SCOTTISH POLICE AUTHORITY
ÙGHDARRAS POILIS NA H-ALBA

Audit, Risk and Assurance Committee
13 August 2026

Item 9.2: Police Scotland FOI/SAR Improvement Plan Q1 2026-27
Presenter: Director of Strategy and Analysis, Police Scotland
Appendix: Appendix A – FOI and SAR Improvement Plan Tracker

Purpose

To provide oversight and assurance on the progress of the Police Scotland FOI/SAR Improvement Plan Q1 2026/27.

Recommendation

For discussion.

Strategic Alignment

Strategic outcome(s)	Police Scotland Strategic Outcomes 1, 2, 3, 4 and 5 1. Threats to public safety and wellbeing are resolved by responsive police service 2. The needs of local communities are addressed through effective service delivery. 3. Public and communities are engaged, involved, and have confidence in policing. 4. Our people are supported through a positive working environment enabling them to serve the public. 5. Police Scotland is sustainable, adaptable, and prepared for future challenges
Risk alignment	Police Scotland Data Protection
Prior governance	Police Scotland Audit, Risk and Assurance Board
Stakeholder engagement	Information Commissioner (ICO)/Office of Scottish Information Commissioner (OSIC)
Rationale for taking in private	Discussion in public is likely to inhibit the free and frank provision of advice or the free and frank exchange of views for the purpose of deliberation.

Implications

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

1 Report Detail

1.1 Background

1.2 A report on the progress of the Police Scotland FOI/SAR Improvement Plan to support improvement within FOI/SAR Compliance. This was requested by members at the May ARAC due to concerns with compliance rates. The Q1 FOI/SAR Improvement Plan Progress Update is documented at Appendix A.

1.3 Information Disclosure sits under the Director of Strategy and Analysis with performance managed through established governance structures. Weekly reporting flows through management lines, with scrutiny at Deputy Chief Constable level at PSEMB and onward reporting to Police Scotland Audit, Risk and Assurance Board.

1.4 The Information Management Disclosure Team continues to operate under significant pressure, driven by sustained growth in demand alongside a continuing decline in compliance with statutory obligations.

1.5 As previously reported, Police Scotland are currently under investigation from the Information Commissioner Office (ICO) into performance relating to Subject Access Requests (SAR). A detailed response has been submitted to ICO, highlighting several planned and ongoing improvements, however, we are yet to receive an outcome.

1.6 In addition, in relation to FOI we are continuing to work collaboratively with Office of Scottish Information Commissioner (OSIC) who have formally requested monthly & quarterly performance measures on a range of activity.

1.7 FOI/SAR Improvement Plan

1.8 Despite these challenges, measurable progress has been made in response to proactive Assurance reviews that were undertaken by the Police Scotland Business Assurance function, there are mitigations in progress to focus on better practice, learning, training, and governance. Detail is provided in Appendix A.

1.9 It is anticipated that the following key mitigations will have a significant impact in the coming months.

- Agency Staff are being recruited to address the SAR & FOI backlog – we have been supported for x14 FTE for a period of 6 months (x7 Grade 1 Admin x7 Grade 4 Disclosure Officer).
- Proactive Publication Project – Data Science project co-ordinated by CDIO with a focus on which datasets, policies or areas of policing are most commonly requested, and at which geographic level (e.g. crime data at street level). This will provide meaningful data to drive the proactive publication work further.
- We are piloting the single search facility Nominal Profile – which is a single search query that will produce an automated, editable document with all data on the nominal in relation to Crime, Concern, and Intelligence. We are supporting the pilot to understand its capacity and accuracy to develop further to roll out fully in the coming months.
- A Redaction Software/ Software Management System is progressing through procurement, and the department is undergoing a full digital review to identify additional opportunities for robotics/automation.
- Overtime has been awarded to tackle 'Registered Bodies' where Police Scotland are legally obligated to share information to organisations such as GTC & SSSC. This is an additional responsibility for the SAR team therefore impacting on capacity.

1.10 Demand

1.11 Compliance with statutory deadlines remains low and continues to be a significant concern despite increases in Q1. It should be noted that the headline compliance figures do not reflect the complexity of the operating environment.

1.12 Freedom of Information

FOI Requests	Q1 Jan-Mar	Q2 Apr-Jun	Q3 Jul-Sep	Q4 Oct-Dec	Q1 Jan-Mar
Requests received	1,076	862	1,223	812	968
% Compliance	67.8%	72.2%	54.7%	66.7%	78%

1.13 Data Protection

SARs	Q1 Jan-Mar	Q2 Apr-Jun	Q3 Jul-Sep	Q4 Oct-Dec	Q1 Jan-Mar
Requests received	2,575	2,448	2,522	2,415	2,787

% Compliance	65.8%	52.2%	37.7%	39.3%	46.6%

1.14 In summary, Information Disclosure continues to operate under sustained pressure from rising demand, legislative change, and constrained resources. Whilst compliance with statutory timelines remains challenging, the combined focus on assurance, process improvement, technology investment, and stakeholder engagement provides a clear framework for stabilising performance and addressing the growing backlog, while longer term solutions are in development to ensure the service remains sustainable.

2 Strategic alignment detail

2.1 Strategic alignment to strategic police plan and other key enabling strategies

Strategic outcome(s)	Police Scotland Strategic Outcomes 1, 2, 3, 4 and 5 1. Threats to public safety and wellbeing are resolved by responsive police service 2. The needs of local communities are addressed through effective service delivery. 3. Public and communities are engaged, involved, and have confidence in policing. 4. Our people are supported through a positive working environment enabling them to serve the public. 5. Police Scotland is sustainable, adaptable, and prepared for future challenges

2.2 Alignment to risk register and risk appetite

Risk alignment	Police Scotland Data Protection

2.3 Prior governance

Prior governance	Police Scotland Audit, Risk and Assurance Board

2.4 Stakeholder engagement

Stakeholder engagement	Information Commissioner (ICO)/Office of Scottish Information Commissioner (OSIC)

3 Implications detail

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

3.1 Data/Privacy: Delayed or incorrect disclosures heighten data breach and privacy concerns.

3.2 Legal: Non-compliance increases the risk of enforcement action from statutory bodies.

POLICE SCOTLAND
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FOI and SAR Improvement Plan Tracker April - June 2026

Strategy & Analysis / Information Disclosure / Angela Wood

FOI and SAR - Improvement Plan Overview

All the recommendations are logged, updated and tracked on 4Action.

• FOI – Professional Advice

No of Considerations	**15**

Considerations are not RAG assessed within Professional Advice Notes which are conducted by the Assurance team as the purpose is to clarify best practice, interpret standards and serves as a guide for owners and practitioners through operational challenges.

Closed this period	**2**	
Closed to date	**2**	
Progress – On track	**13%**	**87%**

Timeframe for completion – up to May 2027

0-6	6-12	12-18	18-24
0	**1**	**12 of 14**	**0**
-	In Progress	In Progress	-

• SAR – Assurance Review

No of Recommendations	**12**
No of Improvements	**11**
TOTAL	**23**

VH	H	M	L
7	3	2	11

Closed this period	**3**	
Closed to date	**3**	
Progress – On Track	**13%**	**87%**

Timeframe for completion – up to April 2027

0-6	6-12	12-18	18-24
3	**19**	**1**	**0**
☑ Complete	In Progress	In Progress	-

FOI and SAR – Joint Progress Updates / Key Milestones

Progress April/May/June	25-35% - On Track

LEAD ROLE: A temporary improvement lead role has been created within the Disclosure Unit with one Disclosure Manager working full time as lead and dedicated to prioritising the FOI and SAR workstreams and to manage progress of all recommendations, considerations and improvement opportunities.

PROACTIVE REVIEW FINDINGS: In response to proactive Assurance reviews for FOI and SAR, that were undertaken by our Business Assurance function, there are several mitigations in progress to address concerns in relation to the rising demand and reduction in compliance across the information disclosure teams and focus on better practice, learning, training, and governance.

DEDICATED BACKLOG STAFF: Agency Staff are being actively recruited to address the backlog – Full approval for 14 FTE for 6 months (7 Grade 1 Admin, 7 Grade 4 Disclosure Officer). Interviews are complete and Vetting is being progressed - first tranche of staff are expected to commence 06/07.

REDACTION SOFTWARE: Redaction Software / Software Management Systems procurement is in progress – working through the operational requirements with the identified Business Solutions Analyst prior to going out to tender.

AUTOMATION: Undergoing a full digital review to identify opportunities for robotics/automation within the current processes.

ICT: Full scale review of all ICT software and processes to establish requirements what and possibilities is underway to identify which products can be deployed and prioritized which can lead to improvements can be made is under way with Digital Division

TRAINING: Working in collaboration with LTD to establish training requirements and development of training courses.

FOI – Progress Updates / Key Milestones

Progress April/May/June	25-35% - On Track

PROACTIVE PUBLICATION – An MSc student started work in June with a project which will run through to the end of August. This is a data science project and is being co-ordinated by the CDIO the team, who are supporting with background information/ data as required. The project questions are:

- What do people want to know about Police Scotland through the FOI process?
- Which datasets are most commonly requested, and at which geographic level (e.g. crime data at street level)?
- Which policies or areas of policing do people most commonly ask for information about (e.g. use of AI)?

At the end of the project, we will have some meaningful data to drive the proactive publication work further.

PROACTIVE PUBLICATION - Road Crash Data, which was identified as a high-volume repeat request, has been published onto the PS Website.

COMMUNICATIONS: Being developed to publish an FOI awareness section on Intranet and Internet - also to be advertised via internal Line Manager Briefing email.

SPOCs: being identified within key business areas to prioritise FOI requests and improve compliance with timescales.

SAR – Progress Updates / Key Milestones

Progress April/May/June	25-35% - On Track

DIGITIAL IMPROVEMENTS: Working with Digital Division.

- Piloting the single search facility (Nominal Profile) to understand its capacity and accuracy to develop further in order to roll out fully in the coming months.
- Nominal Profile is a single search query that will produce an automated, editable document (exportable to Word) with all data on the nominal in relation to Crime, Concern and Intelligence (similar search and profile product available for Location searches, which also returns relevant Incident data).

OVERTIME: Approval has been obtained for 150 hours of overtime.

- The overtime will be used to support the processing of Registered Bodies which is a task performed by the SAR team.
- 'Registered Bodies' - PS are legally obligated to share information to organisations such as GTC and SSSC.
- The Disclosure staff that perform this task are from the SAR team therefore this additional task is adding to strain in this space.
- Dedicated time to reduce this area of work will allow the SAR team to focus on SARs work during the working day and assist in progressing the volume of SARs and increase compliance.

FOI and SAR – Closures

Closed this period	2 on track

Closed this period	3 On time

FOI

- **0 aligned to the 0-6 timescale (as per slide 2).**
- **C7 – COMPLETE –** Management Triage – Meeting now in place on a weekly basis to triage FOIs.
- **C13 – COMPLETE –** Escalation of Harmful information releases – Weekly Management meeting now in place to discuss FOIs which require escalation.

SAR

- Rec 6 – VHigh – **COMPLETE** - PS should consider the creation of a dedicated resource to tackle the SARs backlog – Recruitment of 14 FTE agency staff dedicated to clear backlog.
- Rec 12 – Medium - **COMPLETE -** The Disclosure team should consider a full review of current and existing risks to ensure these are accurately recorded within the National Risk Register – Full Risk Review with Risk Management and risks updated.
- IO 3 – Low - **COMPLETE -**The Disclosure team should consider reviewing the current management triage process – New process implemented.

FOI and SAR - New / Emerging Actions

FOI

- The Office of Scottish Information Commissioner (OSIC) has requested a meeting with the Chief Constable to discuss performance within the Freedom of Information (FOI) function, reflecting ongoing concerns in this area.
- Information and stats have been requested on a Monthly AND Quarterly basis.
- The newly appointed Lead Role Disclosure Manager is progressing tasks from this meeting.

SAR

- The Information Commissioner Office (ICO) has initiated an investigation into performance relating to Subject Access requests (SAR).
- A detailed response has been submitted.
- The newly appointed Lead Role Disclosure Manager is progressing.

FOI and SAR – Blockages and Delays

- **Nothing to report this period.**

- All recommendations, considerations and improvement opportunities are being actively worked on and progressed within agreed timelines.

- All updates are being captured on 4Action with agreed escalation pathways through the Director of Strategy & Analysis to the Audit, Risk and Assurance Board.

Appendix One - FOI and SAR - Key themes

Theme	FOI	SAR	Examples
Governance	1	8	Review of Management Structure
			Full review of all Risks
Better Practice	8	12	Automation processes
			Redaction Software
Human Error	0	1	
			Manual updates to SharePoint
Training	4	2	Section 60 training
			Databelt training
Learning	2	0	Learning opportunities from ICO appeals
Total	15	23	

Appendix Two - FOI and SAR Improvement Work Streams

• FOI

1. Governance - Admin Resource	Resource needed to assist with admin tasks to allow DOs to concentrate on main FOI handling and processing.
2. Better Practice - ICT Review	Full scale review of all ICT software and processes required to establish what improvements can be made.
3. Training - FOI	Review of current training and link with LTD to establish training requirements.
4. Better Practice – Data collation and presentation	Review of processes for data collation to align with OSIC and Review of internal dashboard for reporting.
5. Governance – Management Structure	Review the management structure of the Disclosure Unit for FOI workstreams.

• SAR

1. Governance - Resources	Review of resources within SAR team to achieve alignment of workload volume and staffing No's.
2. Better Practice – ICT Review	Expediate the procurement of redaction software which provides automation.
3. Training – Data Protection	Review of DP training and associated training products.
4. Better Practice – Uploading of ID	Review of online ICT capabilities to allow requesters to attached identification.
5. Governance - Management	Review of managerial duties to enhance autonomy and independence in decision making.

Recommendations Owner : Head of Policy, Risk, Audit & Assurance (inc. Disclosure)

Recommendation Leads: [redacted] – Disclosure Managers

Appendix Three - Current Position – Statistics and KPIs

FOI Requests	Q4 Oct-Dec	Q1 Jan-Mar	Q2 Apr-Jun	Q3 Jul-Sep	Q4 Oct-Dec	Q1 Jan-Mar
Requests received	787	1,076	862	1,223	812	968
% compliance	72%	67.8%	72.2%	54.7%	66.7%	78%

Compliance with statutory deadlines hit a record low in quarter 3, attributable to a significant increase in demand and complexity of requests

SARs	Q4 Oct-Dec	Q1 Jan-Mar	Q2 Apr-Jun	Q3 Jul-Sep	Q4 Oct-Dec	Q1 Jan-Mar
Requests received	2,277	2,575	2,448	2,522	2,415	2782
% compliance	58%	65.8%	52.2%	37.7%	39.3%	46.6%

There are currently 4,525 SARs in progress of which 86% are already outside statutory timescales.

However overall volumes continue to rise. FOI Volume in 2025 increased by 24% compared to 2024. Compared to 2020 (2,326 FOIs) this represents an increase of 71% over five years.

SAR volume in 2025 increased by 13% compared to 2024. Compared to 2020 (5,559 SARs) this represents an increase of 77% over five years.

Appendix Four - Risk

- Reputational: Failure to meet FOI, SAR and PVG obligations damages public trust, confidence and credibility.
- Resource: Existing resource cannot currently meet rising demand resulting in significant backlogs which are breaching statutory timelines.
- Legal: Non-compliance increases the risk of enforcement action from statutory bodies.
- Risk: Persistent delays expose the organisation to operational and governance risks.
- Public interest: Inadequate responses undermine transparency and accountability.
- Data/Privacy: Delayed or incorrect disclosures heighten data breach and privacy concerns.

Risks are being managed and updated regularly and reported through the associated boards.