



Scottish Biometrics
Commissioner
Coimiseanair
Biometrics na h-Alba

Communications & Engagement Strategy

2024/26



Safeguarding our biometric future

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Introduction

The Scottish Biometrics Commissioner (SBC) is an independent parliamentary officeholder appointed by the Monarch on the nomination of the Scottish Parliament. The [Scottish Biometrics Commissioner Act 2020](#) received Royal Assent in April 2020, and the first Commissioner was appointed in April 2021. The general function of the Commissioner is to ***‘support and promote the adoption of lawful, effective, and ethical practices in relation to biometric data used for policing and criminal justice purposes in Scotland by Police Scotland, the Scottish Police Authority (SPA), and the Police Investigations and Review Commissioner (PIRC).’***

The ways in which we discharge our statutory functions are set out in our [Strategic Plan 2021 to 2025](#). In doing so, we seek to establish and maintain our reputation as a trusted and impartial voice on the use of biometric data and technologies for policing and criminal justice purposes in Scotland. Our vision of **‘Safeguarding our Biometric Future’** is supported by our organisational values of being independent, transparent, accountable, and proportionate:

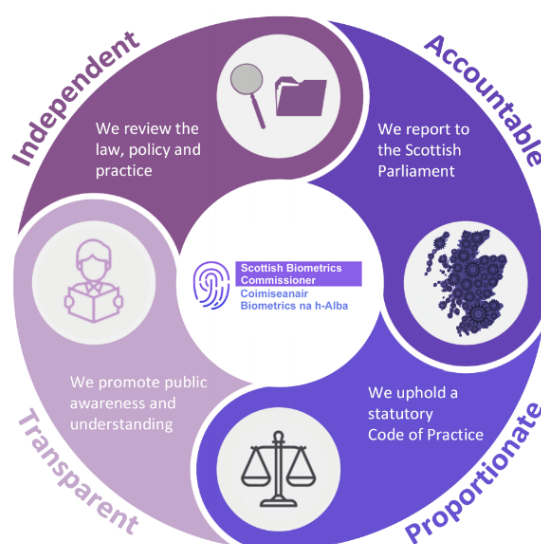


Figure No 1: The Values of the Scottish Biometrics Commissioner

Communicating and engaging effectively with the wide range of stakeholders affected by and interested in our work is key to supporting our general function. This means communicating our work in a clear, accurate and appropriate way to our diverse audiences, and having effective and collaborative conversations with stakeholders.

We report on our work in public through a wide range of products including [annual reports](#) to the Scottish Parliament; [assurance reviews](#); public evidence sessions with the [Parliament Criminal Justice Committee](#); the Scottish Police Authority Board, or relevant Committees such as the SPA Forensic Services Committee or the SPA Policing Performance Committee. On a UK biometrics governance level, we are members of the [UK Forensic Information Database Service \(FINDS\)](#).

Our statutory [Code of Practice](#) on the use of biometric data and technologies for policing and criminal justice purposes in Scotland was approved by the Parliament and Scottish Ministers and took legal effect in Scotland

on 16 November 2022. The Code is accompanied by a [public complaints' mechanism](#) for data subjects. From the winter of 2023/24, we commenced an annual programme of compliance assessments on the Code in respect of [Police Scotland](#), the [Scottish Police Authority \(SPA\)](#) and the [Police Investigations and Review Commissioner \(PIRC\)](#).



Image No 1: Scottish Biometrics Commissioners Code of Practice

As one of the smallest public authorities in Scotland (Commissioner and three staff), our capacity for communications and engagement is constrained by the availability of finance and resources. For that reason, our primary mode of public engagement is through our website. We also have a Facebook, X/Twitter, [YouTube](#) and LinkedIn page. As a policy decision, we do not currently operate other forms of social media such as TikTok, Snapchat and Instagram, being mindful of capacity at this time to service the demand that might arise from a more expansive social media presence.

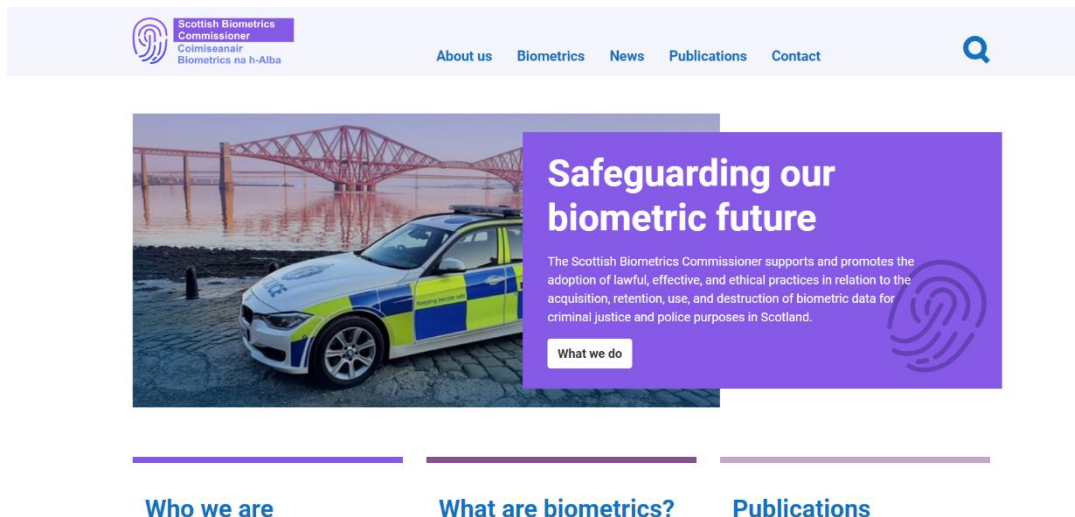


Image No 2: Scottish Biometrics Commissioners Website

Effective communications and engagement helps us:

- focus on the right priorities
- ensure our work has an impact
- safeguard our independence and reputation
- seek diverse perspectives across stakeholders
- build trust and confidence with the public

To achieve this, we need to ensure we are reaching the people affected by our work, to help them understand and benefit from it, as well as using what they tell us to inform what we do and how we do it.

Building and sustaining our reputation as a trusted independent voice within the policing and criminal justice community in Scotland, the UK, and internationally is crucial to our work being received, trusted and acted on. Thus, our communications and engagement work needs to emphasise position and reinforce our independence and the reliability and quality of our work.

This strategy sets out our current approach to achieving the above as well as the developments we will make over the period of this strategy to enhance our positioning, reputation and resonance, and to respond to the dynamic environment in which we operate.

This strategy complements our [Strategic Plan 2021-2025](#), our [Scheme of Governance](#), our [Business Plan 2024/25](#), and our [Publication Scheme](#) as well as our specific duties and obligations under the Scottish Biometrics Commissioner Act 2020. The strategy is also supported by relevant operational and corporate plans.

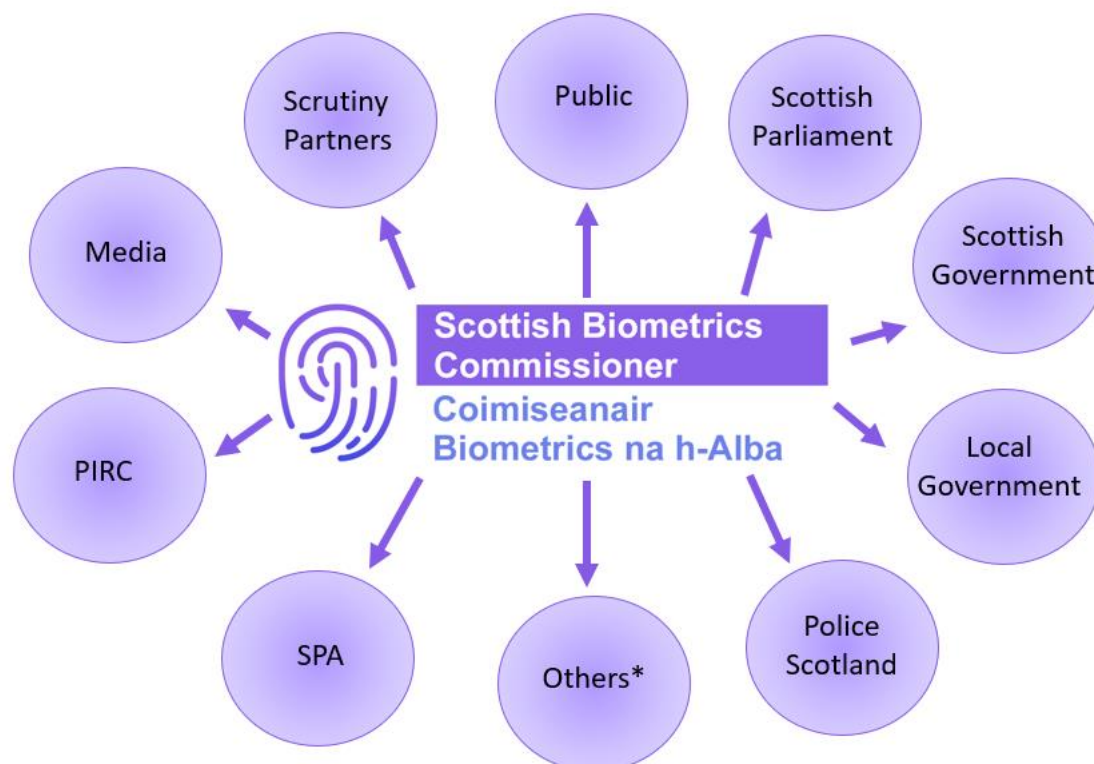
Our stakeholders

The Scottish Biometrics Commissioner function exists in accordance with the legislative duties assigned to us by the Scottish Parliament under the Scottish Biometrics Commissioner Act 2020. This strategy describes how we will deliver our communication and engagement priorities and our organisational corporate and internal communications requirements.

Although all our reporting requirements are directly to the Scottish Parliament, we have a wide range of stakeholders across Scottish public life (see Figure No 2 below).

The 'Public' represents the people who use and pay for Scotland's public services. Key to effectively communicating and engaging with them is recognising that they comprise diverse, heterogenous audiences that communicate in different ways.

The following Figure comprises of a high-level stakeholder map of our key audiences:



*Others include academia, the Commissioner’s Professional Advisory Group, Advisory Board on Audit, Audit Scotland, our internal auditors, other UK partners such as the ICO and Biometrics and Surveillance Camera Commissioner for England and Wales, and other independent officeholders in Scotland including SPSO, SHRC and CYPC.

Figure No 2: The Scottish Biometrics Commissioner external stakeholders

The communications and media environment

The past decade has seen significant changes in how people receive, understand and share information. The emergence and rise to pre-eminence of social media, digital platforms and on-demand video streaming has altered the behaviour of individuals and communities, as well as how organisations reach audiences and disseminate information. The Scottish Biometrics Commissioner will adapt and develop our communication approaches in response, and we will need to continue to do so as technology and online communication platforms evolve.

Reading, listening and viewing of traditional media have declined. The number of professional journalists has reduced substantially, as has the time available for media to find, research and produce informed work. Our communications must provide journalists with relevant, reliable and accessible information to maximise coverage.

People increasingly either search for or receive news limited to their active range of interests and the issues that matter to them. At the same time, the ability of media outlets to produce and disseminate 'public interest' news has diminished. To ensure people understand how we are performing, and how our work can

benefit them, we need to ensure our messages resonate with the issues of importance to them.

The proliferation of digital communications platforms and smartphone usage has led to people consuming information in short, simple and increasingly visual forms, with growing demand for interactive content they can tailor to their own interests and needs. We will need to continue developing our approach to visual communications, data interpretation and interactivity.

To support this strategy, the Commissioner has seconded in a senior police officer from Police Scotland for a period of two years as SBC Director. This, with the imperative of increasing our existing capacity for strategic level communications and engagement including outreach work such as training inputs to Police Scotland.

The political and public service context

Public services face increasing demand and financial pressure. Scotland also has significant new financial powers, a new fiscal framework and social security powers affecting a wide range of people, including the most vulnerable. The relationship between poverty, marginalisation, social exclusion and contact with the criminal justice system whether as offenders or victims is well established. There is an opportunity for the Commissioner in his work to demonstrate the ability to explain this context, as the capture of biometric data for policing and criminal justice purposes cannot be considered in isolation from wider social factors such as the impact of social deprivation.

The domestic and international political environment has been and continues to be volatile, following the 2016 vote to leave the European Union and the continuing debate over Scotland's constitutional future. Research has shown declining trust in institutions, the political process and the media.¹

At a time of acute financial pressure on the public sector, and as the UK Government pursues a 'de-regulation' agenda², it is important that our communications should emphasise the distinctiveness of the Scottish Biometrics Commissioners Act 2020, the powers assigned to us by the Scottish Parliament, and the strength and robustness of our independence, transparency, accountability, and the proportionality of our work.

Strategic approach

Objectives and strategic pillars

There are five overarching objectives of our Communication and Engagement Strategy 2023/25, aimed at addressing the issues and context discussed in this introduction. These are supported by five 'pillars' of our strategic approach to communications and engagement.

¹ [Audit Scotland Communication and Engagement Strategy 2020 to 2023](#)

² UK Data Protection and Digital Information (No 2 Bill) 2023 as withdrawn due to 2024 election

Figure 3 shows our objectives, pillars and supporting workstreams. More explanation about each pillar follows:

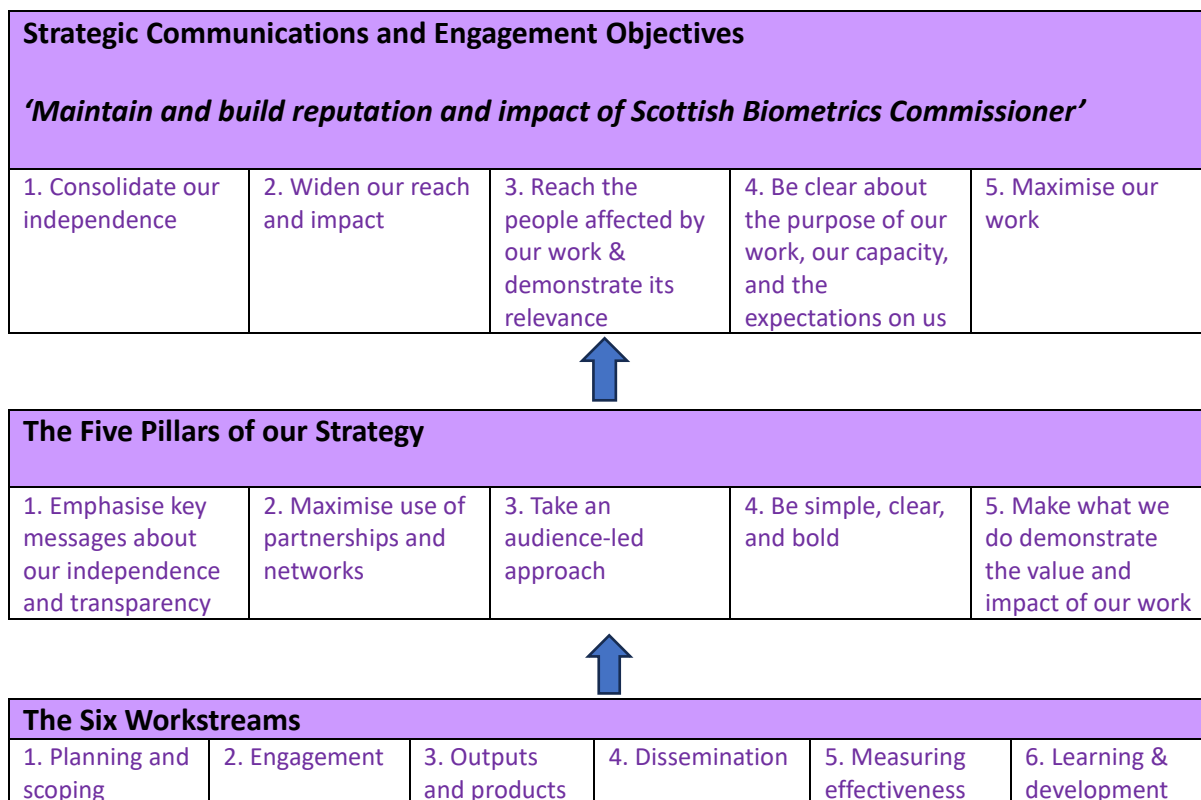


Figure No 3: Objectives, Strategic Pillars, and Workstreams

Emphasise our independence

We will weave core corporate messaging about our independence throughout our communications and engagement activities, both proactively and reactively. Our ambition is to be regarded as a trusted voice in the policing and criminal justice community in Scotland, the UK and internationally. One of the ways to achieve this is through strategic presentations at national and international events:



The Commissioner addressing the global Biometrics Institute Congress in 2023

We will showcase the Commissioner’s statutory Code of Practice and complaint mechanism for data subjects through a variety of mediums. We will emphasise its safeguards in appropriately balancing the needs of policing and the criminal justice system, with the individual and collective rights of data subjects.



The Commissioner and Cabinet Secretary with the Code of Practice

We will continue to be open and transparent in all we do, modelling the behaviours and reputation that we seek to promote. We will explain our role and work to increase clarity, manage stakeholders’ expectations and emphasise our value and benefit to the Parliament and public.

Maximise the use of partnerships and networks

We will maximise the use of partnerships and networks to help understand the needs of the bodies to whom our functions extend. We will also exercise the power to work jointly with others as provided for by [Section 3](#) of the Scottish Biometrics Commissioner Act 2020. For example, in 2023 we published two assurance reviews conducted in partnership with the Scottish Police Authority. Doing so enabled us to pool resources and conduct work on a scale that would not otherwise be possible.



2023 Joint Assurance Reviews on Vulnerable Adults and Children

We will enter (where appropriate) into data sharing arrangements and/or Memoranda of Understanding (MOU’s) with key partners to promote effective and lawful knowledge exchange. We will also encourage partners to provide a link on their website to our own, including to our statutory Code of Practice and/or other relevant publications.

Many niche audiences already engage with other organisations in the human rights and policing and criminal justice sector in Scotland. Partners such as the Criminal Justice Committee, Criminal Justice Board, Scottish Human Rights Commission, the Children and Young People’s Commissioner Scotland or Community Justice Scotland can help us disseminate our messages and outputs, increasing our reach and build our authority with those audiences through our professional association with bodies they already trust. For example, in June 2024 we co-hosted a biometrics conference in Edinburgh in partnership with the Scottish Police Authority and Police Scotland. Pooling budgets and resources enabled us to deliver a national conference that would have been difficult for a tiny public authority on its own.



The 2024 Biometrics Conference delegate pack

This approach will include learning from the third sector about ‘hard-to-reach’ and vulnerable audiences. In 2023 we worked with the Children’s Centre for Youth Justice and the National Association of Appropriate Adults Service Providers. Such approaches increase our skills and capacity and help us reach the people most affected by the areas in which we exercise independent oversight on behalf of the Parliament. These are often the same people who are least likely to engage with the bodies to whom our functions extend.

Take an audience led approach

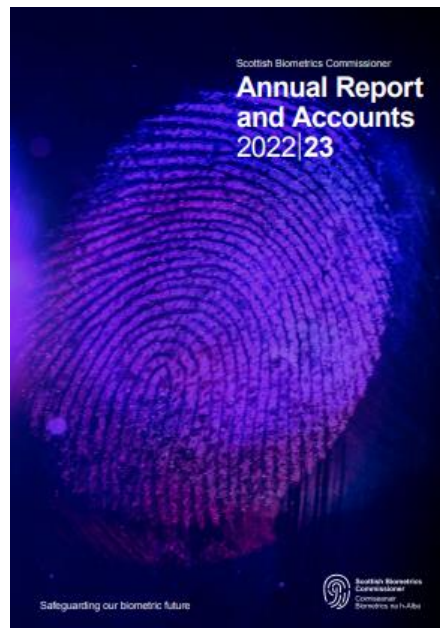
When conducting thematic assurance reviews, we will systematically identify the specific audiences for our work, for example, examining the acquisition of biometric data from children. From this we can research, engage with, and better understand key audience perspectives to ensure that our work covers relevant issues. By doing so, we will also communicate the output from our work with those same audiences to maximise our impact.

This includes identifying when there is a 'general' audience or a niche or specific audience who require a more bespoke approach. This would include tailored outputs, aligning our messages with the audience's issues of interest and disseminating via the channels they already use. This will help us widen our impact and to reach people who are affected by our work and the issues we cover but may not otherwise engage with us.

We will emphasise quality over quantity, allocating resources to bespoke approaches only when it will achieve a clear and significant impact. In our planning and our engagement, we will be clear in the responses and reactions we seek, to increase impact.

Be simple, clear and bold

Simple, clear, and unambiguous messages and language will help cut through the considerable 'noise' in the wider environment and engage audiences who have competing demands for their attention. Clarity about the key issues and expected responses could reinforce our reputation for being authoritative and straightforward and manage expectations.



Our Annual Report and Accounts to Parliament

We will be bold and creative, creating new products and approaches to better reach audiences and reinforce our findings and messages. All our reports to the Scottish Parliament will be professionally formatted for publication and will as much as possible use simple language avoiding overly academic or technical language or referencing. As technology develops and audience behaviours change, we will need to continue to adapt and innovate to continue reaching people and having impact, as well as maintaining a reputation for quality. Part of innovation is accepting that some experiments such as investing in video animations may not work. We will review all projects for lessons learned.

To be clear, authoritative, and reliable our voice needs to be human and authentic. This includes our language and using more of our colleagues as faces of the organisation. A more human connection will build engagement and trust and help showcase our colleagues' skills, knowledge and commitment. This will help our impact and our positioning.

Maximise our work

We will work to extend the life of our Code of Practice, assurance reviews and other reports to the Scottish Parliament beyond their initial publication and publicity to increase their reach and impact. We will also demonstrate the range of our work and expertise by contributing to other debates and policy developments in policing and criminal justice to further demonstrate our value and promote better understanding of our role and work.

When we make recommendations for improvement to any of the bodies to whom our functions extend, we may impose a legal requirement to respond to our recommendations. We will also monitor progress against recommendations made and determine whether a recommendation has been fully or partially discharged. This will demonstrate the impact of our work in driving change.

In monitoring compliance with the Code of Practice, and through assurance reviews and other activity we will acknowledge good and effective practice as well as highlighting areas for improvement. To promote better understanding of our work and provide value to the Scottish public and decision-makers, we will promote our work systematically and where relevant, share best practice across the policing and criminal justice sector.

We will seek to promote our work and the policy framework in Scotland through wider engagement at a UK level and internationally through our membership of the global biometrics community the [Biometrics Institute](#). As part of our strategic approach to communications and engagement, we will actively seek opportunities to speak or present at national and international forums or to host or co-host relevant conferences or symposiums. In all our activity, we will actively promote our corporate logos and our organisational vision and values.

Implementation

This strategy will be supported by an operational plan detailing actions, roles and responsibilities. These are categorised into the six supporting workstreams as outlined in Figure 3. Key actions in each workstream are listed below.

Planning and scoping

As part of our annual thematic programme of assurance, in our annual compliance assessments on the Code of Practice, and in our annual or other reports to Parliament we will develop a media strategy and key messages. Where required, and as we have done previously, we will utilise the services of a trained media professional to maximise the exposure to our work.

The footfall to our website continues to grow providing evidence of us reaching wide audiences. The new Director post will ensure that the SBC function is appropriately resourced and structured to improve leadership capacity and the overarching coordination of communication and engagement projects and strands.

Engagement

We will continue our current stakeholder engagement programmes including through our professional advisory group, with the Parliament and Scottish Ministers, with the policing and criminal justice community, with other officeholders supported by the Scottish Parliament and through Scottish Government forums such as the Criminal Justice Board, the Scottish AI Alliance and the Digital Identity Scotland (DIS) programme.

We will make more use of existing networks and widen our resource base to engage with more organisations and audiences that are either affected by our work or are working with those who are. This includes working with third sector agencies who may represent those with whom biometric data and technologies in a policing and criminal justice context may impact disproportionately. Examples of areas where we will engage more

widely with, once our resource is expanded from 2024/25 include children's organisations, vulnerable adults' organisations, Rape Crisis Scotland, Victim Support Scotland, Citizens Advice Scotland, and the Council of Ethnic Minority Voluntary Organisations (CEMVO).

Outputs and products

During 2023/24 we upgraded the functionality of our website and reviewed our products and messaging. Where possible, we will work with relevant audiences to advise and/or co-produce website content. By doing so, we hope to improve our infographic, video, animation, audio and digital content.

Other aspects of enhancing our approach to communications and engagement included procuring a pop-up corporate banner for use at conferences and events, speaking at the global [Biometrics Institute Congress](#) in October 2023 and again in October 2024, and at the [Future Scot Digital Justice and Policing Conference](#) in November 2023. During 2023, we also conducted a strategic communications and engagement visit to Brussels facilitated by Scottish Government to engage with EU member states, civil society and policing bodies on the future direction of biometrics within EU member states.

Dissemination

We will continue to develop our dissemination methods for our newsletters, reports and publications. We will also lengthen the timeframes of our publicity and marketing of our activities by developing strategic capacity within our organisation and through re-modelling of an existing post. We will also continue to weave our core corporate messaging through all our work.

We will continue to use our website as our primary social media platform. With the arrival of the Director from late July 2024, we will consider expanding into other main social media platforms such as Twitter, providing that we have the capacity and capability to do so. This decision will in part be informed by a review of the effectiveness of our social media approach and our internal audit programme.

Measuring effectiveness

Continue our current monitoring processes through weekly team meetings, monthly management team meetings, quarterly strategic management meetings and through the advice and support of our Advisory Board on Audit.

Further develop our monitoring, including considering whether new measures or workstreams are needed, whether to widen our external engagement, and change expectations and understanding about what constitutes impact and effective communications and engagement.

Learning and development

As part of the 2024/25 funding bid, the Commissioner reviewed the skills and leadership experience required within his team to ensure we have the resources and skill-mix required. As part of this we will prioritise accredited policing sector leadership training for managers and L&D activities for all staff as deemed necessary.

We will also explore opportunities with our strategic partners (as we have done previously) to pool media and communications expertise to maximise the exposure of our published work.