

Police Scotland: Digital, Data and Technology Strategy 2025 – 2028

Response from the Scottish Council for Voluntary Organisations

The Scottish Council for Voluntary Organisations (SCVO) appreciates the opportunity to respond to Police Scotland's consultation on the new '[Digital, Data and Technology Strategy 2025 – 2028](#)'.

SCVO is the national body in representing the voluntary sector (charities, social enterprises, and voluntary groups, aka third sector) in Scotland, with a membership of 3,000+ organisations. Our mission is to champion the sector's social and economic contributions, provide essential services and debate big issues. The sector in all its diversity is a powerful force for positive change across Scotland and a significant part of our economy, with over 46,500 voluntary organisations and over 800,000 volunteers. For further information please refer to SCVO's State of the Sector 2025.

This consultation touches on issues that are central to how we promote and support digital inclusion. SCVO has been leading the delivery of digital inclusion across Scotland for 15 years and continues to do so through a range of different programmes.

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Our DDaT strategy will support the delivery of Vision 2030 outcomes through four strategic ambitions:

To what extent do you agree or disagree that this is an ambition we should be focussing on?

a. New and innovative solutions to prevent and detect crime

We agree with this ambition, particularly the commitment to investing in the digital skills and capabilities of the policing workforce. Digital technology, data and emerging technologies can support crime prevention and detection, but digitally excluded communities must not be disadvantaged by increasingly data-driven approaches.

Digital exclusion can result from lack of devices or affordable connectivity, limited skills or confidence, accessibility, literacy or language barriers, and concerns about sharing information digitally. If some communities are less able or willing to use digital channels, their experiences may be underrepresented in data used to inform policing priorities. Digital exclusion should therefore be considered as a potential source of inequality in data and decision-making, not only an access issue.

As Police Scotland increases its use of AI, automation and analytics, it should consider bias and gaps in datasets, maintain appropriate human oversight, and ensure transparency and accountability. Digital inclusion should be considered alongside privacy, security, ethics and equality when assessing new technologies. Investment in technology should also be matched by workforce development so staff understand both how to use new tools and their limitations, including when citizens may need alternative routes or additional support.

Digital transformation is also changing where and how people experience crime and harm. As more aspects of everyday life take place online, Police Scotland has an important role not only in detecting and responding to cyber and digitally enabled crime, but in preventing it.

Digital inclusion should include people's ability to participate online safely and confidently. People with lower digital skills or confidence may find it harder to recognise scams, fraud and other online harms, understand how to protect themselves or know where to seek help when something goes wrong.

Police Scotland should therefore consider digital safety and resilience alongside access, skills and confidence. This should include working with third-sector and community organisations to reach people who may be particularly vulnerable to digitally enabled crime and ensuring that prevention activity is accessible to those who may not engage with conventional digital awareness campaigns.

b. Digital reimagination to maximise officer and staff efficiency

Transformation should recognise different levels of digital confidence, skills and accessibility needs across the workforce. New systems should be accompanied by accessible technology, appropriate training and ongoing support, with digital capability treated as a continuing development need rather than one-off training.

Police Scotland should apply inclusive and user-centred design from the outset, involving staff with different roles, abilities and accessibility requirements in design and testing. Technology should simplify working practices rather than digitise existing complexity, and accessibility should be a core requirement. Staff should also be able to recognise and respond to digital exclusion among the public, so efficiency gains do not transfer complexity or responsibility to citizens. Success measures should consider staff and citizen experience alongside cost, efficiency and transaction volumes.

c. Reform the citizen experience and engagement

We strongly support providing more accessible and flexible ways to engage with Police Scotland but expanding digital channels must be accompanied by a clear commitment to digital inclusion.

People may face barriers because of access to devices or connectivity, skills, confidence, disability, age, language, literacy, poverty or rural connectivity. These barriers can be temporary as well as persistent. This is particularly important in policing, where people may be engaging at moments of distress, trauma or vulnerability and may struggle with digital processes they could normally manage.

Police Scotland should adopt an inclusive, choice-based service model rather than assuming digital should become the default. Digital services should be

designed so as many people as possible can use them independently, while telephone, face-to-face and other appropriate routes remain available without disadvantaging those who need them. Assisted digital support should also be available for people who can use digital services with some help.

Accessibility should be built in from the outset and go beyond technical compliance to include plain language, accessible authentication, language and interpretation needs, and cognitive demands. Police Scotland should also consider the cumulative burden of accounts, passwords, digital identification, uploads and verification processes.

Communities, third-sector organisations and people at risk of digital exclusion should be involved throughout design and evaluation. Success should not be judged by digital take-up alone. Evaluation should also consider failed or abandoned interactions, demand for assisted and non-digital routes, accessibility barriers and differences between communities. Digital transformation should increase people's options for engaging with Police Scotland, not narrow them.

d. Enhance multi-agency collaboration and partnership

We agree with this ambition and see opportunities for collaboration to reduce digital barriers across policing and other public services. People with complex circumstances may interact with several organisations and face repeated requests for information, multiple accounts and authentication processes, and inconsistent levels of accessibility. Better interoperability and service design should create a more joined-up citizen experience, rather than technical integration for its own sake.

Where information is shared, transparency and trust are essential. People should understand, as far as possible, what information is collected, why it is needed, how it may be shared and what rights or choices they have.

Police Scotland should recognise third sector and community organisations as strategic partners in digital transformation. Their trusted relationships with communities can identify barriers that may be missed through conventional consultation or digital analytics. Partnerships could also create referral routes to digital inclusion support, provided organisations are appropriately resourced rather than expected to absorb additional demand.

Multi-agency working should seek greater consistency in inclusive design, accessibility and assisted digital support, and give communities an ongoing role in shaping services. Digital inclusion requires continued engagement, monitoring and improvement as technology and people's needs change.

Digital transformation should not be assumed to create a saving simply because it reduces demand on Police Scotland's own channels. If people subsequently require support from third-sector organisations or other services to navigate digital processes, costs have been displaced rather than eliminated. This should be recognised in business cases and, where partners are expected to provide ongoing support, appropriately resourced.

How do you think the use of digital, data and technology will impact your experiences with policing in Scotland?

Digital, data and technology have significant potential to make policing more convenient and accessible, including making it easier to report non-emergency issues, access information and support, and receive updates. However, the impact will depend on whether services reflect the different circumstances and capabilities of the people who use them.

Digital inclusion is broader than being online. Barriers can include access to suitable devices and affordable connectivity, skills and confidence, accessibility, literacy, language and the need for support from another person. In a policing or justice context these barriers can be heightened by distress, trauma or difficult personal circumstances. A service being available digitally does not necessarily mean it is accessible or usable.

Digital transformation should therefore increase choice. Digital channels will work well for many people, while others will continue to need telephone, face-to-face or human support. Assisted digital support can help people who need limited help to complete a digital process. Services should also consider the whole journey, including authentication, uploading information, receiving updates and keeping track of appointments or actions.

Accessibility, plain language and inclusive authentication should be built in from the outset. As Police Scotland uses more data, AI and automation, transparency,

human oversight and trust will also be important. There is a risk that people who cannot or choose not to engage digitally become less visible in policing data, so Police Scotland should consider who is absent from digital data as well as what the data shows.

Success should not be measured by digital uptake alone, but by whether technology makes policing more accessible, effective and equitable. Digital should provide an additional route into policing, not become a new barrier to it.

Taking everything into account, to what extent do you support or oppose Police Scotland's draft Digital, Data and Technology Strategy 2025–2028?

We support the overall direction of the strategy and recognise the potential for digital, data and technology to improve policing and people's experiences of services. However, we have concerns about the extent to which digital inclusion is explicitly embedded throughout the strategy.

The strategy makes a welcome commitment to "inclusive design", but inclusive design and digital inclusion are not the same.

An accessible and usable digital service does not address every reason someone may be unable to use it. Digital exclusion can result from lack of devices or affordable connectivity, limited skills or confidence, accessibility, literacy, language, trust or the need for support.

This remains a significant issue in Scotland with Lloyd's Consumer Index reporting that 15% of adults lack foundation-level digital skills and Scottish Household Survey data showing that household internet access varies significantly by deprivation; with 87% of households in the 20% most deprived areas having internet access compared with 96% in the 20% least deprived areas.

This reinforces the need for digital inclusion to be considered as more than the accessibility of individual digital services. People may face barriers relating to connectivity, affordability, devices, skills, confidence and support, and these barriers are not experienced equally across Scotland.

We would therefore encourage Police Scotland to make an explicit commitment to digital inclusion within the final strategy.

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This is particularly important within Ambition C, which identifies increased digital engagement and reduced contact with service centre operators as measures of success. While digital channels can provide greater choice and convenience, these measures could unintentionally incentivise channel shift without considering whether digital is appropriate or accessible for everyone.

Reduced operator contact should not be assumed to represent a successful outcome. It could also reflect people abandoning interactions, being unable to access human assistance or choosing not to engage. Measures of digital uptake and efficiency should therefore be balanced with measures of access, experience and outcomes.

The strategy refers to providing "multiple options for public engagement". We welcome this but recommend making explicit that this includes appropriate non-digital and human-supported options. People should be able to use the channel most appropriate to their circumstances and move between channels without having to restart their interaction.

Our current discovery work with organisations supporting people involved in the justice system and their families reinforces the importance of this. Emerging themes include:

- people requiring support from another person to engage digitally;
- difficulties keeping track of appointments, information and case updates;
- barriers relating to devices, connectivity and data costs; and
- low digital confidence or skills.

These experiences demonstrate why transformation should be designed around people's actual circumstances rather than assuming everyone can engage digitally in the same way. They also highlight the importance of considering how family members, support workers and trusted organisations can safely support people with digital interactions without requiring inappropriate sharing of passwords or credentials.

We would encourage Police Scotland to involve people with lived experience of digital exclusion and organisations supporting them throughout the design,

testing and evaluation of services. Digital inclusion should also be considered in procurement and governance rather than addressed retrospectively.

Finally, digital uptake is not the same as digital inclusion. Police Scotland should measure not only how many people use digital services, but who does not use them, who requires support, where people abandon interactions, whether particular groups face greater barriers, and whether appropriate alternatives remain available.

We support the ambition to make greater use of digital, data and technology. The final strategy would be strengthened by making digital inclusion a clear, cross-cutting commitment, ensuring that no one has reduced access to policing because of their digital access, skills, confidence, accessibility needs or circumstances. Digital-first should not become digital-only.

For any further information relating to this response, please contact:

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