the Commissioner's Strategic Plan runs from 1 December 2021 to 30 November 2025. If an opportunity arises to bring the Commissioner's strategic plan into line with financial years and the 4-year period of the other officeholders' strategic plans, the Commissioner would very much welcome that change.
6. The Commissioner wishes to lay a final revised strategic plan for the period 2021-2025. The changes include:

- documenting that all strategic priorities in year one through to the initial months of year four have been successfully achieved
- adding in an additional Assurance Review report to Parliament on retrospective facial image search which was added to the Commissioner's work programme in year four
- updating the plan with the approved budget allocation for 2025/26
- explaining the transition to reporting on the outcomes of his Strategic Plan.

Governance

7. Under the Scottish Biometrics Commissioner Act 2020, the Commissioner must consult with the SPCB before laying a Strategic Plan or a revised plan.

Resource implications

8. There are no resource implications.

Publication Scheme

9. This paper can be published in line with the SPCB's publication scheme.

Decision

10. The SPCB is invited to consider the revised plan and to provide any comments.

Officeholder Services

March 2025