

BUSINESS PLAN **2025 / 2026**

**Independent & Effective
Investigations & Reviews**

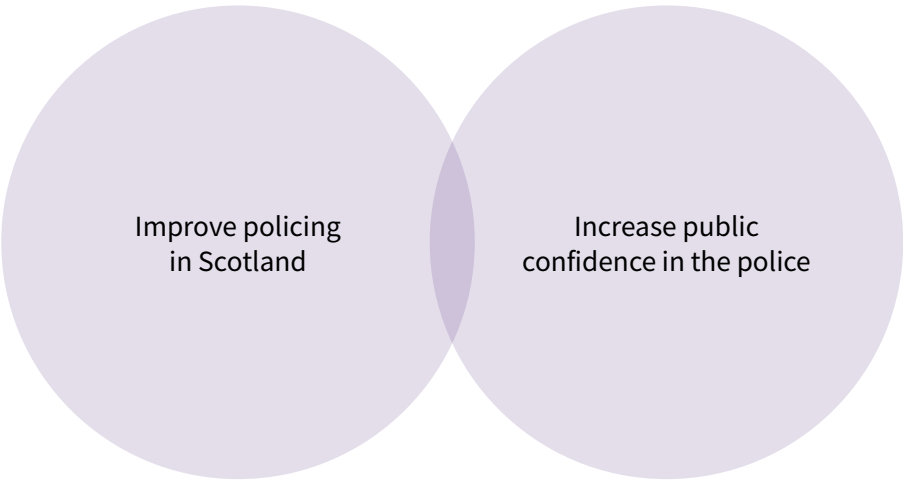
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Police Investigations &
Review Commissioner

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The Police Investigation and Review Commissioner's aim is to achieve two key outcomes through the work that we do:



Commissioner's Foreword

My appointment as Police Investigations and Review Commissioner commenced on 1 April 2025. This date also marked 12 years since the office launched.

During that relatively short period, PIRC has developed a robust foundation for holding policing bodies operating in Scotland to account and for supporting learning and improvement in policing.

This Business Plan for 2025-26 sets out how we will continue to deliver our strategic objectives. It outlines the steps we will take in the year ahead to ensure we provide independent scrutiny of the policing services delivered to the communities of Scotland.

Reflecting on our progress

Since PIRC was established, our workload has increased significantly. Between 2013-14 and 2023-24, the number of referrals for investigation rose by 232%, while the number of investigations taken forward rose by 278%. Over the same period, the number of applications for complaint handling reviews (CHRs) fell by 11% but the number of heads of complaint being assessed rose by 124%.

Despite these increases, we have met and exceeded the objectives set out in our Strategic Plan 2023-25.

We have carried out thorough and timely investigations. In 2023-24, the year for which the most recent data has been published, we assessed 99% of all referrals within five working days of receipt of relevant information, exceeding our target of 90%.¹ We completed and reported to the referring agency 100% of Category A investigations within 90 working days of receipt of all relevant case papers. This exceeded our annual target of 80%. We completed and reported 90% of Category B and C investigations within 120 working days, again exceeding our target of 80%.

We have carried out thorough and timely CHRs and audits. We assessed 99% of CHR applications within five working days of receipt of relevant case papers, exceeding our target of 90%. We concluded 96% of CHRs within 90 working days of receipt of relevant papers and following agreement of the heads of complaint. This exceeded our target of 80%. We also audited Police Scotland's six-stage complaints handling process, making 10 recommendations for improvement.

We have supported, valued and invested in our staff. The level of service delivered by PIRC to members of the public and to referring agencies has been achieved through the commitment and sustained efforts of our staff. We have embedded a training strategy as part of a planned and structured approach to developing their skills. Our Diversity, Equality and Inclusion (DEI) group has worked to enhance staff knowledge and awareness of DEI, while reviewing our procedures, policies and initiatives to ensure we meet our public sector equality duty.²

Additional office accommodation has enabled us to bring together all staff in the office at the same time. It has also helped us to support staff health and welfare by creating a wellbeing room offering a quiet and private space for staff who routinely deal with sensitive and emotionally demanding cases.

We have strengthened independent investigation and oversight of complaints. We have worked with our criminal justice partners to implement the recommendations of Lady Angiolini's review of

complaints handling, investigations and misconduct issues³ that do not require legislation. We have also contributed to the Scottish Parliament's consideration of the Police (Ethics, Conduct and Scrutiny) (Scotland) Bill, which takes forward the legislative recommendations made by Lady Angiolini. These changes will strengthen public confidence in policing oversight and in policing itself.

We have also transformed our digital presence to increase transparency, support accessibility and improve engagement. The modernisation of our online CHR process has been invaluable.

Looking to the future

While the scope and volume of our work has already increased substantially since PIRC was established in 2013, we expect that trend to continue.

In late 2024, a landmark ruling by the Court of Appeal clarified the law on corroboration in two cases referred to it by the Lord Advocate.⁴ The court's judgment has had a significant impact on our work, particularly in relation to the investigation of allegations of assault against the police. A far greater proportion of referrals now proceed to full investigation. The number of investigations initiated into allegations of assault against the police rose 239% in Quarter 4 of 2024-25, compared to the same period the previous year.

As the volume of our work has increased, investigations have also grown more complex and protracted, particularly those directed by the Crown Office and Procurator Fiscal Service (COPFS).

The Police (Ethics, Conduct and Scrutiny) (Scotland) Act 2025 will extend PIRC's role with additional statutory duties and powers. It will also change our governance arrangements, with our Audit and Accountability Committee (AAC) being replaced by a statutory Advisory Board.

In 2025-26, we will continue to engage with and support the Sheku Bayoh Public Inquiry, ensuring that learning arising from evidence given to the Inquiry is identified and recommendations are implemented.

We will also monitor the impact of the rollout of body worn video to operational police officers and staff across Scotland. While the availability of body worn video should enhance the evidence considered by our staff, its impact on the volume of referrals and investigations is not yet clear.

In light of these and other challenges, PIRC is embarking on an ambitious strategic review to ensure that we continue to deliver our statutory mandate and meet the expectations of our service users, partners and stakeholders.

The strategic review will pool the expertise of our staff to consider the challenges ahead and explore new opportunities. It will help us consider how we manage increasing demand at a time of financial constraint. It will help us continue to provide an effective and efficient service to the public while also safeguarding the wellbeing of our staff.

The strategic review is a significant undertaking. It will be taken forward alongside the specific actions set out in this business plan.

To allow the review time to gather evidence and inform our strategic direction, we have extended our Strategic Plan 2023-25 for another year to March 2026. We will then set out new strategic objectives that will help PIRC to continue to provide effective oversight and support improvements in the policing service delivered to our communities.

“ I look forward to drawing upon my experience of scrutinising and supporting improvement in public services to further develop and expand PIRC's role over the coming years and, ultimately, to strengthen public confidence in policing in Scotland. ”

L Paton

Laura Paton, Commissioner



¹Performance data for 2024-25 will be published in our forthcoming annual report.

²Section 149 of the Equality Act 2010.

³Independent review of complaints handling, investigations and misconduct issues in relation to policing – Final report (2020).

⁴HMA v PG and JM [2024] HCJAC 43.

Role of the Police Investigations and Review Commissioner

Our role is to provide independent oversight of policing in Scotland. We investigate incidents involving the police and we review the way the police handle complaints from the public. Our aim is to increase public confidence in policing through independent scrutiny of police actions and by promoting continuous improvement.

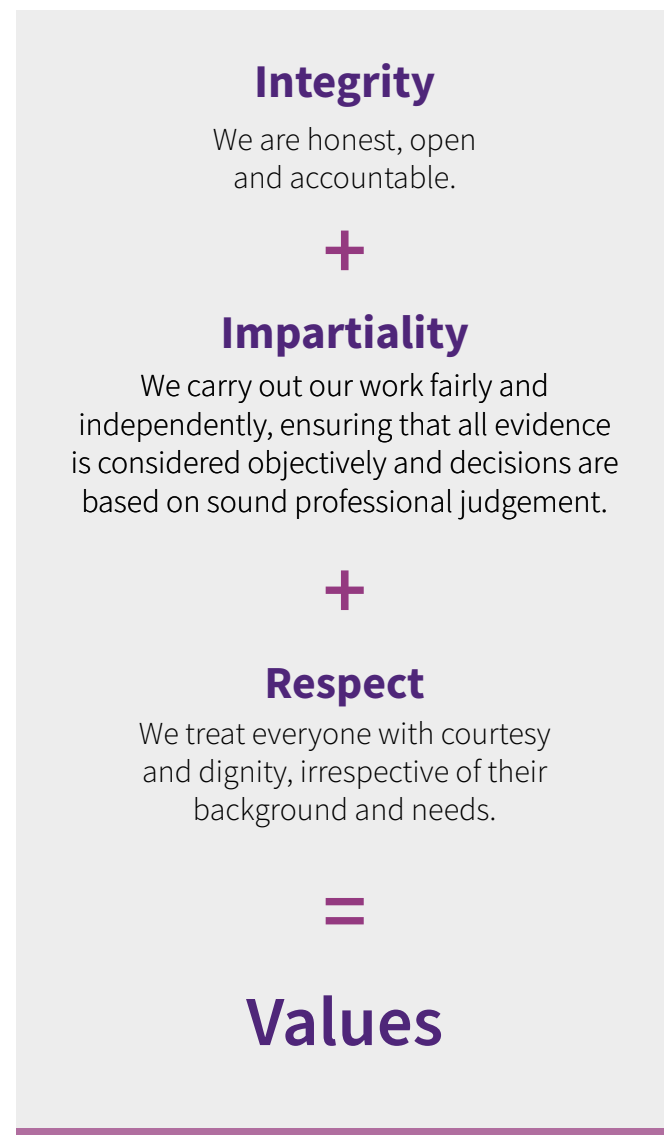
PIRC is funded by the Scottish Government. The Commissioner is appointed by and accountable to Scottish Ministers and is entirely independent of the police.

The Commissioner can recommend learning and improvements to the way the police operate and deliver services. PIRC can also make recommendations, identify learning points, and direct the policing body to reconsider their response to a complaint from a member of the public.

The policing bodies we can investigate or review are:

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

Everything that we do is underpinned by our core values.



Strategic Objectives

In 2022, we carried out a performance data and demand review to better inform our strategic objectives. It looked at our operational delivery against the backdrop of an increasing caseload and our allocated budget.

The review delivered several recommendations that helped set out our revised strategic objectives. These objectives underpin PIRC's performance management framework.

Performance against our strategic objectives is regularly reviewed by our Senior Leadership Team (SLT), AAC and the Scottish Government's Sponsor Team.

Our strategic objectives are:

- To carry out thorough and timely investigations of incidents involving the police.
- To carry out thorough and timely reviews of the way police handle complaints made about them and improve the quality of police complaint handling.
- To support, value and invest in our staff.
- To strengthen independent investigation and oversight of complaints.



By delivering our strategic objectives, we will contribute towards the Scottish Government's national outcomes, working towards communities that are:



The work of PIRC will also directly contribute to the aims set out in The Vision for Justice in Scotland:

- We have a society in which people feel, and are, safer in their communities.
- We have effective, modern, and person-centred approaches to justice in which everyone can have trust, including as victims, those accused of crimes, and as individuals in civil disputes.

Delivering our objectives

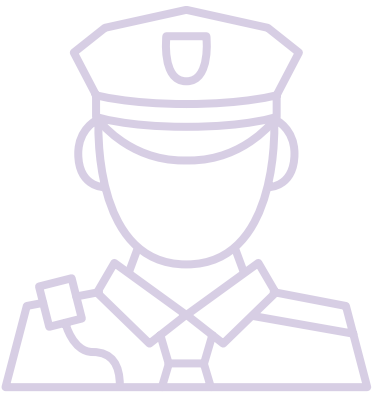
Strategic Objective one: To carry out thorough and timely investigations of incidents involving the police.

Category A investigations remain a priority. These include death investigations directed by the COPFS and other major investigations with complex lines of enquiry where the securing of evidence requires significant resource allocation over a protracted period. We aim to complete such cases within 90 working days from the date the policing body provides case papers. Category B and C investigations should be completed within 120 working days. Our investigations and recommendations will lead to improvements to policing, influence policy and practice, and increase confidence in the police.

Measure	Annual benchmark
Incidents assessed and an investigation decision taken within five working days of receipt of relevant information.	90%
Category A investigation reports (minus major cases ⁵) to be completed and submitted within 90 days following receipt of case papers.	80%
Category B+C investigation reports to be completed and submitted within 120 days following receipt of case papers.	80%

We will:

- ✓ Monitor the impact of the Lord Advocate’s References on our performance.
- ✓ Monitor our operating model to ensure best use of resources.
- ✓ Deliver continuous professional development and training to PIRC investigations staff.
- ✓ Liaise with and deliver training to external partners and stakeholders.
- ✓ Implement and review a revised report template for submissions to COPFS’s Criminal Allegations Against the Police Division.



⁵In exceptional circumstances involving complex or protracted investigations, the Head of Investigations can request the Director of Operations or the Commissioner to categorise the investigation as a major case.

Strategic Objective two: To carry out thorough and timely reviews of the way police handle complaints made about them and improve the quality of police complaint handling.

Timescales for the completion of all categories of CHRs (including Discretionary Decisions⁶) align with the timescales for the completion of Category A investigations at 90 working days. Our CHRs and recommendations will support improvements in police complaints handling. Our audits will deliver evidence-based findings and recommendations to hold policing bodies to account, influence policy and increase confidence in the police complaints system.

Measure	Annual benchmark
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	90%
CHRs including discretionary decisions (minus major cases ⁷) to be completed within 90 working days, following receipt of the relevant police case papers.	80%

We will:

- ✓ Launch a digital animation on our website to guide vulnerable complainers and those with additional support needs through the CHR process.
- ✓ Issue guidance to policing bodies operating in Scotland on how they should deal with complaints made by or on behalf of children.
- ✓ Develop a framework for assessing the efficiency and effectiveness of the complaint handling arrangements maintained by PIRC, the Scottish Police Authority and Police Scotland.



⁶Discretionary Decision letters are issued on the grounds of proportionality, meaning that in our view the policing body has already taken reasonable steps to address the complaint.

⁷In exceptional circumstances involving complex or protracted CHRs, the Head of Review and Policy can request the Director of Operations or the Commissioner to categorise the CHR as a major case

Strategic Objective three: To support, value and invest in our staff.

Our staff are essential to achieving our key aim of securing public confidence in policing in Scotland. It is therefore important to equip them with knowledge and skills, and a healthy work-life balance. Each person will have a personalised development plan to support them to

develop for the future. We will consult various staff groups to shape and influence our policy development and culture, and ensure we provide an inclusive place of work. We aim to have a highly skilled, diverse workforce that delivers an efficient, effective, and high performing service.

We will:

- ✔ Launch a recruitment portal which will enhance the recruitment process for candidates and recruiting managers.
- ✔ Introduce an individual training plan for each staff member which will incorporate job specific and aspirational learning, allowing them to reach their full potential.
- ✔ Develop our health and wellbeing strategy to support workforce safety and wellbeing.
- ✔ Nurture and embed an inclusive environment throughout the organisation.



Strategic Objective four: To strengthen independent investigation and oversight of complaints.

Working with partners, we have taken forward the recommendations of Lady Angiolini’s review of review of complaints handling, investigations and misconduct issues. We will continue to take steps to strengthen

oversight arrangements for policing and complaints handling, with the aim of building confidence in policing and in how policing bodies handle complaints.

We will:

- ✔ Prepare for and implement the Police (Ethics, Conduct and Scrutiny) (Scotland) Act 2025.
- ✔ Continue to engage with and take on board learning from the Sheku Bayoh Public Inquiry.
- ✔ Seek to ensure PIRC is appropriately resourced to meet demand.
- ✔ Engage with justice partners to support improvements in policing and in complaints handling.
- ✔ Deliver a Strategic Review to inform PIRC’s strategic direction and priorities in the coming years.

Our Resources Explained

PIRC receives Grant in Aid from the Scottish Government to finance its statutory functions and activities. Scottish Ministers are accountable to the Scottish Parliament for the financial resources of PIRC and for the allocation of the correct level of financing.

We do not generate any income through the services we provide.

We strive to deliver a high level of service while securing best value by using our funding to maximum effect and by reviewing our ways of working regularly to ensure savings of both time and money are made where possible.

We have been allocated a total budget of £7.336m for 2025-26. The management of our budget is linked to a framework of achieving best value for money through ensuring that resources are applied economically, efficiently and effectively to support business aims through our strategic objectives.

A breakdown of our funding can be seen below:

	Forecasted spend 2025/26
Total Staff Costs	6,241,160
Total Running Costs	1,094,840
Grand Total Costs	£7,336,000

PIRC provides a detailed forecast to the Scottish Government at the beginning of each year. A monthly monitoring report is completed to show a comparison of actual spend against this forecast and the reasons for any variations.

As of 31 March 2025, we had 93 (89.42 full time equivalent) staff including the Commissioner working at PIRC and had four vacant posts which have since been filled. While staff turnover is low (9.1% for 2024-25), we have undertaken to launch a recruitment portal in 2025-26 to enhance the application process for both candidates and recruiting managers.



Police Investigations &
Review Commissioner

Business Plan 2025-26
Independent & Effective Investigations & Reviews

Copies can be downloaded from our website: pirc.scot

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