Ethical Standards Commissioner

CONSULTATION DRAFT

DRAFT STRATEGIC PLAN 2024-2028
CONSULTATION VERSION

Ethical, empathetic, effective

How we'll fulfil our role in public life in Scotland

ESC

Ethical Standards Commissioner

If you require this document in another format (for example large print, audio or Braille) please contact us on
0131 347 3890
www.ethicalstandards.org.uk/contact-us
or
info@ethicalstandards.org.uk.

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Following consultation, this plan will be laid before the Scottish Parliament by the Commissioner for Ethical Standards in Public Life in Scotland as required by section 14 of the Scottish Parliamentary Commissions and Commissioners etc. Act 2010.

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COMMISSIONER'S FOREWORD

I was appointed Ethical Standards Commissioner by the Scottish Parliament on 1 March 2023 and this is the first draft strategic plan that I have produced in that capacity. I plan to build on the foundations that I established whilst still Acting Commissioner and to work effectively and with integrity to earn the trust that has been placed in me.

My office is a statutorily independent one, not subject to direction or control by the Scottish Parliament itself or by the Scottish Ministers. Some of the earliest primary legislation passed by the Scottish Parliament were Acts that related directly to standards in public life in Scotland. The legislation conferred functions on my office, and those of my predecessors, all intended to uphold those standards. The legislative framework that my office operates within demonstrates that the Scottish Parliament takes standards in public life in Scotland very seriously. That in turn is predicated on the understanding that trust in standards of conduct on the part of those elected or appointed to serve the public is fundamental to a well-functioning democracy[1].

My role is to investigate, without fear or favour, complaints about lobbying, the conduct of MSPs, local authority councillors and public body board members. I report on my findings to other bodies, such as the Scottish Parliament itself in the case of MSPs and lobbyists and the Standards Commission for Scotland in the case of councillors and board members. These bodies then take their own view on whether a breach of the rules has occurred and, when it has, apply an appropriate sanction.

Our office is part of a system of checks and balances intended to both promote good conduct and to hold individuals to account when that conduct falls short of what is expected. Each part of this system has to work effectively in order for the public to have trust in it.

We also oversee the system made to appoint chairs and board members to the majority of the boards of public bodies in Scotland. Whilst not elected, the members of the boards of over 100 regulated public bodies in Scotland are responsible for providing the governance oversight of vital services that affect us all. These touch every aspect of our lives; from health to housing, the environment to education, the economy to enterprise, and the creative and cultural sectors and justice and policing to public transport. Each board within its different sector and particular remit provides strategic direction, scrutiny of performance and of course, stewardship of significant amounts of public money. It is in everyone's interests that these important public bodies are led by people who have a diverse range of the most appropriate skills and experience, who act with independence of thought, integrity and commitment and who are reflective of Scotland's geography, demography and breadth of experiences and insights.

Our role is to promote good practice in the making of these appointments, to encourage and enable improvements in board diversity and to report publicly when such practice isn't followed. Such reports present the Scottish Government and ourselves with opportunities to learn and improve on the appointments process.

[1] https://lordslibrary.parliament.uk/standards-in-public-life-and-the-democratic-process/

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This plan aims to inform MSPs, local authority councillors, public body board members and, of course, the people of Scotland, upon whose trust every elected individual and public authority relies, about what we will we do in the coming years. Just as importantly, it explains how we will fulfil our role in accordance with our core values. We recognise that many of the people who come into contact with us may be unhappy, aggrieved or upset. We have made a public commitment to treat each individual who comes into contact with us with us with kindness, empathy and respect. We are now surveying complainers and respondents, on an anonymous basis, on their experience of interacting with our office and on whether we are upholding these values. We have committed to publishing the results.

This plan also sets out a range of other metrics that we have adopted or plan to adopt to measure our performance and which we will use to demonstrate the value of our own contribution to public life. Below each of our overarching objectives are a set of sub-goals that are specific, measurable, achievable, realistic and time bound. We explain in this plan how and in what way they will contribute to the overarching objectives and to the ultimate outcomes that we intend to achieve.

Your views on these, and any other of the proposals set out in the following pages, will be gratefully received. The deadline for responses is **12 January 2024**, although if you require more time to respond please contact us to let us know. All responses and any enquiries you may have about our plans should be sent via email to info@ethicalstandards.org.uk.

Ian Bruce
Ethical Standards Commissioner
08 November 2023

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OUR PURPOSE, VALUES AND STRATEGIC OBJECTIVES

OUR PURPOSE

- To investigate without fear or favour complaints about lobbying and about the ethical conduct of elected officials and board members in public life in Scotland, through timely, proportionate, evidence-based investigations, and to report openly and transparently on our findings.

- To oversee public appointments in Scotland providing assurance that such roles are filled on merit, following a fair, respectful, open and inclusive appointments process that also ensures that those appointed are fit and proper persons.

- To facilitate good practice in public appointments, in Scotland and more widely, through guidance and support for Scottish Ministers and others.

- To run an effective parliamentary office-holder's office in accordance with our values and the principles of good governance and best value.

OUR VALUES

- We will conduct all of our activities in an ethical way, characterised by effective stewardship of public money, accountability, honesty, integrity, propriety, fairness and transparency.

- We will treat each individual and organisation that comes into contact with us with empathy, kindness and respect, recognising that we must earn their trust and ensure that our commitment to equality, diversity and inclusion informs all of our work.

- We welcome constructive criticism and challenge. If we get things wrong we will remedy our errors and learn from these in order to improve our future performance.

OUR STRATEGIC OBJECTIVES

- We will ensure that we have sufficient staff and resources in place to deliver on all of our objectives, building resilience and flexibility across roles and remits. We value people and recognise that unless we have staff who are valued and supported to maintain their wellbeing, feel happy in and proud of our work and the way in which we do it, we will have failed.

- We will ensure that our staff are properly trained, supported and developed to fulfil the requirements of their role and their career progression.

- We will make the best use of up to date and secure digital technology to support our work, enhance our users' experience and safeguard our systems.

- We will operate highly efficient and effective complaints handling processes that deliver consistent, evidence-based responses: ensuring fair and trusted outcomes.

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- We will engage meaningfully with our stakeholders to promote high standards in public life, listening to others' views and working constructively to improve our systems and processes.

- We will ensure appropriate systems of governance, quality review frameworks and robust external accreditation are in place, providing assurance to the public and stakeholders that our objectives are being met. We will also demonstrate our commitment to acquitting our environmental and social responsibilities.

- We will contribute significantly to the maintenance of an effective ethical standards framework through supportive and constructive engagement with equivalent bodies both here and in other administrations.

- We will, through supportive and constructive regulation, make a significant contribution to a public appointments system that produces effective and diverse boards that are reflective of the communities that they serve.

- We will strive to be recognised leaders in the regulation of a system that is effectively run to achieve the appointment of the most able people to our boards and that is managed in compliance with the highest ethical standards.

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OVERVIEW OF THE COMMISSIONER'S PLANS AND PRIORITIES

Some of the key changes we plan to deliver are:

- Greater assurance on quality than currently provided via new, revised and additional targets/KPIs, indicators and review systems, covering all aspects of our work, all of which will be consulted on and published.

- Improved governance designed to oversee and ensure delivery of our strategic objectives and that we are acquitting our functions and statutory and environmental and social obligations appropriately.

- Developing staff to ensure consistent high quality of our professional skills base, our knowledge and expertise in the topics that we are responsible for regulating and demonstrable adherence to our values as an office.

- Better complaints handling via a streamlined, quicker and higher quality service.

- More meaningful and constructive engagement with the media, the public, the Scottish Ministers, the Scottish Parliament, the Standards Commission for Scotland, MSPs, public body board members, local authority councillors, monitoring officers and representative organisations such as COSLA, SOLAR and SOLACE to inform and shape our work and our performance.

- Maintaining and regularly updating a coherent, comprehensive suite of procedures covering our appointments and investigatory work, which we'll publish and refresh on our website so people know what to expect.

- Revising Diversity Delivers, the strategy intended to improve on the diversity of Scotland's public body boards through equality of opportunity and inclusion, and overseeing and assisting with the implementation of its recommendations.

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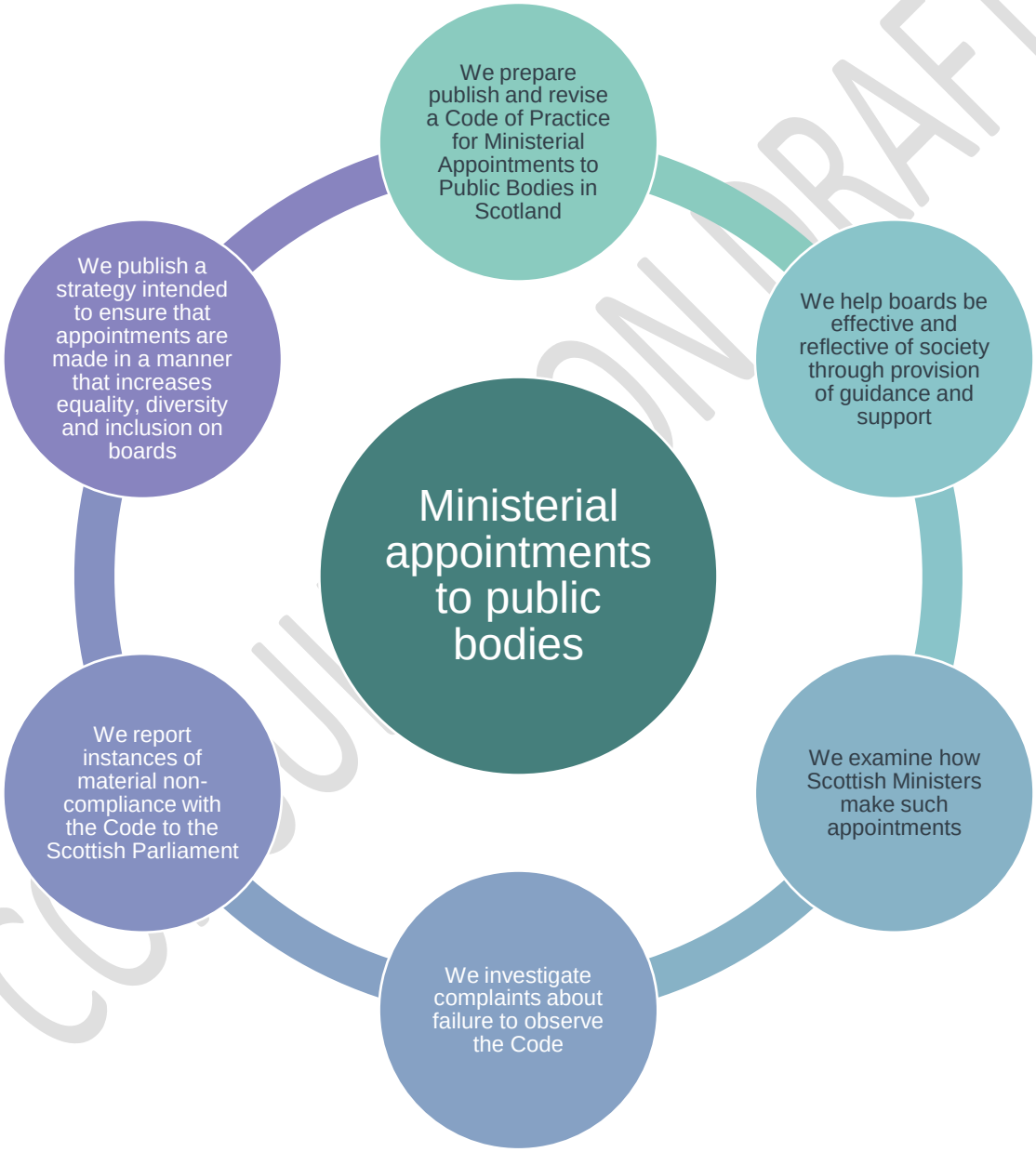
OUR STATUTORY FUNCTIONS

The Commissioner has a broad range of statutory functions which can be summarised as:

- regulation of ministerial appointments to public bodies
- complaints handling

REGULATION OF MINISTERIAL APPOINTMENTS TO PUBLIC BODIES



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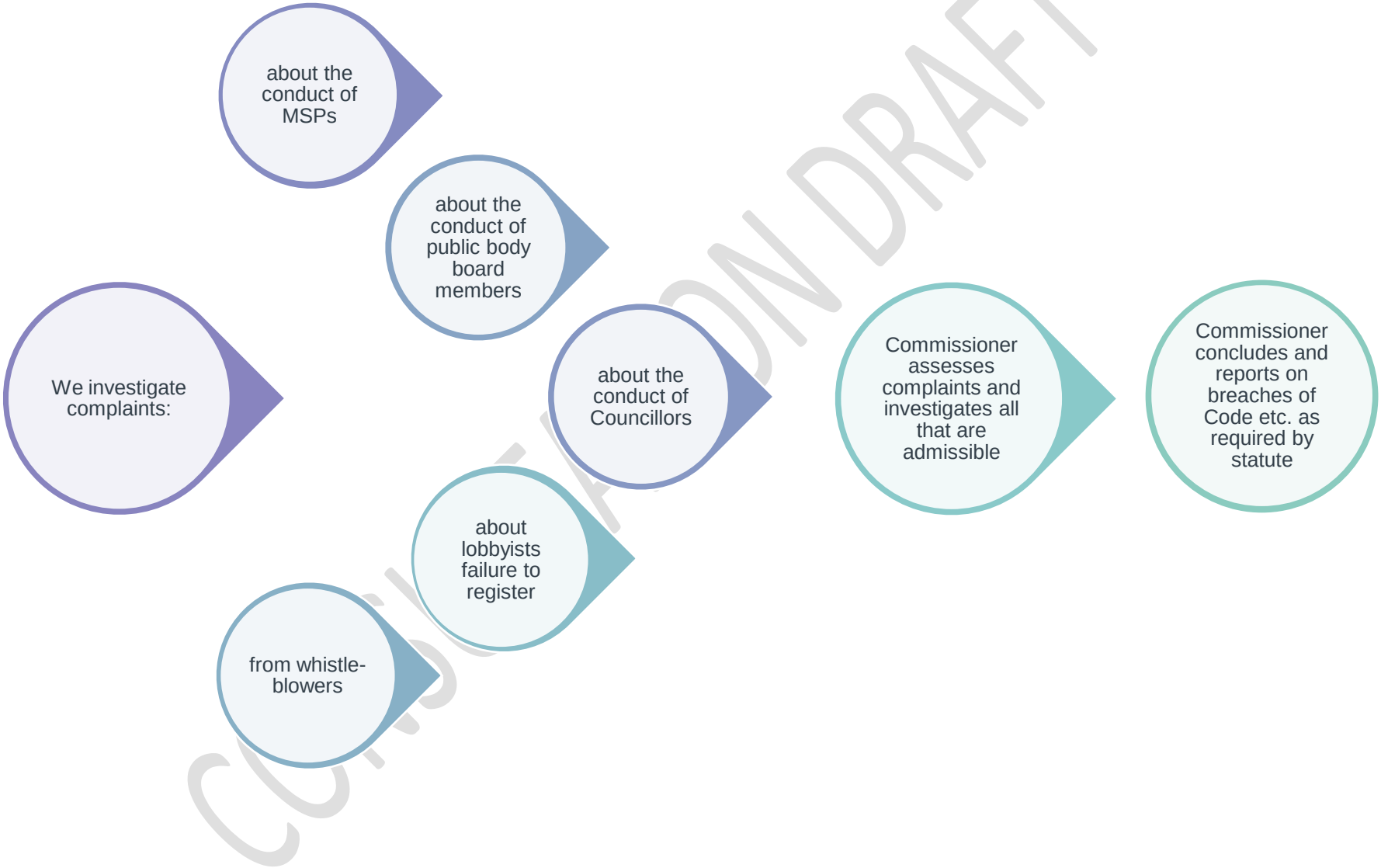
COMPLAINTS HANDLING



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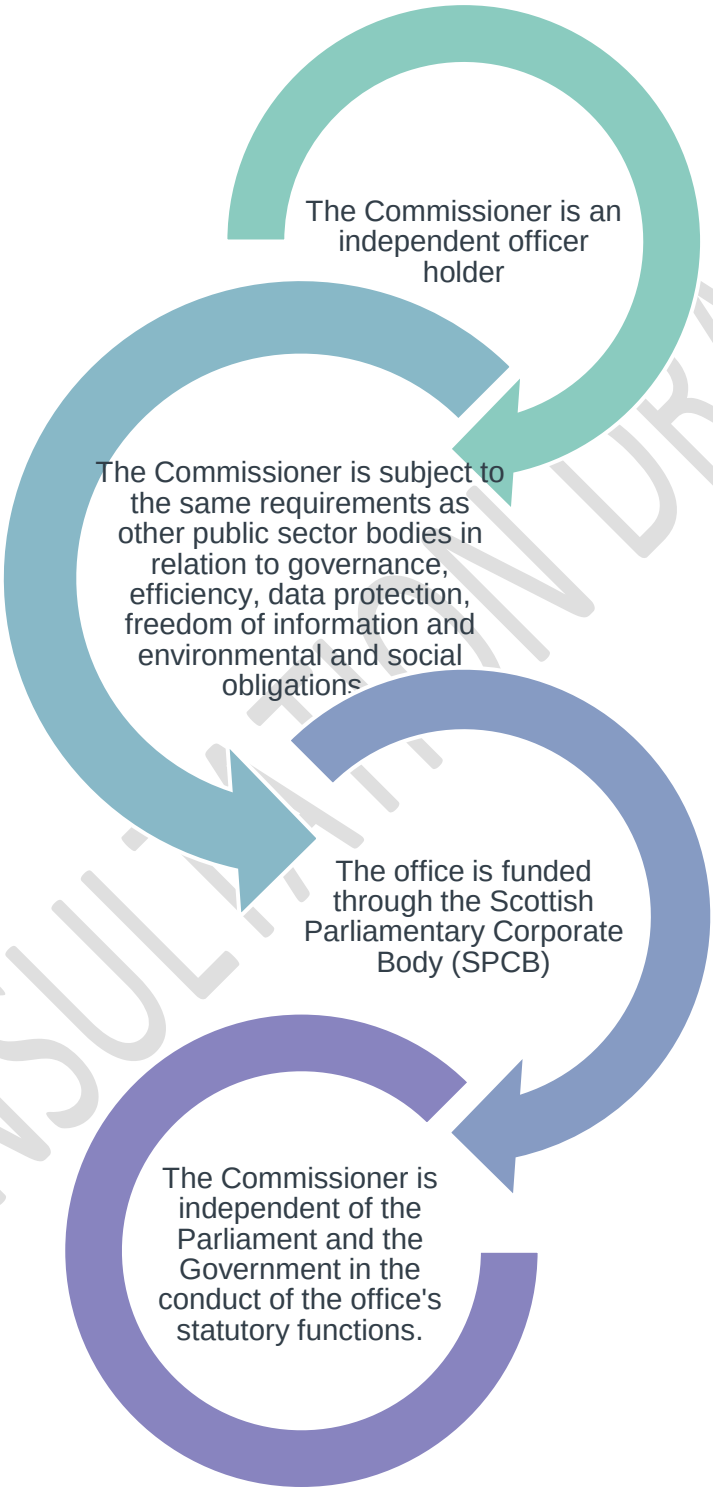
The Commissioner's remit is statutory. All relevant statutes are listed in Appendix 1.

ABOUT THE COMMISSIONER'S OFFICE



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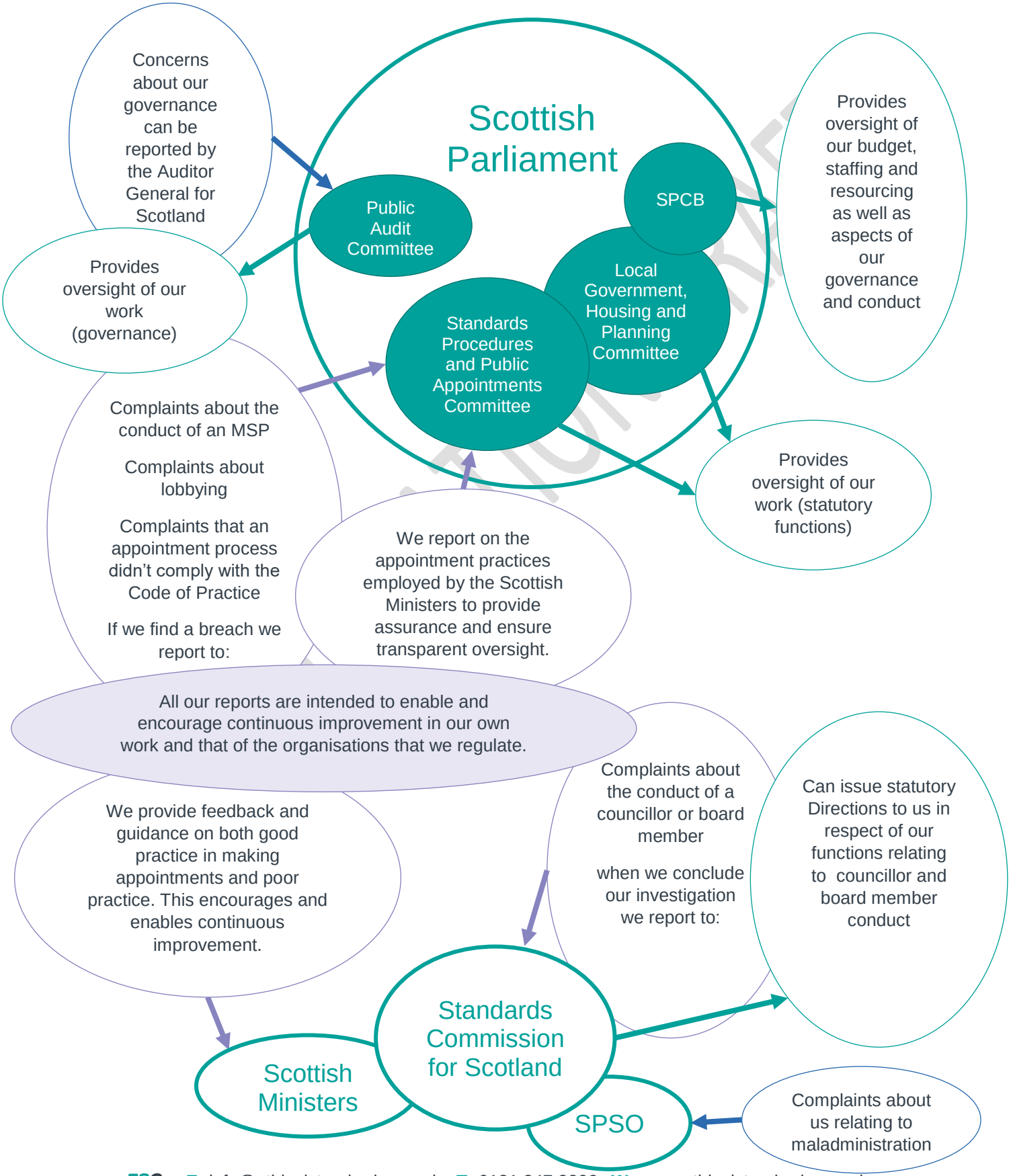
OUR OVERSIGHT AND REPORTING LINES



OPERATIONAL CONTEXT

Our office operates in a demand driven environment, with the volume of public appointment rounds and incoming complaints both fluctuating over time. During the period covered by this strategic plan, we intend to conduct research with a view to assessing whether certain factors lead to increases or decreases in the demands placed upon us. This should assist us to plan more effectively in future for spikes and troughs in activity. In the meantime, we are still operating with a backlog of cases, although it has been reduced significantly in recent months following the recruitment and induction of new investigations team members.

What we do know is that there is an overall trend in increasing complaints about discourtesy and disrespect on the part of elected officials, including when using social media. We do not anticipate that this trend will diminish, unless, alongside the Standards Commission for Scotland, the Scottish Parliament and other key stakeholders, we can leverage the ethical standards framework to encourage more respectful debate on matters of public interest. This will be challenging, given that heated debates on contentious issues are increasingly polarised.

We recognise also that public trust in those who are elected to serve has been eroded during the period of our last strategic plan. We intend to do more to publicise our work in the coming years with a view to providing assurance about the integrity of the public appointments process and ethical conduct in Scotland more generally.

Our working practices changed significantly during the Covid pandemic, with staff working exclusively remotely for extended periods during lockdown. We have gradually adopted a flexible approach to accommodate staff preferences. Based on a survey of those preferences, we are now hybrid working, with a mix of physical attendance and remote attendance the norm. We have revised our physical office and ICT arrangements to reflect these practices and will continue to monitor the situation for the period of this plan, as they have ramifications for our accommodation needs, our productivity and our environmental and social impact.

We also face the same challenges as all public sector organisations and as reflected in our register of key operational risks for our office. Threats to our cybersecurity are increasing, so our maintenance of Cyber Essentials plus accreditation remains vital, as do the other measures we have taken to mitigate the risk of such attacks.

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CONTRIBUTION TO NATIONAL PERFORMANCE FRAMEWORK

The Commissioner's activities are relevant to the people, prevention, performance and partnership elements of the Scottish Government's reform agenda for public services.

- The existence of an independent body responsible for investigating and reporting on alleged breaches of the various codes of conduct contributes to prevention and to performance, and to the maintenance of public confidence in the ethical standards observed by many institutions which are responsible for the development and implementation of public policy and for the delivery of public services.

- The Commissioner's public appointments work, and in particular the role of the Public Appointments Advisers' (PAAs') and the Commissioner's engagement with the Scottish Government officials tasked with enhancing board appointments and governance, contributes to the people, performance and partnership elements of the reform agenda, and to the wider human rights outcome by promoting equality of opportunity and diversity in the public appointments process. We are also committed to equality, diversity and inclusion in our own work, in our interactions with others and in relation to our staff. Assurance that appointments are made on merit and that the process secures diverse boards also contributes to performance against the framework. Good governance of our public bodies will not be attained without diverse boards populated by people who are effective in their roles.

EQUALITY, DIVERSITY AND INCLUSION

- As with other public authorities, the Commissioner's office is subject to the Public Sector Equality Duty (PSED). Equality and the PSED are at the heart of and inform all of our work. We will ensure all staff know how to meet the duty in their work, so they can carry out their roles effectively. We will also collect and analyse demographic data and qualitative views to ensure that our policies and practices are equitable and meet the needs of people, regardless of the protected characteristics that they share.

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OUR STRATEGIC OBJECTIVES AND GOALS

- **We will ensure that we have sufficient staff and resources in place to deliver on all of our objectives, building resilience and flexibility across roles and remits. We value people and recognise that unless we have staff who are valued and supported to maintain their wellbeing, feel happy in and proud of our work and the way in which we do it, we will have failed.**

To achieve this objective, we will:

- Ensure a robust workforce plan is in place to provide resilience and sufficient resources within all teams that sets out clear strategies for workforce profiling, succession planning, sickness absence, role progression and recruitment
- Ensure a bespoke Standard Operating Procedure[2] (SOP) is in place covering all key processes within each team
- Ensure an appropriate Scheme of Delegation[3] (SoD) is in place within each team
- Map out and explore opportunities for cross functional working across the different sections of the office.
- Review sufficiency of current arrangements (modelling of capacity in teams based on different parameters in complaint volumes, appointment activity and other core functions)
- Have each section of the office contribute to budgetary submissions to the Scottish Parliamentary Corporate Body (SPCB) to ensure appropriate resources are in place to continue to meet demands.
- Ensure continuing external wellbeing support is available for staff.
- Survey staff on their wellbeing and act on the results.
- Achieve one or more accreditations to recognise our status as a good employer
- Improve employee experience through the use of streamlined HR processes and systems
- Improve employee voice and engagement to build on the strong sense of community within ESC

- **We will ensure that our staff are properly trained, supported and developed to fulfil the requirements of their role and their career progression.**

To achieve this objective, we will:

- Provide appropriate line manager training to ensure appropriate support for each staff member by way of regular performance review conversations
- Ensure office wide training is available as required and each team has capacity to participate
- Develop a bespoke personal development plan for each staff member

[2] An SOP (Standard Operating Procedure) is a set of written instructions that describes the step-by-step process that must be taken to properly perform a routine activity.
[3] A SoD (Scheme of Delegation) is a reference document intended to set out where responsibilities and accountabilities lie within a structure.

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- Identify areas for development and ensure all staff have access to on-going training and development relevant to their work
- Ensure all staff have opportunities to undertake peer reviews and other types of quality assurance work as part of their on-going career development.
- Identify appropriate sources to provide training and ensure funding in place
- Utilise the wide range of skills available within the PAA team to facilitate organisational and individual training and development
- Provide opportunities for professional development in specialised areas (eg paralegal, governance, application of Articles of the European Court of Human Rights and associated case law, recruitment and selection and equality, diversity and inclusion etc)
- Provide opportunities for staff to attend relevant conferences and webinars etc both on-line and in person
- Ensure performance management framework is in place, kept updated and adhered to in supporting and developing staff

- **We will make the best use of up to date and secure digital technology to support our work, enhance our users' experience and safeguard our systems.**

To achieve this objective, we will:

- Adopt scalable systems – adaptable to staffing changes and scope of business.
- Enhance the fully hybrid working experience (e.g. same for everyone no matter location; removing remote desktop)
- Develop a user IT reference and support hub (ESC's own KnowledgeHub)
- Develop systems that work with the team, not against
- Develop resilient systems with minimum downtime which are data secure/safe
- Migrate to the Cloud; this would involve transferring all data and some systems currently held on the server to M365/Sharepoint.
- Maintain Cyber Essentials+ accreditation
- Identify, assess and remove any redundant hardware (action for 2023/24)
- Update the website to ensure secure and enhanced experience (upgrading and introducing 2FA)
- Make improvements to our existing Complaints Management System (CMS) to ensure it better supports the standards team to work more efficiently.
- Explore options to replace the CMS, including engaging with potential suppliers and develop a bespoke specification that meets the future requirement of a complaints management system.
- Develop new approaches to improve the retention and deletion of records and ensure existing records are managed in accordance with records management policies
- Ensure all staff engage in and are regularly trained on and familiar with guidance on all aspects of cyber security and other digital matters relating to their role.

- **We will operate highly efficient and effective complaints handling processes that deliver consistent, evidence-based responses: ensuring fair and trusted outcomes.**

To achieve this objective, we will:

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- Clear the backlog of cases and put in place Key Performance Indicators (KPIs) to drive greater efficiency in case disposals.
- Ensure systems in place to prevent a backlog arising and systems in place to clear a backlog where one arises and monitor any impact that this may have on the quality of investigations carried out.
- Ensure all complaints and cases continue to follow all relevant stages set out in the Investigations Manual but adopting a flexible approach to ensure that investigatory activity is proportionate to the facts and circumstances of each case
- Review, revise and update the Investigations Manual on a regular basis and seek opportunities for appropriate third party peer review on an annualised basis
- Develop additional outputs to sit alongside the manual as required, such as the creation and maintenance of a KPI tracker to monitor and report on KPIs
- Monitor and report on performance through use of KPIs with a view to either meeting or exceeding stretch targets[4]
- Provide refresher trainer to all staff on the investigations manual
- Seek new ways of working which enhance efficiency, effectiveness and quality of our work as part of our commitment to continuing improvement
- Benchmark our investigations procedures and KPIs from equivalent external bodies and ensure they are externally validated.
- Conduct research to identify trends in public appointments and complaint volumes and report publicly on our findings. Use the results of that same research for strategic and business planning purposes.

- **We will engage meaningfully with our stakeholders to promote high standards in public life, listening to others' views and working constructively to improve our systems and processes.**

To achieve this objective, we will:

- Develop and ensure each team understands key messages for stakeholders
- Develop a stakeholder engagement plan, using the Boston Matrix[5] approach
- Develop a programme of activity with key stakeholders
- Increase opportunities for stakeholders to provide feedback to us through on-line surveys, focus groups etc
- Ensure we communicate effectively with all stakeholders, using plain English wherever possible.
- Ensure we are as accessible as possible to complaint users and others, regularly reviewing out approach and making reasonable adjustments wherever required.
- Listen and take account of the feedback received from stakeholders using the methods above, and reporting transparently on actions taken to improve our systems and processes and, where not taken, why not

- **We will ensure appropriate systems of governance, quality review frameworks and robust external accreditation are in place, providing assurance to the public**

[4] We will revise our KPIs on an ongoing basis to make them more challenging to achieve, with a view to driving up quality and speed of investigations.

[5] Boston Matrix is a tool to help identify and categorise stakeholders in a clear and consistent manner.

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and stakeholders that our objectives are being met. We will also demonstrate our commitment to acquitting our environmental and social responsibilities.

To achieve this objective, we will:

- Develop a single governance framework document
- Develop a robust policy management process to ensure that no policy is "stale" and all are reviewed within stated timescales
- Improve retention and deletion of records – meeting legal obligations and streamlining processing of information requests.
- Develop and put in place a quality assurance framework covering hot, cold and peer reviews[6] covering all aspects of the office's activities
- Introduce root cause analysis (RCA) techniques to identify and resolve underlying cause of a particular issue
- Report publicly on the outcomes from quality reviews
- Take forward a programme of work designed to ensure that our decision-making is in keeping with relevant case law, precedents and the decisions of relevant adjudicatory bodies, so we can evidence that the approach to our work remains consistent and stands up to external challenge.

- **We will contribute significantly to the maintenance of an effective ethical standards framework through supportive and constructive engagement with equivalent bodies both here and in other administrations.**

To achieve this objective, we will:

- Engage with other Commissioners in the UK and other bodies with similar functions for learning and to share good practice.
- Provide opportunities for staff to stay updated with case and legislative developments in the ethical standards framework
- Respond to or engage with future consultations and opportunities to input views to revisions/updates to the ethical standards framework and related topics both here in Scotland and outwith
- Ensure constructive feedback from our stakeholders is recorded, considered and, where applicable, implemented to improve how we work.

- **We will, through supportive and constructive regulation, make a significant contribution to a public appointments system that produces effective and diverse boards that are reflective of the communities that they serve.**

- We will continue to support implementation of the 2022 Code of Practice, through supportive and constructive regulation, encouraging a learning mindset from all who are involved in making appointments, to develop and utilise good practice and innovation.
- We will report publicly on the difference that the Code of Practice is making to the appointments process, for good or bad, with a view to improving on practices. We will do

[6] From a standards team perspective, a hot review would be conducted during the course of a live investigation. A cold review would be conducted on a completed investigation and where the report has been issued. Peer reviews are used in relation to key stages of an investigation. All types of review would focus on compliance with certain aspects of the investigations manual and on quality assurance and consistency of approach.

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so by publicising instances of good practice or innovative practice and learning as well as areas for improvement.
- We will seek to understand through our research the difference that board appointments make to the governance of the public body and the difference that diversity brings.

- **We will strive to be recognised leaders in the regulation of a system that is effectively run to achieve the appointment of the most able people to our boards and that is managed in compliance with the highest ethical standards.**

    - We will consult extensively on and revise and republish Diversity Delivers (including new recommendations for the achievement of greater board diversity).
    - We will develop our own learning and understanding about great practice in recruitment and selection by reaching out to other organisations and administrations and by conducting our own research.
    - We will share our findings through the provision of guidance.

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HOW WE WILL REPORT ON PROGRESS

We will report progress against the strategic plan through our:

- Annual Report and Accounts
- Regular publication of minutes of Senior Management Team meetings at which progress will be discussed and recorded
- Publication of progress against all activities and goals set out below the strategic objectives listed above in the form of annual biennial plan progress reports.

The annual report and minutes will also set out progress against the published business plan.

The biennial business plan sets out the activities of the organisation and how they support the delivery of our strategic objectives. The plan is a mixture of regular business as usual activity as well as actions to deliver specific pieces of work. It will include references to operational performance indicators, targets, monitoring mechanisms and quality standards for the organisation. We recognise that we must have clear metrics for all of our proposed goals. These are set out in Appendix 4 to this plan alongside an explanation for why they have been adopted and why we consider they represent a reasonable measure of success or failure, as appropriate.

These will be reviewed annually on a rolling basis.

Progress will also be reported via the following channels, with all publications available on our website and highlighted on social media as appropriate:

- Reports and evidence to the relevant subject committees of the Scottish Parliament
- Specific reports required by legislation and national guidance
- Special reports
- Publications of documents such as governance reports
- Ad hoc reports
- Good practice case studies on our website, to celebrate and encourage wider adoption

The results of our engagement with a range of stakeholders using surveys and other methods will also be reported on.

The individuals and organisations that we are consulting in order to develop this strategic plan are included in Appendix 3.

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COSTS

We recognise that public sector resources are limited and understand that we must review, scrutinise and report publicly on our work to ensure best value and continuous improvement.

The following table shows current expenditure projected over the period of this plan, assuming no change in real terms. This budget is the minimum required to deliver current statutory functions to published standards and timescales.

	2024/25	2025/26	2026/27	2027/28
	Revised Budget Bid	Indicative Budget	Indicative Budget	Indicative Budget
Staff Costs	1,402,500	1,497,100	1,556,000	1,604,000
Staff Related Costs	23,800	25,300	26,200	27,000
Property Costs	106,000	109,700	112,700	116,000
Professional Fees	165,000	170,100	167,900	171,000
Running Costs	74,900	78,800	80,400	83,000
Sub-total	**1,772,200**	**1,881,000**	**1,943,200**	**2,001,000**
Capital Expenditure	5,800	10,000	8,200	10,000
TOTALS	**1,778,000**	**1,891,000**	**1,951,400**	**2,011,000**

These budgets take account of the fact that the majority of our work is demand led. They will be refined each year to reflect any significant changes and agreed with the Scottish Parliamentary Corporate Body. Changes to the budget may be driven by external forces, such as pay increases and adjustments to pension contribution rates. Funding for additional specific projects supporting this strategic plan will be sought as part of the annual budget exercise. An indication of these costs is given in the table on the following page. Where possible, we will absorb these costs in the existing budget.

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Strategic objective		2024/25	2025/26	2026/27	2027/28
1	We will ensure that we have sufficient staff and resources in place to deliver on all of our objectives, building resilience and flexibility across roles and remits. We value people and recognise that unless we have staff who are valued and supported to maintain their wellbeing, feel happy in and proud of our work and the way in which we do it, we will have failed. All actions in support of this objective will be undertaken inhouse or within our agreed annual budget. We have already identified specific costs associated with the following action. These costs have been incorporated into existing budget bids.				
i)	External accreditation of status as good employer	£3,500	£3,500		
2	We will ensure that our staff are properly trained, supported and developed to fulfil the requirements of their role and their career progression. All actions in support of this objective will be undertaken inhouse or within our agreed annual budget. The costs associated with the following action are estimated and we may be able to incorporate into existing budgets.				
h)	Professional development in key specialist areas		£2,000	£2,000	£2,000
3	We will make the best use of up to date and secure digital technology to support our work, enhance our users' experience and safeguard our systems. All actions in support of this objective will be undertaken inhouse or within our agreed annual budget. We have already identified specific costs associated with the following action. These costs have been incorporated into existing budget bids.				
g)	Maintain Cyber Essentials+ accreditation	£3,000	£3,100	£3,200	£3,300
4	We will operate highly efficient and effective complaints handling processes that deliver consistent, evidence-based responses: ensuring fair and trusted outcomes. All actions in support of this objective will be undertaken inhouse or within our agreed annual budget.				
5	We will engage meaningfully with our stakeholders to promote high standards in public life, listening to others' views and working constructively to improve our systems and processes. All actions in support of this objective will be undertaken inhouse or within our agreed annual budget.				
6	We will ensure appropriate systems of governance, quality review frameworks and robust external accreditation are in place, providing assurance to the public and stakeholders that our objectives are being met. We will also demonstrate our commitment to acquitting our environmental and social responsibilities.				

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Strategic objective	2024/25	2025/26	2026/27	2027/28
	All actions in support of this objective will be undertaken inhouse or within our agreed annual budget.			
7	We will contribute significantly to the maintenance of an effective ethical standards framework through supportive and constructive engagement with equivalent bodies both here and in other administrations. All actions in support of this objective will be undertaken inhouse or within our agreed annual budget.			
8	We will, through supportive and constructive regulation, make a significant contribution to a public appointments system that produces effective and diverse boards that are reflective of the communities that they serve. All actions in support of this objective will be undertaken inhouse or within our agreed annual budget.			
9	We will strive to be recognised leaders in the regulation of a system that is effectively run to achieve the appointment of the most able people to our boards and that is managed in compliance with the highest ethical standards. All actions in support of this objective will be undertaken inhouse or within our agreed annual budget.			

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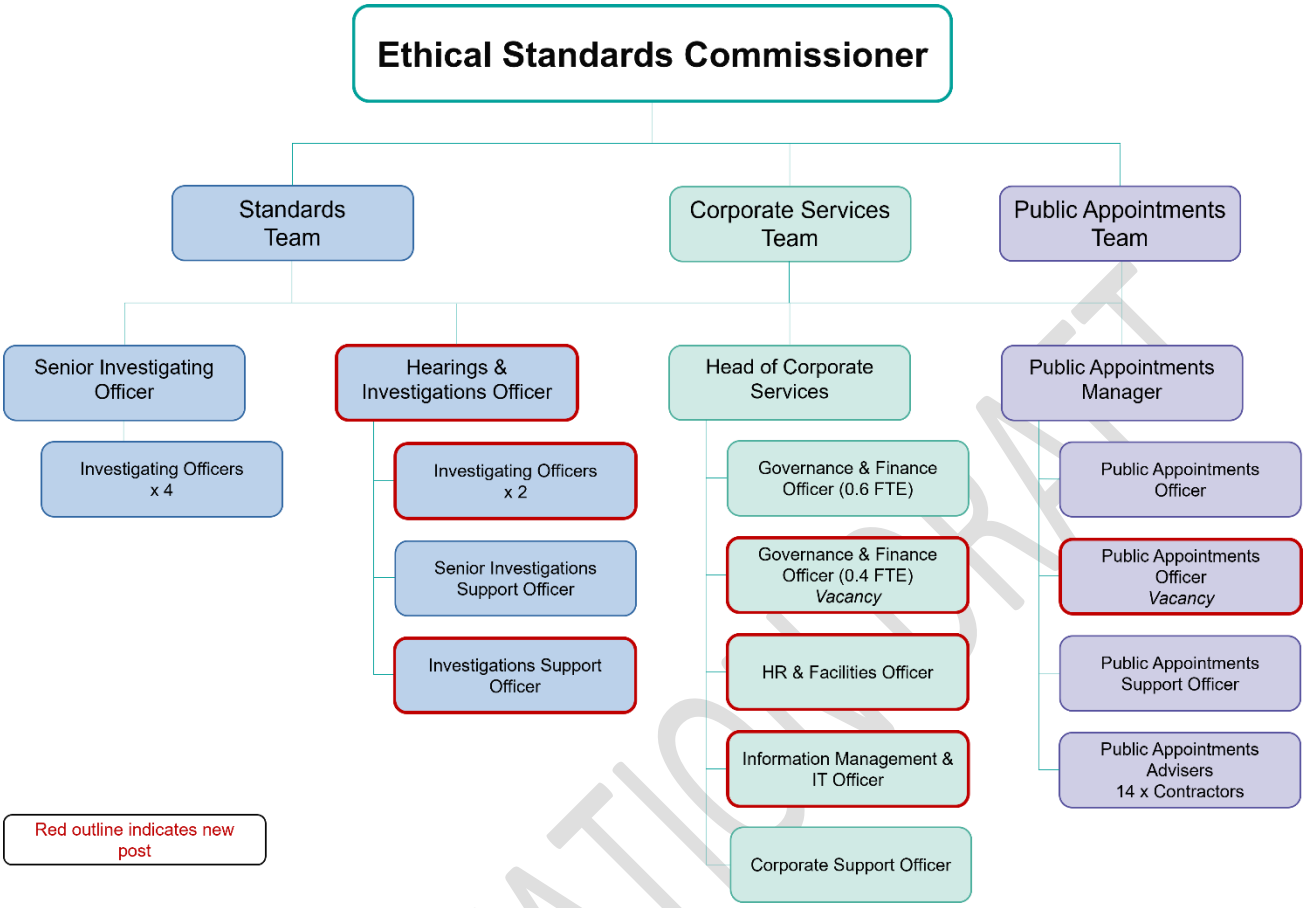
OUR STRUCTURE



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TIMEFRAME

Detailed delivery dates for our strategic objectives in year one are published in our Biennial Business Plan 2023-2025 available on our website. Delivery dates for all goals sitting under the strategic objectives are being planned currently and will be published in successive business plans for each two year period up to 2028.

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APPENDIX 1

STATUTORY PROVISIONS

The Commissioner's functions in relation to public standards were originally set out in

a) the Ethical Standards in Public Life etc. (Scotland) Act 2000 (the Ethical Standards Act), and

b) the Scottish Parliamentary Standards Commissioner Act 2002 (the Parliamentary Standards Act).

The Commissioner's functions in relation to public appointments were set out in the Public Appointments and Public Bodies etc. (Scotland) Act 2003 (the Public Appointments Act).

Revisions to the institutional arrangements and performance requirements were set out in the Scottish Parliamentary Commissions and Commissioners etc Act 2010, and in The Public Services Reform (Commissioner for Ethical Standards in Public Life in Scotland etc.) Order 2013 (Scottish Statutory Instrument 2013/197)

The remit was extended by the Interests of Members of the Scottish Parliament (Amendment) Act 2016 and by the Lobbying (Scotland) Act 2016.

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APPENDIX 2

WHAT WE DO

1. We investigate complaints about the conduct of MSPs, local authority councillors and board members of public bodies.

   Standards of behaviour are set out in codes of conduct for MSPs, councillors and board members.

   Where the Commissioner has concluded his investigation, he will report to
   - the Standards Commission for Scotland, in the case of councillors and board and
   - to the Scottish Parliament, in the case of MSPs and where in his view a breach of the relevant provisions has occurred.

   The Commissioner also investigates complaints about lobbyists, where they fail to register or supply certain information to the Scottish Parliament. Any breach is reported to the Scottish Parliament.

2. We regulate how the Scottish Ministers make appointments to the boards of regulated public bodies. The Commissioner has the power to:
   - prepare and publish and, as necessary, revise a Code of Practice for Ministerial Appointments to Public Bodies in Scotland
   - issue guidance on the Code
   - examine how the Scottish Ministers are making appointments and in particular assess whether they are following the Code of Practice, and
   - report any serious instances of non-compliance to the Scottish Parliament

   We must also ensure that, as far as possible, appointments are made fairly and openly and allow everyone, where reasonably practicable, the opportunity to be considered for an appointment.

Details of the legislation underpinning these functions are available on our website.

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APPENDIX 3

The individuals and organisations with a stake in our work, and with whom we are consulting on this plan.

- The Scottish Parliament
- The Scottish Government
- The Standards Commission for Scotland
- COSLA
- The Society of Local Authority Lawyers & Administrators in Scotland
- SOLACE Scotland
- Chief Executives and Council Leaders of all Local Authorities in Scotland

Aberdeen City Council
Aberdeenshire Council
Angus Council
Argyll and Bute Council
City of Edinburgh Council
Clackmannanshire Council
Comhairle nan Eilean Siar
Dumfries and Galloway Council
Dundee City Council
East Ayrshire Council
East Dunbartonshire Council
East Lothian Council
East Renfrewshire Council
Falkirk Council
Fife Council
Glasgow City Council
Highland Council
Inverclyde Council
Midlothian Council
Moray Council
North Ayrshire Council
North Lanarkshire Council
Orkney Islands Council
Perth and Kinross Council
Renfrewshire Council
Shetland Islands Council
South Ayrshire Council
South Lanarkshire Council
Stirling Council
West Dunbartonshire Council
West Lothian Council
Scottish Borders Council

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- The Chairs of Public Bodies

North East Scotland College
the Accounts Commission for Scotland
Architecture and Design Scotland
Ayrshire Regional College
the Bord na Gaidhlig
Borders NHS
Borders Regional College
the Cairngorms National Park Authority
Caledonian Maritime Assets Ltd
Forth Valley College
Children's Hearings Scotland
NHS National Services Scotland
Community Justice Scotland
Creative Scotland
the Crofting Commission
Crown Estate Scotland
Dumfries & Galloway Regional College
Dundee and Angus Regional College
Edinburgh Regional College
Fife Regional College
Food Standards Scotland
Grampian NHS
Highland NHS
Highlands and Islands Airports Ltd
Highlands and Islands Enterprise
Historic Environment Scotland
the Independent Living Fund
the Judicial Appointments Board for Scotland
the Regional Board for Lanarkshire Colleges
the Local Government Boundary Commission for Scotland
Lothian NHS
the Mental Welfare Commission for Scotland
the Mobility and Access Committee for Scotland
the National Galleries of Scotland
the National Library of Scotland
the National Museums of Scotland
NHS 24
the Office of the Scottish Charity Regulator
Orkney NHS
Quality Meat Scotland
the Risk Management Authority
the Royal Botanic Garden Edinburgh
the Schools Closure Review Panel
the Scottish Agricultural Wages Board
the Scottish Ambulance Service
the Scottish Children's Reporter Administration
the Scottish Commission on Social Security
Scottish Enterprise
the Scottish Further & Higher Education Funding Council
the Scottish Futures Trust
the Scottish Housing Regulator
the Scottish Land Commission

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the Scottish Law Commission
the Scottish Police Authority
the Scottish Social Services Council
Skills Development Scotland
VisitScotland
the Water Industry Commission for Scotland
West Lothian Regional College
Western Isles NHS
Scottish Advisory Committee on Distinction Awards
City of Glasgow College
Glasgow Clyde College
Glasgow Kelvin College
Inverness College
Lews Castle College
North Highland College
Perth College
Ayrshire and Arran NHS
the Care Inspectorate
David MacBrayne Ltd
Dumfries and Galloway NHS
Fife NHS
Forth Valley NHS
Greater Glasgow and Clyde NHS
Healthcare Improvement Scotland
Lanarkshire NHS
Loch Lomond and the Trossachs National Park Authority
NHS Education for Scotland
the Parole Board for Scotland
the Poverty and Inequality Commission
Public Health Scotland
Revenue Scotland
the Scottish Criminal Cases Review Commission
the Scottish Environment Protection Agency
the Scottish Fire and Rescue Service
the Scottish Legal Aid Board
the Scottish Legal Complaints Commission
the Scottish Qualifications Authority
Scottish Water
Shetland NHS
South of Scotland Enterprise
sportscotland
the State Hospitals Board for Scotland
Tayside NHS
West Regional College
the Regional Board for Glasgow Colleges
the Golden Jubilee Foundation Board
the Scottish Fiscal Commission
Scottish Natural Heritage
Scottish Canals
Moray College
East Ayrshire Health and Social Care Partnership
North Ayrshire Integration Joint Board
South Ayrshire Integration Joint Board
Scottish Borders Health and Social Care Integration Joint Board
Dumfries and Galloway Integration Joint Board

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Fife Integration Joint Board
Clackmannanshire and Stirling Integration Joint Board
Falkirk Health and Social Care Partnership
Aberdeen City Integration Joint Board
Aberdeenshire Integration Joint Board
Moray Integration Joint Board
East Dunbartonshire Health and Social Care Partnership Integration Joint Board
East Renfrewshire Integration Joint Board
Glasgow City Integration Joint Board
Inverclyde Integration Joint Board
Renfrewshire Integration Joint Board
West Dunbartonshire Integration Joint Board
Argyll and Bute Integration Joint Board
Highland Health and Social Care Partnership
North Lanarkshire Health and Social Care Integration Joint Board
South Lanarkshire Integration Joint Board
City of Edinburgh Integration Joint Board
East Lothian Integration Joint Board
Midlothian Integration Joint Board
West Lothian Integration Joint Board
Orkney Islands Integration Joint Board
Shetland Islands Integration Joint Board
Angus Integration Joint Board
Dundee Heath and Social Care Partnership
Perth and Kinross Joint Integration Board
Western Isles Integration Joint Board
Highlands and Islands Regional transport partnership
North-East of Scotland Regional transport partnership
Shetland Regional transport partnership
South-East of Scotland Regional transport partnership
South-West of Scotland Regional transport partnership
Strathclyde Regional transport partnership
Tayside and Central Scotland Regional transport partnership

Additionally, the Chairs of NHS Boards as a separate group

- Equalities Organisations

Inclusion Scotland
the Equality and Human Rights Commission Scotland
CEMVO
Age Scotland
the Scottish Women's Convention
MECOPP
Changing the Chemistry
Stonewall Scotland
the Scottish Youth Parliament
BEMIS
Women on Boards
the Equality Network
Disability Equality Scotland
the Coalition for Racial Equality and Rights
Neish Training
Young Scot

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LGBT Youth Scotland
EQUATE Scotland
the Glasgow Centre for Inclusive Living
VOX Scotland
Youth Scotland
Engender
the First Minister's National Advisory Council on Women and Girls
Close the Gap
the University of the West of Scotland
Heriot-Watt University
PATH Scotland
the West of Scotland Regional Equality Council
Central Scotland Regional Equality Council
Edinburgh and Lothians Regional Equality Council

- Other Significant Organisations

Accounts Commission for Scotland
Audit Scotland
Chartered Institute of Public Finance and Accountancy
Colleges Scotland
Committee on Standards in Public Life
Institute of Chartered Accountants of Scotland
Institute of Directors Scotland
Law Society of Scotland
Office of the Commissioner for Public Appointments
Office of the Commissioner for Public Appointments in Northern Ireland
Scottish Chambers of Commerce
Scottish Council for Voluntary Organisations
Scottish Human Rights Commission
Scottish Public Services Ombudsman
Scottish Trades Union Congress
The Children and Young People's Commissioner Scotland
the Improvement Service

- Public Appointments Advisers

Di Airey
Neelam Bakshi
Jayam Dalal
Matt Drynan
Kay Hampton
Ali Jarvis
Paul Matheson
Bill Smith
Alec Spencer
Duncan Wallace
Heidi Winser
Sue Young

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APPENDIX 4

Metrics used to assess our performance against our goals.

In drafting this plan we had regard to the OECD guidance on assessing the effectiveness of regulatory interventions[7]. We concluded that we could use a range of quantitative and qualitative measures in an endeavour to demonstrate the impact of our work. These include reporting on our activities and positing proxy measures for changes in the behaviours and outcomes that the activities are intended to drive. The details are set out in the tables below. Considerably more detail on the measures and target dates for achievement are set out in our business plans, which are published online, and in our action plans.

- **We will ensure that we have sufficient staff and resources in place to deliver on all of our objectives, building resilience and flexibility across roles and remits. We value people and recognise that unless we have staff who are valued and supported to maintain their wellbeing, feel happy in and proud of our work and the way in which we do it, we will have failed.**

Measure	What achieved
Robust workforce plan is in place and independently accredited	Demonstrable that sufficient staff in place and organisation sufficiently resilient to fulfil all functions.
Standard Operating Procedure[8] (SOP) is in place covering all key processes within each team	Corporate memory embedded improving resilience and efficiency, regardless of unanticipated staff turnover.
An appropriate Scheme of Delegation[9] (SoD) is in place within each team	Decisions are devolved to the most appropriate roles, improving overall efficiency.
Opportunities for cross functional working across the different sections of the office are identified.	Improve resilience and staff satisfaction and personal development.
Sufficiency of current staffing arrangements independently reviewed.	Provides internal and external assurance that workforce planning has been effective.
Budget submissions to the SPCB are evidence based and related directly to planned activity.	Ensure appropriate resources are in place to continue to meet demands.
Ensure continuing external wellbeing support is available for staff.	Staff have access to a free, confidential support service, maintaining or improving their mental health and wellbeing.

[7] https://www.oecd.org/gov/regulatory-policy/1_coglianese%20web.pdf

[8] An SoP (Standard Operating Procedure) is a set of written instructions that describes the step-by-step process that must be taken to properly perform a routine activity.

[9] A SoD (Scheme of Delegation) is a reference document intended to set out where responsibilities and accountabilities lie within a structure.

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Measure	What achieved
Staff wellbeing survey conducted. SMT takes action to address any identified concerns.	The organisation understands if staff have concerns about wellbeing and puts measures in place to address them.
Achieve one or more accreditations to recognise our status as a good employer	External validation of our status as a good employer.
HR processes and systems are more streamlined.	Employee experience of our systems improved.
New mechanisms adopted to improve employee voice and engagement to build on the strong sense of community within ESC	A more engaged workforce leads to greater levels of collaboration and better decision making.

- **We will ensure that our staff are properly trained, supported and developed to fulfil the requirements of their role and their career progression.**

Measure	What achieved
All line managers trained in management and performance reviews. Regular catch ups between managers and staff are diarised.	Appropriate support in place for each staff member to ensure optimal performance.
The office has a formal training log to record all training offered and attended.	All staff are trained to fulfil their role.
Each staff member has a bespoke personal development plan in place.	All staff are trained to fulfil their role.
Areas for individual staff development are identified by way of performance management. The training log is updated to ensure that staff needs are being met.	All staff are trained to fulfil their role.
Audit trails evidence that peer review and quality assurance work is taking place across the office.	Improved staff knowledge and skills relevant to their own roles and their career development.
Appropriate sources to provide training identified and recorded. Budget bids are linked directly to staff training and development needs.	Training is appropriate and costed.
The wide range of skills available within the PAA team are recorded. These are reviewed alongside potential provision (and costs) for external provision.	The most cost-effective sources of training are identified and utilised.
Opportunities for professional development in specialised areas (eg paralegal, governance, application of Articles of the ECHR and associated case law, recruitment and selection and equality, diversity and inclusion etc) are identified and added to the training log. Staff access those relevant to their roles.	Staff develop specialist skills and knowledge, improving decision making and advice given.
Staff attend relevant conferences and webinars etc both on-line and in person	Staff develop knowledge, improving decision making and advice given.

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Measure	What achieved
Ensure performance management framework is in place, kept updated and adhered to in supporting and developing staff	All staff are trained to fulfil their role.

- **We will make the best use of up to date and secure digital technology to support our work, enhance our users' experience and safeguard our systems.**

Measure	What achieved
Scalable systems adopted.	ICT systems are demonstrably adaptable to staffing changes and scope of business.
Remote desktop removed. Revised working practices adopted.	Enhanced fully hybrid working experience for all staff, regardless of location.
A user IT reference and support hub established.	Staff are enabled to utilise our systems more effectively. Retention of knowledge to mitigate corporate memory loss due to unexpected circumstances.
New systems designed and developed.	Staff are enabled to utilise our systems more effectively with increased productivity.
New and more resilient systems with minimum downtime which are data secure/safe designed and developed.	More resilient and secure system in place, safeguarding our systems and data. The ability to recover from disruption with reduced downtime.
Migration to the Cloud completed. All data and some systems currently held on the server transferred to M365/Sharepoint.	More resilient and secure system in place, safeguarding our systems and data.
Cyber Essentials+ accreditation maintained.	More resilient and secure system in place, safeguarding our systems and data.
Redundant hardware identified, assessed and removed.	All obsolete or insecure technology removed and replaced. Users' experience enhanced.
Website updated and upgraded, with 2 factor authentication included.	Users' experience enhanced.
Improvements to our existing Complaints Management System (CMS) made.	CMS better supports the standards team to work more efficiently.
Options to replace the CMS, including engaging with potential suppliers, explored. Bespoke specification that meets the future requirement of a complaints management system designed.	Concrete proposals in place for replacement of the current CMS or an upgrade of it identified. Ensures that CMS fit for purpose for the future.

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Measure	What achieved
New approaches to improving the retention and deletion of records in place. Audit trail and report from the Keeper of Records demonstrates existing records are managed in accordance with records management policies.	Records management practices are more efficient and compliant with our RMP. Public assurance on our records management practices.
All staff engaged in and regularly trained on and familiar with guidance on all aspects of cyber security and other digital matters relating to their role.	Staff equipped to use our systems appropriately. Greater assurance on data security provided. Staff confidence of safety in their role.
Internal auditors have assessed our systems of control as substantial or strong.	Public assurance on our effective use of our systems. Any recommendations implemented.

- **We will operate highly efficient and effective complaints handling processes that deliver consistent, evidence-based responses: ensuring fair and trusted outcomes.**

Measure	What achieved
Backlog of cases that exist within the CMS cleared. KPIs to drive greater efficiency in case disposals measured and results reported on.	Complaints assessed and investigations progressed more quickly. Good quality contemporaneous evidence, including witness statements are gathered and considered, closer to the time of the conduct complained of. Complainers and respondents happier with time taken to assess and investigate complaints.
Systems in place to prevent a backlog arising and systems in place to clear a backlog where one arises.	Complaints assessed and investigations progressed more quickly. Good quality contemporaneous evidence, including witness statements are gathered and considered, closer to the time of the conduct complained of. Complainers and respondents happier with time taken to assess and investigate complaints.
Audit trail demonstrates that all complaints and cases continue to follow all relevant stages set out in the Investigations Manual and that peer and hot and cold reviews provide assurance about the quality of our investigatory work.	We can publicly demonstrate that our processes deliver consistent evidence-based outcomes.
Investigations Manual is reviewed, revised and updated on a regular basis.	We can demonstrate that we are improving on our practices based on service user feedback. Greater levels of satisfaction with our service from users.
Additional outputs to sit alongside the manual developed as required. Creation and maintenance of a KPI tracker to monitor and report on KPIs	Public and other stakeholders able to see and to hold us to account for our performance.

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Measure	What achieved
Our performance is monitored and reported on through use of KPIs with a view to either meeting or exceeding stretch targets. Stretch targets identified, published and updated to become more stretching.	Public and other stakeholders able to see and to hold us to account for our performance.
Refresher trainer to all staff on the investigations manual provided.	We can demonstrate that we are taking a consistent office-wide approach to our work and that all staff have the appropriate knowledge to carry out their roles as effectively as possible.
New ways of working, which enhance efficiency and effectiveness, are identified and adopted.	We can demonstrate our commitment to continuing improvement.
Investigations procedures and KPIs from equivalent external bodies are benchmarked against our own and externally validated.	We can demonstrate that we are meeting our own KPIs and that we are working, as a minimum, as efficiently and effectively as equivalent organisations. We can commit to improving where we aren't.
Research to identify trends in public appointments and complaint volumes is conducted and findings reported publicly. The results of that same research are used for strategic and business planning purposes.	We are better able to understand and demonstrate what drives changes in demand. We are better able to plan for troughs and peaks in activity.

- **We will engage meaningfully with our stakeholders to promote high standards in public life, listening to others' views and working constructively to improve our systems and processes.**

Measure	What achieved
Key messages for stakeholders developed. Each team understands these and communicates them to those they are in contact with.	Our stakeholders are better informed about our work. Our stakeholders understand our contribution to the ethical standards framework. As a consequence, stakeholder confidence in the ethical standards framework is increased.
A stakeholder engagement plan, using the Boston Matrix[10] approach, is developed.	Our stakeholders are better informed about our work. Our stakeholders understand our contribution to the ethical standards framework. As a consequence, stakeholder confidence in the ethical standards framework is increased.

[10] Boston Matrix is a tool to help identify and categorise stakeholders in a clear and consistent manner.

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Measure	What achieved
A programme of activity with key stakeholders is developed.	Our stakeholders are better informed about our work. Our stakeholders understand our contribution to the ethical standards framework. As a consequence, stakeholder confidence in the ethical standards framework is increased.
We have provided increased opportunities for stakeholders to provide feedback to us through on-line surveys, focus groups etc	Our stakeholders are better informed about our work. Our stakeholders understand our contribution to the ethical standards framework. Our stakeholders are able to shape the way in which we work, leading to greater engagement and satisfaction levels. As a consequence, stakeholder confidence in the ethical standards framework is increased.
We are communicating effectively with all stakeholders, using plain English wherever possible. Our materials are translated into a range of formats such as BSL and Easy Read.	Our service is more accessible and understandable to more people, leading to greater engagement and satisfaction levels. As a consequence, stakeholder confidence in the ethical standards framework is increased.
We can demonstrate that we are as accessible as possible to complaint users and others, regularly reviewing out approach and making reasonable adjustments wherever required.	Our service is more accessible and understandable to more people, leading to greater engagement and satisfaction levels. As a consequence, stakeholder confidence in the ethical standards framework is increased.
We can demonstrate that we have listened to and taken account of the feedback received from stakeholders using the methods above, and reported transparently on actions taken to improve our systems and processes and, where not taken, why not.	Our stakeholders are better informed about our work. Our stakeholders understand our contribution to the ethical standards framework. Our stakeholders are able to shape the way in which we work, leading to greater engagement and satisfaction levels. As a consequence, stakeholder confidence in the ethical standards framework is increased.

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- **We will ensure appropriate systems of governance, quality review frameworks and robust external accreditation are in place, providing assurance to the public and stakeholders that our objectives are being met. We will also demonstrate our commitment to acquitting our environmental and social responsibilities.**

Measure	What achieved
A single governance framework document is developed and published. A comprehensive suite of governance policies and procedures will sit below it, all also published, and our practices will be assessed through internal and external audit, the results of which will also be published.	Public assurance that appropriate systems of governance are in place and are being adhered too. .
A robust policy management process developed to ensure that no policy is "stale" and all are reviewed within stated timescales. All revised policies consulted on internally and published.	Public assurance that our policies are up to date, reflect legislative and other relevant changes and are compliant and compatible with our obligations.
We have improved our retention and deletion of records. The Keeper has endorsed our practices as compliant.	Public assurance that we are meeting our legal obligations. We have more streamlined and faster processing of information requests.
We have developed and put in place a quality assurance framework covering hot, cold and peer reviews[11] covering all aspects of the office's activities.	Public assurance that appropriate systems of quality control are in place, covering all aspects of our work.
We have introduced root cause analysis (RCA) techniques to identify and resolve the underlying cause of a particular issue.	Public assurance that appropriate systems of quality control are in place, covering all aspects of our work. Demonstrable commitment to improvement.
We have reported publicly on the outcomes from quality reviews (internal and external).	Public assurance that appropriate systems of quality control are in place, covering all aspects of our work. Demonstrable commitment to improvement.
We have implemented "Project Partnership" which ensures a shared understanding of our role and relationship with other stakeholders and have, where possible, a consistent approach.	We can evidence that the approach to our work remains consistent and stands up to external challenge.

- **We will contribute significantly to the maintenance of an effective ethical standards framework through supportive and constructive engagement with equivalent bodies both here and in other administrations.**

[11] From a standards team perspective, a hot review would be conducted during the course of a live investigation. A cold review would be conducted on a completed investigation and where the report has been issued. Both types of review would focus on compliance with certain aspects of the investigations manual.

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Measure	What achieved
We have engaged with other Commissioners in the UK and other bodies with similar functions for learning and to share good practice.	We can demonstrate that we have collaborated and shared information in the public interest. We can demonstrate how this contributes to an effective ethical standards framework.
We have provided opportunities for staff to stay updated with case and legislative developments in the ethical standards framework	We can demonstrate that we have been keeping abreast of case and legislative developments. We can demonstrate how this contributes to an effective ethical standards framework.
We have responded to or engaged with consultations and opportunities to input views to revisions/updates to the ethical standards framework, including any outcomes from "Project Partnership", and related topics both here in Scotland and outwith.	We can demonstrate that we have provided supportive and constructive engagement. We can demonstrate how this contributes to an effective ethical standards framework.
We have gathered, recorded, considered and, where applicable, implemented constructive feedback from our stakeholders to improve how we work.	We can demonstrate that we have acted on constructive feedback. We have increased stakeholder confidence in our work. We can demonstrate how this contributes to an effective ethical standards framework.

- **We will, through supportive and constructive regulation, make a significant contribution to a public appointments system that produces effective and diverse boards that are reflective of the communities that they serve.**

Measure	What achieved
We have supported implementation of the 2022 Code of Practice, through supportive and constructive regulation, encouraging a learning mindset from all who are involved in making appointments, to develop and utilise good practice and innovation.	Greater levels of commitment to and understanding of the provisions set out in the Code leads to greater levels of compliance.

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Measure	What achieved
We have reported publicly on the difference that the Code is making to the appointments process, for good or bad, with a view to improving on practices. We will do so by publicising instances of good practice or innovative practice and learning as well as areas for improvement. We have developed and used a range of metrics, both qualitative and quantitative, to measure the impact of the Code's implementation on board diversity and effectiveness.	Greater levels of transparency about the difference that the Code, and our oversight of the appointments process, makes to board diversity and effectiveness. Metrics provide proxy measures for the difference that our work makes to board diversity, inclusion and effectiveness. Increased public understanding of and trust in the regulated appointments system leads to a more diverse range of applicants coming forward.
We will seek to understand through research the difference that board appointments make to the governance of the public body and the difference that diversity brings.	Greater levels of transparency about the difference that the Code, and our oversight of the appointments process, makes to board diversity and effectiveness. Increased public understanding of and trust in the regulated appointments system.

- **We will strive to be recognised leaders in the regulation of a system that is effectively run to achieve the appointment of the most able people to our boards and that is managed in compliance with the highest ethical standards.**

Measure	What achieved
We have consulted extensively on and revised and republished Diversity Delivers (including new recommendations for the achievement of greater board diversity).	A revised, evidence-based strategy has been developed. A wider range of stakeholders has been engaged and been able to shape development of the strategy. Ultimately, the strategy's implementation leads to more diverse, inclusive and effective boards.

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We have developed our own learning and understanding about great practice in recruitment and selection by reaching out to other organisations and administrations and by conducting our own research.	We can demonstrate that our understanding of great practice in recruitment and selection is based on evidence from other organisations and administrations. We can show that our guidance is based on the latest thinking and how following it leads to better appointments. Ultimately, we can show that implementation of our guidance leads to more diverse, inclusive and effective boards.
We have shared our findings through the provision of guidance.	We can show that our guidance is based on the latest thinking and how following it leads to better appointments. Ultimately, we can show that implementation of our guidance leads to more diverse, inclusive and effective boards.

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