

pirc

Police Investigations &
Review Commissioner



Strategic Review

2025/26

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1. Commissioner's Foreword

As Police Investigations and Review Commissioner, my aim is to promote improvement and public confidence in policing in Scotland through independent, evidence-based oversight.

Tasked with investigating incidents involving the police and reviewing how the police handle complaints from the public, we play a key role in safeguarding the human rights of those who come into contact with the police.

Pirc core values

- integrity
- impartiality
- respect



Since being established in 2013, PIRC has identified learning and supported improvements in the policing service provided to the public. During that time, policy and legislative changes have extended our role and demand has increased significantly.

As PIRC has grown and developed as an organisation, the context in which we operate has also evolved. To ensure we continue to fulfil our statutory duties efficiently and effectively, PIRC embarked on this Strategic Review.

The review has assessed how we have fulfilled our duties to date and the key challenges ahead. It outlines the further steps now required to meet the expectations of the public and our partners.

Carrying out this Strategic Review at the same time as PIRC experienced significant increases in workload has been challenging.

So too will be delivering the changes necessary while at the same time managing daily operations. However, we consider this an essential investment in our future.

I am grateful to staff across the organisation whose commitment has made this work possible. Their experience and insights have shaped the review's findings and recommendations, and they will be key to their delivery.

The Strategic Review will inform the development of a three-year Strategic Plan for 2026-29. This will set out new strategic objectives and how we will build on what we have already achieved to ensure PIRC is well-positioned to meet future challenges.

I am confident in our collective ability to deliver the transformational work needed to provide the highest possible standard of service.

2. Executive Summary

Background

The Police Investigations and Review Commissioner (PIRC) was established in 2013 when the Police Complaints Commissioner for Scotland was renamed and given additional powers. These changes coincided with the creation of the single Police Service of Scotland. In the absence of another police force, PIRC's role was to ensure that Police Scotland's complaints handling arrangements, and incidents involving policing bodies operating in Scotland, were reviewed and investigated by an independent organisation.

In 2024, PIRC commissioned this Strategic Review to provide a comprehensive assessment of our strategic direction, performance and governance, as well as the environment in which we operate. The review underpins our mission to promote and support public confidence in policing in Scotland through independent, evidence-based oversight. The review also aims to ensure that PIRC remains fit for purpose in a changing justice and public safety landscape.

Scope of the review

The review examined PIRC's statutory functions, operational effectiveness, governance structures and stakeholder relationships. It also evaluated our readiness to address external challenges, our responsiveness to public expectation and our ability to provide impartial oversight.

Key findings

- Our mission set out by this Strategic Review is to promote and support public confidence in policing in Scotland through independent, evidence-based oversight.
- We operate within a complex and evolving regulatory environment and have maintained a strong commitment to our oversight role.
- Increases in demand across PIRC's core functions are affecting the speed of service delivery and the sustainability of current resource levels.
- Our staff are critical to the effective delivery of our functions, particularly at a time when demand is high and resources are stretched.
- We often cannot speak publicly about the detail of the cases we investigate and the complaints we review. However, we must balance confidentiality with transparency, and consider how we can best engage with the public and stakeholders if we are to promote and support public confidence in policing.
- Internal governance and leadership structures are functional but would benefit from clearer accountability lines and enhanced strategic planning.
- Over the years, PIRC has developed a useful performance management framework. This should evolve further, from business as usual, target-based Key Performance Indicators (KPIs) to broader strategic objectives that reflect our purpose, mission, values and public impact. This shift will support better governance, continuous improvement and transparency across the organisation, and provides the platform for our ambitions for the future.
- Attempts at benchmarking with other police oversight bodies highlighted significant differences in mandate and scale, inhibiting any direct comparability.

High-level recommendations

1. Advance trauma-informed practice across the organisation

Embed trauma-informed principles into policies, procedures and staff development to improve service delivery and support wellbeing.

2. Strengthen human rights and equalities integration

Enhance the visibility and impact of PIRC's human rights work through a dedicated working group, aligning with broader equalities and non-discrimination commitments.

3. Improve legislative foresight and readiness

Establish a horizon-scanning and policy engagement process to anticipate, influence, and prepare for legislative changes, including the introduction of enabling regulations in 2026 for the Police (Ethics, Conduct and Scrutiny) (Scotland) Act 2025¹ and other reforms.

4. Promote staff wellbeing and a safe working environment

Identify health and safety risks, implement mitigation strategies, and transparently report progress to foster a supportive and secure workplace.

5. Optimise organisational capacity and demand management

Implement strategic approaches to manage demand, including enhancing regional coverage through targeted resourcing, prioritisation frameworks, and improved triage processes.

6. Demonstrate leadership in public sector reform

Contribute actively to public sector reform by ensuring efficient use of resources, delivering high-quality services, and evidencing value for money.

7. Embed a culture of continuous improvement

Establish structured mechanisms to gather, analyse, and act on feedback from service users to enhance service quality and responsiveness.

8. Enhance stakeholder and public engagement

Explore how we achieve better contribution from stakeholders and the wider public on subjects and topics relevant to the services we deliver.

9. Implementation and oversight

Establish a phased implementation plan with quarterly milestones, supported by a robust monitoring and evaluation framework.

This review provides a foundation for strengthening PIRC's role as a trusted, transparent and effective oversight body.

The recommendations are designed to support continuous improvement and ensure that the organisation remains responsive to the needs of the public, stakeholders and policing partners.

¹[Police \(Ethics, Conduct and Scrutiny\) \(Scotland\) Act 2025](#)

3. Introduction

Background

PIRC plays a central role in the Scottish justice system by providing independent oversight of policing bodies operating in Scotland. We promote trust and confidence in policing by ensuring complaints handling procedures and incidents involving the police are reviewed and investigated thoroughly, and reported in a robust and objective manner in accordance with the law. PIRC does this through the delivery of our core functions:

- Reviewing the handling of non-criminal complaints about policing bodies
- Investigating serious incidents involving the police²
- Investigating allegations of misconduct against Senior Officers.

Since being established in April 2013, PIRC's remit, operating environment and workload have evolved significantly. Our role has expanded due to policy and legislative changes. Many of these changes arose from the recommendations made by Lady Elish Angiolini in her review of complaints handling, investigations and misconduct issues in relation to policing.³ At the same time, there have been developments in digital services and increased public expectations of transparency and accountability in respect of public services. These changes have contributed to an increase in the volume and complexity of work undertaken by PIRC, and intensified scrutiny of our effectiveness.

Simultaneously, broader developments across the policing and criminal justice landscape have reshaped the strategic context in which PIRC operates. There have been changes in governance and oversight arrangements and an increase in the importance placed on public engagement and stakeholder trust. In addition, significant events involving law enforcement, often occurring outside Scotland, have impacted the public perception of policing in general. Understanding this evolving environment is essential for assessing PIRC's current position and determining our future direction within the Scottish justice system.

In response to these pressures and evolving circumstances, PIRC resolved to undertake this comprehensive Strategic Review. This decision reflects a forward-looking approach to organisational governance and underscores a commitment to ensuring that PIRC remains effective, resilient and fully equipped to meet the demands of our role in the years ahead.

Objective

This Strategic Review was designed to assess PIRC's past and current performance, including our use of resources and how we have delivered our statutory responsibilities. It has identified and analysed the key operational, organisational, and strategic challenges facing PIRC in the short, medium and longer term, while examining the impact of legislative, technological, and societal changes on our role and capacity. The review also provides an evidence base to inform the development of a new Strategic Plan to guide PIRC's growth and direction over the next three years. In addition, it evaluates PIRC's governance, leadership, and stakeholder engagement within the context of our evolving remit.

Methodology

Initially, we pooled the expertise of our staff to assess major changes in our strategic landscape and political and legal enabling environment. They identified a range of topics representing current and forthcoming challenges for PIRC. Thereafter, the topics were researched in more detail by Subject Matter Experts (SMEs) from across PIRC. The SMEs assessed and scored the risks associated with each topic. The scores for all topics were then validated and moderated by our Strategic Review Advisory Group (SRAG), comprising members of the Senior Leadership Team (SLT), as well as PIRC's Audit and Accountability Committee (AAC). This ensured that the final risk score assigned to each topic was subject to robust validation.

Full details of the methodology applied are contained in [Appendix A](#).

²Serious incidents can include serious injuries or deaths in custody or following police contact, and allegations of criminality against on-duty officers. | ³[The Rt Hon Lady Elish Angiolini KC's Independent Review of Complaints Handling, Investigations and Misconduct Issues in Relation to Policing](#)

4. Strategic Context

Our purpose

PIRC's purpose is to fulfil our statutory duties to provide independent oversight of policing in Scotland.

Our statutory duties primarily arise from:

- Police, Public Order and Criminal Justice (Scotland) Act 2006⁴
- Police and Fire Reform (Scotland) Act 2012⁵
- The Police Investigations and Review Commissioner (Investigations Procedure, Serious Incidents and Specified Weapons) Regulations 2013⁶
- The Police Service of Scotland (Senior Officers) (Conduct) Regulations 2013⁷
- Police (Ethics, Conduct and Scrutiny) (Scotland) Act 2025.

Our mission

PIRC's mission is to promote and support public confidence in policing in Scotland through independent, evidence-based oversight.

Our values

- **Impartiality**
We work fairly and independently, considering all evidence objectively and basing our decisions on sound professional judgement.
- **Respect**
We treat everyone with courtesy and dignity.
- **Integrity**
We act with honesty, openness, and accountability.

Legal and regulatory framework

PIRC's statutory duties include:

- Conducting independent investigations into deaths and serious incidents involving police officers
- Reviewing the handling of complaints by policing bodies operating in Scotland
- Exercising powers equivalent to those of a police constable during investigations, including search, seizure, and arrest.

Recently, the Police (Ethics, Conduct and Scrutiny) (Scotland) Act 2025 (the PECSS Act) expanded and strengthened our role. The Act introduced significant reforms, including:

- a statutory Code of Ethics for Police Scotland
- a duty of candour, requiring full cooperation from police personnel during investigations
- enhanced investigatory powers for PIRC, particularly in cases involving misconduct or those undertaken in the public interest
- enabling powers to allow PIRC to 'call in' complaints considered to be in the public interest
- establishing an audit role for PIRC in respect of whistleblowing.⁸

These reforms reflect the Scottish Government's stated commitment to improving transparency, ethical standards, and public trust in policing. They originated from recommendations in the Angiolini Review, which called for more robust oversight mechanisms and greater accountability in police conduct.

The policing bodies we can investigate or review are:

- Police Scotland
- The Scottish Police Authority (SPA)
- British Transport Police (BTP)
- Civil Nuclear Constabulary (CNC)
- National Crime Agency (NCA)
- The Ministry of Defence Police (MDP)
- His Majesty's Revenue & Customs (HMRC)
- UK Border Force
- UK Visas and Immigration and
- the Independent Commission for Reconciliation and Information Recovery (ICRIR)

PIRC has a meaningful impact on policing through our investigations and reviews. We can make recommendations, highlight learning points and direct policing bodies to reconsider their response to a complaint. These are done with a view to supporting improvement in how policing bodies in Scotland deliver their service.

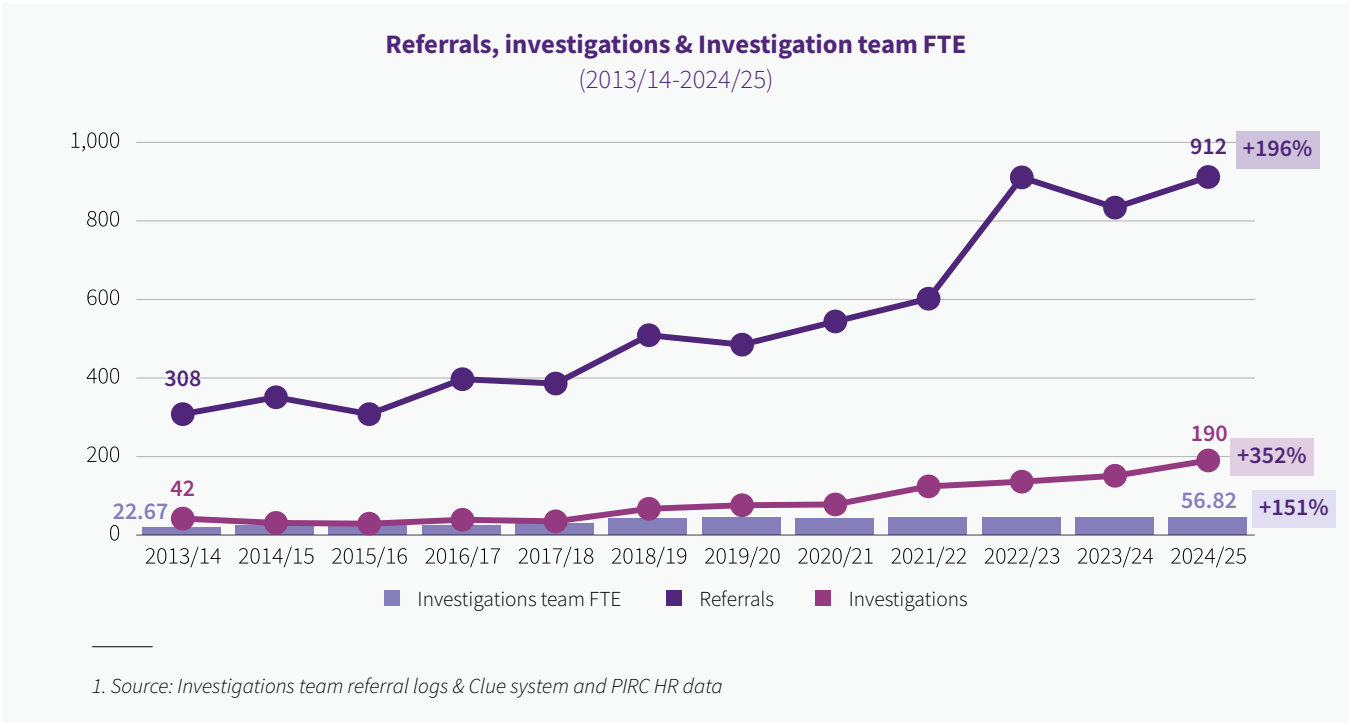
⁴Police, Public Order and Criminal Justice (Scotland) Act 2006 | ⁵Police and Fire Reform (Scotland) Act 2012 | ⁶The Police Investigations and Review Commissioner (Investigations Procedure, Serious Incidents and Specified Weapons) Regulations 2013 | ⁷The Police Service of Scotland (Senior Officers) (Conduct) Regulations 2013 | ⁸The PECSS Act provides for the auditing by PIRC of Police Scotland and the Scottish Police Authority's arrangements for handling whistleblowing complaints, while it is also intended that PIRC will shortly be added to the list of prescribed organisations under the Public Interest Disclosure Act 1998 to whom protected disclosures can be made.

Strategic workload analysis

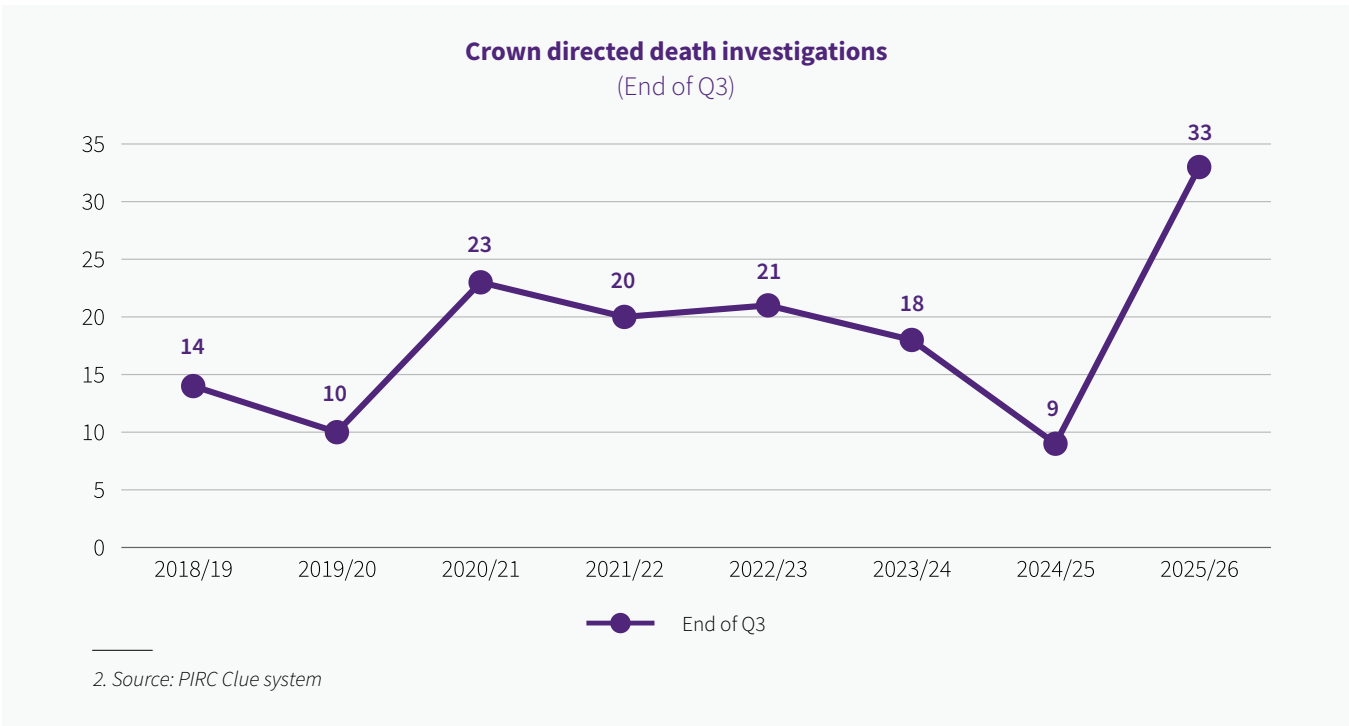
PIRC’s workload has increased substantially over the past decade, reflecting our expanded remit and growing demand for public accountability.

Investigations

In 2013/14, PIRC assessed 308 investigation referrals and conducted 42 investigations, 18 of which were at the direction of the Crown Office and Procurator Fiscal Service (COPFS). In direct comparison, during 2024/25, PIRC assessed 912 investigation referrals and conducted 190 investigations, of which 174 were COPFS directed.



This reflects a 196% increase in referrals and a 352% increase in investigations.

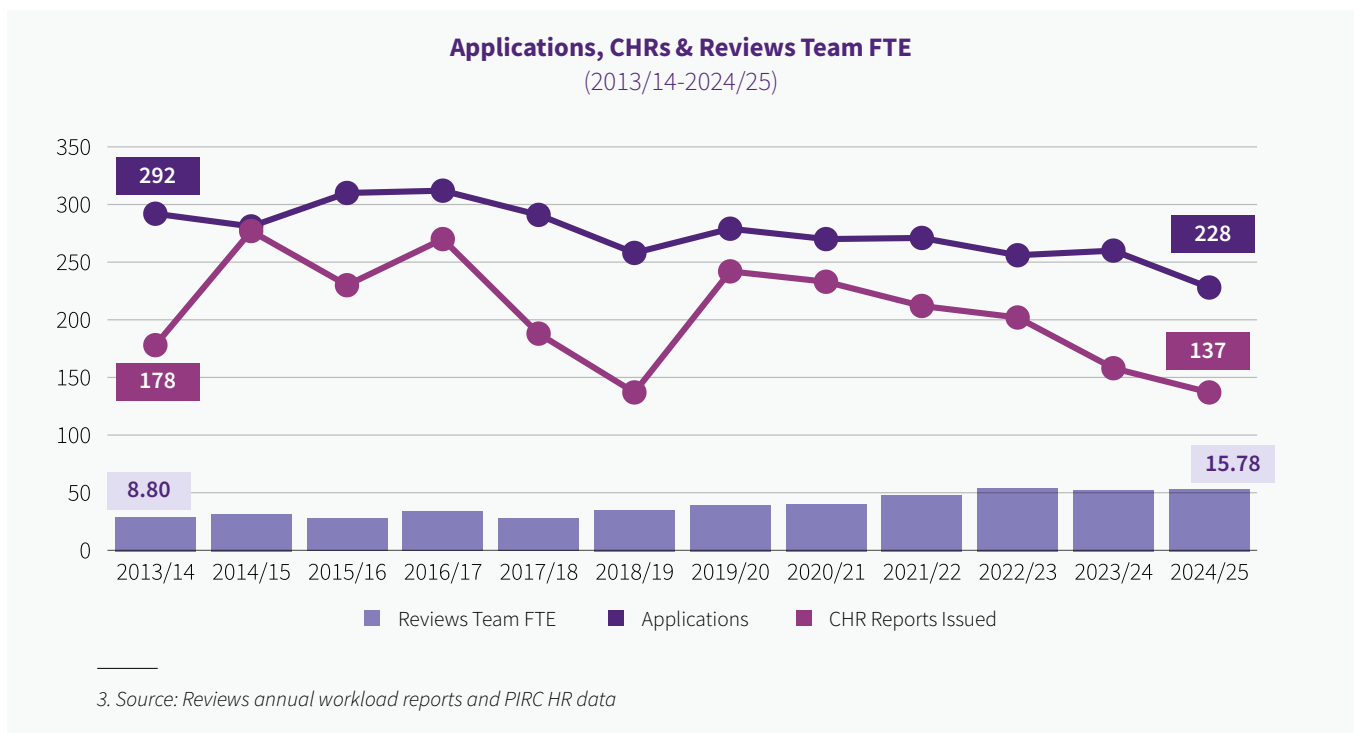


In the current financial year (2025/26), a significant annual increase (267%) has been noted in the number of death investigations undertaken at the direction of COPFS. Although the number of death investigations was low in 2024/25, we have still experienced an increase of around 83% in this area over the last three financial years.

PIRC has no scope for discretion in these cases and must conduct an investigation where directed. This is a source of increased workload that is beyond our control and for which we cannot fully plan. In turn, this further complicates the resourcing issues discussed in the Investigations subsection of the [Thematic Analysis](#) section of this Review.

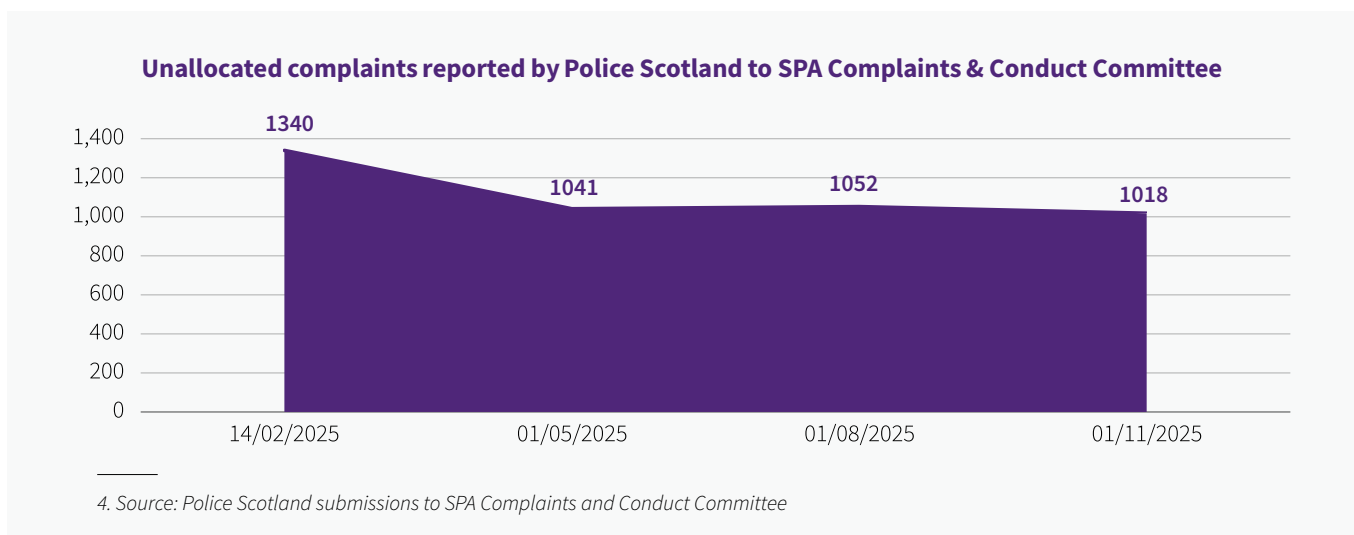
Complaint Handling Reviews (CHRs)

In 2013/14, PIRC received 292 CHR applications, reviewed 600 Heads of Complaint (HoCs) and completed 178 CHRs. In comparison, during 2024/25, PIRC received 228 CHR applications, reviewed 554 HoCs and completed 137 CHRs.

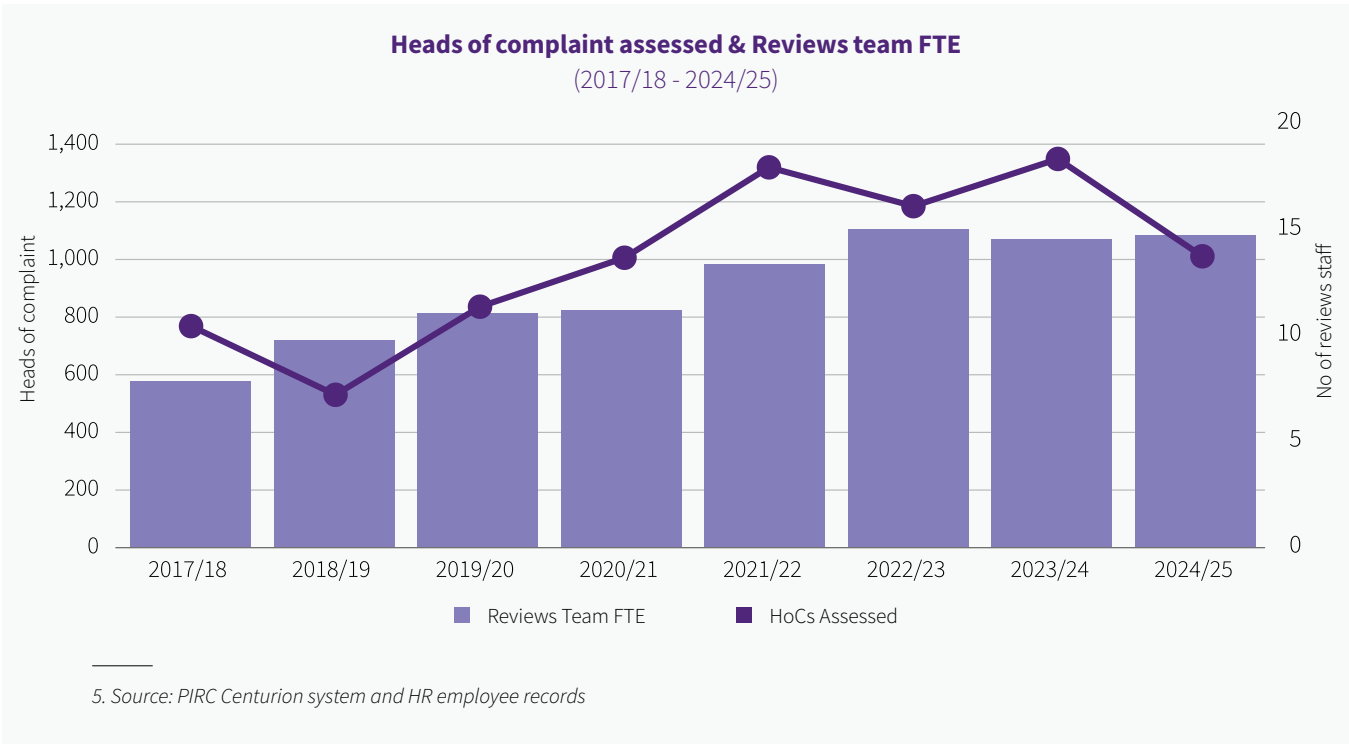


As of January 2026, Police Scotland has approximately 1,000 unallocated complaints.

This represents a risk for PIRC, given there is potential for a significant number of these complaints to translate into CHR applications once they have been allocated and responded to by Police Scotland.



While the volume of CHR applications has remained broadly stable over the years, their complexity has increased significantly. This is evidenced by a notable rise in HoCs assessed from 2017 onwards.⁹



Overall, since our inception in 2013/14, we have:

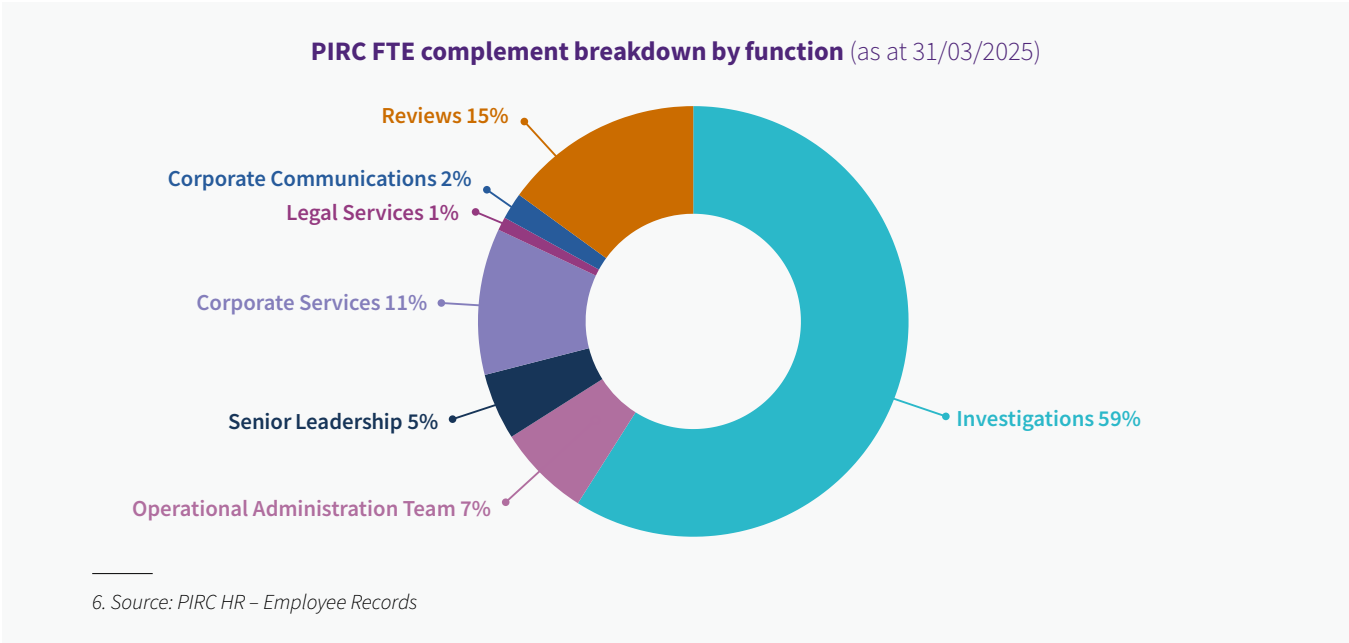
- ✓ Completed 998 investigations
- ✓ Examined 3,308 CHR applications
- ✓ Issued 3,495 recommendations, achieving a 97% implementation rate.

The data highlights a marked escalation in investigative demand and workload complexity, underscoring the need for sustained investment in resources, technology and streamlined process to maintain service standards and statutory compliance.

⁹‘HoCs Assessed’ data was recorded differently prior to 2017/18 and is not compatible with current reporting mechanism.

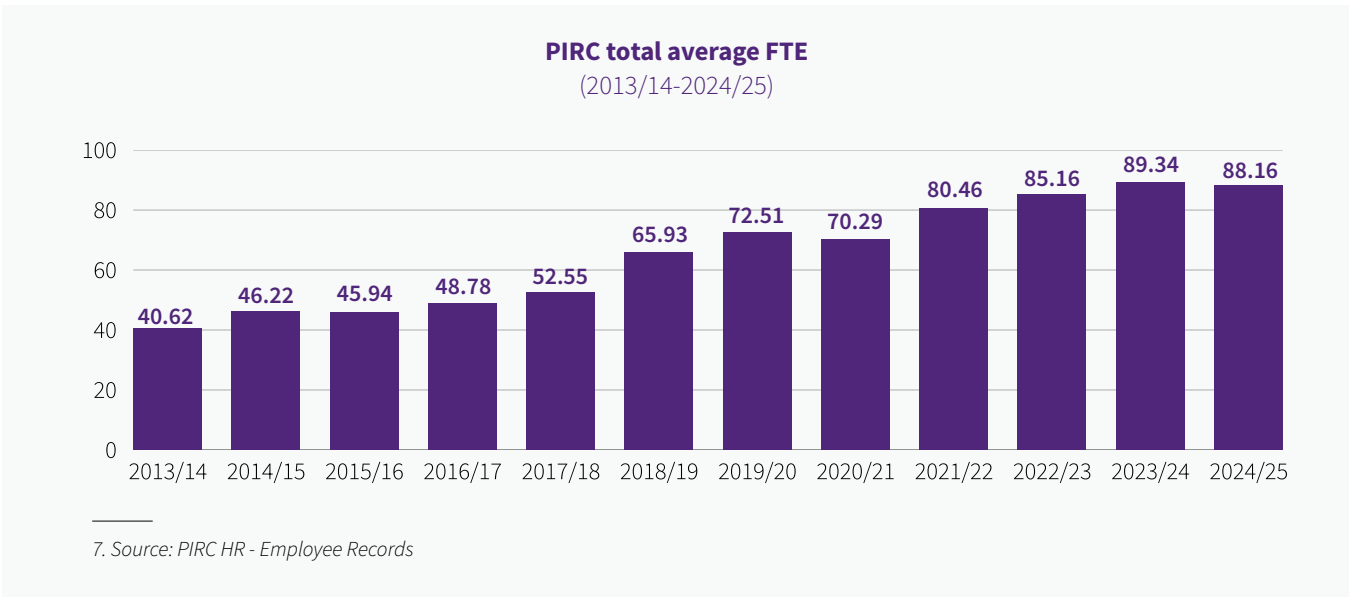
Workforce appraisal

In 2013/14, PIRC operated with approximately 40.62 full-time equivalent (FTE) staff, sufficient to discharge its statutory functions within a relatively stable and predictable environment. This lean structure was sufficient when the organisation had more limited scope and operational demand.



By 2024/25, staffing had expanded to 88.16 FTE staff, reflecting a significant increase in statutory responsibilities, case complexity, and public expectations.

This growth underscores PIRC’s evolution from a fledgling oversight body to a mature investigation and review authority. However, it brings with it the need for increased resource and sustainable workforce planning.

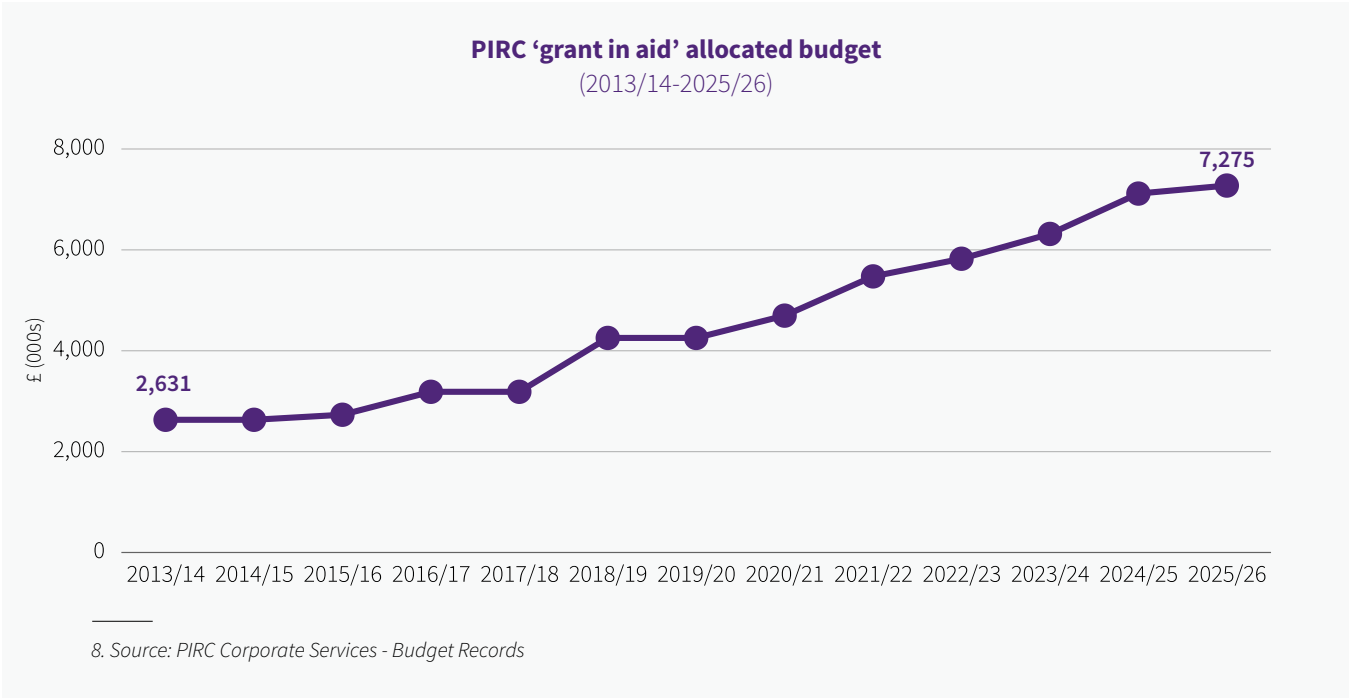


The near 120% increase in headcount over a decade demonstrates operational scaling; however, without corresponding investment in capability development and efficiency measures, the organisation risks capacity strain and diminished agility in responding to future legislative and societal demands.

Budget allocation

The Commissioner is appointed by and accountable to Scottish Ministers and is entirely independent of the police. PIRC is funded by the Scottish Government. We have no self-generating funding streams.

During 2013/14, PIRC was allocated a budget of £2.6 million. Funding was proportionate to a small, newly established team with core operational requirements when external pressures were minimal.



During 2025/26, PIRC was allocated a budget of £7.275 million. Despite the budget increase of approximately 176%, financial growth has not kept pace with a fourfold rise in investigative workload and the increasing complexity of cases.

Escalating costs for legal representation, technology investment and staff wellbeing have compounded pressures. Inflation and public sector pay commitments have further eroded real-terms funding, constraining flexibility and creating sustainability risks.

Societal changes

Societal changes continue to exert a profound influence on policing and, by extension, the work of PIRC. One notable example is the prevalence of digital technology, which has brought about a significant increase in the use of digital evidence during our investigation and reviews. Advances in this technology have also transformed how evidence is retrieved and prepared for submission to COPFS. This evolution demands improved technical capability and robust data-handling processes within our investigations, particularly with the partially completed deployment of Body Worn Video (BWV) to every operational Police Scotland officer.

Medical advances have also reshaped frontline policing. Officers are now equipped to deliver immediate medical assistance, including the administration of Naloxone for suspected opioid overdoses, a practice seen in our recent investigations.

Similarly, mental ill health has emerged as a recurring theme in our casework. While awareness and understanding of mental health crises have improved, the availability of medical resources and facilities remains inconsistent across Scotland. In the absence of adequate services, the police are increasingly first responders to incidents involving individuals in acute mental distress, driving a substantial rise in related calls.

This has been a significant source of our increasing Crown-directed casework, which can require wide-ranging complex medical evidence to be explored alongside associated compliance considerations in respect of police public protection arrangements.

National policing and public safety landscape

PIRC is responsible for the oversight of a number of policing bodies, including Police Scotland and the SPA. Demand on these organisations has continued to evolve since the formation of a single police service in 2013, placing additional pressures on reducing resources.¹⁰ The complexity in serious and organised crime groups is increasing rapidly, and vulnerability in society continues to place a significant strain on policing and other services. The roll out of a proportionate response to policing means services are being prioritised to the greatest threats, risk and harms, and where lines of enquiry exist.

Police Scotland is the second largest police service in the UK and, as of December 2025, employed 16,416 FTE police officers and 6,008 FTE police staff.

During 2023/24, Police Scotland responded to almost 2.2 million 999 emergency and 101 non-emergency calls and over 190,000 emails. Its annual budget allocation was over £1,400 million.

During 2022/23, Police Scotland generated 1,501,274 STORM incidents, processed 99,223 people who had been taken into custody, and dealt with 6,621 complaints against the police.¹¹

The 2023/24 Scottish Crime and Justice Survey¹² detailed that around one-in-five adults (19.9%) were a victim of at least one crime covered by the headline survey. This included property and violent crime as well as, for the first time, crimes of fraud and computer misuse. While the prevalence and volume of both property and violent crime combined had increased since 2021/22, they remained at similar levels to the pre-pandemic position in 2019/20 and below that in 2008/09.

The latest figures also showed that, while the majority of people continued to feel safe in their local communities, most measures of confidence in the police and justice system had declined in recent years.

Public views on the overall performance of the police in their local area and their effectiveness across a range of measures showed mixed results. Many remained broadly positive but their numbers had fallen in recent years. Less than half of adults in Scotland (45%) believed the police in their local area were doing an 'excellent' or 'good' job in 2023/24. This was a decrease from 61% in 2012/13 and 49% in 2021/22.

Views on the public's confidence in police effectiveness across a range of measures including preventing crime, responding to incidents, and supporting victims of crime, were generally positive in 2023/24 but had fallen since 2014/15.

Views on whether the police treated people fairly or focused on issues important to the community were at similar levels to 2009/10 but had generally fallen since 2019/20. Views on how police conducted themselves in the local community had been stable over the longer term but had shown some reductions in recent years.

National Performance Framework

The National Performance Framework sets out a vision for national wellbeing in Scotland. It features national outcomes designed to tell us what good looks like. Of these outcomes, two are particularly relevant to the work of PIRC – 'We live in communities that are inclusive, empowered, resilient and safe' and 'We respect, protect and fulfil human rights and live free from discrimination'. The national outcomes are currently under review. Consideration will be given to how PIRC's work aligns with revised outcomes.

Public sector reform: shaping Scotland's future

Public sector reform is not just about how services will be delivered and funded; it is about creating a sustainable model that meets the needs of future generations.

The challenges of rising demand, constrained budgets and persistent inequality were first addressed in 2011 by the Commission on the Future Delivery of Public Services (known as the 'Christie Commission').¹³ The Christie Commission proposed a transformative agenda built on four principles:

- **People:** Empower individuals and communities
- **Partnership:** Collaborate to integrate services and improve outcomes
- **Prevention:** Invest in prevention rather than reaction
- **Performance:** Deliver efficient, accountable, value-for-money services.

¹⁰SPA Annual Report and Accounts 2023-2024 | ¹¹Figures from PIRC Annual Report 2022/23, Page 29 | ¹²Scottish Crime and Justice Survey 2023/24: Main findings - gov.scot |

¹³Christie Commission on the future delivery of public services - gov.scot

Despite some significant successes over the intervening years, the Scottish Government recognised that this vision had not been delivered to its full potential. In response, the Scottish Government launched its Public Sector Reform Strategy in June 2025, aiming to tackle fiscal pressures, demographic shifts and rising demand.

The strategy targets £1 billion in savings over five years through:

- streamlining corporate functions and overheads
- rationalising public sector estates
- accelerating automation and digital service delivery
- annual 0.5% reduction in non-frontline staff
- greater reliance on the third sector for service delivery.

Looking ahead, these reforms present both opportunities and risks for PIRC.

Opportunities: Increased efficiency, improved citizen experience through digital services, and stronger partnerships with the third sector which could transform service delivery.

Risks: An over-reliance on automation may reduce human oversight, while workforce reductions could impact service quality and resilience. Furthermore, it may not meet the needs of those who feel let down by the police, particularly victims of serious or sensitive incidents. Effective governance and continuous evaluation will be critical to ensure reforms deliver on their promise without compromising public trust.

Best Value

Best Value¹⁴ provides a common framework for continuous improvement in public services in Scotland, and is a key foundation of the Scottish Government's public service reform agenda.

Accountable Officers have a specific responsibility to ensure that arrangements have been made to secure Best Value. The Scottish Ministers expect all Accountable Officers to comply with the duty of Best Value placed upon them.

In addition, the Boards of relevant public service organisations have corporate responsibility for promoting the efficient and effective use of staff and other resources by the organisations in accordance with the principles of Best Value.

As a public body, PIRC must comply with the duty of Best Value in Public Services, which is defined as follows:

- to make arrangements to secure continuous improvement in performance whilst maintaining an appropriate balance between quality and cost; and, in making those arrangements and securing that balance
- to have regard to economy, efficiency, effectiveness, the equal opportunities requirements, and to contribute to the achievement of sustainable development.

Best Value guidance identifies seven key themes in relation to which public bodies must demonstrate a focus on continuous improvement in performance. The themes are:

- Vision and leadership
- Governance and accountability
- Effective use of resources
- Partnerships and collaborative working
- Working with communities
- Sustainability
- Fairness and equality.

These seven themes are well aligned to the findings and recommendations of our Strategic Review. This reinforces the credibility of our review process, supporting stakeholder confidence in our methodology and conclusions.

¹⁴[Best value in public services: guidance for accountable officers - gov.scot](#)

5. Governance & accountability

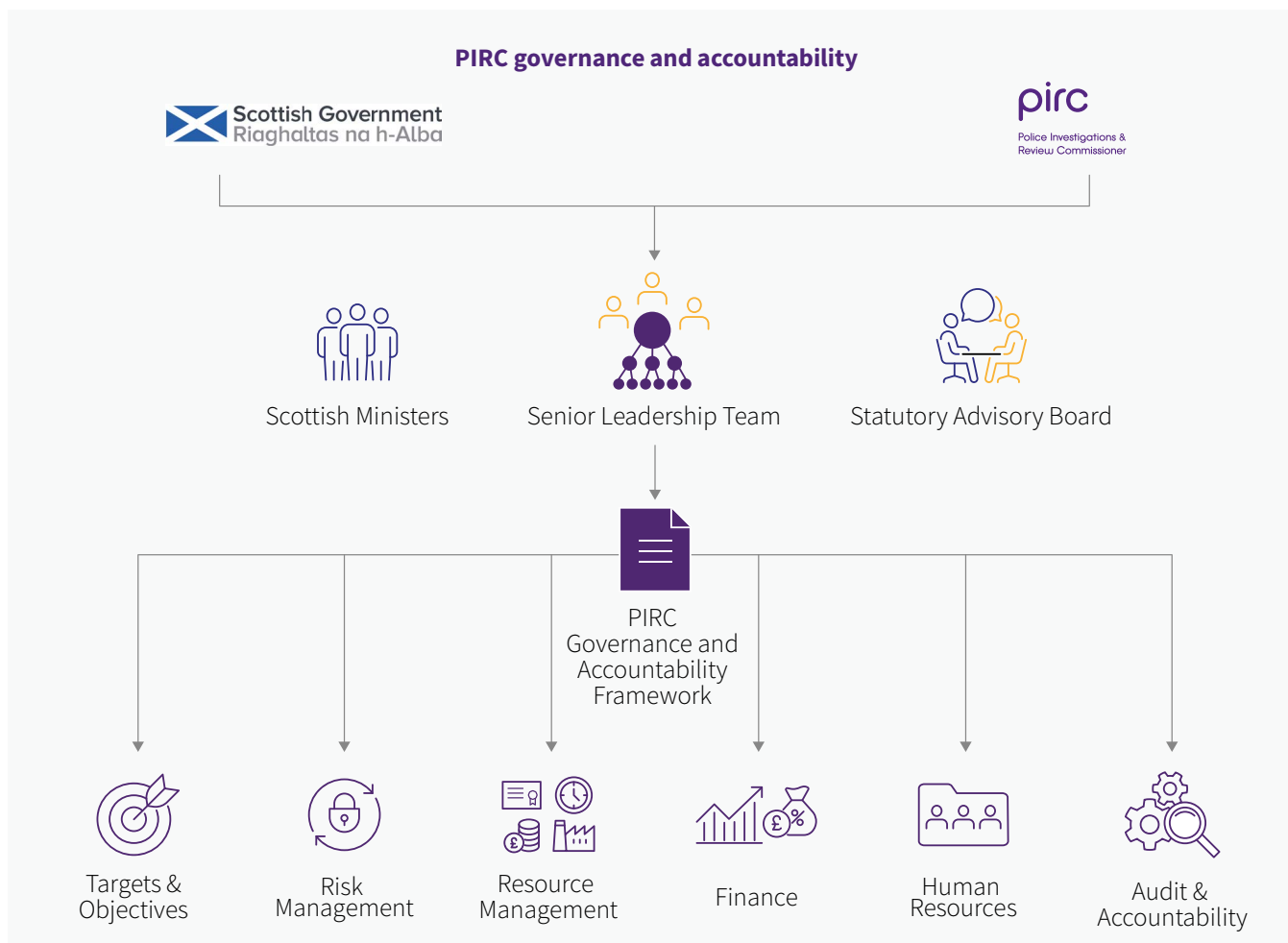
Background

Good governance and leadership within PIRC are vital for enhancing public trust in the organisation and providing the platform for effective service delivery. Our governance and leadership structure must promote the key principles of accountability, transparency and integrity, whilst effectively managing risk and performance. This ensures that we can benefit the organisation, our stakeholders and the general public we are here to serve, by navigating challenges effectively.

Governance and Accountability Framework Document

PIRC adheres to the Scottish Government Governance and Accountability Framework Document,¹⁵ which is agreed between PIRC and the Scottish Ministers. The Framework Document was updated in January 2026 to reflect that the PECSS Act provides that we should now create and maintain a Statutory Advisory Board (SAB), replacing the functions previously undertaken by our AAC.

The Framework Document sets out the key responsibilities of the Commissioner, the PIRC Accountable Officer, PIRC's SLT, the SAB, the Scottish Ministers and the Scottish Government Portfolio Accountable Officer. The Framework Document also sets out that PIRC should have a Strategic Plan to reflect the organisation's strategic aims and objectives as agreed with the Scottish Ministers. The Strategic Plan will inform the development of Annual Business Plans, outlining our key targets and milestones in each financial year.



¹⁵[PIRC Governance and Accountability Framework document](#)

The Commissioner's responsibilities

In leading PIRC, the Commissioner has a wide range of responsibilities set out by the Framework Document. In relation to governance and leadership, the Commissioner must ensure that the SLT is diverse in terms of the relevant skills, experience and knowledge appropriate to directing PIRC business, and in terms of protected characteristics under the Equality Act 2010.

The Commissioner must also ensure that the organisation carries out regular self-assessment and is working effectively and efficiently. This is underpinned by maintaining a suitable performance appraisal system to assess individual performance on a continuous basis, to ensure the organisation is able to meet its key aims and objectives.

The PIRC Accountable Officer's responsibilities

The Framework Document provides that the Accountable Officer's responsibilities are set out in the [Scottish Public Finance Manual](#) (SPFM). However, the document itself provides examples of some of these responsibilities, including but not limited to, the Accountable Officer ensuring that PIRC has:

- robust performance and risk management arrangements in place (consistent with the Risk Management section of the SPFM)
- effective arrangements in place to provide assurance on risk management, governance and internal control
- a SAB which consists of a Chair and at least three external and independent members.

PIRC SLT responsibilities

The Framework Document provides that a key responsibility of the SLT is to take forward the strategic objectives agreed by the Scottish Ministers, as set out in PIRC's Strategic Plan. The Framework Document further provides that the SLT must determine the steps needed to deal with changes which are likely to impact on the strategic aims and objectives of PIRC, or on the attainability of its operational targets.

PIRC SAB responsibilities

The Framework Document states that the PECSS Act requires the Commissioner to establish and maintain a SAB. The role of the SAB includes advising the Commissioner about matters relating to governance, and ensuring PIRC is committed to delivering its functions effectively, efficiently and in accordance with the aims, policies and priorities of the Scottish Ministers.

Current governance structure

PIRC currently has a SLT consisting of the Commissioner, the Director of Operations and the following Heads of Service:

- Head of Corporate Services
- Head of Legal Services
- Head of Investigations
- Head of Reviews and Policy.

SLT is also attended in an associate capacity by the Head of Communications and the Finance Manager. Additional members may be appointed or attend at the discretion of the SLT.

The SLT meets on a monthly basis, or at such times as may be fixed by the Commissioner. It has approved terms of reference to define its role, authority, quorum and decision-making process. This assists the Commissioner, the Accountable Officer and the SLT as a whole in ensuring they discharge their responsibilities as set out in the Framework Document. The minutes of the SLT meetings are published on the PIRC website. Confidential matters are dealt with by way of closed minutes, which are not published.

The key responsibilities of the SLT include setting and being accountable for advancing the strategic objectives agreed by the Scottish Ministers, publishing them in PIRC's Strategic Plan, and delivering them through the Annual Business Plan.

At present, three of our four strategic objectives relate to KPIs set to track operational service delivery. Whilst it is recognised that these KPIs are necessary to assist the SLT in measuring performance in the Investigations and Reviews business functions, they provide no scope to develop organisational functions and activity in terms of capacity, service delivery or tracking service user satisfaction.

The organisation has been working hard to meet short term targets, and that has resulted in the timely delivery of investigations and reviews. At the same time, there is an opportunity to balance this with a stronger focus on strategic change. Achieving performance targets is important, but taking a wider view would help embed a culture that looks ahead, invests in building skills, supporting staff, and improving the service user experience.

If we focus too much on day-to-day service delivery, we may neglect the longer-term goals and the steps needed to achieve them. Consequently, our ability to adapt and innovate, especially during times of rapid change and high demand, will be limited. By combining short-term wins with medium to longer term investment in people and systems, we can build resilience and set PIRC up for lasting success. In doing so, we must ensure that we balance our revised strategic objectives against tangible initiatives to strengthen our overall responsiveness to current and forthcoming challenges.

During the Strategic Review, the SLT demonstrated the vital role it plays in determining the steps needed to deal with changes which are likely to impact on the strategic aims and objectives of PIRC, or on the attainability of its operational targets. This involved convening SRAG, a sub-group of the SLT. The specific role of SRAG was to review and moderate the results of an internal risk scoring exercise, as part of the Strategic Review Risk Scoring Validation Process, to identify those corporate risks and priorities which will inform our long-term strategy and strategic objectives.

PIRC also has a SAB, comprised of an independent Chair and board members appointed by the Scottish Ministers. The SAB effectively replaces PIRC's AAC in providing independent scrutiny of our strategic plans and our performance against objectives and targets set in business plans. The SAB will also promote the efficient, economic and effective use of resources consistent with the principles of Best Value, and regularly scrutinise financial performance and compliance with financial guidance issued by the Scottish Government.

During the Strategic Review's Risk Scoring Validation Process, the importance of this independent scrutiny was highlighted by convening an AAC sub-group to provide oversight of this process. This ensured that its internal results were subject to further review, challenge, modification and ratification.

There are a number of governance and leadership related sub-groups operating across the organisation, including the Diversity, Equality and Inclusion (DEI) group and the Staff Representative group.

Overall, PIRC's governance and leadership arrangements are well-established and meet the requirements set out in the Scottish Government's Governance and Accountability Framework Document.

A review of the sub-groups supporting the overarching governance and leadership arrangements would be beneficial. This would allow us to assess the purpose, membership and output of these sub-groups and enhance PIRC's ability to tackle issues which impact a number of different areas of the business. A review would also ascertain whether new groups are required to ensure we are prepared to manage emerging issues and meet new challenges. These include, but are not limited to:

- refocusing on and strengthening our role as a key safeguard for the human rights of those who come into contact with the police, and
- ensuring we are engaged in new policy initiatives and proposed legislative changes impacting policing bodies operating in Scotland and PIRC itself.

Business governance approach

PIRC currently has a 2023-25 Strategic Plan, which was extended by one year until March 2026 to allow the Strategic Review time to gather evidence and inform our strategic direction. The Strategic Plan sets out our vision, purpose and values, and our strategic priorities. We also have a 2025/26 Business Plan, which provides information on the role of PIRC, our available resources, and how our current strategic objectives will be delivered. These plans are published on PIRC's website.

Going forward, the Strategic Plan will set out higher-level strategic objectives to support our long-term mission and ambitions. These should be underpinned by Annual Business Plans with specific and measurable actions setting out how the objectives will be delivered and by whom. The Business Plans should set milestones and timescales for completion, align to the Strategic Risk Register, and provide assurances for the SLT and SAB on corporate development progress. Progress will be reported on regularly and monitored by the SLT and the SAB.

Current risk management framework

PIRC's Risk Management Policy¹⁶ defines our Risk Management Framework. The Framework is used to identify risks to the effective and efficient delivery of our statutory duties, and to define the strategy for eliminating, or minimising the impact of, these risks.

We currently have eight strategic risks on our risk register:¹⁷

1. **Capability, leadership and skills:** the risk is that we fail to build and retain the capability, leadership and skills essential for resilience, innovation, ensuring PIRC can meet future challenges and stakeholder expectations.
2. **Capacity:** the risk is that we fail to ensure we have the capacity to deliver effective outcomes, meet objectives and respond to evolving demands.
3. **Digital:** the risk is that we fail to effectively influence and align with Scottish Government-led digital strategies to ensure PIRC has appropriate, secure and innovative digital solutions.
4. **Engagement:** the risk is that we fail to engage stakeholders effectively and promptly, to ensure confidence in PIRC's independence, transparency and outcomes.
5. **Finance:** the risk is that we fail to agree a sustainable long-term underfunding resolution that maintains organisational capacity and supports innovation, ensuring that outcomes are timely and credible in the eyes of all stakeholders.
6. **Governance:** the risk is that we fail to establish and maintain appropriate structures and principles that transparently deliver outcomes in line with public expectations and statutory responsibilities.
7. **Improvement and innovation:** the risk is that we fail to identify and maximise opportunities to become more responsive, efficient and future ready, ensuring PIRC can adapt to change and meet evolving stakeholder expectations.
8. **Wellbeing:** the risk is that we fail to prioritise and support the wellbeing of staff and stakeholders to ensure organisational resilience, positive engagement and performance.

PIRC uses a Risk Management Programme to capture changes and updates made to the Risk Register, and a report on the strategic risks is provided to the SLT for review at its monthly meeting.

Our current internal audit plan is influenced by these eight strategic risks and was agreed by the AAC.

Going forward, the SAB will provide independent oversight of PIRC's risk monitoring arrangements through review of the Strategic Risk Register and associated actions.

The SAB can challenge PIRC's assessment of the strategic risks and the controls in place to mitigate them.

¹⁶PIRC Risk Management Policy, July 2024 | ¹⁷PIRC Risk Register, November 2025

6. Thematic Analysis

This chapter provides analysis of PIRC's operational effectiveness and the strategic challenges shaping our future direction.

It examines PIRC's three core business functions – Investigations, Reviews and Corporate Services. We explore emerging trends and cross-cutting themes that will influence organisational priorities over the next three years. The purpose of this chapter is to establish an evidence base to inform decision-making and guide the development of PIRC's Strategic and Annual Business Plans for 2026/27 to 2028/2029.

The analysis is designed for clarity and logical progression. Each subsection follows a systematic structure, beginning with an overview of the current position and statutory context, then moving to an assessment of performance data, risks, and dependencies. Key recommendations are highlighted where relevant.

Subsections

A. Strategic drivers and challenges

Firstly, we address cross-cutting issues such as legislative change, increasing demand and case complexity, geographical coverage, workforce pressures, funding constraints, and technology dependencies (including BWV and the Digital Evidence Sharing Capability). Each theme was analysed for its operational, financial and reputational impact.

B. Investigations

Next, we examine PIRC's investigative function, our statutory obligations and performance against KPIs. This includes analysis of workload trends, drivers of increased demand such as the Lord Advocate's References on the law of corroboration¹⁸ and our operational resilience.

C. Reviews

We then assess the Reviews team's CHR process, eligibility criteria and outcomes. This section will evaluate performance benchmarks and recent trends in application volumes.

D. Corporate services overview

Thereafter, we evaluate the functions that underpin our work including governance, finance, human resources and digital services. This includes consideration of efficiency measures, resource constraints and organisational resilience.

E. Effective partnership engagement

Finally, we explore PIRC's stakeholder relationships, communication strategies and engagement mechanisms. We discuss current practice and identify gaps in engagement which are critical to maintaining public confidence and transparency.

Comparative analysis

Consideration was given to benchmarking PIRC with counterpart oversight bodies in other UK nations and Ireland. However, the statutory mandates, operating contexts and challenges faced by the other oversight bodies can vary significantly from those of PIRC. Benchmarking was therefore considered to be of limited use in articulating or clarifying issues.

Risk scoring validation process

An initial total of 18 topics were grouped in four thematic categories to ensure we represented the principal strands of risk currently facing PIRC i.e. Operational Function, Law and Policy Changes, Technology and People. The Risk Scoring Validation Process ensured that risk scores assigned to each topic were subject to robust validation. Full details of the Risk Scoring Validation Process and the thematic categories are contained in Appendices A and B of this report.

The key topics will be explored further in the following sections.

¹⁸[Lord Advocate's References](#)

A. Strategic drivers and challenges

The following themes were assessed to have significant implications for PIRC and will require coordination and collegiate working across the organisation to address.

Law and policy changes

Given the breadth of legislative and policing reforms, alongside public inquiries and other influencing factors, PIRC must proactively anticipate, adapt and respond to maintain alignment with the evolving scale of demand. From an organisational perspective, establishing a robust horizon-scanning capability would significantly enhance strategic preparedness, ensuring optimal capacity, service delivery and resilience.

Police (Ethics, Conduct and Scrutiny) (Scotland) Act 2025

The PECSS Act makes a range of changes to police ethics, conduct and scrutiny arrangements. It extends PIRC's statutory functions. Its impact on PIRC's Investigations, Reviews and Corporate Services functions are set out below.

The Act also provides that PIRC will have statutory oversight of police whistleblowing arrangements, and the power to review any police or SPA policy or procedure, should this be in the public interest. These extended powers will require development of an entirely new capability, with a decision to be made on whether this will form part of an existing function or if a separate function should be created.

- **The PECSS Act and Investigations**

The PECSS Act provides that PIRC can now investigate serving and former police officers, regardless of when the alleged offence occurred (before, during or after their police service). This could include historical allegations, which can be more challenging and time intensive to investigate. While a small number of our staff have been involved in non-recent investigations and 'cold case' work, experience in this area is still limited. The PECSS Act also clarifies that PIRC can be directed to investigate deaths involving off duty police officers or staff, even where there is no apparent connection to their police role.

There is also provision that would allow disciplinary processes to continue for up to one year after an officer resigns from their position. This is intended to close a loophole that could conceivably see an officer accused of a serious offence resign and then almost immediately take up a position within another policing service. Accordingly, PIRC will require to undertake and support disciplinary proceedings in any case where an officer is subject to them within the one-year period after leaving the service.

At present, the SPA conducts a preliminary assessment of allegations of senior officer misconduct before referring the matter to PIRC. The PECSS Act provides that the SPA will automatically refer all such allegations directly to PIRC. This places the conduct assessment duty on PIRC alone, a task for which we have limited capability and capacity at this time.

The PECSS Act also affords PIRC powers to investigate allegations made against officers from policing bodies outside Scotland who are operating in the country in a 'mutual aid' capacity. This has the potential to substantially extend our stakeholder network and will likely require close interaction with policing bodies in other parts of the UK and their respective oversight bodies.

- **The PECSS Act and Reviews**

The PECSS Act makes a material change to PIRC's Reviews function from one predominantly involving the review of complaints handling to one that includes direct complaint handling. New powers allocated to PIRC include the ability to 'call-in' complaints where complaint handling is deemed to have been inadequate and our intervention is required in the public interest. This would involve taking statements, gathering evidence and engaging with complainers and officers face-to-face. The Act also introduces new provisions for complaint reconsiderations by PIRC. Existing strengths in CHR analysis, audit and guidance development mean that the Reviews function is mostly capable in terms of skills but not sufficiently resourced or staffed.

As a result of the PECSS Act, PIRC's recommendations will now have a statutory basis, requiring policing bodies to formally respond and allowing PIRC to publish these responses when they are received.

Furthermore, the PECSS Act guarantees that PIRC will be given access to Police Scotland electronic information systems, such as Centurion. Work is required to facilitate this access for PIRC Administrative and Reviews staff.

• **The PECSS Act and Corporate Services**

As noted above, the PECSS Act requires PIRC's existing AAC to transition to a Statutory Advisory Board. PIRC's Corporate Services team plays a key role in supporting the role played by the SAB.

Although the PECSS Act makes no further provisions directly affecting how our corporate services are delivered, much of the burden of implementation will affect this business area. Key areas of focus will include:

- recruitment (where possible), including specialist skills to fill gaps in organisational knowledge and experience
- training / skills development in areas such as investigating historic allegations, police misconduct and whistleblowing
- strengthened focus on staff wellbeing and resilience
- IT Systems – SCOTS network scheduled cloud migration, with requirement to modify Centurion system
- management of increased volumes of freedom of information and subject access requests and stakeholder responsibilities
- increased travel arrangements arising from in-person investigations and audits.

Victims, Witnesses, and Justice Reform (Scotland) Act 2025

The Victims, Witnesses, and Justice Reform (Scotland) Act 2025 seeks to improve the treatment of victims and witnesses, improve the prosecution of sexual offence cases, and reform rules relating to juries and verdicts. Its provisions are wide-ranging and only some are relevant to PIRC:

• **Part 1: Victims and Witnesses Commissioner for Scotland**

The Act establishes a Victims and Witnesses Commissioner for Scotland, the intention being that the Commissioner will provide an independent voice for victims and witnesses, champion their views and encourage policy makers and criminal justice agencies to put victims' rights at the heart of the justice system.

We anticipate that the new Commissioner's general work, findings and recommendations may be relevant to PIRC, and that PIRC's work in respect of both Investigations and Reviews will be of interest to the Commissioner.

In the exercise of their functions, the Victims and Witnesses Commissioner has the power to work with, provide assistance to or consult PIRC. The Commissioner's powers and functions in respect of 'criminal justice agencies' do not include PIRC but may still have relevance insofar as they apply to other agencies (notably the Chief Constable). We therefore anticipate engaging with the Commissioner once appointed, to map areas of common interest and opportunities where information sharing and shared learning may be mutually beneficial.

• **Part 2: trauma-informed practice**

The Act's requirements for criminal justice agencies to adopt trauma-informed practice do not directly apply to PIRC but do apply to a number of our strategic partners, including Police Scotland and COPFS.

Research consistently demonstrates that trauma-informed practice improves outcomes for individuals interacting with justice services by reducing re-traumatisation, enhancing trust and supporting procedural fairness.

Failure to adopt such practice risks a poorer service, reputational harm, diminished public confidence, and generates potential gaps in alignment with sector-wide standards, particularly as strategic partners such as Police Scotland and COPFS embed trauma-informed practice into their operations.

The extent to which Police Scotland has embedded trauma-informed practice may have implications for PIRC's work, particularly in relation to complaints handling processes. PIRC should monitor how Police Scotland and COPFS implement trauma-informed approaches and assess any resulting impact on our own operations.

Internally, PIRC should consider progressing towards a trauma-informed workforce, in line with the Scottish Government's *Vision for Justice*,¹⁹ which seeks to ensure that all services are person-centred and trauma-informed. To support this, the National Health Service (NHS) Education for Scotland has developed a Knowledge and Skills Framework designed to guide the development of trauma-informed practice across the justice sector.

¹⁹Scottish Government, [The Vision for Justice in Scotland](#) (2022).

Recommendation 1: Advance trauma-informed practice across the organisation

Embed trauma-informed principles into policies, procedures and staff development to improve service delivery and support wellbeing.

Criminal Justice Modernisation and Abusive Domestic Behaviour Reviews (Scotland) Act 2025

The Criminal Justice Modernisation and Abusive Domestic Behaviour Reviews (Scotland) Act 2025 provides a legislative framework for domestic homicide and suicide reviews. The purpose of such reviews is to identify lessons following a domestic abuse related death, with the aim of preventing future abuse and deaths.

The Act has designated PIRC as a notifying body, that is, an agency which may identify deaths that we believe are suitable for review. To facilitate reviews, the Act also places duties of participation, cooperation and information sharing on specified bodies, including PIRC. Accordingly, PIRC will require to prepare for the Act's implementation, working alongside key partners.

United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Act 2024

This Act incorporates the United Nations Convention on the Rights of the Child (UNCRC) into Scottish domestic law. The Act makes it unlawful for Scottish public authorities, including PIRC and policing bodies, to act, or fail to act, in a way which is incompatible with the UNCRC requirements.²⁰

PIRC has already taken steps to embed a child-rights based approach in our work. The Investigations and Reviews teams briefed the SLT on the impact of the UNCRC and necessary preparatory actions. Actions that have been taken include:

- drafting statutory guidance on child-friendly complaints handling for all policing bodies in Scotland (to be launched in 2026)
- the development of child-friendly complaints handling procedures and guidance for PIRC staff
- enhanced case recording to flag and track cases involving children, allowing us to monitor and analyse their frequency and handling
- acquisition of specialist recording equipment for Joint Investigative Interviews (JIIs)
- commissioning training from the Convention of Scottish Local Authorities (COSLA), Police Scotland and Social Work Scotland on conducting child interviews sensitively to avoid distress or re-traumatisation
- identifying child advocacy services to support engagement with children.

Further work will be required to ensure PIRC fully implements the UNCRC requirements, including:

- updating key documents such as policies and procedures
- revising records management procedures to ensure retention aligns with the provisions of the Act.

PIRC will also consider whether formal Children's Rights and Wellbeing Impact Assessments should be applied across all functions.

Public interest in how PIRC complies with the UNCRC requirements when handling cases involving children is expected to increase significantly. The number of cases involving children is also expected to rise as a result of PIRC's expanded role under the PECSS Act as well as the introduction of more child-friendly complaints handling. Any failure to comply with the UNCRC requirements would compromise the service provided to children and present a substantial reputational risk to PIRC.

²⁰The UNCRC requirements are comprised of Articles 1 to 42 of the UNCRC, as well as the rights set out in the First and Second Optional Protocols.

Human Rights Bill

The Scottish Government is proposing to introduce a Human Rights Bill in the next parliamentary session, subject to the outcome of the 2026 Scottish Parliament election. The aim of the Human Rights Bill will be to further embed a human rights culture in Scotland by giving domestic legal effect to international economic, social and cultural rights and environmental standards, as well as rights relating to women, disabled people and racialised minorities. The Bill will require those delivering public services – including PIRC – to embed the rights in the delivery of our functions. In addition, oversight bodies such as PIRC will be required, in the exercise of our functions, to take steps to support the public authorities we scrutinise to comply with their duties under the Bill.

To date, PIRC has engaged with the Scottish Government to inform the development of the Bill and assess its service delivery, training and resource implications. Should the Bill form part of a future Programme for Government, PIRC will continue to assess its implications for our work and ensure its effective implementation. This work can be taken forward by PIRC's new Human Rights Group, while our monthly Human Rights Bulletins – prepared by staff in our Reviews team to highlight human rights issues affecting the justice system in Scotland – will be a useful tool to help raise staff awareness of the Bill's requirements. Given the key role PIRC plays in safeguarding the human rights of those who come into contact with the police, it is essential that we continue to strengthen our approach and embed human rights in our policies, procedures and practice.

Recommendation 2: Strengthen human rights and equalities integration

Enhance the visibility and impact of PIRC's human rights work through a dedicated working group, aligning with broader equalities and non-discrimination commitments.

Recommendation 3: Improve legislative foresight and readiness

Establish a horizon-scanning and policy engagement process to anticipate, influence, and prepare for legislative changes, including the introduction of enabling Regulations in 2026 for the PECSS Act and other reforms.

Specification of documents

A specification of documents is a legally binding court mechanism to recover information held by PIRC that may be relevant to civil and criminal proceedings.²¹ PIRC's duty is to act promptly, ensure only legally authorised disclosure, comply fully with the terms of the specification and formally certify that compliance to the court. Non-compliance could potentially lead to court hearings and reputational and organisational risk. Material released under court order must not be redacted, as doing so may constitute contempt of court. Responding to such court orders – particularly where information is held as a result of Crown-directed investigations – requires specialist legal expertise and extensive engagement with those instructed on behalf of the Lord Advocate.

PIRC's small legal services team requires to work collaboratively with Investigations and Reviews staff to ensure compliance where disclosure is to be made. In the last four years, PIRC has received at least 22 such court orders. It is reasonable to assume that this will increase as demand grows for PIRC's core services.

Sheku Bayoh Public Inquiry

Sheku Bayoh died in May 2015 after an incident involving police officers. A Public Inquiry was established to examine the immediate circumstances leading to Mr Bayoh's death, how the police dealt with the aftermath, the subsequent investigation into the death (carried out by PIRC), and whether race was a factor.

The Inquiry has not yet concluded. As a core participant, PIRC will continue to engage with the Inquiry as it progresses. PIRC's participation in the Inquiry to date has required the instruction of counsel and has necessitated a funding uplift from the Scottish Government.

Once the Inquiry's findings and recommendations are published, they will be closely examined by PIRC and any learning not already implemented will be taken forward.

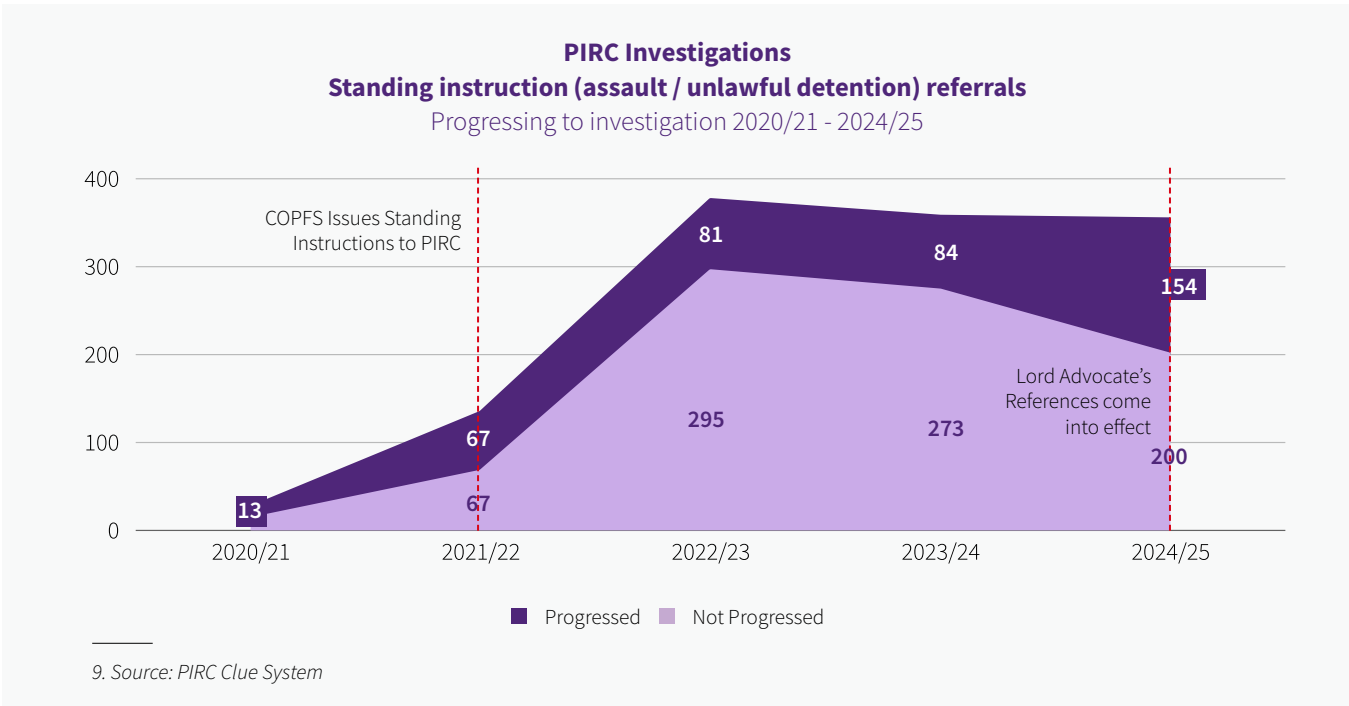
²¹The term 'specification of documents' where it appears should also be taken to mean other court orders for recovery of documents and material such as those made under the Administration of Justice (Scotland) Act 1972 and orders for recovery of documents made in other courts and tribunals such as the Employment Tribunal.

Increasing demand and case complexity

As the following sections will further illustrate, the demands on our Investigations and Reviews teams have increased significantly and our caseload has become more complex in nature.

Investigations

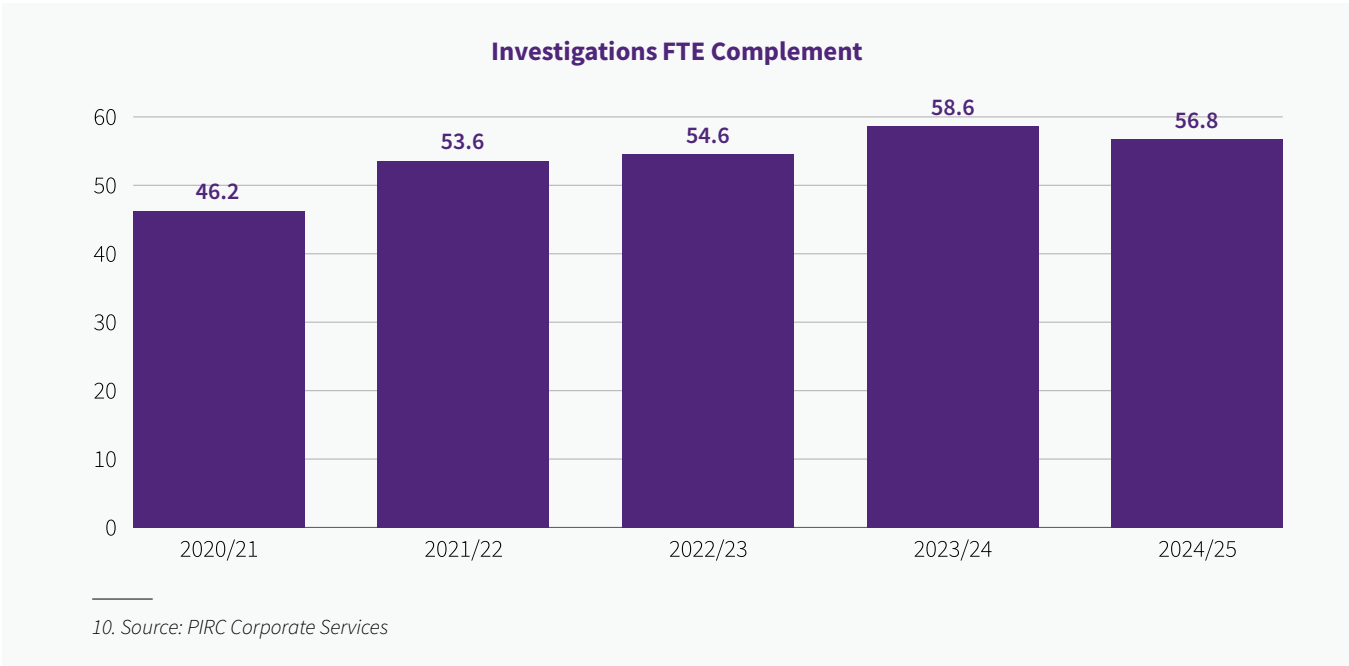
In October 2021, demand for PIRC investigations increased significantly. This followed a recommendation from the Angiolini Review which resulted in COPFS issuing a standing instruction that PIRC investigate all criminal allegations against the police that engage Articles 3 and 5 of the European Convention on Human Rights (ECHR), including all allegations of assault and unlawful detention. This change resulted in a 51% surge in referrals almost immediately, an elevated level of demand that has persisted in subsequent years.



The additional demand generated by the standing instruction has been further compounded by the clarification of the law on corroboration arising from cases referred to the Court of Appeal by the Lord Advocate. This development is particularly significant for how PIRC addresses allegations of assault against police officers and police staff. Consequently, what was a relatively modest share of overall demand in 2020/21 has, within a short timeframe, escalated to the most substantial volume of casework, necessitating considerable resource allocation despite resources remaining largely static.

In addition, there has been an 83% increase in Crown directed death investigations over the last three years, as discussed earlier in the [Strategic Context](#) section of this report.

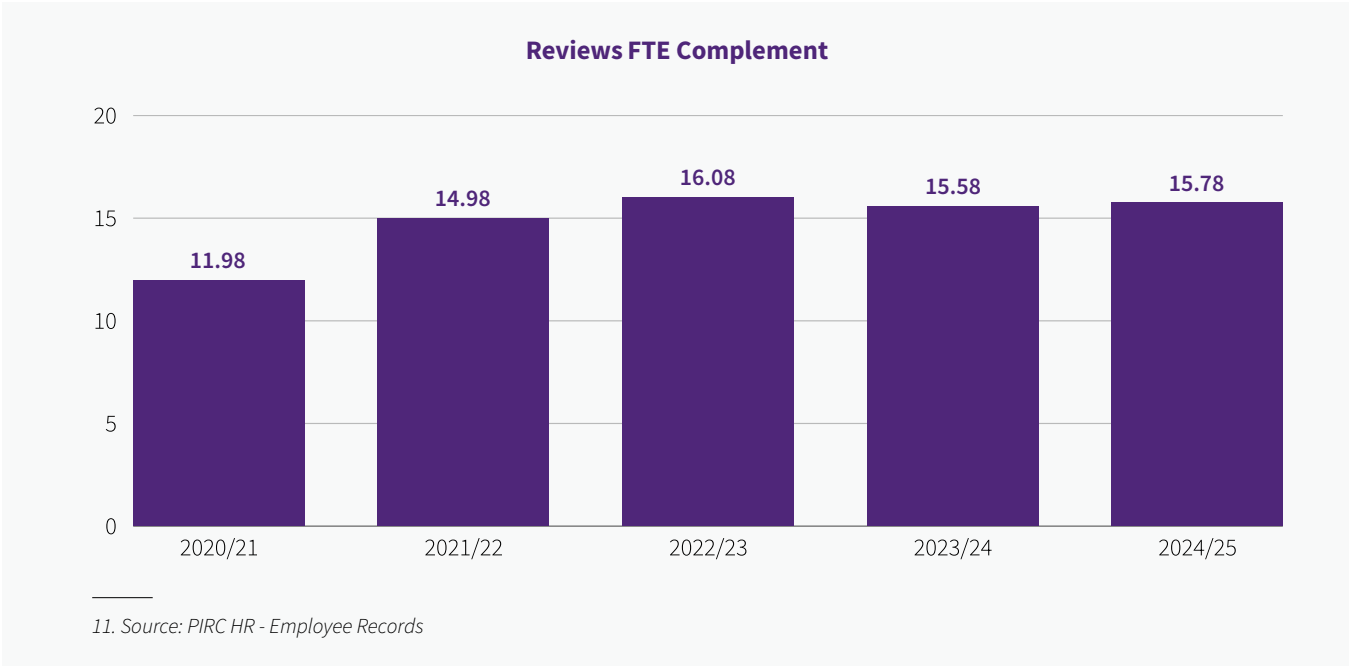
As PIRC is required to investigate deaths and criminal allegations against the police at the direction of COPFS, our capacity to carry out other discretionary investigations will be severely limited.



Additional responsibilities introduced by the PECSS Act and the Criminal Justice Modernisation and Abusive Domestic Behaviour Reviews (Scotland) Act 2025 mean that our already limited resource will face increasingly complex investigative challenges.

Reviews

As of January 2026, Police Scotland has a backlog of approximately 1,000 non-criminal complaints. We anticipate that steps it takes to address the backlog will trigger a surge in CHR applications to PIRC, with an estimated 524 submissions. This represents a tripling of normal demand and a potential 300% increase in the Reviews workload within a short timeframe.



Additionally, the PIRC Reviews team has assessed in excess of 1,000 HoCs each year over the last five financial years. This represents a notable increase in applications for CHRs containing multiple HoCs.

The number of complaints received is generally increasing across the public sector. There has also been a rise in the complexity of complaints, driven by factors such as vulnerability and wider pressures on public services. This means a percentage increase in complaints can equate to a higher percentage rise in workload as complex cases require more in-depth investigation. However, the growth experienced by PIRC can also be attributed, at least in part, to Reviews staff providing best practice guidance to PSD staff on comprehensively recording and addressing every aspect of a complaint individually. As a result of the above, our CHRs have become increasingly complex in nature.

Managing our business as usual workload, which has grown significantly, limits our ability to create capacity and invest in the horizon-scanning, transformational work that will enable PIRC to continue to develop and improve our service, and ensure we are well-positioned to meet future challenges.

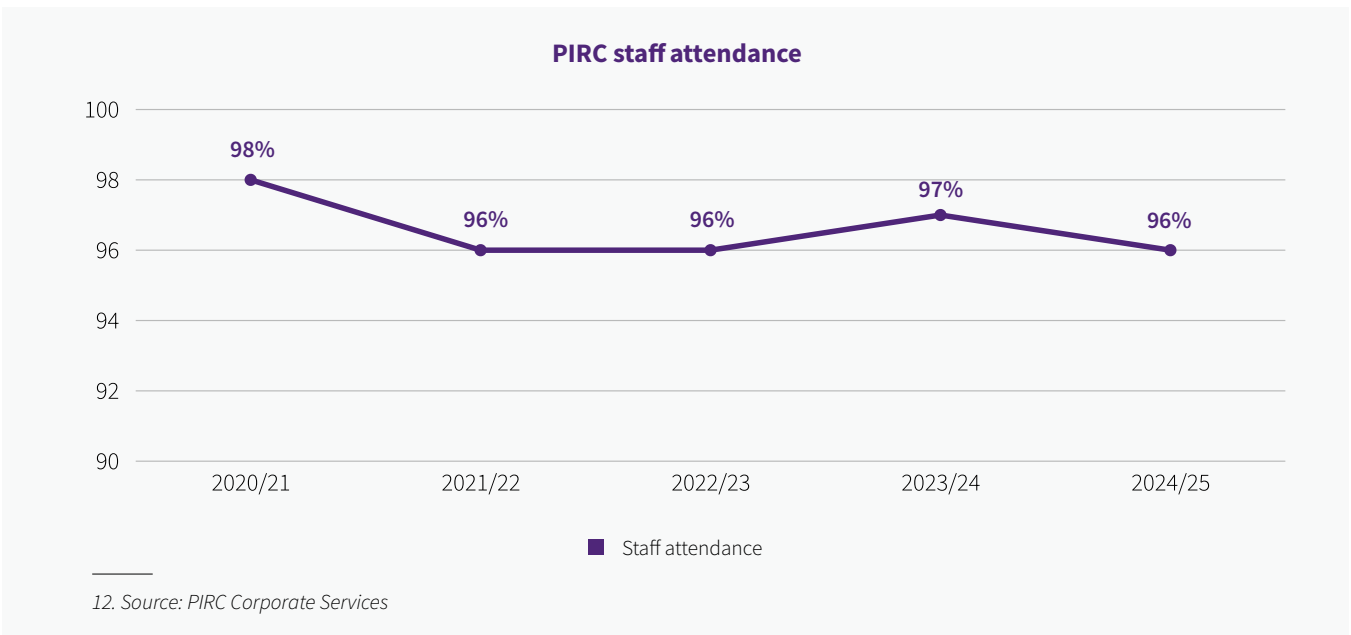
Workforce pressures and staff wellbeing

Over the past few years, PIRC has faced a perfect storm of changes and pressures. New legislation, such as the PECSS Act, has added layers of complexity to our work. At the same time, demand has surged, driven by factors like the non-legislative recommendations from the Angiolini Review including the COPFS standing instructions, Lord Advocate’s References, and a sharp rise in investigations, which have tripled in volume and become more complex. These challenges have been compounded by static resources and the growing expectation for thorough, best-practice complaint handling.

The growing volume and complexity of work carried out by PIRC, as well as its emotionally challenging nature poses a risk to staff health, safety and wellbeing. A major concern is the potential for psychological harm. Investigators, Review Officers, and Administrators are routinely exposed to upsetting audio-visual evidence, sensitive accounts of trauma, and, in some cases, scenes involving death or serious injury. Combined with high caseloads, this exposure creates pronounced risks of work-related stress, burnout, vicarious trauma and even Post-traumatic Stress Disorder (PTSD). Staff also regularly interact with members of the public who may be in distress or abusive. This can further intensify emotional strain on our staff.

These psychological pressures are often accompanied by physical risks. Our investigators in particular can be exposed to violence or aggression, hazardous substances, and the demands of long-distance travel under time pressures.

The cumulative impact of these challenges increases the risk of sickness absence,²² financial strain due to reduced pay during extended absence, and deterioration in work-life balance. It is worth noting that, despite these pressures, PIRC staff attendance has remained consistently high, never falling below 96% over the past five years.



²²Stress and mental health at work - HSE

Beyond individual impacts, these pressures may affect morale and resilience across the organisation, while also creating a risk of losing valuable skills and knowledge if staff struggle to cope with sustained demands and choose to move on. Without effective mitigation, these risks are almost certain to escalate over the coming years, impacting not only staff wellbeing but also our operational capacity and the timeliness and quality of our service to the public.

The consequences may also extend beyond PIRC. Police officers and staff who are the subject of investigation or review may experience heightened stress, anxiety or fear of scrutiny due to the increased time taken to complete cases, leaving matters unresolved for extended periods.

Delays caused by capacity constraints also risk undermining public confidence in policing. These staff-related risks are therefore critical, both to ensuring that we are an effective organisation and that we meet our duty of care as an employer.

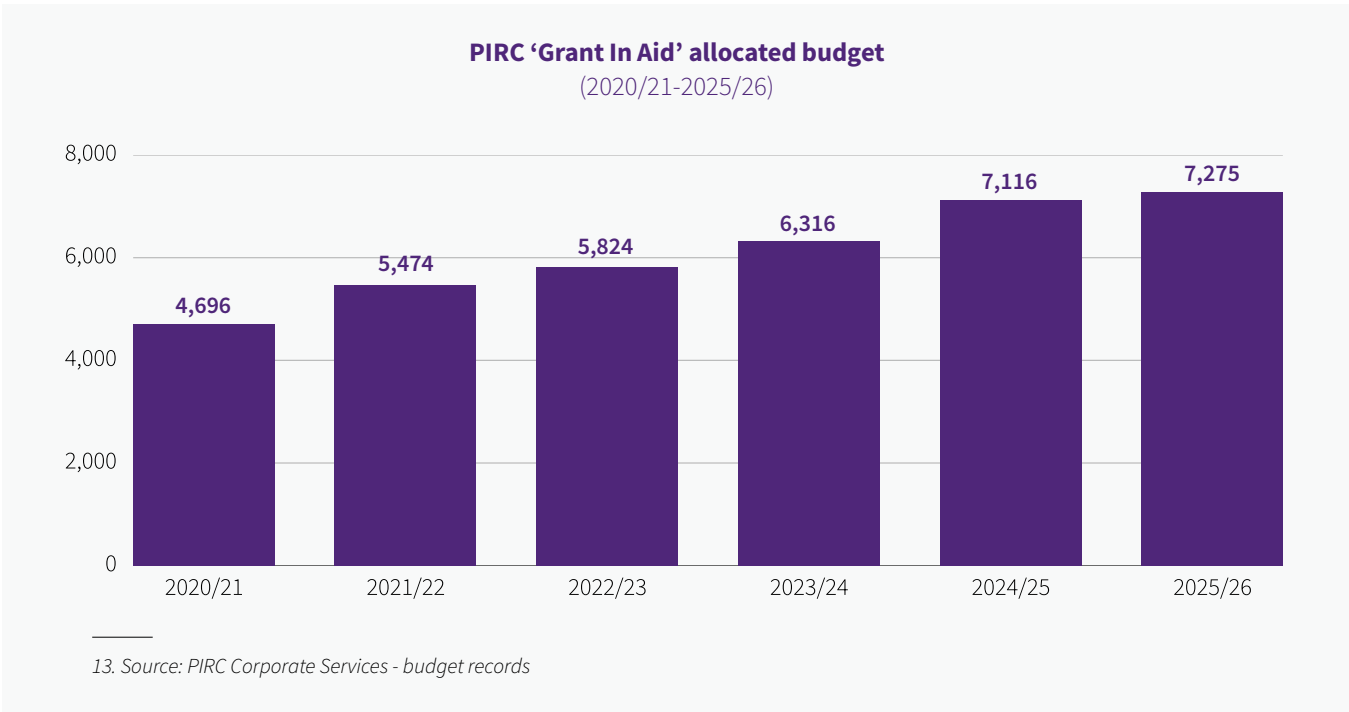
Recommendation 4: Promote staff wellbeing and a safe working environment

Identify health and safety risks, implement mitigation strategies, and transparently report progress to foster a supportive and secure workplace.

Funding constraints and efficiency expectations

An uplift to the original Grant In Aid (GiA) Budget in 2021/22 was allocated in recognition of additional workload brought about by the Angiolini Review recommendations, and was used to recruit additional staff.

This strategic foresight by the Scottish Government ensured that PIRC was able to fulfil our extended duties whilst maintaining acceptable service levels.



Subsequent uplifts to PIRC’s original GiA allocations were generally allocated for non-operational purposes, such as inflation, pay awards and legal costs. None have been awarded with the intention of increasing capacity or capability to cope with increasing workload.

PIRC has secured additional funding in our 2026/27 budget but we will continue to face challenges in line with major increases in workload and expanding statutory duties. Staff costs equate to just over 88% of PIRC's budget, leaving little flexibility. PIRC has in the past made notable efficiencies through digital transformation, improved case management, hybrid working and streamlined processes.

Some further efficiencies may be achievable in digitalisation, regional deployment and collaboration, but reductions to investigative or reviews capacity, specialist staffing or statutory functions are not advisable due to legal, operational and public confidence risks.

Introduction of Body Worn Video & Digital Evidence Sharing Capability

Police Scotland began introducing BWV in January 2021. The technology was first issued to Authorised Firearms Officers (AFOs). Deployment is now progressing across local divisions, with full rollout expected by Spring 2026. PIRC contributed to Police Scotland's BWV Standard Operating Procedures (SOPs), including by encouraging the service to extend the 'pre-record' feature from 30 seconds to 2 minutes (without audio) in order to improve transparency and increase investigative opportunities if required.

PIRC currently has two Technical Investigators experienced in handling BWV footage from Police Scotland and BTP. That said, full rollout by Police Scotland will significantly increase digital storage needs and may strain network bandwidth. This will require close monitoring as viewing volumes rise. Internal processes have been aligned with Police Scotland's Code of Practice and relevant impact assessments.

BWV has proven valuable in resolving allegations against the police quickly when footage confirms or refutes the alleged conduct. However, footage can also reveal misconduct not otherwise identified. Other oversight bodies report modest benefits. For example, the Police Ombudsman for Northern Ireland (PONI) saw a 9% drop in complaints and 10% drop in allegations following the introduction of BWV, though other factors likely contributed.

The growing need to review BWV for referrals and CHRs raises health and wellbeing concerns, both physical (increased screen time) and psychological (exposure to distressing content). PIRC must ensure appropriate support for staff.

BWV footage recorded by Police Scotland is stored using Video Manager software. Currently, PIRC does not have direct access to Video Manager and relies on Police Scotland to transfer footage, which causes delays. A move to a cloud-based solution is being pursued but may require external expertise.

Finally, the Scottish Government's Digital Evidence Sharing Capability (DESC) initiative is being rolled out to justice partners. DESC is an IT solution for the collection, management, sharing and disclosure of digital evidence between justice agencies. At present, we are not included in this roll out. However, the DESC initiative should be monitored closely for future consideration.

B. Investigations

PIRC's team of highly trained investigators is responsible for carrying out independent investigations into serious incidents involving the police in Scotland. Operating with the same powers and privileges as police officers during an investigation, the team provides impartial scrutiny designed to strengthen public confidence in policing.

PIRC aims to conduct comprehensive and thorough investigations in a timely manner. This may be at the direction of COPFS or at the request of policing bodies. PIRC can also commence an investigation on public interest grounds, but this power is exercised infrequently. Most often, cases which are of sufficient public interest to merit investigation have already been the subject of a referral by a policing body or direction by COPFS.

PIRC has a duty to investigate criminal allegations against the police, deaths in police custody and deaths following police contact, all directed by COPFS. In addition, where firearms, taser or Pelargonic Acid Vanillylamide (PAVA) spray have been discharged, PIRC is legally required to examine the circumstances and, if deemed necessary and proportionate, conduct an investigation.

The effectiveness of PIRC's investigative processes is evidenced by the consistent achievement of KPIs as detailed in the following table:

Measure	2023/24	2024/25	Annual benchmark
Incidents assessed and an investigation decision taken within five working days of receipt of relevant information.	99%	92%	90%
Category A investigation reports (minus major cases) to be completed and submitted within 90 days following receipt of case papers.	100%	100%	80%
Category B+C investigation reports to be completed and submitted within 120 days following receipt of case papers.	90%	98%	80%

14. Source: PIRC end of year performance reports

Where COPFS directs a criminal investigation, PIRC prepares and issues a report to them. At this point, PIRC's involvement concludes. Any decision regarding criminal prosecution rests solely with COPFS. Accordingly, PIRC reports are sub judice and not available to the public.

For investigations initiated by a referral from a policing body, PIRC submits a report to the PSD of the referring organisation. Such reports may include clear, concise and actionable recommendations, which can be specific to the case or thematic in nature, addressing broader organisational practices.

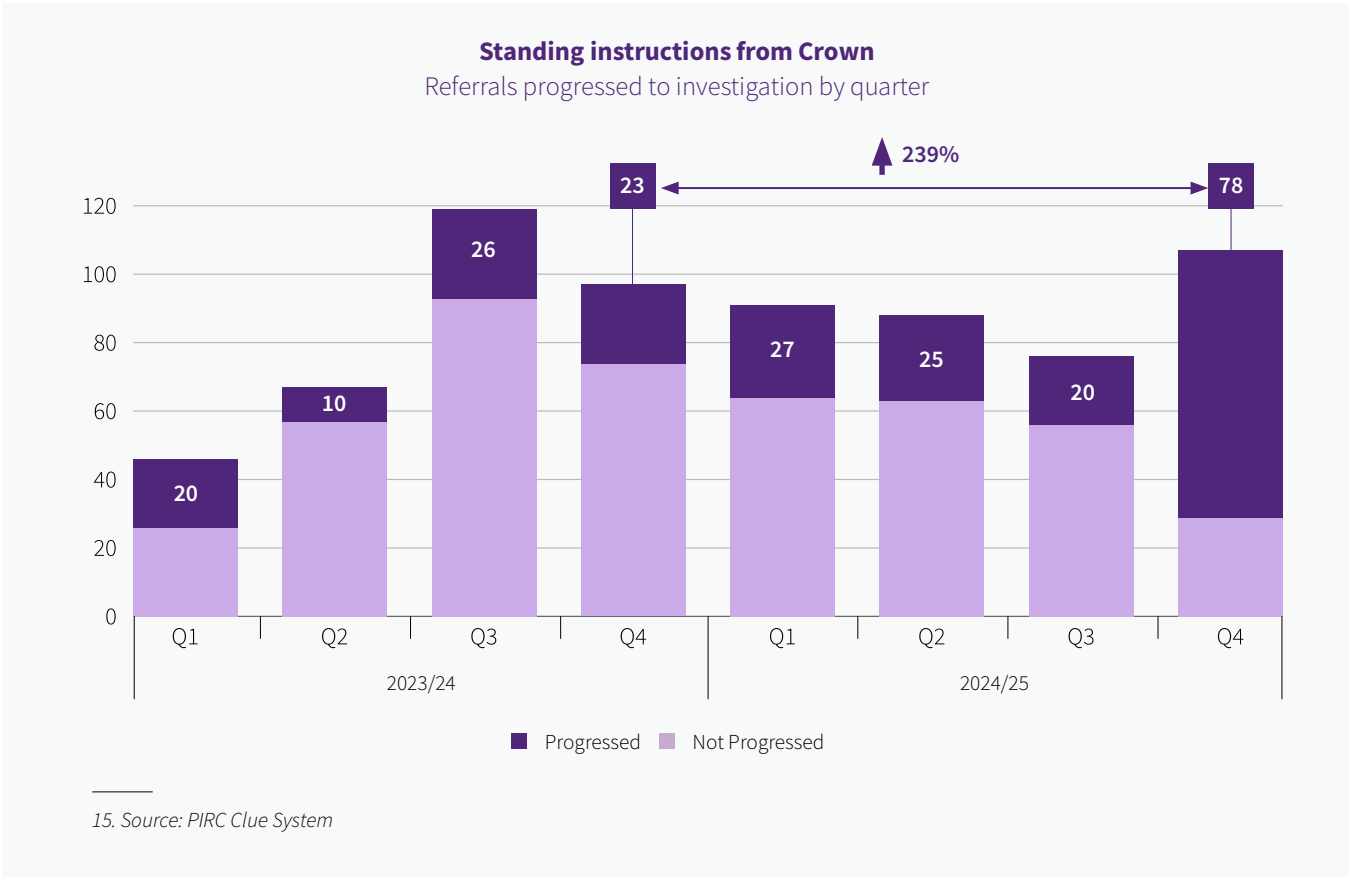
Although these recommendations are frequently accepted and responded to within three months, at present policing bodies are under no statutory obligation to implement them. PIRC monitors and reviews the status of all issued recommendations on an ongoing basis to promote accountability and continuous improvement. Such reports can be published in a summarised format to the public, subject to guidance and legal considerations.

Main challenges and risks for Investigations

The Lord Advocate's References on the law of corroboration

The Lord Advocate's References of 2023 have significantly impacted the law of corroboration, by providing clarification that 'de recenti' statements and/or distress are capable of corroborating a complainer's account of an incident e.g. an allegation of assault, when spoken to by an independent witness.

This change necessitates a far higher proportion of incidents to progress to a full investigation by PIRC than was previously the case, most notably those referred under Article 3 of ECHR, which involve allegations of assault by police officers or staff. Internal implications for PIRC are that the workload for Investigations has substantially increased, highlighted by data for Quarter 4 of 2024/25. As the graph below demonstrates, PIRC saw a 239% increase in Article 3 referrals for this period when compared with the same period from the previous year.



PIRC’s operating model has been altered to cope with demand.

The economic cost of managing the consequences are considerable. PIRC submitted a business case for a significant uplift in resources to the Scottish Government in June 2025. While the business case was accepted in principle by the Scottish Government, which acknowledged the pressures PIRC is facing, no further funding was provided in 2025/26.

However, PIRC secured an uplift of £1 million in our budget for 2026/27. This will allow us to appoint a small number of new investigators. While welcome, the uplift was not all that was needed. Consequently, PIRC must continue to explore options on how best to manage our increased workload. At present, due to the volume of investigations, the time taken to conclude each case will be longer. This means members of the public and referring agencies will wait longer for the outcome of our investigations and our current KPIs will likely not be met.

Efficient delivery of investigative function

Currently, PIRC has a single office based within the Central Belt of Scotland (Hamilton, South Lanarkshire). However, PIRC Investigations staff are required to travel across Scotland when undertaking core tasks relating to their investigative duties.

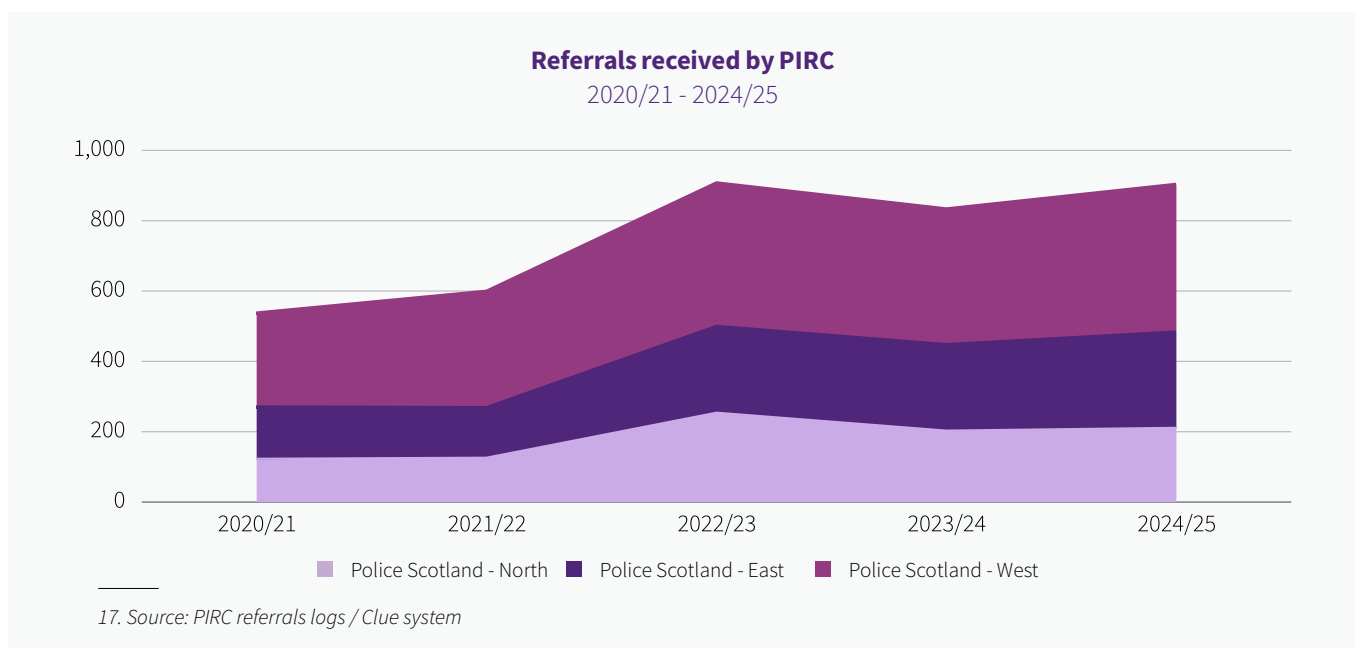
Police Scotland’s geographical ‘command’ model is organised into 3 areas – West, East and North. The North command area covers approximately 1.3 million people across three local policing divisions and 10 local authority areas. North East (‘A’) Division includes Aberdeen City, Aberdeenshire and Moray council areas; Tayside (‘D’) Division includes Dundee, Angus and Perth and Kinross council areas; and Highland and Islands (‘N’) Division includes Highland, Western Isles, Shetland and Orkney council areas.

The following table illustrates the distances PIRC Investigators may be required to travel across Scotland from Hamilton.

Destination	PS Division	Miles	Duration (one way)	Req'd staff travel time
Lerwick (incl ferry)	N	370	15:08	30:16
Stornoway (incl ferry)	N	278	07:33	15:06
Inverness	N	169	03:30	07:00
Aberdeen	A	147	02:43	05:26
Dundee	D	82	01:33	03:06
Dumfries	V	65	01:16	02:32
Edinburgh	E	42	01:13	02:26
Ayr	U	40	00:59	01:58
Paisley	K	21	00:36	01:12
Glasgow	G	13	00:24	00:48
Motherwell	Q	3	00:11	00:22

16. Source: Google maps – distance & travel times from PIRC HQ²⁴

Over the last two financial years, around 22% of PIRC investigations related to incidents occurring in the North. PIRC staff are required to travel long distances by car for such investigations. This can reduce investigator efficiency, given the hours lost to travel, as well as being environmentally damaging.



A cost/benefit analysis would be required to fully assess if PIRC would be better served by i) remaining with the status quo, ii) establishing a second office in the North, or iii) co-locating in any available public sector North-based 'hub'. The consideration of this topic is Investigations-focused, as this is the business area where staff travel is almost exclusively occurring. However, should PIRC self-generate enquiries into non-criminal complaints (as provided for in the PECSS Act), it is likely that the need for significant business travel will extend to Reviews staff.

²⁴Any requirement for staff to travel to Lerwick or Stornoway would justify the use of flights rather than using a vehicle.

The standard working pattern for PIRC staff is seven hours per day. The time required to travel for investigative work becomes an issue when the distance travelled is beyond 70 miles, remembering that rest periods require to be taken for any trips that exceed 2 hours.

This has efficiency implications as the majority of staff time on distant enquiries can be absorbed travelling, as opposed to completing tasks. This delays the completion of investigations, with a potential negative impact on victims, subject officers, and police resources due to subject officers being suspended or placed on restricted duties while an investigation is ongoing.

An investigator costs approximately £237 per seven-hour day and a Deputy Senior Investigator £308 per seven-hour day to employ, as an overall organisational cost, including pension contributions and National Insurance. The further north they have to travel, the more hours lost to travel are incurred as well as the potential for accommodation costs and associated expenses.

As previously outlined, there has been a 239% increase in Article 3 referrals progressing to investigation as well as an increase in the number of death investigations. This has led to an increase in the travel required by PIRC staff. This could be countered by establishing a strategically placed second base to allow locally placed staff to complete core investigative tasks.

A second base may also:

- offset any public perception of PIRC being too central belt focused and avoid the risk of a perception of ‘investigations by postcode’. This carries significant reputational risk for PIRC
- strengthen our capacity to respond swiftly and effectively to dynamic, fast-evolving, and spontaneous incidents
- present opportunities for recruiting from wider communities leading to more diverse representation amongst PIRC staff.

Distance travelled by conventionally fuelled vehicles also has a potentially negative effect on the environment. A move towards the use of hybrid vehicles is already underway to counter this. A PIRC office located in the North would allow the organisation to consolidate its commitment to environmentally friendly modes of transport by increasing the use of electric vehicles to travel shorter distances.

There would be a financial cost to establishing a second base, including identifying and setting up an office or co-location, property leases, infrastructure and ongoing maintenance. A detailed scoping exercise and business case would require to consider these factors.

Given the already increased workload experienced by our Investigations team and the proportion of investigations conducted in the North, there is an opportunity for PIRC to consider how to work more efficiently.

Recommendation 5: Optimise organisational capacity and demand management

Implement strategic approaches to manage demand, including enhancing regional coverage through targeted resourcing, prioritisation frameworks, and improved triage processes.

C. Reviews

The CHR function of PIRC, undertaken by the Reviews team, is a statutory mechanism which enables members of the public to request an independent review of how policing bodies have dealt with their complaints.

A policing body must have concluded its handling of a complaint and provided a final response to the complainer before they can be eligible to make an application for a CHR to PIRC. The application should be made within three months of the policing body issuing its final letter of response to the original complaint.

The purpose of a CHR is to assess whether the relevant policing body handled the complaint to a reasonable standard, in accordance with:

- PIRC Statutory Guidance issued to all policing bodies in Scotland
- policing bodies' complaints handling guidance and procedures
- principles of fairness, transparency and effective resolution.

In 2024/25, more than 95% of applications to PIRC requesting CHRs involved complaints dealt with by Police Scotland.

At the conclusion of a CHR, PIRC may issue one or more of the following outcomes:

- **Reconsideration Directions** – applied in cases of serious procedural failure, requiring the policing body to reconsider its handling of the complaint
- **Recommendations** – these may relate specifically to the circumstances of an individual complaint or address broader systemic issues relating to how a policing body manages complaints
- **Provide Learning Points** – intended to prevent recurrence of similar issues, these highlight adherence to statutory guidance and may identify good practice in complaint handling for wider dissemination within policing bodies
- **Discretionary Decision Letters** – issued where a full review is deemed disproportionate following an initial assessment of the application.

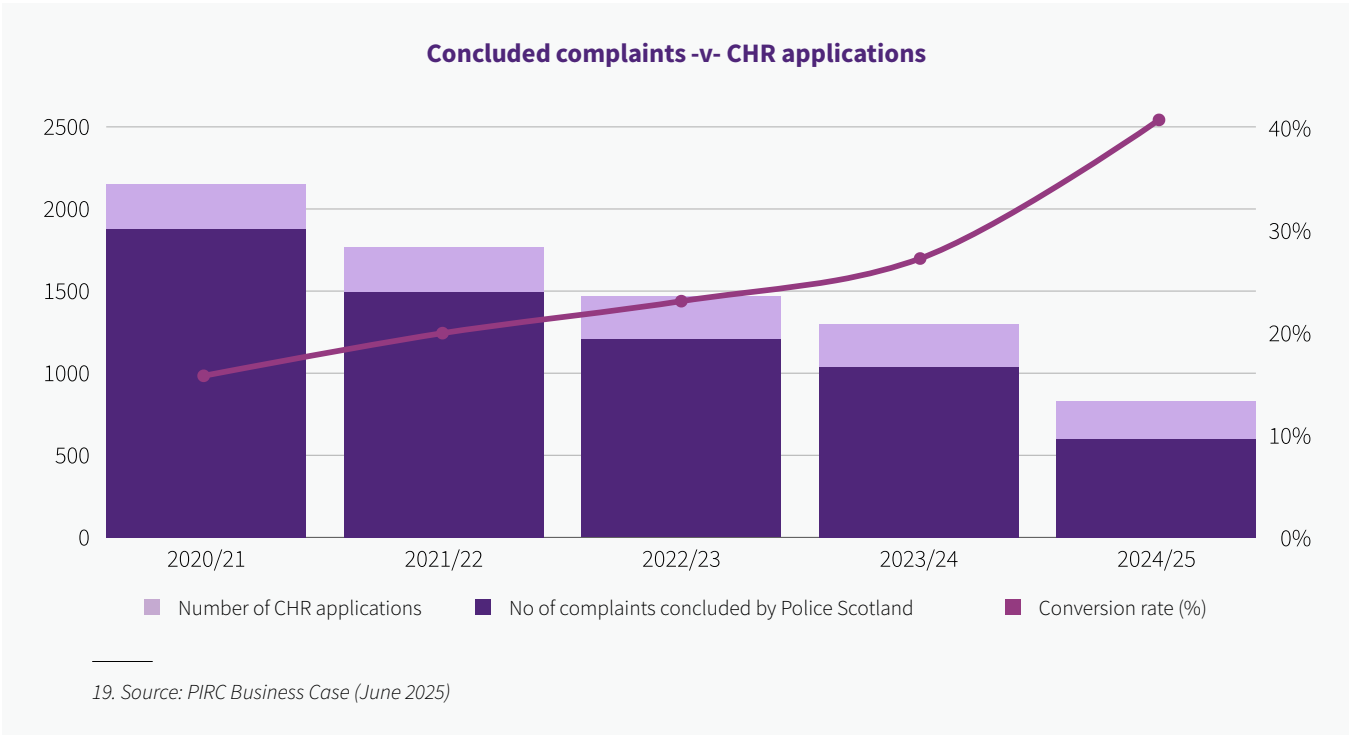
Historically, Reconsideration Directions were the only CHR outcome with statutory authority. However, the PECSS Act conferred legal status on PIRC recommendations. Policing bodies are now required to formally respond to PIRC recommendations, thereby strengthening accountability and compliance.

PIRC has consistently demonstrated strong operational effectiveness, meeting or exceeding the annual benchmark KPIs as detailed in the following table:

Measure	2023/24	2024/25	Annual benchmark
90% of CHR applications to undergo Senior Review Officer assessment and decision to be taken within five working days of receipt of the relevant police case papers.	99%	99%	90%
80% of CHRs including discretionary decisions (minus major cases) to be completed within 90 working days, following receipt of the relevant police case papers.	96%	99%	80%

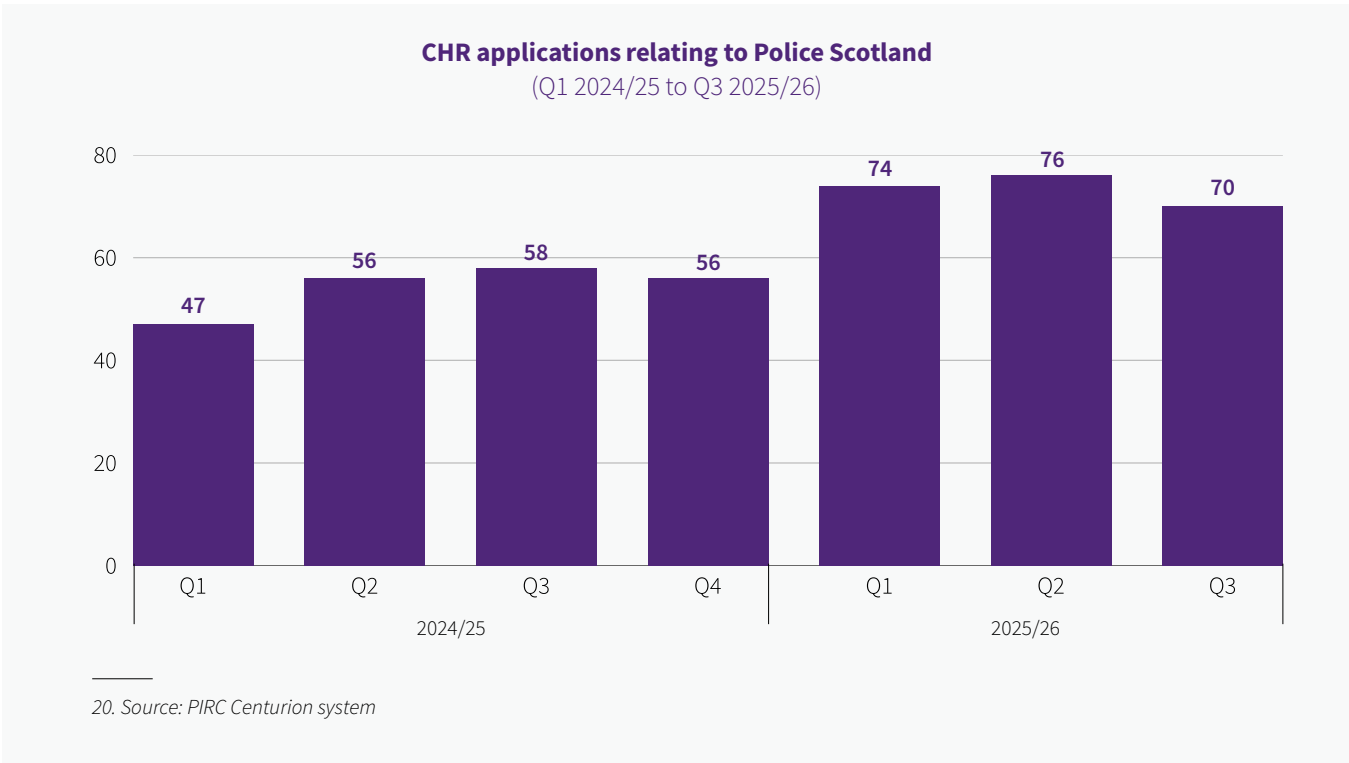
18. Source: PIRC end of year performance reports

There has been a notable rise in the number of eligible complainers choosing to apply to PIRC for a CHR over the past three years. Only 14% of eligible complainers requested a CHR in 2020/21. By 2024/25, this figure had increased to 36%. On average, over the last three years, 29% of eligible police complaints have resulted in CHR applications. We assess that this upward trend is likely to continue as a result of considerable delays in complaints being concluded by Police Scotland, resulting in their backlog of complaints.



In 2025, Police Scotland recruited 25 temporary complaint handlers to clear approximately 2,000 outstanding complaints over the next two years. Once these complaints are resolved, individuals will then become eligible to request a CHR from PIRC.

As a result, PIRC is already experiencing a noticeable increase in CHR applications relating to Police Scotland during 2025/26 compared to the previous year:



If the upward trend in the number of applications continues, or even stabilises, it is unlikely that PIRC's Reviews team will have the required resources to deliver established KPIs. This will directly impact the quality of service we provide to the public and policing bodies.

Main challenges and risks for Reviews

The main challenges and risks affecting PIRC's Reviews team are:

- dealing with the consequences of the police backlog of complaints
- the requirement to better articulate and monitor the outcomes of recommendations and learning points issued to policing bodies
- the implementation of the PECSS Act which will provide increased powers for the Reviews function.

These matters are discussed fully in the [Strategic Drivers & Challenges](#) and the [Effective Partnership Engagement](#) sections of this report.

D. Corporate Services overview

The Corporate Services team provides the business-wide platform from which the Investigations and Reviews teams can provide effective service delivery.

Corporate Services performs the following key functions:



Governance, Risk and Accountability is discussed in detail in the [Governance and Accountability](#) section earlier in this report. Similarly, the primary issues related to Finance and Resource Management are fully discussed in [Main Challenges and Risks for Corporate Services](#) below.

The Corporate Services team undertakes a broad range of responsibilities associated with the delivery of its remaining key functions. These include:

- financial management
- supporting and developing our workforce through training, initiatives and promoting a healthy work/life balance
- maintaining a safe, secure and fit-for-purpose working environment
- coordinating business continuity plans, including cyber security
- ensuring compliance with information governance standards
- supporting digital transformation, including online CHR applications and enhanced web accessibility.

The Corporate Services team plays a pivotal role in ensuring PIRC remains a well-governed, efficient and resilient public body. This provides the essential infrastructure that enables the Investigations and Reviews teams to work towards our mission of promoting and supporting public confidence in policing in Scotland through independent, evidence-based oversight.

Main challenges and risks for Corporate Services

Finance

PIRC is fully funded by the Scottish Government. If we are seeking an increase to our budget, we must follow a formal request process. The nature of this process depends on the amount required. A business case is often submitted alongside an Accountable Officer's template. This includes requests for uplifts for staff pay awards, which are negotiated with recognised trade unions.

PIRC is aligned to the government's pay and grading structure, but there is no commitment from the government to fund pay awards annually. If increases cannot be afforded in PIRC's allocated budget, a formal request for additional funding is required. In order to remain aligned with the government's pay and grading structure, we would be unable to backfill vacant posts if such a request was unsuccessful.

PIRC is operating within a challenging economic environment, which represents significant risk to the organisation's service delivery capability. In turn, this could impact public perception of PIRC's effectiveness in promoting and securing confidence in policing if we do not deliver our key functions efficiently. PIRC's Annual Report and Accounts are published, which generates queries from the members of the public around, for example, the cost of investigations undertaken. Internally, our Annual Report and Accounts are subject to scrutiny by the AAC.

Given the intrinsic link between finance and the ability to deliver services, there are a number of current financial pressures which represent high reputational and capacity risk for PIRC. These include:

Cost of increased demand

As previously discussed, factors such as the Lord Advocate's References have significantly increased our statutory responsibilities, which brings with it financial pressures.

Furthermore, the Financial Memorandum²⁵ prepared by the Scottish Government during the Bill's passage estimated that PIRC would incur annual ongoing costs in the region of £700,000 as a result of implementing the PECSS Act. There has also been an overall increase in the number of commissions required by the Scottish and UK Governments on budget and staffing figures and costs. PIRC continues to work closely with the Scottish Government to highlight the additional operational demands which impacts annual budget requirements.

²⁵[Revised Financial Memorandum accessible](#)

IT systems

There will also be costs associated with the ongoing use of key IT systems. The government IT network used by PIRC will shortly become cloud-based. This will be incompatible with the Centurion system used by PIRC to manage CHRs. PIRC requires to resolve this issue during 2026.

Additional staff hours

There is a risk of over-reliance on good faith shown by staff to work additional hours to manage increased workload. In turn, staff will find it difficult to reclaim flexi hours accrued, which could negatively impact their work/life balance, and lead to staff seeking other forms of recompense for time owed.

Demonstrating leadership through efficiencies

The Scottish Government's Public Sector Reform Strategy is a national priority aimed at addressing fiscal constraints, demographic changes and rising service demands. The strategy seeks to deliver efficiency, accountability and improved outcomes through measures such as streamlined operations, digital transformation, and enhanced collaboration.

For PIRC, demonstrating leadership in this agenda is essential to maintain credibility as an independent oversight body and to align with the principles of Best Value. In 2024/25, we achieved efficiencies totalling £304,853, which equates to savings of 4.28%. This exceeds the target of 3% set by the Scottish Government.

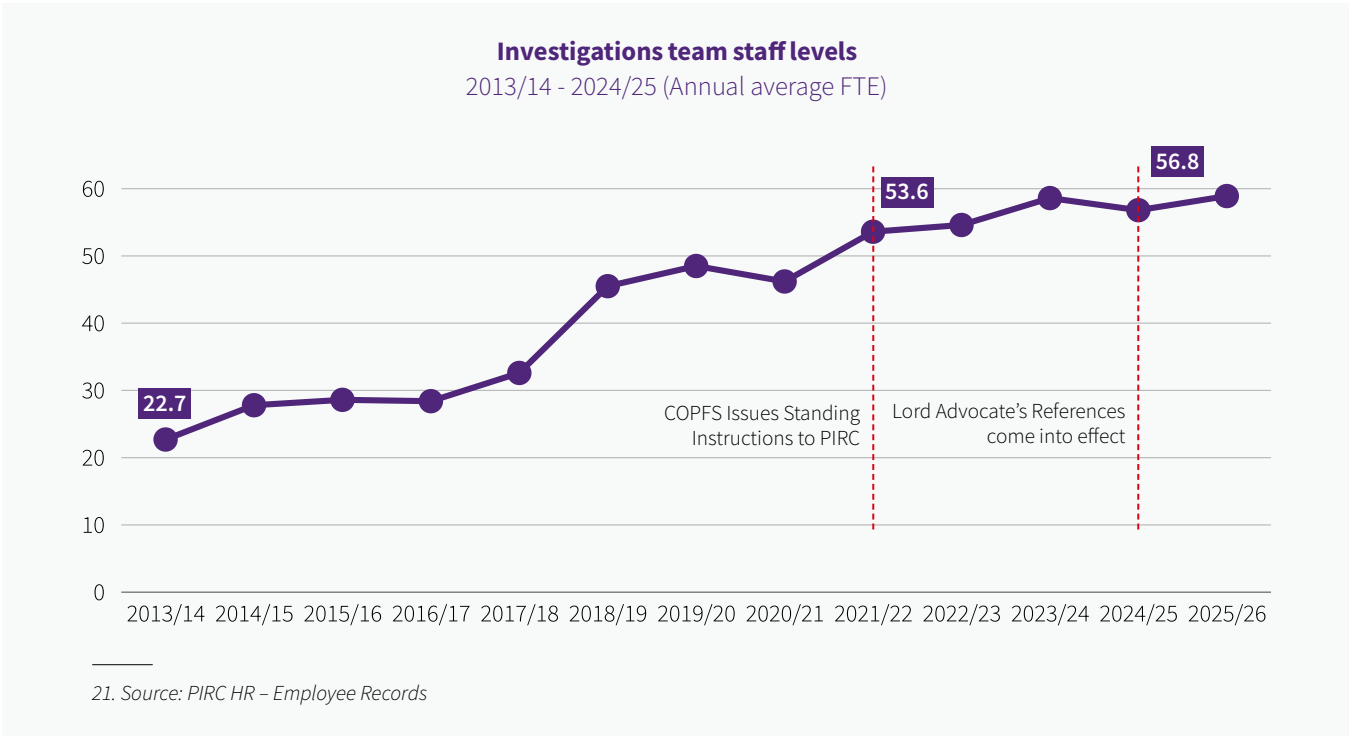
We will continue to face significant resource pressures, given investigative demand has increased by over 350% in the past decade while budget growth has lagged behind. Nonetheless, we remain committed to supporting the principles of Public Sector Reform through efficient resource use, high-quality service delivery and transparent evidence of value for money. This will enable us to strengthen public confidence, mitigate sustainability risks and position PIRC as a model of innovation and accountability within Scotland's justice system.

Recommendation 6: Demonstrate leadership in public sector reform

Contribute actively to public sector reform by ensuring efficient use of resources, delivering high-quality services, and evidencing value for money.

People

The total complement of FTE staff has remained generally consistent in recent years. The last significant increase occurred in 2020/21, prior to COPFS issuing a standing instruction in October 2021 for PIRC to investigate all allegations of assault made against police officers.



There is significant public interest in the number of former police officers employed by PIRC, and Freedom of Information requests on this matter are routinely received. A record, distinguishing employees with a policing background from those without, is maintained by our Human Resources team. Given our role in holding policing to account, we understand why this issue generates such interest. We commit to continuing to publish information in this regard, with a view to improving transparency and maintaining public confidence.

To ensure that PIRC can fulfil our statutory purpose, we must have an adequate staff establishment. Our staff must also be suitably trained with the necessary skills and experience to undertake their roles. At present, PIRC has a broad range of experience and skills across the organisation, with a combination of staff from policing and non-policing backgrounds.

Given the serious and complex nature of certain investigations, there is an expectation that PIRC will maintain access to specialist-trained staff, such as Family Liaison Officers for cases involving deaths. While some staff possess this expertise from previous policing roles, additional training can be provided by Police Scotland upon request. However, the availability of such specialists may be affected by staff turnover, and there are associated costs in training replacements as required.

In addition, insufficient training can undermine staff capability and confidence, leading to reduced morale and increased work-related stress. The recent extension of our statutory remit heightens the need for PIRC to fully understand our obligations and role within the justice system, ensuring these requirements are embedded in future training and staff development programmes.

PIRC incurs ongoing costs for learning and development programmes and the advertising of available roles. For example, the Lord Advocate’s References on the law of corroboration have necessitated additional training and development for staff. Coupled with the imminent implementation of the PECSS Act, this underscores that the recruitment, training, development and retention of our people represents a material risk, with potential implications for overall organisational resilience and performance.

E. Effective partnership engagement

Background

Stakeholder feedback is a fundamental component of effective governance and accountability within PIRC.

Our mission to maintain public confidence in policing relies on the principle of policing by consent, which derives its legitimacy from the citizens it serves. To uphold this principle, it is imperative that PIRC's decisions and actions reflect the needs, expectations and perspectives of those most affected. Accordingly, PIRC must actively seek and incorporate feedback from a diverse range of internal and external stakeholders. This approach ensures that decision-making processes are informed, inclusive, and transparent, strengthens relationships with key partners, and enables the early identification and mitigation of potential risks before they escalate.

Internal staff consultation

PIRC currently conducts a biennial staff survey to provide all staff with the opportunity to give their views and insights which may help shape the future of working in the organisation. The results of the survey inform an action plan, owned by the SLT but devolved to each business area to progress. This allows PIRC to respond to staff concerns or observations about working practices and to deliver change across the organisation, where possible.

The staff survey results are issued in an anonymised format to all staff when collated. It is noted that, while survey results and updates are available on PIRC's intranet, the intranet itself is dated and could be improved.

PIRC also maintains a Staff Representative Group, comprised of members from across the business. This group meets every two months to provide the opportunity for representatives to comment on policy and organisational changes that will impact staff. The group can also raise issues highlighted by staff for further discussion.

Performance appraisals also facilitate two-way conversations during which staff are actively encouraged to raise issues affecting their performance and development.

Development of this Strategic Review itself has also enabled valuable internal discussion, where staff at all levels of the organisation have been actively encouraged to contribute, with some playing key roles as SMEs.

Public confidence

PIRC's mission to promote and support public confidence in policing in Scotland through independent, evidence-based oversight is at the forefront of everything we do. We regularly engage with COPFS and policing bodies across Scotland throughout the investigations and reviews we undertake.

If we identify shortcomings in serious incidents involving the police or how a member of the public's complaint has been handled, we can make recommendations to policing bodies to prevent similar situations arising in future. The Reviews team has also established an audit function to assess particular areas of police complaint handling processes. Our audits make recommendations which bring about wider systemic and meaningful change in policing process and practice than those made within CHRs.

Any recommendations made by PIRC, whether through the Investigations or Reviews teams, currently have no power in statute. However, we have a high success rate for compliance with our recommendations under the existing system. That said, the timeframe for implementation by policing bodies remains a challenge and can undermine public confidence in our ability to hold policing to account. Recommendations that have been outstanding for a prolonged period are escalated through internal SLT channels to senior management within policing bodies.

The PECSS Act will provide a statutory basis for our recommendations. It should be noted that the Act does not provide an obligation for policing bodies to implement PIRC recommendations, rather there is an obligation for policing bodies to respond formally to them. The Act does also provide that responses to recommendations, and any subsequent implementation reports, from policing bodies should be published by PIRC. At present, we add recommendation outcomes implemented by policing bodies to relevant cases that have summaries published on the PIRC website.

The public expects PIRC to fulfil its statutory obligation to hold policing bodies to account through implementation of recommendations made to address shortcomings in policing. Our recommendations can often bring about outcomes for members of the public that they would otherwise not have achieved. However, there can still be a disconnect between what members of the public think we can or should achieve versus what can be achieved in line with our current statutory powers, despite best efforts to manage expectations at the outset of an investigation or review. The wider promotion of the positive impact we can have on policing process and practice through our recommendations also remains a matter for further consideration.

PIRC therefore engages with a range of service users, be that applicants that seek a CHR who are dissatisfied with how the policing body has dealt with their non-criminal complaint, to the next of kin of people who have died following police contact, to complainers alleging criminality by the police. However, further work is required in terms of public perception of the impact of our recommendations, and our ability to hold policing bodies to account while working within the parameters of our specific statutory remit.

External stakeholders

PIRC maintains structured and consistent communication with key external partners to strengthen accountability and transparency. This includes:

- Scottish Parliament Criminal Justice Committee – Senior representatives appeared before the Committee in January 2025 and March 2026 to provide evidence supporting PIRC's Annual Report
- Scottish Government – Regular engagement ensures discussion on business as usual workstreams, and early consideration of proposed legislation, clarifying provisions, resource implications, and potential challenges before enactment
- Practitioners Forum – Established in collaboration with Police Scotland's PSD, these forums provide feedback on CHR findings and themes. Expansion to other policing bodies is under consideration
- Investigations Liaison – PIRC Investigations supervisors meet quarterly with PSD representatives to review referral assessment processes
- National Complaint Handling Development Group (NCHDG) – A strategic forum involving PIRC, PSD, and the SPA focused on complaint-handling development
- Engagement with other policing bodies across Scotland through the course of our investigations and reviews.

Service user feedback

PIRC's service users comprise potential victims and witnesses of crime, members of the public who have complained to policing bodies, the policing bodies themselves, and COPFS. We may also interact with advocacy services or other third parties acting on behalf of individuals who have cause to contact PIRC.

PIRC does not currently seek structured feedback from our service users. While a public-facing email address exists, it is not designed to capture meaningful insights on user experience. As a result, data specific to the quality and effectiveness of PIRC's services remains limited.

At present, a Post Review Monitoring Form is attached to every CHR report issued to policing bodies. However, response rates from police officers and staff are low, and any feedback received is of limited value, as those individuals canvassed have no direct engagement with PIRC or experience as a service user.

To address this gap, the Reviews team has developed an online questionnaire aimed at capturing feedback from CHR applicants and PSD staff directly involved in the review process. The intention is to use this information to strengthen stakeholder engagement and identify areas for improvement. Full implementation will require dedicated time and resources to ensure feedback is systematically analysed and acted upon.

We recognise that we need to develop and implement a comprehensive service user feedback framework applicable to all individuals and organisations engaging with all of our services. This framework should establish a structured mechanism for gathering, analysing, and responding to feedback, ensuring that user perspectives inform continuous improvement. By adopting this approach, PIRC will enhance transparency, accountability and service quality, reinforcing our commitment to meeting stakeholder needs and expectations.

Recommendation 7: Embed a culture of continuous improvement

Establish structured mechanisms to gather, analyse, and act on feedback from service users to enhance service quality and responsiveness.

Better informed policies and procedures

PIRC currently lacks any advisory or ‘critical friend’ capacity drawn from the population to inform its policies, procedures and emerging areas of business. This absence limits our ability to anticipate and respond effectively to issues that may disproportionately affect specific groups within society.

A potential enhancement to consider in this area is the establishment of an Advisory Reference Group (ARG). This group would comprise subject matter experts and citizens who can provide informed advice and guidance on key topics, including matters relating to protected characteristics.

An ARG would improve PIRC’s ability to apply best practice in service delivery and engagement by supporting PIRC’s strategic objective to build and invest in a skilled and diverse workforce. Seeking the views of a varied group of individuals will also ensure that we uphold our inclusive values and better reflect the communities we serve. An ARG would provide assurance that internal policies align with current best practice in Diversity, Equality and Inclusion.

In addition, an ARG would help PIRC to prioritise and enhance our response to developments such as outcomes from public inquiries, the expansion of PIRC’s remit under the PECSS Act, and new national guidance on disclosure practices. Clarity would be required regarding the ARG’s role and function, particularly in relation to ensuring a separation from existing governance structures such as our Statutory Advisory Board.

Key considerations for the creation of an ARG include:

- appropriate composition, such as appropriate representation from and on behalf of diverse and minority groups
- frequency of meetings
- mechanisms to encourage participation
- to complement the ARG, PIRC should also consider creating a ‘Key Contacts Network’, a curated list of relevant experts and practitioners who can be consulted on issues aligned to their technical expertise.

Internal discussion and analysis will be required to identify societal challenges and thematic priorities that would shape the ARG’s objectives and operating model. This process should take account of internal and external implications, including the principles set out in the Government Communication Service’s *Ensuring Effective Stakeholder Engagement* guidance and the Christie Commission’s recommendations on the future delivery of public services in Scotland.

Recommendation 8: Enhance stakeholder and public engagement

Establish how we achieve better contribution from stakeholders and the wider public on subjects and topics relevant to the services we deliver.

7. Implementation plan

As outlined in the supporting recommendation below, an implementation plan should be established to ensure that all recommendations made in this report are tracked to completion.

The implementation plan will set the framework for successful delivery of the recommendations, by identifying appropriate owners, agreed timelines and an effective process to monitor and report on progress.

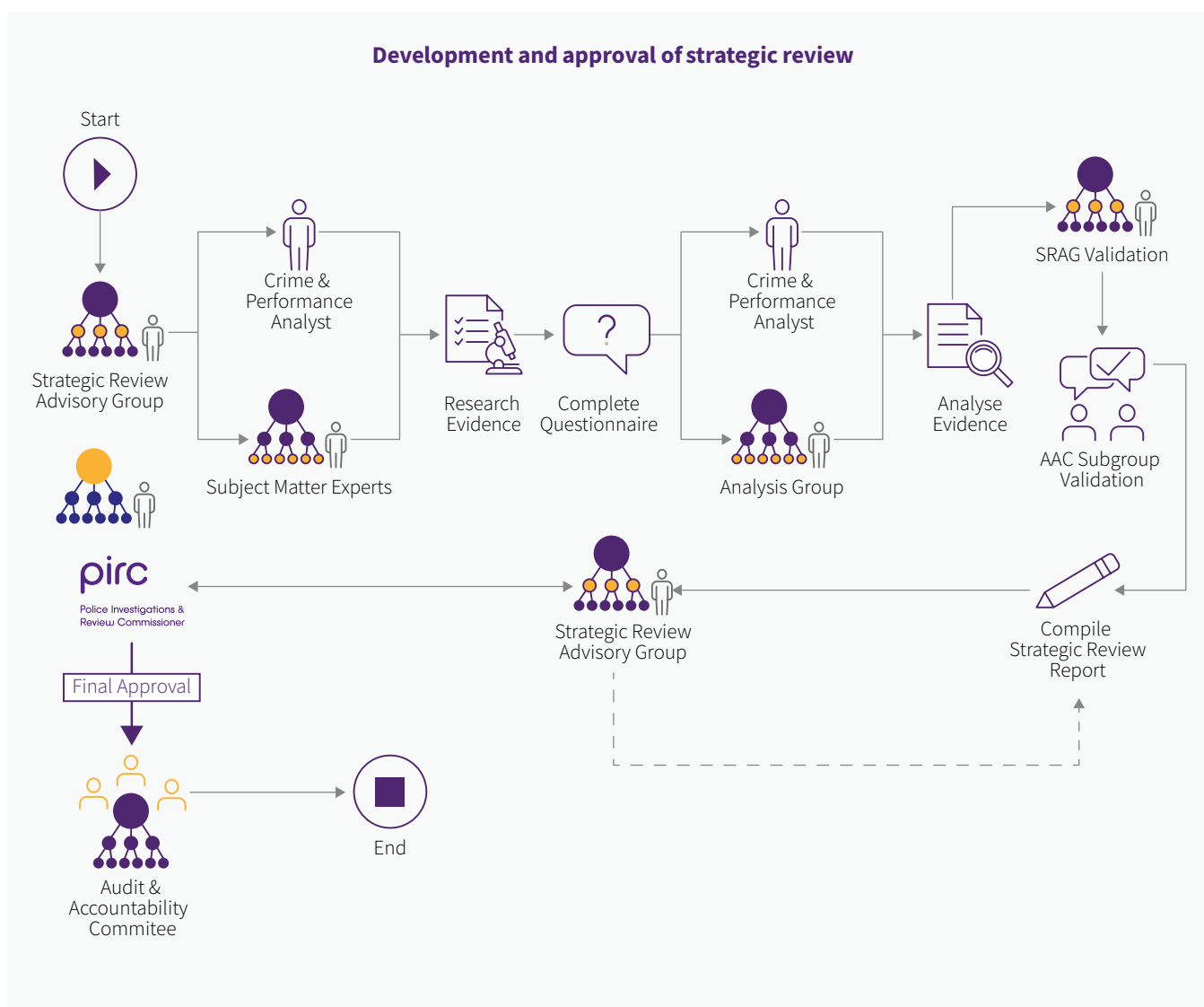
Recommendation 9: Implementation and oversight

Establish a phased implementation plan with quarterly milestones, supported by a robust monitoring and evaluation framework.

Appendix A

Methodology

The following methodology was applied throughout the Strategic Review to ensure that the identification and assessment of topics was rigorous and subject to independent scrutiny:



Organisational risks and challenges capture

A baseline was established by leveraging organisational insights to identify and collate ongoing risks and challenges. This exercise applied the PESTLE framework, enabling a structured analysis of political, economic, social, technological, legal, and environmental factors. The approach consolidated corporate knowledge and produced a group of thematic issues as a baseline, thereafter categorising topics for further analysis to represent the key risks, challenges and opportunities shaping PIRC’s operating environment.

Establishment of Strategic Review Advisory Group (SRAG)

A dedicated group was constituted from members of the Senior Leadership Team (SLT) to provide overarching oversight, to ensure rigorous governance of the review process and support the identification of key strategic themes.

Identification of themes, topics and subject matter experts (SMEs)

SRAG agreed the principal themes to provide a clear focus for topic selection. A formal invitation was then issued to all staff, inviting submissions for topics to be considered. Following approval, each topic was allocated to a designated SME responsible for leading the research and evidence-gathering process.

Development and deployment of an online topic submission tool and guidance

A standardised method of rating and collating evidence was introduced to ensure that each topic was evaluated consistently. This approach enabled the systematic assessment of both the potential impact of, and PIRC’s organisational readiness to manage, these issues.

Research and evidence gathering

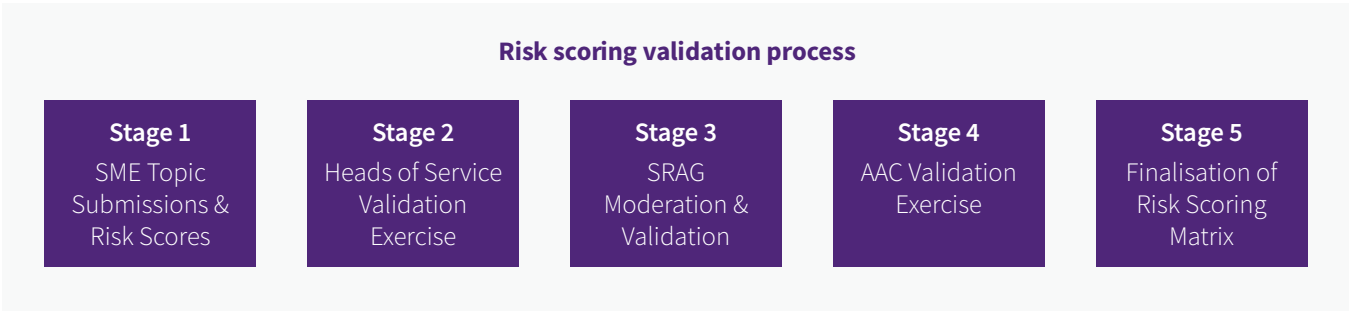
SMEs undertook comprehensive desk-based research, internal data analysis and stakeholder engagement. This process encompassed the review of performance data, organisational policies and procedures, relevant legislation and comparative material where appropriate. Each SME provided a detailed submission for the topic(s) they were allocated.

Data collection and analysis

All data was consolidated and analysed centrally. Ratings assigned to topic submissions were converted into quantitative scores, which were then used to calculate overall risk scores. These risk scores provided the basis for ranking the thematic topics in order of priority.

Validation

A five-stage Risk Scoring Validation Process was undertaken to validate the risk scores assigned to each topic.



Stage 1: topic submissions & risk scores

The topic submissions from SMEs were assessed and analysed to validate the opening overall risk score for each topic, which was then recorded in a structured scoring matrix.

Stage 2: initial internal validation – Heads of Service review

The SME topic submissions were reviewed in a Validation Exercise by the relevant Heads of Service to ratify or moderate the opening risk score recorded by the SME. This exercise allowed for the wider implications to the organisation to be assessed and quantified by the Head of Service responsible for the service delivery in respect of the specific topic.

Stage 3: further internal validation – SRAG

Thereafter, each topic submission was summarised by the Strategic Review project team, in order to distil the significant volume of technical information into a concise format. This information was then presented to SRAG for review of the topic summaries and moderation of the risk scores to reflect the SLT's overall strategic considerations.

Stage 4: AAC validation

The updated topic summaries and scoring matrix were submitted to the AAC sub-group, comprising the AAC Chair and one AAC member, for independent review and validation of the internal risk scoring exercise. A meeting was convened between the AAC sub-group and the Strategic Review project team to examine each summary in detail and provide the sub-group members with an opportunity to seek clarification and gain deeper insight into any specific issues arising from their review.

During the AAC sub-group's validation of the risk scoring exercise, the topic originally titled Staff Profile was renamed Skills Profile to better reflect its focus on the organisation's overall capability to deliver effective services. The sub-group noted that this terminology more accurately captures the assessment of organisational skillsets. It also recommended that the Skills Profile be considered alongside the People Profile, given the link between these two areas. Accordingly, within this Strategic Review report, these topics have been addressed under the single heading of People.

The AAC sub-group's oversight validation strengthened the credibility and reliability of PIRC's internal risk scoring process. This oversight ensured that the assessment and scoring of each topic were rigorously examined, enabling accurate identification of the key risks and challenges facing PIRC.

Stage 5: finalisation of risk scoring matrix

The principal significant change following the AAC exercise was the merging of two topics, namely 'Community Engagement' and 'Communication Opportunities,' to a single Communications topic with an updated risk score. This meant that a total of 17 risks were assessed at the final stage of the Risk Scoring Validation Exercise.

Report compilation and approval

This report has been produced through an iterative drafting process, incorporating feedback from SRAG to ensure accuracy and robustness. The final document has been formally approved by the Commissioner and subsequently submitted to the AAC for review, followed by a structured stakeholder feedback session.

This methodological framework was designed to ensure that the Strategic Review is comprehensive, transparent and firmly grounded in evidence, while remaining sensitive to both the operational realities and the strategic ambitions of the organisation. It combines rigorous data collection, structured analysis, and multi-layered validation to provide a robust foundation for decision-making.

To help support and encourage organisational awareness and engagement throughout the review process, a dedicated Communications Plan was created in accordance with OASIS principles (Objectives, Audience, Strategy, Implementation and Scoring). This plan included timely and consistent communications across all staff levels to help equip and enable colleagues through clear information provision, structured workshops and two-way communication. The opportunities for feedback were integral to the key objective of staff actively influencing and shaping the review.

Appendix B

Strategic Review thematic topics

Theme	Topic
Operational function	Demand analysis
	Geographical impact - centralised resource v national service provision
	Outcomes – recommendations and their impact
	Financial profile
	Staff profile – training, capacity, risk & budget
Law & policy changes	Police (Ethics, Conduct & Scrutiny) (Scotland) Bill
	Lord Advocate's Reference on corroboration
	Victims, Witnesses, And Justice Reform (Scotland) Bill
	United Nations Convention on the Rights of the Child
	Increased demand for specification of documents and other civil matters
Technology	Introduction of Body Worn Video (BWV)
	Digital Evidence Sharing Capability
	IT systems & contracts
People	Freedom of information / subject access requests
	People profile (diversity, equality, inclusion)
	Communication & engagement
	Health & safety

Appendix C

List of acronyms

AAC²⁶	Audit and Accountability Committee
AFO	Authorised Firearms Officer
Angiolini Review	Independent review of complaints handling, investigations and misconduct issues in relation to policing
ARG	Advisory Reference Group
BTP	British Transport Police
BTPA	British Transport Police Authority
BWV	Body worn video
CHR	Complaint Handling Review
CNC	Civil Nuclear Constabulary
COPFS	Crown Office and Procurator Fiscal Service
COSLA	Convention of Scottish Local Authorities
DEI	Diversity, Equality and Inclusion
DESC	Digital Evidence Sharing Capability
ECHR	European Convention on Human Rights
FOISA	Freedom of Information (Scotland) Act 2002
FTE	Full time equivalent
FY	Financial year
GiA	Grant-in-Aid
HMRC	His Majesty's Revenue & Customs
HoC	Heads of complaint
ICRIR	Independent Commission for Reconciliation and Information Recovery
JII	Joint Investigative Interview

²⁶ PIRC's AAC's transitioned to the SAB in early 2026, in line with provisions of the PECSS Act.

KPI	Key Performance Indicator
MDP	Ministry of Defence Police
NCA	National Crime Agency
NCHDG	National Complaint Handling Development Group
NDPB	Non-departmental public body
NHS	National Health Service
OASIS	Objectives, audience, strategy, implementation and scoring
PAVA	Pelargonic acid vanillylamide
PCCS	Police Complaints Commissioner for Scotland
The PECSS Act	Police (Ethics, Conduct and Scrutiny) (Scotland) Act 2025
PESTLE	Political, economic, social, technological, legal, environmental
PIRC	Police Investigations and Review Commissioner
PONI	Police Ombudsman for Northern Ireland
Police Scotland	Police Service of Scotland
PSD	Professional Standards Department
PTSD	Post-traumatic stress disorder
SAB	Statutory Advisory Board
SG	Scottish Government
SLT	Senior Leadership Team
SME	Subject matter expert
SOP	Standard Operating Procedure
SPA	Scottish Police Authority
SPFM	Scottish Public Finance Manual
SRAG	Strategic Review Advisory Group
UKVI	UK Visas and Immigration Service
UNCRC	United Nations Convention on the Rights of the Child



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