



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