



## Freedom of Information Response

**Our reference:** FOI 25-3686

**Responded to:** 01 April 2026

Your recent request for information is replicated below, together with our response.

Tackling domestic abuse is a priority for Police Scotland and we are committed to working with our partners to reduce the harm it causes and ultimately eradicate it.

Domestic abuse is a despicable and debilitating crime which affects all of our communities and has no respect for ability, age, ethnicity, gender, race, religion or sexual orientation.

Police Scotland will not tolerate it.

Police Scotland will proactively target perpetrators and support victims to prevent domestic abuse from damaging the lives of victims and their families.

Police Scotland defines domestic abuse as:

“Any form of physical, verbal, sexual, psychological or financial abuse which might amount to criminal conduct and which takes place within the context of a relationship.

The relationship will be between partners (married, cohabiting, civil partnership or otherwise) or ex-partners. The abuse may be committed in the home or elsewhere including online”

This definition is included in the Joint Protocol between Police Scotland and the Crown Office and Procurator Fiscal Service (COPFS), “*In partnership challenging domestic abuse*” which is a public document that can be found on the [Police Scotland](#) website or on the [COPFS](#) website.

**I am requesting information under the Freedom of Information (Scotland) Act 2002 regarding the Domestic Abuse investigation conducted in the Greater Glasgow Division which resulted in a report concerning XXX during the period 1 January 2010 to 31 December 2020.**

**Please provide the following information:**

### **1. Officer Actions, Procedures, and Records**

• **All records showing investigative steps taken by the officer responsible for compiling the Domestic Abuse enquiry and IVPD entries relating to the above case, including:**

- **risk assessments**
- **decision-making notes**
- **supervisory reviews**
- **any rationale recorded for investigative actions**

I am refusing to confirm or deny whether the personal information sought exists or is held by Police Scotland in terms of section 18 of the Act. Section 18 applies where the following two conditions are met:

- It would be contrary to the public interest to reveal whether the information is held. Whilst we accept that you may have a particular personal interest in being informed as to whether the information sought is held, the overwhelming public interest lies in protecting individuals' right to privacy and their expectation of confidence as regards their information.
- If the information was held, it would be exempt from disclosure. In this instance, sections 38(1)(b) and 38(1)(2A) of the Act apply insofar as you have requested *third party* personal data, the disclosure of which would contravene the data protection principles set out in the Act.

## **2. Compliance With Mandatory SOPs**

**Confirmation of whether mandatory Domestic Abuse SOP procedures in force at the time required:**

- **corroboration checks**
- **supervisory sign-off**
- **specific victim-contact steps**
- **interview requirements for suspects**
- **evidential sufficiency checks prior to referral to COPFS**
- **Copies of the relevant SOPs (redacted if necessary).**

In relation to Standard Operating Procedures (SOP) between 2010-2013, prior to the inception of Police Scotland, I must advise these are considered legacy documents.

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Unfortunately, I estimate that it would cost well in excess of the current FOI cost threshold of £600 to process your request. I am therefore refusing to provide the information sought in terms of section 12(1) of the Act - Excessive Cost of Compliance.

By way of explanation, to provide you with legacy documents would require a manual review of the archived records. As such, this is an exercise which would exceed the cost limit set out in the Fees Regulations.

In relation to Domestic Abuse SOPs from 2013 – 2020. I have attached separately 7 documents that relate to your request.

With V6.00 of the Domestic Abuse PSoS SOP currently published on our website:

[Domestic Abuse Investigation SOP](#)

As you will note, some information has been redacted from these SOPs, as I am refusing to provide it in terms of section 16(1) of the Act on the basis that the following exemptions apply:

- *Section 35(1)(a)&(b) - Law Enforcement*

Disclosure would prejudice substantially the prevention or detection of crime and the apprehension or prosecution of offenders. By disclosing specific investigative and risk assessment checks used by Police in domestic abuse cases could alert perpetrators to police methods and enable them to conceal relevant risks or compromise victim safety.

- *Section 30(c) - Prejudice to the Effective Conduct of Public Affairs.*

Disclosure would prejudice substantially the effective conduct of public affairs.

In this case telephone numbers and email addresses have been redacted as disclosure would serve to disrupt the well-established processes which members of the public are encouraged to use when contacting Police Scotland, thus prejudicing our ability to effectively manage such contact appropriately.

Whilst there is a public interest in better informing the public as to the internal mechanisms used within the force, this must be balanced with the need to ensure that the appropriate channels are used for contact and that internal mailboxes are not compromised in any way.

- *Section 38(1)(b) – Personal Information*

Personal data is defined in Article 4 of the General Data Protection Regulation (GDPR) as:

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'Information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person'.

Section 38(2A) of the Act provides that personal data is exempt from disclosure where disclosure would contravene any of the data protection principles set out at Article 5(1) of the GDPR which states that:

'Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject'.

Article 6 of the GDPR goes on to state that processing shall be lawful only if certain conditions are met. The only potentially applicable condition is Article 6(1)(f) which states:

'Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child'.

Notwithstanding, I am further of the view that your interests are overridden by the interests or fundamental rights and freedoms of the data subjects.

On that basis, it is considered that disclosure of the information sought would be unlawful.

As such, any personal data, including names has been redacted.

### 3. Use of Moorov Doctrine in Police Referrals

- **Any internal guidance available to officers during this period regarding the use of the Moorov Doctrine when submitting reports to COPFS.**
- **Any policies or training documents concerning cases involving multiple unconnected complainers.**

The information sought is held by Police Scotland, but I am refusing to provide it in terms of section 16(1) of the Act on the basis that the following exemption applies:

- *Section 35(1)(a)&(b) - Law Enforcement*

Disclosure would prejudice substantially the prevention or detection of crime and the apprehension or prosecution of offenders. By disclosing tactical information would publicly provide information on investigative techniques used to detect crime. This in turn would enable those with hostile intent to use the provided information to avoid justice.

#### **4. IVPD & Domestic Abuse Recording Standards**

- **All guidance, policies, or circulars in effect during this period regarding:**
- **risk assessment duties -**
- **non-complainer-led Domestic Abuse investigations –**

The information sought is held by Police Scotland, but I am refusing to provide it in terms of section 16(1) of the Act on the basis that the section 25(1) exemption applies:

“Information which the applicant can reasonably obtain other than by requesting it [...] is exempt information”.

The information sought is publicly available:

[Domestic Abuse Investigation SOP](#) and [Joint protocol between Police Scotland and the Crown Office and Procurator Fiscal Service | COPFS](#)

- **classification of incidents without a direct complainer**

We have interpreted this as referring to our classification categories and I must advise there is no guidance etc. specific to the classification of incidents without a direct complainer, therefore, the information sought is not held by Police Scotland and section 17 of the Act applies.

To explain, incidents are categorised by the type of incident and crimes are categorised by the relevant offence classification. They are not classified based on whether there is a direct complainer or not. General guidance relating to categorising incident types etc. would apply.

- **IVPD recording**
- **police-initiated contact with third parties**

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Firstly, the interim Vulnerable Person Database (iVPD) was not rolled out nationally across Police Scotland until March 2014, with the stated aim to identify and prioritise Police Scotland's response to an individual who may be experiencing adversity and / or vulnerability. Therefore, the information sought prior to this date is not held by Police Scotland and section 17 of the Act applies.

Attached separately are 14 documents relating to policies and circulars that were issued between 2014 and 2020 relating to iVPD and Domestic Abuse. I also wish to direct you to the National Guidance available on our website:

[Interim Vulnerable Persons Database Rules, Conventions and Data Input Standards National Guidance](#)

It must be highlighted that both Domestic Abuse and iVPD recording policy and practice have changed over the years and as such, much of the guidance provided has been amended, rescinded, or is currently being updated to reflect ever evolving operational policing practice. However, for transparency, all guidance that was relevant at any point during the relevant time period has been provided, with many of the Force Memorandum's highlighting where policy has been superseded.

I must also advise that further documents held by Police Scotland have been refused in their entirety and several of the documents provided have information redacted. Therefore, the information sought is held by Police Scotland, but I am refusing to provide it in terms of section 16(1) of the Act on the basis that the following exemptions apply:

- *Section 30(c) - Prejudice to the Effective Conduct of Public Affairs.*

Disclosure would prejudice substantially the effective conduct of public affairs.

In this case telephone numbers and email addresses have been redacted as disclosure would serve to disrupt the well-established processes which members of the public are encouraged to use when contacting Police Scotland, thus prejudicing our ability to effectively manage such contact appropriately.

Whilst there is a public interest in better informing the public as to the internal mechanisms used within the force, this must be balanced with the need to ensure that the appropriate channels are used for contact and that internal mailboxes are not compromised in any way.

- *Section 35(1)(a)&(b) - Law Enforcement*

Disclosure would prejudice substantially the prevention or detection of crime and the apprehension or prosecution of offenders.

The withheld documents comprise of step-by-step user guidance and screenshots of Police Scotland systems, which would reveal system functionality, layouts, workflows, and technical capabilities.

Making such visual representations publicly available could assist individuals with malicious intent to understand, replicate, or exploit police systems, thereby undermining law enforcement processes and operational effectiveness.

- *Section 39(1) - Health, safety and the environment*

One of the main purposes of the Police Service is to protect individuals and members of the public, to disclose the requested information would be contrary to that purpose.

Disclosure of user guides/screenshots of internal police systems could endanger the safety of Police Scotland personnel and the wider public. Revealing how systems operate, including their structure and capabilities, may increase the risk of systems being targeted or compromised, which in turn could have adverse consequences for public safety.

### **Public Interest Test**

As you will be aware, the exemptions listed above are non-absolute and require the application of the Public Interest Test.

While there is a public interest in openness and transparency, this is outweighed by the significant public interest in ensuring the effective functioning of policing systems, the prevention and detection of crime and the protection of public and officer safety.

In this case, the public interest in maintaining the integrity and security of Police Scotland's operational systems, ensuring the prevention and detection of crime, and protecting health and safety therefore outweighs the public interest in disclosure.

### **5. Audits and Quality Assurance**

- **Any internal audits, supervisory reviews, quality assurance findings, or inspections concerning Domestic Abuse investigations in the Greater Glasgow Division between 2013 and 2020.**

- **Any findings relating to:**

- **incomplete risk assessments**

- **failure to interview suspects**
- **reliance on police-initiated allegations**
- **use of uncorroborated or non-complainer information**
- **escalation of cases without evidence**

Firstly, I must advise that this request is impacted by the [Record Retention SOP](#) which details - Any internal audits, supervisory reviews, quality assurance findings – would be destroyed after 5 years. Therefore, the information sought is not held by Police Scotland and section 17 of the Act therefore applies.

I must also advise each domestic incident is unique. Every domestic incident is subject to proportionate levels of internal audits and various levels of supervisory reviews prior to finalising. Any request for information on this subject would require specific case reference,

#### **6. Statistical Information for Greater Glasgow Division (2010–2020)**

- **Number of Domestic Abuse investigations initiated solely by police contact (without a complainer).**
- **Number of such investigations referred to COPFS.**
- **Number in which multiple unconnected women were used to establish sufficiency.**

Unfortunately, I estimate that it would cost well in excess of the current FOI cost threshold of £600 to process your request. I am therefore refusing to provide the information sought in terms of section 12(1) of the Act - Excessive Cost of Compliance.

By way of explanation, to provide the information requested would require a manual review of all domestic abuse investigations. As such, this is an exercise which would exceed the cost limit set out in the Fees Regulations.

- **Number withdrawn or marked “as proceedings”.**

Police Scotland does not hold this data and section 17 of the Act therefore applies. You may wish to contact the Crown Office and Procurator Fiscal Service (COPFS).

If you require any further assistance, please contact us quoting the reference above.

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You can request a review of this response within the next 40 working days by [email](#) or by letter (Information Management - FOI, Police Scotland, Clyde Gateway, 2 French Street, Dalmarnock, G40 4EH). Requests must include the reason for your dissatisfaction.

If you remain dissatisfied following our review response, you can appeal to the Office of the Scottish Information Commissioner (OSIC) within 6 months - [online](#), by [email](#) or by letter (OSIC, Kinburn Castle, Doubledykes Road, St Andrews, KY16 9DS).

Following an OSIC appeal, you can appeal to the Court of Session on a point of law only.

This response will be added to our [Disclosure Log](#) in seven days' time.

Every effort has been taken to ensure our response is as accessible as possible.

If you require this response to be provided in an alternative format, please let us know.