

# **SPA Complaints & Conduct Committee**

## **2024/25 – Quarter 4 and End of Year Summary**

**1 January – 31 March 2025**

## Executive Summary

### Complaint Handling Reviews

Applications received for CHRs concerning Police Scotland numbered 217 in 2024/25 – a decrease of 35 from the previous year.

Police Scotland generally continues to provide initial case papers timeously, with 92% of initial papers being provided within the agreed timescale.

PIRC made 130 further information requests to Police Scotland as part of ongoing reviews 2024/25. On average, requests were fulfilled within 12.9 working days of receipt of the request. This is in line with the timescales agreed with Police Scotland.

Overall, 52% of complaints reviewed in Q4 were deemed to be handled to a reasonable standard.

By the end of 2024/25 60% of the Heads of Complaint reviewed were assessed to be reasonably handled by Police Scotland - a modest increase on 2023/24 (57%)

A cumulative total of 179 recommendations have been made by the PIRC Reviews Team to Police Scotland by the end of Q4 2024/25, relating to 85 Complaint Handling Reviews.

Recurring themes highlighted as Learning Points to complaint handlers within Police Scotland include complaint categorisation, the appropriate use of Front Line Resolution as well as numerous examples of good practice.

### Investigations

In Q4 2024/25, there were 217 referrals concerning Police Scotland in Q4 2024/25 received by PIRC. 63% of these originated from Police Scotland itself.

The number of referrals received by PIRC from Police Scotland has increased from 430 in 2023/24 to 525 in 2024/25 – an increase of 22%. Increases are attributable to more frequent referrals of Serious Injury Following Police Contact and all forms of Firearms use.

Serious injury referrals have increased annually but whereas in previous years referrals were more commonly related to Serious Injury in Police Custody, the distribution has become more even with decreases in this type and increases in Serious Injury Following Police Contact.

The annual number of Police Scotland referrals proceeding directly to investigation fell from just over 6% in 2023/24 to 3% in 2024/25 of the total referrals received each year.

All recommendations made by PIRC to Police Scotland have been responded to by the end of 2024/25.

All Key Performance Indicators set for PIRC Reviews and Investigations Teams were met in 2024/25.

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## Introduction

This is the fourth and final submission of the Police Investigation and Review Commissioner to the SPA Complaints and Conduct Committee for 2024/25.

This is the second year where revised recording standards and counting rules have been in place. PIRC introduced these standards and rules on 1<sup>st</sup> April 2023, following an extensive Performance Data Review and consultation.

The counting rules aim to increase public confidence in policing through scrutiny of their actions and ensuring any lessons are learned to improve the standard of service provided by the Police bodies operating in Scotland.

This report provides details in relation to the interaction between Police Scotland and the PIRC to increase public confidence in policing by ensuring learning recommendations which have been identified, issued and are intended to result in positive change in police practice.

## Our Role

The role of the Police Investigations & Review Commissioner (PIRC) was established in 2013 at the same time as the single Police Service of Scotland.

The Commissioner, who is appointed by Scottish Ministers, is independent of the police. Her role is to independently investigate incidents involving the police and independently review the way the police handle complaints from the public.

The PIRC ensures that the SPA and the Chief Constable maintain a suitable system for handling complaints and issues statutory guidance where appropriate.



### We can investigate:

- Incidents involving the police, referred by COPFS. These may include deaths in custody and allegations of criminality made about police officers or members of Police staff.
- Serious incidents involving the police, at the request of the Chief Constable or SPA. Reasons for requests for investigations from the Chief Constable may include the serious injury of a person in police custody, the death or serious injury of a person following contact with the police or the use of firearms by police officers.
- Allegations of misconduct by senior police officers of the rank of Assistant Chief Constable (ACC) and above, if requested by the SPA.
- Other matters relating to the SPA or the Police Service where the Commissioner considers it in the public interest.
- At the conclusion of an investigation, the Commissioner can recommend learning and improvements to the way the police operate and deliver services to the public in Scotland.



**We can review:**

- How the police in Scotland handle complaints made to them by the public. The purpose of the Complaint Handling Review (CHR) process is to determine whether or not the complaint was handled to a reasonable standard by the police.
- At the conclusion of a CHR, the Commissioner can make recommendations, identify learning points, or direct the policing body to reconsider their response.



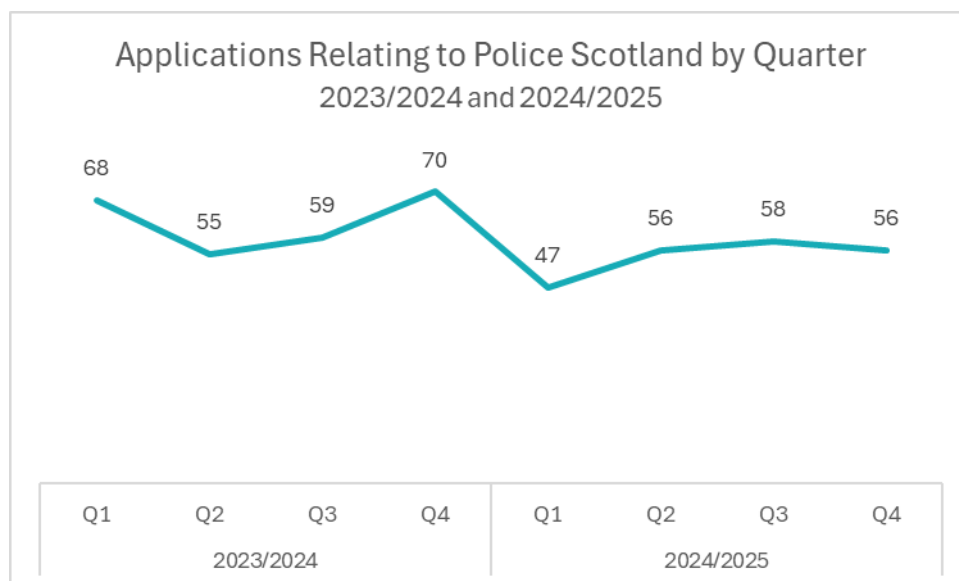
**We cannot review:**

- Complaints which have not been considered and adjudicated upon by the policing body.
- Complaints of criminality.
- Complaints made by individuals currently serving, or who formerly served, with the police about the terms and conditions of their service.



## Complaint Handling Reviews

### Applications



1. Source: PIRC Reviews Quarterly Performance Report (Q4 2024/25)

In Q4 2024/25, PIRC has received 56 applications for a Complaint Handling Review (CHR) for cases involving Police Scotland, a decrease of two applications (-3.4%) on the previous quarter and a decrease of 12 on the preceding year's Q4 applications.

The total number of applications received concerning Police Scotland was 217. This is a decrease of 35 (-13.8%) on the number of applications received by PIRC in 2023/2024.

The most significant decrease in applications occurred in Q1 – where 21 (30%) fewer applications concerning Police Scotland were received by PIRC than had been in Q1 in the previous year.

### Key Performance Indicators

- 90% of CHR applications to undergo SRO assessment and decision to be taken within 5 working days of receipt of the relevant police case papers.
  - Q4 2024/25 - **100%** (END OF YEAR – **99%**)
- 80% of CHRs including discretionary decisions (minus major cases) to be completed within 90 working days, following receipt of the relevant police case papers.
  - Q4 2024/25 – **100%** (END OF YEAR – **99%**)

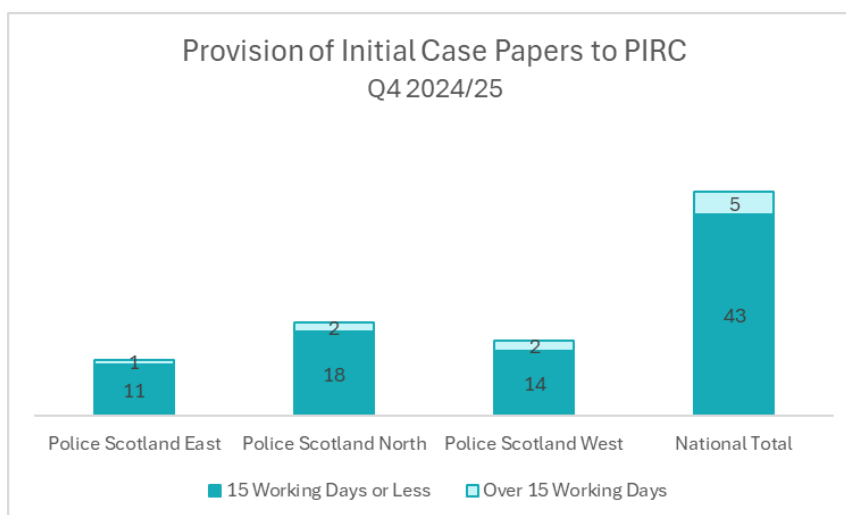


## Timescales

### Provision of Initial Case Papers

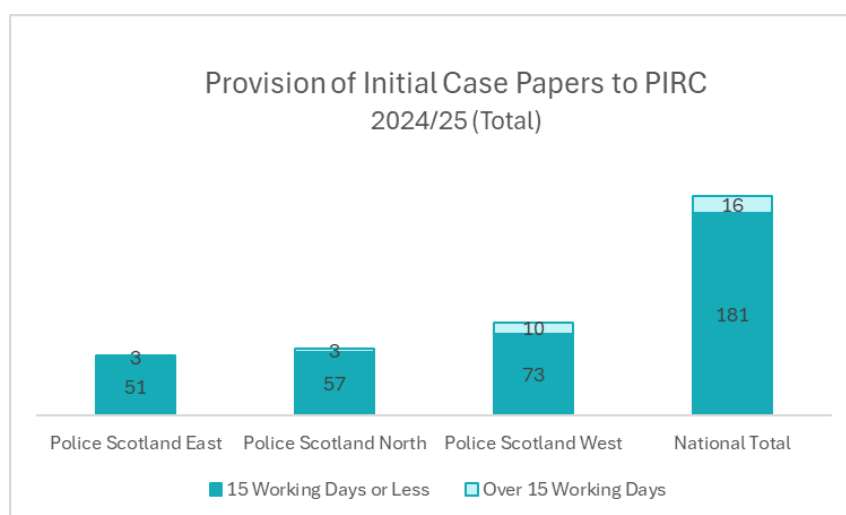
As part of the PIRC's Performance Data Review, it has been agreed that Police Scotland will now aim to provide all complaint case papers to the PIRC within 15 working days of request. This was previously 14 calendar days. This approach standardises the process for the provision of case papers across the Reviews and Investigations functions within PIRC.

In May 2024, PSD and PIRC started to exchange information via Egress file sharing system to ensure efficient and secure provision of police complaint files.



2. Source: PIRC Centurion System

In Q4, there were 48 cases where papers were requested from Police Scotland. Requests were compiled within timescale in 43 of these cases (90%). Background papers were provided, on average, within 6.7 working days.



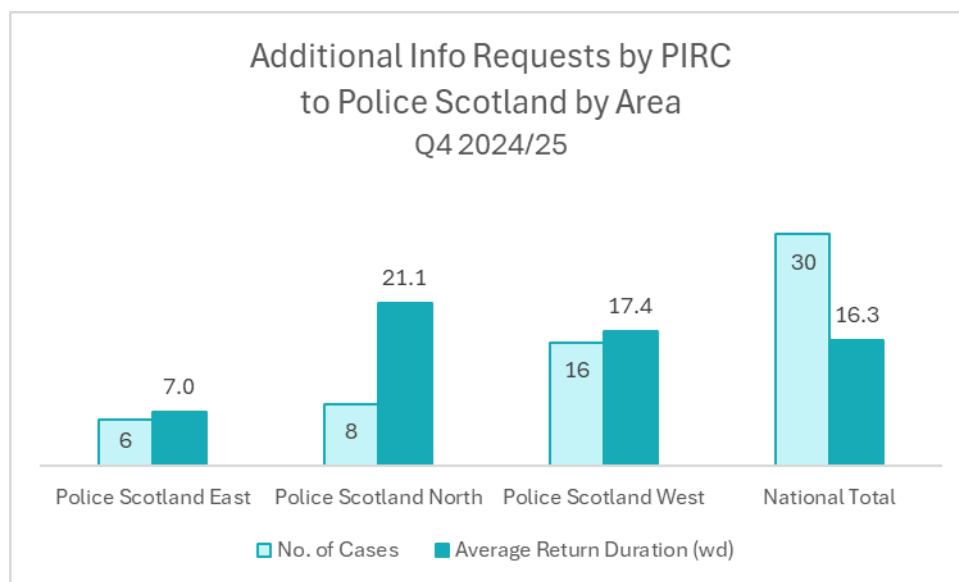
3. Source: PIRC Centurion System

For the full year, there were 197 requests for initial case papers, the majority of which (92%) were received within timescale. By comparison, in the previous year, 237 requests were made by PIRC with 89% being provided within timescale.

### Information Requests During Review

On receipt of background papers, the Reviews team will undertake a detailed assessment of the police complaint file and identify any information or documentation that was relied upon or referred to in the police complaint response but not included in the papers initially provided to the PIRC.

In these circumstances, a further information request is made, with Police Scotland aiming to provide the further information requested within 15 working days.

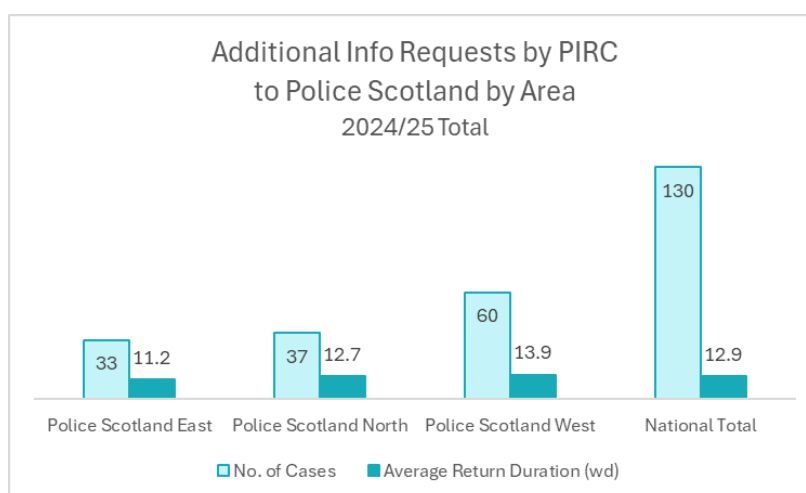


4. Source: PIRC Centurion System

During Q4 2024/25, PIRC made 30 further information requests to Police Scotland as part of an ongoing review. This is one more request than was made in Q3. On average, requests were fulfilled within 16.3 working days of receipt of the request. This is 1.3 days over the timescales agreed with Police Scotland.

The quarterly increase in PIRC requests is modest. However, the length of time taken to respond to these requests has increased significantly in the North and West areas, resulting in Police Scotland failing to respond within agreed timescales in Q4.

It should be noted however that Q4 increases have not significantly impacted the overall return duration for the full financial year (12.9 working days). On average, each area of Police Scotland having responded to requests within the agreed 15 working day timescale during 2024/2025.

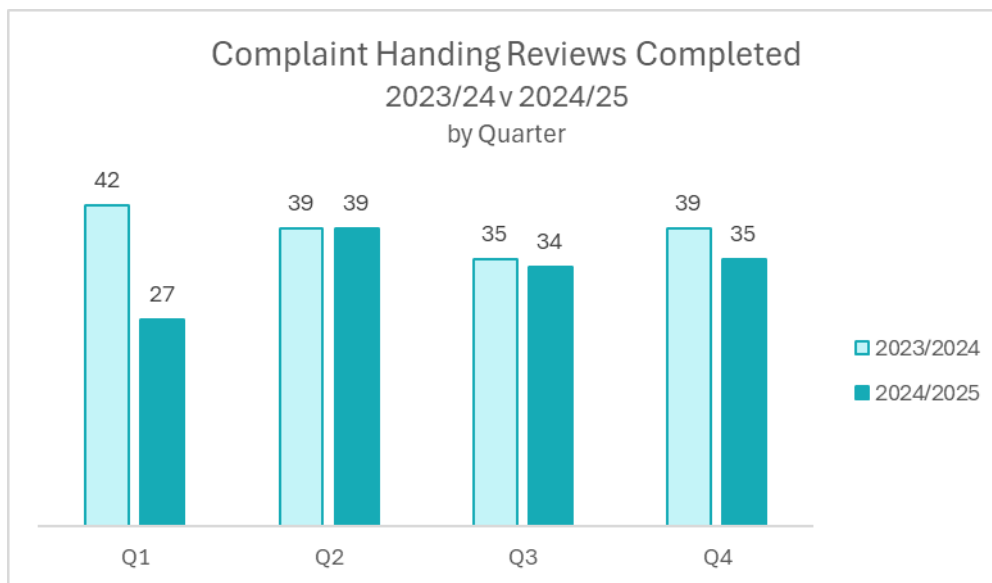


5. Source: PIRC Centurion System





## Complaint Handling Review Reports Cases completed – National.



6. Source: PIRC Centurion System

PIRC issued 35 Complaint Handling Reviews by PIRC to Police Scotland in Q4 of 2024/25. This represents one additional CHR being completed than in Q3 (+2.9%) and a decrease of four CHRs (-10.3%) compared to Q4 in the preceding year.

Over the financial year, a total of 135 cases were concluded by issuing a CHR.

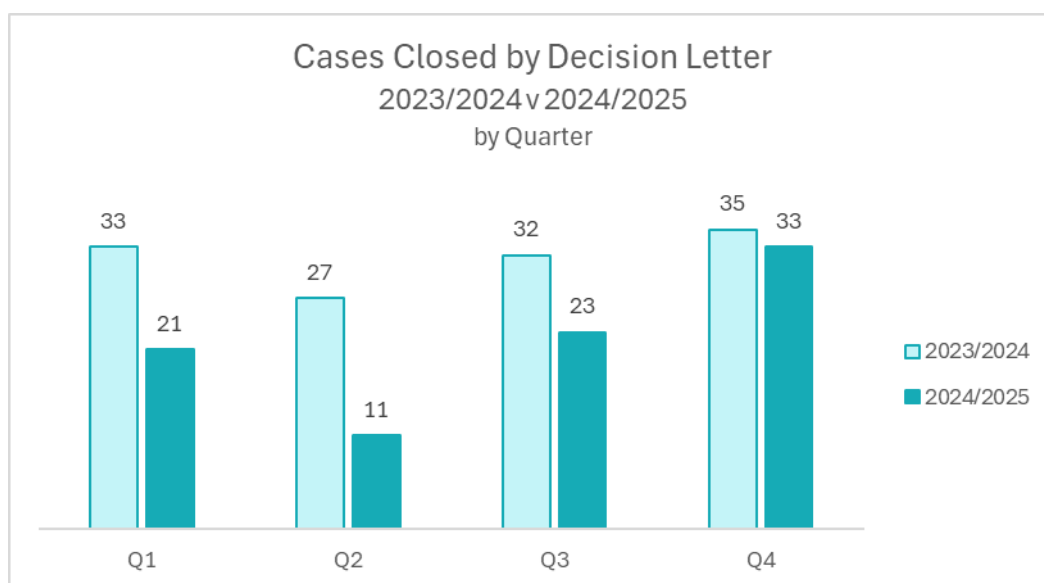
This represents an overall annual decrease of 20 (-12.9%) – a second consecutive annual decrease.

### Cases closed - Decisions.

PIRC now records and reports the number of applications that were the subject of a discretionary decision. This includes applications where, following an assessment, the PIRC is satisfied that Police Scotland has taken reasonable steps to address a complaint. Consequently, the PIRC will not proceed with a review on the grounds of proportionality.

The PIRC recognise that complaints that are not reviewed on proportionality grounds represents opportunities for PSD to identify good complaint handling practice. To assist in this regard, the PIRC now send PSD a detailed letter explaining why discretion was exercised, so that good practice can be shared with those involved in complaint handling.

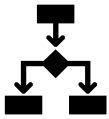
It is important to highlight that applications and heads of complaint that did not progress on proportionality grounds would otherwise be complaints that were likely to be reasonably handled, had they been taken to review.



7. Source: PIRC Centurion System

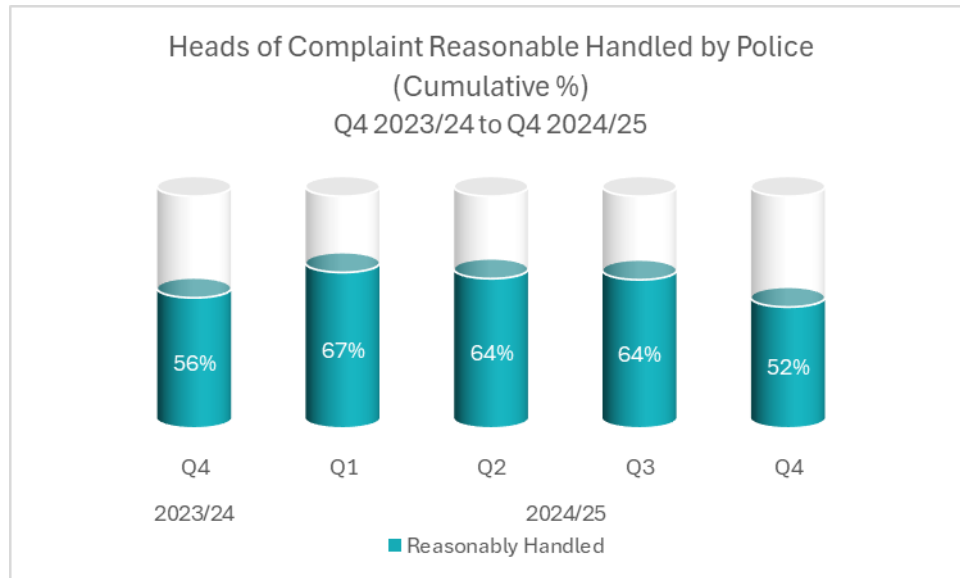
There has been an annual decrease of 39 cases being closed through discretionary decisions. Taken with the reduction in the number of CHR cases being issued, this is reflective of the general downward trend of CHR applications to PIRC, which is assessed to be directly linked to a significant reduction of complaint cases being concluded by Police Scotland and the backlog of unallocated complaints.

It is assessed that with the additional civilian staff taking up post within PSD in December 2024, and the actions taken by PSD to reduce the backlog of unallocated complaints under their response attributed to Operation Glade, the volume of relevant complaints concluded by Police Scotland will increase substantially, which will result in a significant increase in the number of CHR applications submitted to PIRC in 2025/2026.



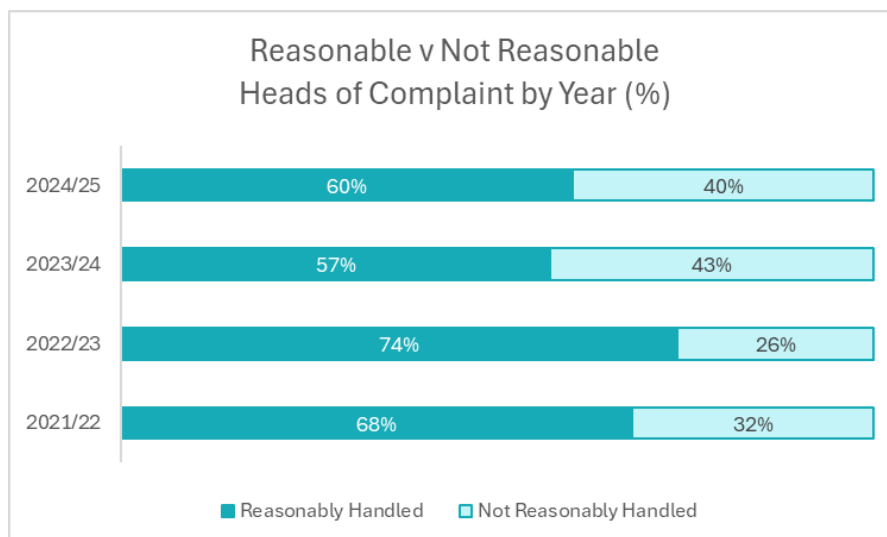
## Outcome

### Reasonable v Not Reasonable



8. Source: PIRC Reviews Quarterly Performance Reports

Heads of Complaints assessed to have been handled reasonably by police in Q4 (52%) was twelve percentage points lower than in Q3 and four percentage points lower than in Q4 2023/24.



Despite the Q4 decrease in reasonable handled HoCs, the annual proportion of HoCs reasonably handled by police now stands at 60% - a modest increase on the preceding year.

## CHR Disposal Outcomes

- **Recommendations** - these are made in the CHR reports where we identify deficiencies or shortcomings in the police complaint handling. Our recommendations may, for example, ask the policing body to undertake further enquiries, to re-assess the available information, to issue an apology, to re-visit a specific policy/procedure or issue the complainer with further response.
- **Learning Points** - PIRC is committed to promoting a culture of learning and improvement. During our reviews, we seek to identify and capture organisational and individual learning opportunities.
- **Reconsideration Directions** - reconsideration directions are used in cases where significant complaint handling failings have been identified during a review. It requires someone previously unconnected with the complaint enquiry to reconsider the complaint.
- **Discretionary Decisions** – Not every CHR application is progressed to a Complaint Handling Review. The Commissioner may carry out a CHR where it is deemed fair, reasonable, proportionate and in the public interest to do so.

In cases where applications are not taken forward, the Commissioner will issue a discretionary decision letter, having considered the application and found that it does not merit a Complaint Handling Review.

A total of 33 decision letters were issued by PIRC to Police Scotland in Q4 2024/25, with 88 being the total for the year.

In most cases, this means that the PIRC has deemed Police Scotland to have carried out a proportionate enquiry into these complaints. Accordingly, as the police appeared to have already taken reasonable steps to respond and address the complaint, the PIRC has determined there would be no added value to be gained from reviewing the handling of the complaints.

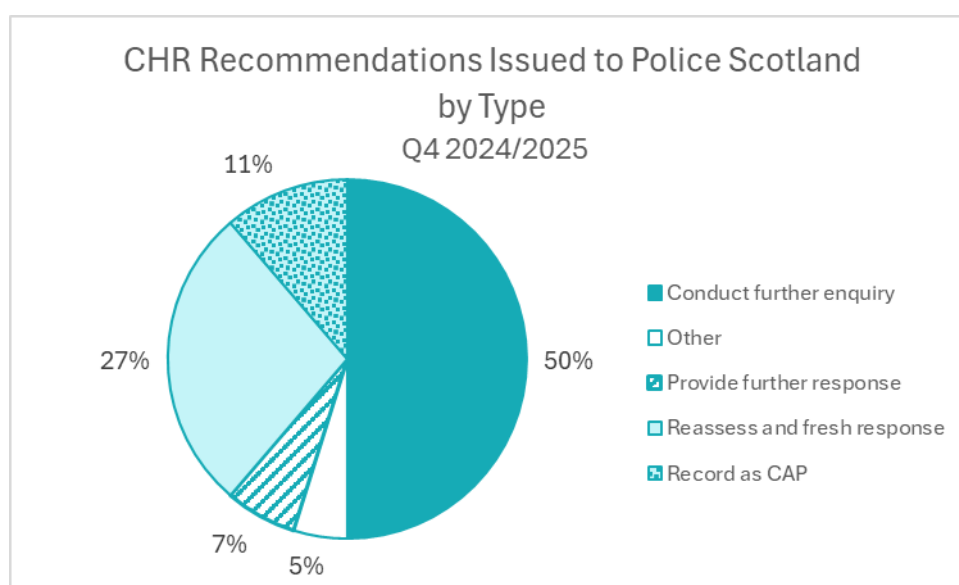
It can be reasonably assessed that - had these applications proceeded to a complaint handling review - a finding of 'reasonably handled' would follow.



## Recommendations Made

Over the quarter, PIRC made 62 recommendations within 21 CHRs to Police Scotland. These are broken down by Recommendation Type and area below:

	2024/2025
Recommendation Type	Q4
Conduct further enquiry	31
Reassess and fresh response	17
Record as CAP	7
Provide further response	4
Other <sup>1</sup>	3
<b>Total</b>	<b>62</b>

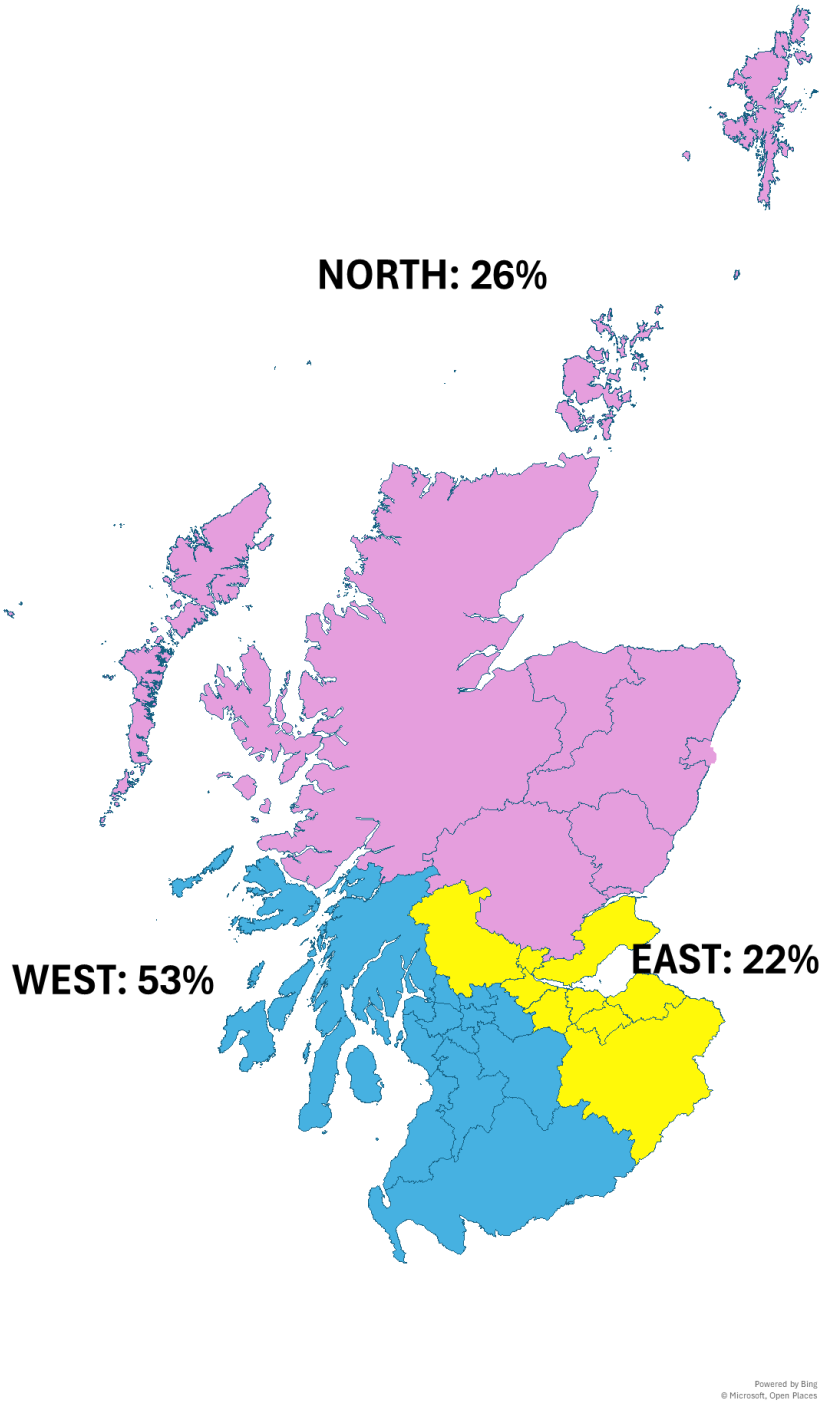


9. Source: PIRC Centurion System

A cumulative total of 179 recommendations have been made by the PIRC Reviews Team to Police Scotland by the end of Q4 2024/25, relating to 85 Complaint Handling Reviews.

<sup>1</sup> Two of the recommendations categorised as 'Other' related to individual officers being provided with specific advice or learning. The remaining recommendation related to the re-categorisation of a complaint.

CHR Recommendations Issued to Police Scotland (%)  
2024/2025



10. Data source: PIRC Centurion System  
Map Source: Powered by Bing © Microsoft, Open Places



## Learning Points Identified

The PIRC identifies opportunities for organisational or individual learning and improvement as part of the Complaint Handling Review process. These learning opportunities are highlighted to the police as Learning Points within the CHR reports. All our Learning Points were designed to enhance PSD compliance with our Statutory Guidance and Police Scotland's Complaints About Police Standard Operating Procedures.

The Learning Points are also opportunities for PIRC to highlight examples of good complaint handling practices.

During Quarter 4, we identified 37 Learning Points for Police Scotland arising from Complaint Handling Reviews and Discretionary Decisions.

- **Police Scotland North:** 8 Learning Points

Themes included the appropriate use of Front Line Resolution (FLR), including establishing reasons for delay. Two learning points in this quarter related to good practice of officers in relation to thorough and detailed responses provided as well as the identification of complaints that had been omitted from an enquiry.

- **Police Scotland East:** 12 Learning Points

Themes include complaint categorisation; allocation of complaints to appropriate enquiry officers and in good time; appropriate use of FLR and contacting complainers to clarify the nature of complaints.

- **Police Scotland West:** 17 Learning Points

Themes include appropriate use of FLR; full retention of auditable records in respect of all complaints and detailing all enquiries; complaint response content, rationale and tone and ensuring any references made to guidance is consistent with the latest version of documentation.

The PIRC previously highlighted organisational Learning Points which included:

- amendment to the guidance on notification of NOK residing in other parts of the UK;
- amendment to guidance to ensure that serving police officers who report domestic abuse or who are suspects in domestic abuse cases are not investigated by their colleagues
- amendment to Suspension from Duty SOP to ensure that risk assessments are properly recorded in all cases, even where suspension is not deemed necessary
- review of current procedures to document members of the public attending local police stations

These organisational Learning Points were issued to Police Scotland between May and July 2023, and currently remain outstanding. PIRC continues to liaise with Police Scotland in this regard, however there has been no substantive or notable updates on the implementation of these Learning Points since the last reporting period (Q3 2024/2025).



## Stakeholder Engagement

During Q4 2024/2025, the Review Team continued to engage with the Professional Standards Department of Police Scotland.

### Practitioners Forum

Following the PSD/PIRC Liaison Event, the PIRC Reviews team in collaboration with PSD established a series of Practitioners Forums to take place during 2024/2025. These events are held quarterly, with separate forums organised for each PSD region. The PIRC provide detailed feedback to PSD teams on the findings and themes arising out of CHR reports originating from the designated PSD region. The events also provide an opportunity for PSD complaint handlers to raise any topical issues or to request additional guidance on complaint-related matters arising in their respective regions. These events were held in April, August, and November 2024. The Practitioner Forums scheduled for February 2025 were postponed until May 2025 to allow training for new PSD complaint investigators to take place. The next round of these events is scheduled for 27/28 May 2025.

### PSD Induction Training

In October 2023, PSD started a new comprehensive induction training course for those recently appointed to work within PSD. Over the course of four days, both PIRC Reviews and Investigations teams are invited to deliver training inputs and presentations, covering complaint handling best practice, CHR process, statutory referrals, and PIRC investigations.

This course now runs every 6 months. As part of the implementation of the NCARU audit recommendations, a much more comprehensive input has been developed by the NCARU staff to cover accurate recording and the initial assessment and categorisation of relevant complaints (Stages 1 & 2 of six-stage process).

The NCARU input now forms part of the future PSD Induction Training course. This training course was delivered jointly by PIRC and PSD in April and November 2024, and PIRC engaged with Police Scotland to assist with delivering tailored induction training to new cohort of PSD complaint handlers which took place at the end of February 2025.

PIRC Reviews Team also organised and hosted a follow-up training event for new PSD complaint handlers, including interactive workshops, practical examples scenarios and presentations, which took place on 30 April 2025.

### National Complaint Handling Development Group (NCHDG)

The reformed NCHDG has resumed its work, with meetings held in December 2023, March 2024, June 2024, September 2024 and December 2024. The group was until recently chaired by Superintendent Kate Stephen, and consists of representatives from PSD involved in complaint handling, PIRC, and the SPA.

This group is focused primarily on practical complaint-handling trends/themes. The group is also used as the forum to discuss any recommendations arising from the PIRC/SPA NCARU Audit and PIRC 6-Stage Audit. At the last meeting, the group benefited from an input from a representative from Police Ombudsman for Northern Ireland (PONI), learning about the procedures and practices adopted by the PONI when dealing with complaints from members of the public. The NCHDG meeting in Q4 was postponed until May 2025 to allow a newly appointed PSD Superintendent James Mann to attend.



## **PIRC Audit – 6-Stage Process**

In line with recommendation 7 of the Lady Elish Angiolini report, the PIRC has undertaken an audit of Police Scotland's 6-stage complaints process. The final report was published by the Commissioner on 10 July 2024. The report made ten recommendations designed to improve and strengthen the existing Police Scotland's complaint handling procedures. PSD appointed a Chief Inspector to oversee and progress implementation of recommendations. In February 2025, the Commissioner accepted the implementation of four recommendations, which are now discharged:

### **Recommendation 1**

Police Scotland should review the accessibility of the complaints system for members of the public whose first language is not English.

### **Recommendation 4**

Police Scotland should enhance the existing six-stage form to prompt NCARU to secure perishable evidence at the earliest opportunity.

### **Recommendation 5**

Police Scotland should consider separating the complainer contact and the enquiry log into two distinct logs that require to be updated by EOs.

### **Recommendation 10**

Police Scotland should strengthen the current guidance on the Quality Assurance (QA) process and seek to ensure that all complaint files contain an auditable trail of QA by a senior officer.

Although it was anticipated that a further four recommendations could be implemented and discharged by the end of Q4, due to staff changes within PSD, implementation of these recommendations did not progress. PIRC will continue to engage with PSD to oversee successful implementation of all recommendations made within the PIRC audit report.



## Investigations

In terms of Section 33A(c) of the Police, Public Order and Criminal Justice (Scotland) Act 2006 (as amended) and Regulation 3 of the Police Investigations and Review Commissioner (Investigations Procedure, Serious Incidents and Specified Weapons) Regulations 2013 (the 2013 Regulations), **the Chief Constable must request the Commissioner to investigate any serious incident<sup>2</sup> involving the police which is a circumstance involving, (a) a constable; or (b) a member of the police staff.**

On receipt of a referral from Police Scotland, PIRC undertake an assessment of the referral and decide whether to investigate or not. Assessments may include examining CCTV, Body Worn Video, other video, witness statements, command & control logs, telephone calls, Airwave radio transmissions, briefing papers or other material.

## Referrals

Following a Performance Data Review in October 2022, the PIRC, as part of this review, revised referral incident types that the PIRC deal with, to streamline and standardise referral types.

Referrals from Police Scotland are categorised in the following terms:

- Death Following Police Contact
- Serious Injury Following Police Contact
- Serious Injury in Police Custody
- Firearms Discharged
- Firearms Presented
- Taser
- Incapacitant Spray<sup>3</sup>

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<sup>2</sup> A “serious incident involving the police” which the Commissioner may investigate in pursuance of paragraph (c) of section 33A is a circumstance in or in consequence of which a person has died or has sustained serious injury where (i) the person, at or before the time of death or serious injury, had contact (directly or indirectly) with a person serving with the police acting in the execution of that person's duties; and (ii) there is an indication that the contact may have caused (directly or indirectly) or contributed to the death or serious injury; (b) any other circumstance in or in consequence of which (i) a person has otherwise sustained a serious injury at a time when the person was being detained or kept in custody by a person serving with the police; or (ii) a person serving with the police has used a firearm or any other weapon of such description as the Scottish Ministers may by regulations specify.

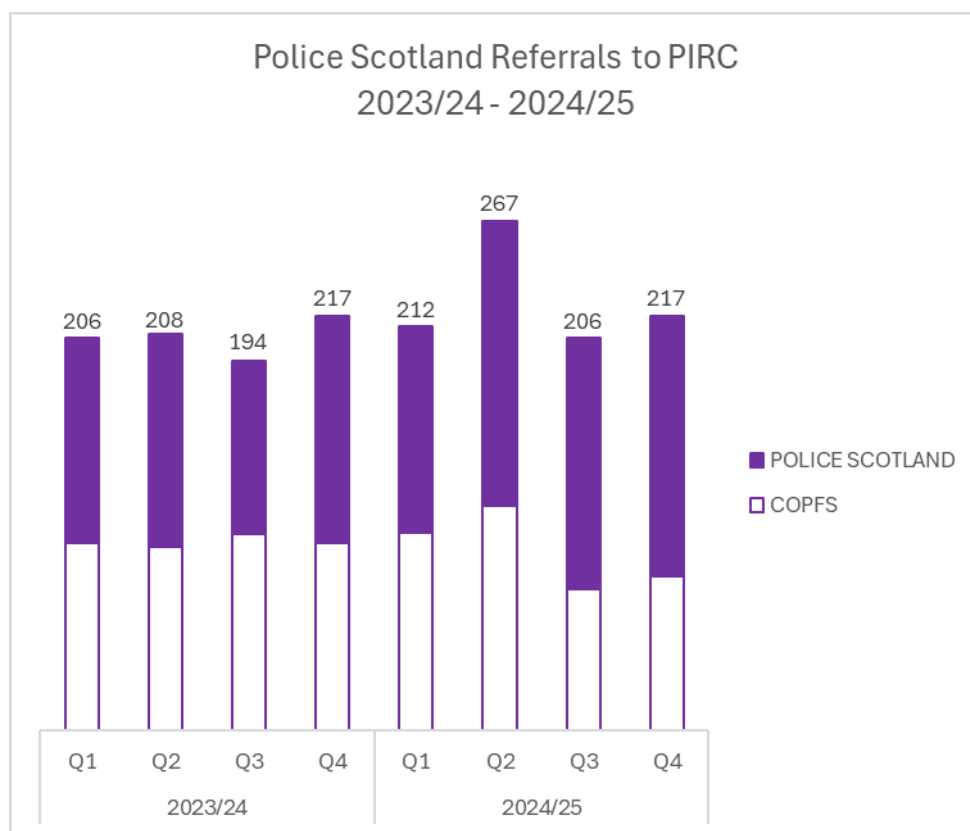
<sup>3</sup> The overall referral figures quoted by PIRC are not comparable to those reported by PSOS. This is due to the inclusion of referrals involving incapacitant spray (which are not managed by PSD, therefore not cited) as well as the PSOS inclusion of Crown Directed matters, which are excluded in PIRC figures.

In addition, under Section 33A(b) of the 2006 Act, COPFS may instruct PIRC to investigate:

- Death in Custody
- Death Following Police Contact
- Other Criminal Matters

**COPFS investigation statistics are not included in this report, as they related to live ongoing criminal investigations at the direction of COPFS.**

(Note: Since 4 October 2021, COPFS has a standing instruction resulting from the Dame Elish Angiolini Independent Review of Complaints Handling, Investigations and Misconduct issues (Recommendation 47), which instructs that all on duty allegations of assault made against police officers and police staff are referred onwards from Police Scotland to PIRC for assessment and where appropriate investigation.



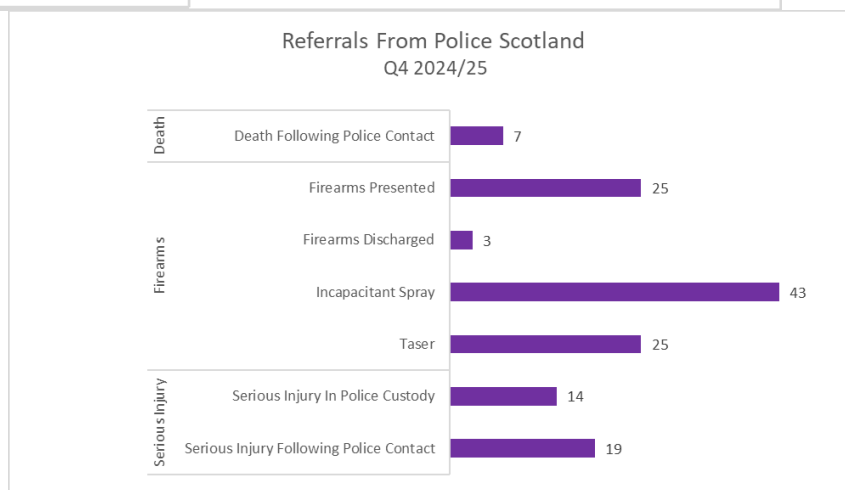
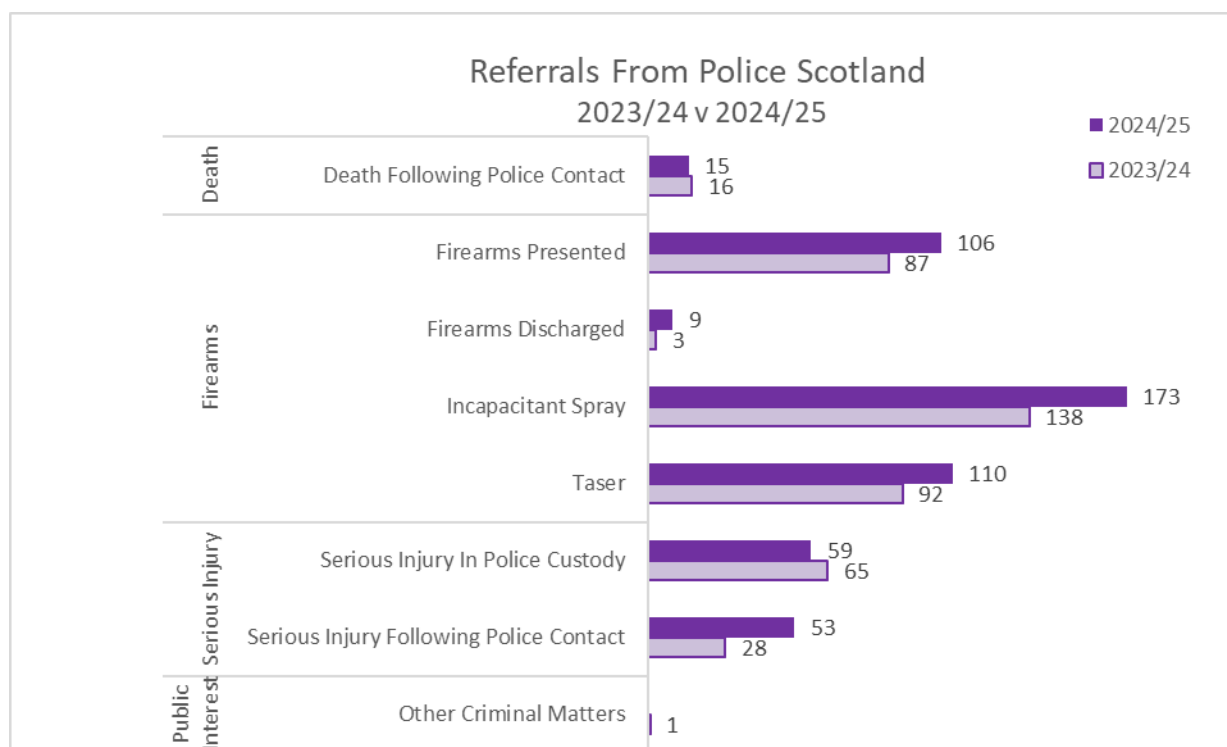
11. Source: PIRC Clue System

Overall, there were 217 referrals concerning Police Scotland in Q4 2024/25. The majority of referrals originated from Police Scotland itself (n=136, 63%).

Comparatively, this represents an increase of 4% (n=9) on Q3 but is equal to the number recorded in Q4 2023/24. The increase in the proportion of referrals originating from Police Scotland noted in Q3 (64%) has continued in Q4. This is due to a reduction in COPFS referrals as well as increased referrals received from Police Scotland.

Over the full year there were 525 referrals, with 58% originating from Police Scotland.

## Referrals by Type



12. Source: PIRC Clue System<sup>4</sup>

<sup>4</sup> Discrepancies between figures submitted by PIRC and Police Scotland can arise from different categorisation requirements for each organisation's workload management.

For example, if an Authorised Firearms Officer discharges a taser in the course of their duties – one of a suite of options available to AFOs – Police Scotland will refer this as an Armed Policing incident. If the officer involved was a Specially Trained Officer, the referral would be counted as a 'STO – Taser' referral by Police Scotland.

For its part, the PIRC's interest in the same incident would be primarily concerned with the fact that a taser was discharged at all - but it would not make the distinction between the type of officer involved. PIRC would therefore always record this type of incident as a 'Taser' event.

If, however, firearms were also presented by AFOs at the same incident, PIRC would have an obligation to examine each element of the incident (i.e. both taser discharge and firearms) so would raise a second referral for 'Firearms Presented'.

#### *Quarterly Analysis*

Referrals for Death Following Police Contact were unusually high in Q4 (n=7) and account for almost half of this referral type for the whole year (n=15). Five of the Q4 referrals were superseded by COPFS referrals and one progressed to full investigation on the Police referral. Quarterly increases were also noted in Serious Injury referrals (n=33), the use of Incapacitant Spray (n=43) and Firearms Discharge (n=3) in Q4 2024/25.

#### *Annual Overview*

The number of referrals received by PIRC from Police Scotland has increased from 430 in 2023/24 to 525 in 2024/25 – an increase of 22%. Increases are attributable to more frequent referrals of Serious Injury Following Police Contact and all forms of Firearms presentation and use.

Overall, Serious Injury referrals have increased by 20%, but the split has become more evenly distributed between the two subtypes (Following Police Contact = 53; In Police Custody = 59).

A proportional change was observed in Serious Injury referrals, where an increase of incidents occurring Following Police Contact increased from 7% (2023/24) to 10% (2024/25) of the total number of referrals received. A corresponding decrease was also noted in Serious Injury in Police Custody referrals, from 15% (2023/24) to 11% (2024/25).

With regards to the presentation and use of Firearms, increases are noted in all subtypes, culminating in a 24% annual increase in Firearms referrals from Police Scotland. Contributing to this are increases in Incapacitant Spray use (n=35); Firearms presentations (n=19) and Taser deployments (n=18). The discharge of Firearms was also referred to PIRC six more times in 2024/25 than in 2023/24.

The annual number of Police Scotland referrals proceeding directly to investigation fell from 27 to 17. Proportionally, this is a decrease from just over 6% in 2023/24 to 3% in 2024/25 of the total referrals received each year, respectively.



## Investigation Categories

To ensure adequate resourcing and prioritisation, all PIRC investigations are categorised using criteria detailed in the PIRC Operations Directorate Business Counting Rules.

Prioritisation is given to death and other high-profile investigations. Each investigation is categorised either A+, A, B or C depending on the complexity or seriousness of the investigation.

### Major Cases – Category A+

In exceptional circumstances, the Head of Investigations or the Head of Reviews and Policy (or their nominated representative) can request the Director of Operations or, in their absence, the Commissioner, to designate an investigation with major case status. This only applies to a very small number of complex or protracted investigations, including those where the timescales are being directed by another authority such as COPFS. In such cases it will be clear from the outset that the case is going to take a prolonged period to reach a conclusion, and there is no reasonable prospect of KPI timescales for the completion of the case being met.

An extended timescale will be provided for major cases with the Commissioner and Director of Operations given regular situational updates. The PIRC will also maintain contact with affected family members or next of kin and ensure that timeous progress updates are provided on the status of the investigation.

### Category A

Investigations into deaths in police custody or following police contact; or a major investigation with complex lines of enquiry where the securing of evidence requires significant resource allocation over a protracted period or an investigation which generates high levels of public/political interest placing additional demands on the organisation in relation to completion times.

### Category B

An investigation where the lines of enquiry are apparent from the outset but where the securing of evidence can only be achieved through prolonged investigation.

### Category C

A routine investigation where the lines of enquiry are apparent from the outset and the gathering of all relevant evidence can be achieved without placing great demands on the investigations team.

Referrals received in Q4 originating from Police Scotland that progressed to full investigation are as follows:

- 1 x Death FPC (Category A - J Division)
- 2 x Firearms Discharges (both Category B; both D Division)
- 3 x Serious Injury Following Police Contact (all Category B; P, G and J Divisions, respectively)

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Over the full financial year, a total of 16 Police Scotland referrals progressed to investigation, as follows:

Referral Type	Police Scotland Referrals
Death Following Police Contact	2
Serious Injury Following Police Contact	4
Serious Injury In Police Custody	1
Firearms Discharged	2
Firearms Presented	1
Taser	6
<b>Total</b>	<b>16</b>

13. Source: PIRC Clue System

## Key Performance Indicators

The following key performance indicators, (KPI's) report on the PIRC's performance on managing all investigations:

- 90% of all cases referred to the PIRC will be assessed, and a decision provided of whether an investigation will proceed within 5 working days following receipt of background case papers police.
  - Q4 2024/25 - **80%** (END OF YEAR **92%**)
- 80% of Category A investigations (minus major cases) completed and reports submitted within 90 working days, following receipt of background case papers.
  - Q4 2024/25 – **100%** (END OF YEAR **100%**)
- 80% of Category B & C investigations (minus major cases) completed and reports submitted within 120 working days, following receipt of background case papers.
  - Q4 2024/25 – **95%** (END OF YEAR **98%**)



## Recommendations

PIRC reports to Police Scotland may include findings and recommendations and are intended to assist organisational learning and development or to address any systemic issues discovered. **Police Scotland do not have a legal requirement to implement any recommendations**, however, in the main these are implemented.

To assist Professional Standards Department, implement best practice, a PIRC Senior Investigator has been assigned responsibility for the progression of recommendations, through improved communication channels and scheduled meetings taking place to provide clarification and suggest implementation strategies, if required.

### Responses Received

PIRC has received one response to a thematic recommendation previously submitted to Police Scotland in Q2:

<b>PIRC Recommendation</b>
In the absence of guidance within national Covert Policing manuals in relation to the identification of plain clothes officers when deployed during armed operations, Police Scotland should consider drafting specific guidance that stipulates the requirement to carry out dynamic risk assessments in such circumstances and mirrors guidelines set out within both the Armed Policing Operations Standard Operating Procedures and National Police Firearms Training Curriculum (NPFTC), specifically: 'Officers deployed in plain clothes at a firearms incident need to be clearly identifiable as police officers' 'Plain clothed officers who are unarmed will be issued with a high visibility (bright yellow) baseball cap with police markings' 'If plain clothed officers are deployed to provide observations or visual containment this information, their deployment positions and any subsequent changes must be clearly and unambiguously relayed to firearms officers and the TFC. This is especially important on any occasion where plain clothes officers do not have possession of the approved high visibility 'Police' baseball caps' Any decision to deviate from this should be recorded and a rationale provided.
<b>Police Response</b>
<i>Guidance was drafted by our Organised Crime and Counter Terrorism Unit (OCCTU) via memo. This guidance was circulated to all officers in our OCCTU, Intelligence Development Unit (IDU), Covert Operations Unit (COU) and Organised Crime Partnership (OCP) on 14th February 2025. In addition to the above, department wide learning was disseminated in relation to the importance of debrief following deployment and the highlighting/ recording any use of force in line with OST, whether it is towards a member of the public, or a Police Officer.</i>

### Recommendations Outstanding

No recommendations issued by PIRC to Police Scotland remained outstanding at the end of 2024/25.

### Recommendations Issued

No recommendations were issued by PIRC to Police Scotland in Q4 2024/25





## Stakeholder Engagement

### Revision to Law for Corroboration

On 1 January 2025, as a consequence of the Lord Advocates references around the law of corroboration, PIRC were required to implement a revised investigative approach. Consequently, PIRC now undertakes significantly more criminal investigations and will continue to do so.

The increase in demand also impacts on PSD with a significantly higher volume of PIRC requests for case related information. Engagement continues between PIRC and Police Scotland around the efficient and effective management of the information sharing and associated processes.

### Body Worn Video (BWV)

PIRC have met with DCC Connors in respect of some areas which had been highlighted in respect of the PSOS SOP on BWV. DCC Connors has agreed to consider the areas highlighted and has already scheduled a meeting to advise on her deliberations.

### Training

PIRC staff continue to support Police Scotland training across a variety of training courses at the SPC as well as PSD Induction Training.

### Memorandum of Understanding (MOU).

The MoU has been returned from Police Scotland with no changes to the PIRC submission. The document is now under final consideration by the Commissioner and once complete will be returned to Police Scotland for final consideration / sign-off.

**END OF REPORT**