SCOTTISH POLICE AUTHORITY
ÙGHDARRAS POILIS NA H-ALBA

**Complaints and Conduct Committee**

**19 May 2026**

**Item 6:** Non-Criminal Complaints Update (Operation Glade)

**Presenter:** Chief Superintendent Helen Harrison

**Appendix:** Yes – BDO SLWG Action Plan

## Purpose

The purpose of this briefing paper is to provide members of the SPA Complaints and Conduct committee with an update in respect of the non-criminal complaint's portfolio within Professional Standards Department (PSD).

Members are *invited to note and discuss* the contents of the paper.

## Recommendation

**For Discussion**

## Strategic Alignment

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| Strategic alignment | Supports Police Scotland's 2030 Vision<br>Aligns with Police Scotland's values of Integrity, Fairness, Respect and Commitment to Upholding Human Rights. |
| Risk alignment | Aligns to Police Scotland Risk regarding the ongoing unallocated list of non-criminal complaints. |
| Prior governance | Police Scotland Professional Standards Department – internal review and approval – ACC Professionalism and Assurance sign off. |
| Stakeholder engagement | N/A |

## Implications

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| Community | | Data & Privacy | | Environmental | |
| Equalities & Human Rights | | Financial | x | Health, Safety & Wellbeing | |
| Legal | | Workforce | x | | |

# 1 Report Detail

## 1.1 Background

1.2 Operation GLADE commenced in April 2024 as a mechanism to provide executive oversight, facilitate key discussions and co-ordinate improvements to reduce the non-criminal Complaints About the Police (CAP) backlog and enhance long term PSD complaint service delivery. ACC Ratcliff continues to chair regular gold meetings to track progress and ensure focus on this critical area of business.

This paper provides further detail to the previous briefing paper submitted for the February Complaints and Conduct Committee and does not seek to repeat the detail within that paper, which covers other elements of work already completed to date.

This paper also provides an update in relation to the ongoing complaints allocated out with PSD and the short life working group in relation to the outstanding BDO and PIRC audit recommendations.

### Further detail

2.1 The allocation of 1254 complaints to local and national divisions for investigation and resolution has been completed as per the table below. A project team led by Superintendent Mann from Non-criminal Investigations is supporting the divisions in terms of allocations, training, enquiries and quality assurance. Divisional SPOC's have been identified and fully engaged in the process at Chief Inspector level and fortnightly meetings have been initiated to ensure investigative progress is tracked.

Of the 1254 complaints, contact has been made with 561 (45%) complainers with **68 complaints fully concluded**. There have also been 101 heads of complaints agreed with a further 12 final letters at the quality assurance stage. A further 38 letters have been checked and sent back for amendments, these will be suitable for sending soon. PSD awareness sessions have now concluded with a steady uptake in the drop-in sessions, that are now in place. The QA Team has 3 investigators working full-time, such is the uplift in work, led by PI Paul Cooper and supported by a further 2 Investigators sharing the tasks with BAU complaint investigations.

A fortnightly report gathered by the OP Glade team provides more information in terms of progress across key touch points in the complaint process to allow PSD SMT to track progress in each division accordingly.

PSD has and will continue to retain the most complex enquiries including the following.

- Category A+,
- Complaints against PSD/SPA,
- Sub judicial matters,
- Complaints against senior officers (Insp and above),
- Complex complaints which do not meet the Cat A+ threshold but have a high volume of Heads of Complaint (HOC)
- All Police Made Complaints.

**Complaints allocated to National Divisions and Local Policing**

| April 2026 | Allocated to Division |
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| Category A | 322 |
| Category B | 864 |
| **Total** | **1186 (-68)** |

**Complaints retained in PSD**

| April 2026 Category | Allocated | PLDP (allocated) | Unallocated | Sub Judice - Paused | Grand Total |
|---|---|---|---|---|---|
| A+ | 14 | 0 | 0 | 11 | 25 |
| A | 125 | 0 | 72 | 41 | 238 |
| B | 232 | 151 | 97 | 56 | 536 |
| C | 14 | 0 | 0 | 0 | 14 |
| Grand Total | **385** | **151** | **169** | **108** | **813** |

PSD Investigations completed **283** investigations and determination letters sent from 1 January to 1 April 2026 inclusive. These are awaiting official closure on the Centurion system by the PSD administration team.

Impact factors which are affecting the closure of complaints include, reduced staffing numbers as per reduction in RIG staff, transference of complaints between those leaving and those remaining, losing investigators to the QA team, and the lack of availability of overtime, which had previously been relied on in 2025/2026.

**32** CAPs are yet to be allocated via the probationary Sergeant project. The process of reviewing suitable complaints and the delivery of awareness sessions remains ongoing, which again is taken on by the

investigators over and above BAU. When the remaining CAPs are allocated, this will reduce the PSD unallocated figure to **137**.

Given that probationary Sergeants have started their roles at division, some have already been allocated complaints via the OP Glade roll out. Communications to prevent this from occurring moving forward have been communicated to division.

An input was provided by Chief Inspector Bowie to all investigators regarding the implementation of the reduction in size/length of letters. Alongside the non-investigation provision for low level allegations as agreed with our partners at PIRC, this should have a positive impact on increasing capacity in the coming weeks.

## 2.2 NCARU DEMAND

| Area | Submissions Completed | Relevant CAPS | NCARU FLR | Progressed to Criminal Investigations | Progressed to Non-Criminal – Cat A's | Progressed to PIT – Cat B's | NCARU retained – Cat C | Disposals- other* |
|---|---|---|---|---|---|---|---|---|
| **North** | 456 | 281 | 155 (55%) | 8 | 55 | 47 | 16 | 175 |
| **East** | 672 | 382 | 195 (51%) | 18 | 37 | 115 | 17 | 290 |
| **West** | 954 | 614 | 386 (63%) | 35 | 21 | 166 | 6 | 340 |
| **Total** | **2082** | **1277** | **736 (58%)** | **61** | **113** | **328** | **39** | **805** |

**14 day letters, Abandoned CAPs, Unacceptable Complainers, MI's, Added to existing CAP, Non-PSD related matters*

From 1 January to 1 April 2026, 2082, submissions to NCARU were assessed and concluded. Of those 1277 were relevant complaints, 480 progressed to Non-Criminal Investigations. The average **FLR rate is 58%** an increase of 13% from last quarter.

The total of new complaints awaiting assessment is currently **179**, the team process circa 25 – 45 complaints per day depending on complexity, demand and resourcing.

The NCARU continue to maximise opportunities for FLR to save time and create departmental efficiencies.

## 2.3 RESOURCING

Since the last SPA CCC the previously Revenue Investment Group funded civilian investigators, posts have decreased from 19.5 FTE to 10 FTE. Due to this a restructure within Non-criminal Investigations has taken place. This has resulted in a removal of the 'Proportionate Investigations Team' and an alignment to geographical and regional complaint investigations

teams. The investigator split has been based on the % of total live complaints in each regional area.

- NCARU - 1 Chief Inspector, 3 Inspectors and 20 assessment team.
- CHR – 3 Sergeants and 1 Investigator
- DSI and PMC – 1 Chief Inspector, 2 Inspectors, 1 Sergeant and 1 Investigator
- Non-Crim Investigations and Op Glade –1 Chief Inspector, 4 Inspectors and 28 Investigators.

## 2.4 BDO and PIRC AUDIT

A Short Life Working Group formally commenced in December 2025 chaired by Superintendent Mann; this has continued monthly with relevant stakeholders to ensure all recommendations are tracked and coordinated appropriately. An updated action log from the group has been included within **Appendix A**. The outstanding recommendations from the PIRC audit namely Recommendation 3,6,7 and 8 have been discussed with the PIRC and added to the agenda of the newly formed 'Audit SLWG' which will meet monthly and report into the NCHDG.

## 2.5 PATH TO GREEN

Superintendent Mann was tasked at the November 2025 Complaints and Conduct Committee to document the actions and suggested timelines to move the Operation Glade organisational risk from current red status to green utilising reasonable planning assumptions to gain an organisational position regarding the area of business.

The following proposed short terms actions have been updated since the February SPA CCC to reflect ongoing work in the last quarter.

**Short Term (0 - 3 months) February to May 2026**

- Support Local Allocation Project delivery ensuring investigative progress is tracked and coordinated. **Update – Ongoing support and guidance provided by dedicated QA team. Quantitative data within Appendix A to show tangible progress in all divisions.**

- Roll-out of awareness sessions and compliant handling training to divisional SPOCs. **Update – Completed in March / April, over 1000 attendees recorded at the online training.**

- Address new demand within NCARU and Non-criminal Investigations in a proportionate manner. **Update – Shortened and more**

**proportionate letters briefed to investigations team and discussed with PIRC. Letters to be complainer focused with main allegation / HOC to be addressed.**

**Medium Term (3-9 months) May 2026 to December 2026**

- Address proportionality definition with the PIRC to ensure our complaint investigations and determination letters are handled efficiently (review of PIRC Statutory Guidance). **Update – Final Letter SLWG to be initiated with attendees from PIRC and report into NCHDG.**

- Increase productivity based on a more proportionate level of investigation and determination letter.

- Review of resourcing to ensure daily demand is serviced appropriately.

- Explore the use of single search and robotics technology to enhance internal processes.

- Continue with BDO SLWG to ensure recommendations are progressed and discharged.

- Finalise the amendments to the compliant handling SOP including revised KPI timescales.

**Long Term (9 months +) December 2026 – March 2027**

- Consider the funding and implementation of automation technology to improve complaints handling processes.

- Continue to work with local policing to address root causes of complaints to enhance prevention.

- Finalise BDO recommendations action plan.

# 3. Strategic alignment detail

## 3.1 Strategic alignment to strategic police plan and other key enabling strategies

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| Strategic alignment | Supports Police Scotland's 2030 Vision for safer communities, less crime, better supported victims (complaints) and a thriving workplace and our commitment to be an inclusive, anti-racist and anti-discriminatory organisation.<br><br>Is cognisant and compliant of ECHR principles and Police Scotland's values of Integrity, Fairness, Respect and Standards of Professional Behaviour. |

## 3.2 Alignment to risk register and risk appetite

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| Risk alignment | Non-criminal Complaints - current score 20<br>Owner – ACC Ratcliff<br>Lead – Superintendent Mann |

## 3.3 Prior governance

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| Prior governance | Police Scotland Professional Standards Department – internal review and approval. Final sign off by ACC Ratcliff. |

## 3.4 Stakeholder engagement

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| Stakeholder engagement | Ongoing engagement with SPA complaints and the PIRC. |

# 4 Implications detail

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| Community | | Data & Privacy | | Environmental | |
| Equalities & Human Rights | | Financial | X | Health, Safety & Wellbeing | |
| Legal | | Workforce | X | | |

4.1 An Operation Glade overtime bid was previously requested and approved to maximise opportunities to address the unallocated list of complaints. The team have historically used circa 200-300 per month however due to budget constraints this overtime fund will not be available in 26/27.

4.2 There are a range of workforce implications due to the recruitment of our civilian investigators to address the unallocated queue of complaints and the resent operational decision to allocated complaints to National and Local policing divisions.

| Action Number | Recommendation | Owner | Update | Completion Date |
|---|---|---|---|---|
| 1 (Finding 1 – Categorisation & Triage) | Consider developing a formal, risk-based categorisation framework with clearly<br>defined criteria for each complaint category. This should align with PIRC<br>requirements on reputational risk, sensitivity, high profile, and overall impact on public confidence. By providing a structured approach, the risk of subjective<br>judgments is reduced, and consistency in complaint handling is promoted. | CI NCARU | December 2025 – Current categories in place for a year, reviewed in Feb 2025 by NCARU.<br>January 2026 – Current categories based on current operation model which is being changed due to local allocation of OP Glade. Initial discussions have been held with PIRC. Target operating model within NCARU to be reviewed after local allocation finalised in line with the categories.<br>February 2026 – No change from Jan update. To be built into the CAP SOP. Requires some engagement with PIRC also.<br>**March 2026 – Risk matrix in draft, these provide a method of scoring complaints based on set criteria. Matrix could be piloted in one area of NCARU. Categories to be discussed with PIRC in an attempt to possibly align to three A, B and C.** | March 26<br>To be extended to<br>**June 26** |
| 2 (Finding 1) | Deliver targeted training and guidance to inspectors and NCARU staff on the new<br>categorisation framework. This will ensure that all team members consistently | CI NCARU | December 2025 – Training package in place for new recruits in place, SOP and PIRC Stat Guidelines. On review of the above CAT, training would reflect that change.<br>January 2026 – Training is dependent on above review of categories. | March 26<br>To be extended to<br>**June 26** |

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| | interpret and apply the set criteria, improving the accuracy of risk assessments and<br><br>streamlining complaint triage processes. | | February 2026 – As per above.<br><br>**March 2026 – On agreement of draft risk matrix, awareness and training can be delivered.** | |
| 3 (Finding 2 – Automation and AI) | Consider introducing AI-tools for initial categorisation and summarisation of<br><br>complaint data to alleviate repetitive tasks for the NCARU. This approach will<br><br>reduce reliance on manual processes, enabling staff to focus on high-priority<br><br>investigations and effective complainant engagement. The AI-model should be<br><br>developed using historical complaint data to refine its accuracy over time. | Supt non-criminal investigations | December 2025 - JM to link in with DD and UIPATH to move on conversations.<br><br>January 2026 – Email received from Digital Division (DD) confirming at present time there is no budget and there are other competing priorities. To be kept under review in terms of feasibility.<br><br>February 2026 – No change as per above no budget at present.<br><br>**March 2026 – Not a priority for budget spend within digital division at present time.** | **Dec 2026** |
| 4 (Finding 2) | Automate end-to-end workflow and data processing activities, such as generating<br><br>reports, sending letters, and transferring complaint data between systems.<br><br>Streamlined integration of systems (e.g., linking Centurion with Power BI or Excel | PSD Business Support Co-ordinator | December 2025 – Aiming for workflow to be implemented by April 2026, work ongoing with non-crim and NCARU.<br><br>**January 2026 –** Due to current operational demands, workflow implementation may be delayed slightly until summer 2026**.** PI's to trial process. Power BI access sits with ICT/Dig Division. Tender is also out for the | Jan 2027 |

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| | through APIs) would significantly reduce the administrative burden and offer realtime performance monitoring. | | complaints database to be known by March 2026. Revised workflow date will be confirmed at this stage.<br><br>**February 2026 – No update.**<br><br>**March 2026 – No update or admin attendance.** | |
| 5 (Finding 2) | Implementation of a Real Time dashboard:<br><br>We recommend utilising Power BI dashboards to develop the reporting<br><br>function. Providing staff with drag-and-drop analytics platforms which be<br><br>filtered and visualised through graphs without requiring advanced technical<br><br>skills.<br><br>Include time-trend visualisations (weekly/monthly/quarterly) to spot<br><br>sudden surges and underlying causes proactively.<br><br>O Explore predictive analytics methodologies (e.g., forecasting models) to anticipate future | PSD Business Support Co-ordinator | December 2025 – Power BI sits with APU, ICT job submitted with DD regarding this work, PSD Business Support Co-ordinator will chase up DD.<br><br>January 2026 - Ongoing, with Digital Div/ICT. Ann will get an update asap.<br><br>February 2026 – Draft BI dashboard to be circulated for comment.<br><br>**March 2026 - No update or admin attendance.** | Dec 2026 |
| 6 (Finding 3 – System Access) | Extend Centurion access privileges to appropriately trained civilian investigators and NCARU officers. This would allow them to directly upload complaints and make | SSD Supt/ PSD Admin | December 2025 – With current backlogs may not be possible at this time however this option should be considered along | Dec 2026 |

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| | updates in real time, thereby reducing the reliance on administrative staff, minimising double entry, and improving overall data accuracy. | | with single online home option. (E and W model). To be raised at PSD / DD meeting.<br><br>January 2026 – Briefing paper of options being drafted to document the pros and cons of direct input.<br><br>February 2026 – Feedback from the team was that it takes extensive time (up to 2 years) to be trained and proficient in the uploading of complaints onto centurion. Model changed to support Admin with NCARU resources to ensure upload is timeous.<br><br>**March 2026 – Staff member from non-criminal embedded within Admin from April to test process and evaluate.** | |
| 7 (Finding 3) | Implement targeted training and clear guidelines on data entry for all authorised users. This should include quality checks and validation processes within Centurion to mitigate the risk of input errors while supporting a wider access model. | SSD Supt/ PSD Admin / PI non-criminal North | December 2025 – Training and shadow/buddy system to be considered now that upgrade is in place.<br><br>January 2026 **–** Email trail from PIRC confirming the CHF form contains relevant fields, then the buddy system can be progressed within this recommendation. Ongoing to be progressed after February.<br><br>February 2026 – Superseded by having non-criminal resource working with Admin to QA prior to upload of complaints. | Dec 2026 |

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| | | | **March 2026 – QA team built into the Operation Glade project.** | |
| 8 (Finding 4 – Incompletion of CHF) | Configure the Centurion system to have set mandatory fields. Introduce form validation checks in the electronic system so that users cannot finalise or submit a complaint record without populating key sections (e.g. organisational learning, allegation details, completion dates). | SSD Supt/ PSD Admin | December 2025 – In place in version 8, leave open until live and tested for a period.<br><br>**January 2026 -** Live and tested, working as expected. To be closed. Evidence of checks to be submitted.<br><br>**February 2026 – to be closed as per above.**<br><br>**March 2026 – To be closed, to be confirmed by GAA on 4Action.** | June 2026 |
| 9 (Finding 4) | Create a short QA checklist to verify that forms contain the core information required by the PIRC (statements, dates, circumstances, organisational learning). | PI NCARU West / PI non-criminal North | December 2025 – The CHF and investigation form captures the below data. BDO had sight of these forms during audit. PIRC have suggested more detail should be contained in these forms which have been communicated. New ORG learning form has been introduced.<br><br>January 2026 – Email from between PIRC and NCARU to be provided to Audit and Assurance for evidence to be sent to BDO.<br><br>February 2026 – No update. | March 2026 |

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| | | | **March 2026 – Op Glade QA team have implemented a checklist, to be sent as evidence.** | |
| 10 (Finding 5 – Complaint Delays) | Implement a streamlined acknowledgement process, including an automated notification for all submission methods to ensure compliance with the three-day acknowledgment requirement. This could involve modifying existing systems so that a complaint reference number is generated automatically upon receipt, reducing dependency on manual logging by administrative staff. | West Non-Crim CI | December 2025 - Some submissions are not complaints from members of the public therefore auto generation of ref numbers may not be appropriate. Linked to the review for new KPI's.<br><br>January 2026 **–** Acknowledgement process in place if the complainer provides an email address via the complaint process online. This should be the primary process unless by exception.<br>Auto generation of ref numbers will not be relevant or helpful within the division.<br><br>Submission methods via the CC office/SPA etc are not possible as not via the online system. The variations will be potentially captured in the complaint handling SOP.<br><br>February 2026 – This could be closed as the online system captures the 3-day acknowledgement process.<br><br>**March 2026 – To be closed as per above.** | Dec 2026 |
| 11 (Finding 5) | Conduct a capacity and demand review of the Proportionate Inv Team (PIT) to | PS NCARU West | **January 2026** - Engagement with DPU ongoing to test a process with data, staffing profile, annual leave and provide analysis. | Dec 2026 |

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| | align staffing levels with the volume of Category B complaints. This should involve setting clear performance metrics (e.g. target response and resolution times) and regularly reviewing progress against these targets. Where a backlog persists, implement swift escalation measures, such as reallocating resources or bringing in additional support, to address ongoing delays. | | February 2026 – There is no resource or budget within DPU for this work.<br><br>**March 2026 - PIT team being merged with non-criminal from 6th April 2026 due to reduction in police staff – weekly performance sheets submitted to CIs. To be closed, can be evidenced by weekly forms.** | |
| 12 (Finding 6 - SOP) | Update and consolidate the complaints policy and Standard Operating Procedure (SOP) to accurately reflect all relevant teams (e.g. Proportionate Investigations Team, Category A Team) and their responsibilities. This should include clearly defined timelines at each stage, details of reporting lines, and a transparent description of the end-to-end process. | CI NCARU & SSD / NCARU | December 2025 - Draft SOP ongoing with amendments to be made following last meeting with PIRC.<br><br>**January 2026 –** Handover to be done between SSD and NCARU team. Requires internal and external consultation. Timeline to be explored and reviewed in relation to expected publication.<br><br>To consider timeline for 6.2 and 6.3 also.<br><br>February 2026 – In progress.<br><br>**March 2026 – PI NCARU West has sent out for further consultation and feedback to crim and non-crim team. Child complaints to be added and duty of candour. After feedback, meeting to discuss and thereafter to PIRC for consultation** | March 2026<br><br>To be extended<br><br>**June 2026** |

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| 13 (Finding 7 – Complainer Comms) | Develop and implement a single, standardised template for final determination letters, incorporating the PIRC 4Rs (Regret, Responsibility, Reasons, and Remedy) to ensure consistency. The template should feature:<br>• A clear outline of the agreed complaints and corresponding enquiries.<br>• A concise explanation of the actions taken in response, illustrating how the outcome will be remedied.<br>• Information on how a complainer can contact PIRC if they remain dissatisfied. | PI non-criminal North / Business Support Co-ordinator | December 2025 – We do use template letters at present, that could be reviewed and altered accordingly.<br><br>January 2026 – Ongoing review and discussions with SSD to be had in relation to templates and SOP. PIRC to be consulted with as part of the process.<br><br>February 2026 – PIRC gave feedback regarding GMP letter templates at the NCHDG that they could not support such templates. Agreement required from PIRC regarding this recommendation.<br><br>**March 2026 – PIRC gave feedback verbally at the NCHDG that they did not support the GMP and West Midlands style letters. Policy decision required with PIRC consultation.** | Oct 2026 |
| 14 (Finding 8 – Effectiveness & Root Cause) | Develop multiple staff members' capability in root-cause analysis to reduce single-person dependency. Establish guidelines and training to ensure the consistent use of appropriate analytical methods across the Professionalism and Preventions team. | SSD Supt | December 2025 – Linked to ORG learning and analytical work.<br><br>January 2026 – In depth analysis work to be started on small section of conduct work on underlying causes as a pilot.<br><br>February 2026 – On hold due to SPA CCC data, to be progressed asap. | March 2027 |

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| | | | **March 2026 – TBC by CI SSD.** | |
| 15 (Finding 8) | Implement a mechanism to link organisational learning activities—such as training or revised procedures—to complaint trends. This should include a clear process to monitor and evaluate whether the actions taken have effectively reduced complaint volumes and improved service quality. | SSD Supt | December 2025 – Linked to above, analytical work and dashboard. Communicating with local policing divisions to ascertain if learning has worked.<br><br>January 2026 - As per above update. Conversations ongoing with national org learning.<br><br>February 2026 – Org learning forms in use. Other work still going.<br><br>**March 2026 – TBC by CI SSD .** | March 2027 |
| 16 (Finding 9 – Org Learning ) | Update the Complaint Handling Form to include a specific section for inspectors to record any potential organisational learning from individual complaints, not just emerging trends. | NCARU CI | December 2025 - Already captured on the CHF form if identified at the NCARU stage. New ORG learning form used if identified via the investigation stage.<br><br>**January 2026 -** Org learning form will capture the learning that is relevant. To be considered for closure. Current review on the CHF form.<br><br>February 2026 – As per above to be closed.<br><br>**March 2026 – Evidence submitted to Audit and Assurance, by PI non-criminal North. To be closed.** | March 2026 |

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