

Finance and Public Administration Committee  
17<sup>th</sup> Meeting, 2024 (Session 6)  
Tuesday 14 May 2024

## Scotland's Commissioner Landscape: A Strategic Approach

### Purpose

1. The Committee is invited to take evidence from the following witnesses in relation to its inquiry into [Scotland's Commissioner Landscape: A Strategic Approach](#)—

#### Panel 1: Scrutiny of proposals to create Commissioners

- Clare Haughey MSP, Convener, Health, Social Care and Sport Committee, and
- Audrey Nicoll MSP, Convener, Criminal Justice Committee.

#### Panel 2: Scrutiny of Commissioners' performance

- Sue Webber MSP, Convener, Education, Children and Young People Committee, and
- Martin Whitfield MSP, Convener, Standards, Procedures and Public Appointments Committee.

2. Ariane Burgess MSP, Convener of the Local Government, Housing and Planning Committee, who is unable to attend this session, has instead provided a written submission, which is attached at Annexe A.

### Overview

3. Seven<sup>1</sup> independent officeholders are directly responsible to the Scottish Parliament, with their terms and conditions of appointment and annual budgets set by the Scottish Parliamentary Corporate Body (SPCB). They are a mix of commissions, commissioners, or ombudsman, and range from having regulatory, complaints handling, rights-based, investigatory or advocacy functions.
4. Legislation creating a patient safety commissioner has also recently been passed by the Scottish Parliament. A further six<sup>2</sup> are being proposed or considered. The Commissioners' budgets form part of the SPCB's own budget which is "top-sliced" from the Scottish Consolidated Fund.

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<sup>1</sup> These are the Scottish Information Commissioner, Scottish Biometrics Commissioner, Children and Young People's Commissioner Scotland, Standards Commission for Scotland, Ethical Standards Commissioner, Scottish Public Services Ombudsman and Scottish Human Rights Commission.

<sup>2</sup> The Parliament is currently scrutinising Bills that would also see a Victims and Witnesses Commissioner and Disability Commissioner being established. Draft proposals for Members Bills creating an Older People's Commissioner and Wellbeing and Sustainable Development Commissioner are under consideration by Parliament, while the Scottish Government is also looking at the possibility of creating a Future Generations Commissioner and a Learning Disabilities, Autism and Neurodiversity Commissioner or Commission.

5. In its [Report on the Scottish Budget 2023-24](#), the Committee expressed concerns regarding this potential significant increase in the number of SPCB-supported bodies and their associated costs. More recently, the Committee raised these broad concerns during scrutiny of Financial Memorandums (FMs) for Bills proposing the creation of a patient safety commissioner (now passed) and a victims and witnesses commissioner (stage 2).
6. Following informal discussions with the Scottish Government's Public Bodies Support Unit, the Scottish Parliament's Non-Government Bills Unit, and SPCB supporting officials, the Committee launched an inquiry in December 2023 into [Scotland's Commissioner Landscape: A Strategic Approach](#), with the following remit—
  - to foster greater understanding of how the Commissioner landscape in Scotland has evolved since devolution,
  - to enhance clarity around the role, and different types, of Commissioners and their relationships with government and parliament,
  - to establish the extent to which a more coherent and strategic approach to the creation and development of Commissioners in Scotland is needed and how this might be achieved,
  - to provide greater transparency to how the governance, accountability, budget-setting, and scrutiny arrangements work in practice, and whether any improvements are required, and
  - to identify where any lessons might be learned from international Commissioner models.
7. The focus of the inquiry is on SPCB-supported Commissions, Commissioners, and Ombudsman only. Other than as wider context, the inquiry will **not** therefore:
  - consider the overall public body landscape,
  - examine the role of those commissioners who report directly to the Scottish Government, or
  - make recommendations on the merits or otherwise of individual commissioners.
8. The inquiry's call for views ran from 11 January until 11 March 2024 and received [23 responses](#). Questions were grouped around three broad themes: (a) the Commissioner landscape, (b) governance, accountability, and scrutiny, and (c) value for money and the effectiveness of the current approach.
9. SPICe has produced a [summary of the written submissions](#) received, as well as a [briefing](#) to support the inquiry which maps the current Commissioner landscape and identifies other UK and international Commissioner models.
10. The Committee has to date held three evidence sessions in relation to this inquiry—
  - On [16 April 2024](#), the Committee heard from Research Scotland on its May 2023 [Report on Commissions and Commissioners](#), which was commissioned by the Scottish Government to inform proposals to create a Learning Disabilities, Autism, and Neurodiversity Commissioner.

- On [30 April 2024](#), the Committee heard from all current officeholders<sup>3</sup> supported by the SPCB (Commissions, Commissioners and Ombudsman), on their insights in relation to the Commissioner landscape.
- On 7 May 2024, the Committee took evidence in round-table format from Age Scotland, the ALLIANCE<sup>4</sup>, Alzheimer Scotland, Carnegie UK Trust, Common Weal, and the National Autistic Society, regarding their views on the need for creating new commissioners and other options.

11. Annexe B provides a summary of the issues raised at these evidence sessions.

12. The Committee also held an informal session with former Commissioners and Ombudsman on 16 April 2024 and clerks produced [a summary of the issues discussed](#) at this session.

## Scrutiny of Bills proposing Commissioners

### Background

13. The Committee will hear from the Conveners of both the Health, Social Care and Sport Committee (HSCSC) and the Criminal Justice Committee (CJC) in relation to their recent experiences of scrutinising Bills that proposed the creation of Commissioners. Topics that could be explored at this session include: the types of issues that the respective committees took into account when considering these proposals (including alternative models such as a policy champion or expanding another body), the evidence presented in favour and against, awareness of the [Session 2 Finance Committee's criteria](#) to be taken into account by those proposing new Commissioners, and views on how new commissioners would fit into the existing Commissioners and wider public sector landscape.

14. The Committee may also wish to take the opportunity to ask the CJC Convener about the approach that that Committee takes in scrutinising the work of the Scottish Biometrics Commissioner, such as the frequency, adequacy, and nature of scrutiny, along with any improvements that might be made to this process.

### Patient Safety Commissioner for Scotland

15. The HSCSC was lead committee for scrutiny of the Patient Safety Commissioner for Scotland Bill at Stages 1 and 2. The aims of this Commissioner, as set out in the Bill documents, were to—

- improve patient safety by promoting the views of patients in relation to health care safety,
- develop a system-wide view of health care in Scotland and use it to identify wider safety issues, and
- promote better co-ordination of responses to patient safety concerns across Scotland.

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<sup>3</sup> These officeholders are listed at footnote 1.

<sup>4</sup> Health and Social Care Alliance Scotland

16. The Scottish Government introduced this Bill on 6 October 2022 in response to recommendations made by the Independent Medicines and Medical Devices Safety Review ('the Cumberlege Review').
17. In its [Stage 1 Report on the Bill](#) published on 28 April 2023, the lead committee highlighted "the importance of ensuring public confidence and trust in the healthcare system in Scotland" and therefore agreed that the Commissioner should be appointed by the SPCB and accountable to the Scottish Parliament. It also supported the primary functions of the Commissioner as being "to advocate for systematic improvements and to amplify the voice of patients".
18. The Stage 1 Report goes on to highlight that—

"Stakeholders noted concerns over ... the potential for overlap and duplication of roles and responsibilities within the system, and the future role of the proposed Commissioner within an already complex landscape."
19. The HSCSC recommended that the Bill be strengthened to set out more clearly a collaborative approach and the parameters of Commissioner investigations, with a view to minimising duplication. It further recommended that the Bill's review and evaluation provisions be strengthened "to require the Commissioner to undertake ongoing monitoring and evaluation of their work and incorporate the outcome of this process into their annual report". Concerns highlighted by the FPA Committee regarding the increasing number of parliamentary commissioners and their associated costs were also noted by the lead committee.
20. The Bill was passed by Parliament unanimously on 27 September 2023 and enacted on 7 November 2023.

## Victims and Witnesses Commissioner

21. The CJC was lead committee for Stage 1 scrutiny of the Victims, Witnesses and Justice Reform (Scotland) Bill, which was introduced on 25 April 2023, and is currently at Stage 2. The Bill covers a range of matters, including creating the office of Victims and Witnesses Commissioner for Scotland. The [Policy Memorandum](#) for the Bill states that this Commissioner will be independent of the Scottish Government and accountable to the Scottish Parliament and will champion the rights and views of victims and witnesses and encourage policy-makers and criminal justice agencies to put their voices at the heart of justice". It will also "monitor criminal justice agencies' compliance with the Standards of Service and the Victims' Code and promote best practice and trauma-informed approaches".
22. The CJC published its [Stage 1 Report on the Victims, Witnesses, and Justice Reform \(Scotland\) Bill](#) on 29 March 2024. In relation to the proposed creation of a Victims and Witnesses Commissioner, the CJC stated—

"We remain to be convinced that a strong case has been made for the establishment of a Victims and Witnesses Commissioner. Instead, we consider that better outcomes may be achieved by focusing spending in areas which have a more direct and immediate benefit for victims and witnesses. We invite the Scottish Government to consider if they still wish to proceed."

23. The Scottish Government's [response to the CJC of 16 April 2024](#) states that the Scottish Government "is committed to the establishment of a Victims and Witnesses Commissioner", citing extensive consultation on the issue since 2020 and arguing that it would fill an identified accountability gap. The Scottish Government highlighted that provisions in the Bill do not prevent the role of this Commissioner from being held by another Commissioner, "although there are possible limits on a dual-appointment". It further noted that the Bill allows for the sharing of premises, staff, services and other resources with other officeholders or public body, "providing for cost savings".

24. The CJC further recommended—

"If, having considered the points we raised, a Commissioner post is to be established, then we recommend that in the first instance it should be for a time-limited period in order to allow for an assessment to be made of the value of the role. We recommend that any extension to this initial period should only take place after an independent review had been conducted into the operation of the post and following a further decision of Parliament. We expect that Parliament would want to see clear evidence that the post of Commissioner has noticeably improved the experience of victims and witnesses. We recommend that the initial time-limited period for the post should be a single term in office to allow sufficient opportunity for the effectiveness, or otherwise, of the new post to be demonstrated."

25. In response, the Scottish Government states that "if this is the will of Parliament, the Scottish Government would suggest that the term be long enough for the Commissioner to demonstrate their effectiveness, in order to ensure accurate feedback to an independent review". It added that "the Bill provides for the tenure of the role to be determined by the SPCB".

26. The Stage 1 Report also highlighted concerns raised by the Children and Young People's Commissioner Scotland about the potential overlap between its remit and the role of the proposed Commissioner. The Scottish Government noted these concerns and indicated that it "will explore with the Children's Commissioner on how the two roles can best work together for the interests of child victims and witnesses in Scotland".

27. The general principles of the Bill were agreed to by division<sup>5</sup> on 23 April 2024.

## **Scrutiny of Commissioners' performance**

### **Background**

28. In January 2023, the SPCB and Conveners Group signed a Written Agreement<sup>6</sup> aimed at clarifying the respective roles and responsibilities of the SPCB and relevant committees in the oversight of officeholders. It aims to set out a robust

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<sup>5</sup> For 60, Against 0, Abstentions 62.

<sup>6</sup> Annexe C to Convener Group [meeting-papers-25-jan-2023.pdf \(parliament.scot\)](#)

governance role for the SPCB and promotes effective scrutiny by committees of how officeholders carry out their functions.

29. The Committee will take evidence from the Conveners of both the Education, Children and Young People Committee (ECYPC) and the Standards, Procedures and Public Appointments Committee (SPPAC), on their experiences of scrutinising the performance of commissioners within their remits. The ECYPC examines the effectiveness of the Children and Young People Commissioner Scotland, while the SPPAC scrutinises the work of the Scottish Information Commissioner and the Ethical Standards Commissioner.

30. Issues that may be explored at the session include how the committees scrutinise the performance of these commissioners (including if and how they gather evidence on performance), whether they consider there is clarity around committees' role vis a vis that of the SPCB, if any clarification regarding remits to avoid duplication is required, and how this type of scrutiny differs from committees holding government to account. The Committee has also heard that some Commissioners would like more opportunities to give evidence to committees on their performance, it can be challenging to scrutinise their performance against delivery of outcomes, and some have suggested that performance and budget scrutiny should be more closely linked.

31. The Convener of the Local Government, Housing and Planning Committee (LGHPC), who was unable to attend the session on 14 May 2024, wrote to the Committee on 7 May, setting out her views in relation to scrutiny of Commissioners. In her letter, attached at Annexe A, the Convener explains that the LGHPC scrutinises the work of the Scottish Public Services Ombudsman, the Standards Commission, and the Ethical Standards Commissioner insofar as his role relates to local government. Annual evidence sessions are held with the officeholders which are primarily focused on their annual reports, and they also contribute to other aspects of the Committee's work which "we do not feel ... [has] in any way undermined our capacity to hold them to account for their performance".

32. The Convener goes on to highlight some improvements that could be made to the way in which these bodies are scrutinised, including—

- committees having a role in scrutinising the proposed budgets of commissions, commissioners, and ombudsman accountable to them, and making any recommendations to the FPA Committee in its scrutiny of the wider SPCB budget,
- in addition to annual evidence sessions, committees could undertake "a more thorough review of these bodies once a session", and
- the need for greater understanding of the roles of individual bodies across the Commissioner landscape.

## **Next steps**

33. The Committee will continue taking evidence in relation to this inquiry at its next meeting.

## **Clerks to the Committee, May 2024**

## **Letter from the Convener of the Local Government, Housing and Planning Committee in relation to the FPA Committee's Commissioner Landscape Inquiry**

7 May 2024

Dear Kenneth,

### **Scotland's Commissioner Landscape: A Strategic Approach**

Thank you for giving my Committee the opportunity to contribute to your inquiry into 'Scotland's Commissioner Landscape: A Strategic Approach'.

I'm sorry that I was not able to join you for your Committee's evidence session on 14 May, but unfortunately my Committee is meeting at the same time.

I welcome, however, the opportunity to provide comments in writing.

As you will be aware, the Local Government, Housing and Planning Committee scrutinises the work of the Scottish Public Services Ombudsman, the Standards Commission and the Ethical Standards Commissioner. In the case of the Ethical Standards Commissioner it should be noted that our interests are limited to the Commissioner's role insofar as it relates to local government.

To date we have held these bodies to account through the undertaking of annual sessions, which have focussed around their annual reports.

We have also involved both the Ethical Standards Commissioner and the Scottish Public Services Ombudsman in other aspects of the Committee's work. For example, the Ethical Standards Commissioner has contributed to the Committee's work on understanding barriers to local elected office, while the Scottish Public Services Ombudsman has informed the Committee's work on building safety and maintenance. We do not feel that their contributions to other aspects of our work have in any way undermined our capacity to hold them to account for their performance.

We do, however, believe that there are improvements which could be made to the way in which we scrutinise the work of these bodies.

Specifically, we note that there is currently no scrutiny of the specific budgets of these bodies separate from the scrutiny of the wider SPCB budget. We consider that there would be value in committees undertaking scrutiny of the proposed budgets of commissions, commissioners and ombudsman accountable to them. Committees could then feed any recommendations arising out of that scrutiny into your Committee's scrutiny of the wider SPCB budget. This seems particularly critical at time of reduced budgets, but would seem a prudent approach irrespective of the economic climate.

As noted earlier, we take evidence from these bodies annually. There is a limit, however, to what can be achieved in a one-off session with an ombudsman, commission or commissioner discussing their annual report. We think there would be value in committees undertaking a more thorough review of these bodies once a session. Such a review could involve engagement with stakeholders and individuals who have engaged with these bodies and would hopefully provide committees with a better understanding of how effectively these bodies are operating.

More generally, while my Committee does not have perspective across the Commissioner landscape, it would appear clear from the bodies the Committee does engage with that more could be done to improve understanding of their roles. For example, it is very doubtful that there is broad understanding of the differentiation between the roles of the Standards Commission and the Ethical Standards Commissioner.

I hope this is of help to your inquiry, but please let me know if you would like to explore any of these issues further.

Yours sincerely,

Ariane Burgess  
Convener, Local Government, Housing and Planning Committee



## Summary of issues raised at previous evidence sessions

Research Scotland (16 April 2024)

34. On [16 April 2024](#), the Committee heard evidence from Research Scotland on its May 2023 [Report on Commissions and Commissioners](#), which was commissioned by the Scottish Government to inform proposals to create a Learning Disabilities, Autism, and Neurodiversity Commissioner. The Report's introduction acknowledges that "there is very little published research in Scotland and the UK on commissions or commissioners, and little evaluation exploring the pros and cons of different approaches, powers or ways of working for commissioners". The Committee discussed Research Scotland's findings, including the following issues—

- Most interviewees value the powers they have and see these as a key difference between commissioners and campaigning or lobbying bodies.
- Gaps in powers were highlighted by some interviewees, including the inability to self-initiate inquiries, to make binding recommendations or to share information.
- Most are content with their governance arrangements. The model of a single commissioner appeared to work particularly well given the clear lines of responsibility and decision-making.
- Interviewees value their independence from government and tend to have constructive relationships with government.
- There were mixed views on whether a commissioner is the best way to address the issues 'on the ground' for those with learning disabilities, autism, or neurodiversity, although there was broad agreement that additional support is needed in some form.
- Concerns were raised that "creating commissioners for particular groups would lead to a large number of commissioners and a complex landscape", with many interviewees highlighting an already complicated picture. Some expressed concern that "people could end up being pushed between commissioners or being unsure which applied to them".
- Interviewees suggested that other options for strengthening human rights for people with autism, learning disabilities and neurodiversity should be considered, including better resourcing for other bodies such as relevant existing commissions, and supporting good practice.
- Some interviewees suggested that a lead commissioner housed by an existing human rights commission or other organisation may be worth considering, as it could reduce costs through sharing services. Others however suggested this approach might divert resources and dilute the body's focus on "human rights for everyone".

## Current officeholders (30 April 2024)

35. On [30 April 2024](#), the Committee took evidence from all current officeholders<sup>7</sup> supported by the SPCB (Commissions, Commissioners and Ombudsman) in relation to the inquiry. The following issues were raised—

### Growing Commissioner Landscape

- It was recognised that the landscape has evolved organically over time, with each officeholder being distinct and having different governance arrangements “for good reasons”.
- The Committee heard that the proposals to create new commissioners are often driven by systematic failures and frustrations in the system, as well as a view that a particular group needs a ‘champion’.
- The commissioner model can often be seen as the starting point rather than the outcome of detailed deliberations on need, added value and a full range of options. Some witnesses argued that proposals for new commissioners should be viewed through the lens of intersectionality, rather than the current approach of “putting people in boxes” which could then create uncertainty for individuals (whose needs straddle a number of Commissioner remits) as to which Commissioner they should approach.
- There is a perception that an officeholder is more independent than ‘champions’ or those commissioners who are responsible to government. This assumption was challenged by witnesses, who argued that ‘independence of thought’ was seen to be more important and is being achieved through other models such as government ‘champions’.
- The SHRC suggested that an alternative to creating new, separate officeholders would be for it to represent the rights of a range of groups through ‘leads’ or ‘rapporteurs’. It highlighted its broad remit and pluralistic approach in line other international human rights institutions.
- Witnesses had mixed views on whether the inclusion of sunset clauses in enabling legislation would be a positive move. Some consider that an officeholder must be in post for some time before they are able to address systemic issues. Setting up new a body, even for a short time, can also require a substantial amount of time and money.
- One witness suggested that there should be a presumption against creating any new officeholder. Post-implementation reviews should be carried out, along with periodic reviews to assess whether the officeholder is still relevant and required.
- It was argued that the Children and Young People’s Commissioner Scotland is required to be a separate entity as children are less able to advocate for themselves and their voices could be lost if their rights were instead subsumed into an adult-focused body.

### Accountability, scrutiny, and budget-setting

- Budget-setting arrangements are challenging for officeholders, who are asked to submit their budget bids in July/August, then do not receive confirmation of their budget until January/February the following year and before the SPCB pay award (which they follow) is agreed. As staff costs

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<sup>7</sup> These officeholders are listed at footnote 1.

make up a large proportion of their overall budgets, pay awards can impact significantly on their budgets.

- Some officeholders are demand-led, which provides an additional layer of uncertainty in relation to budget bids.
- The SPCB provides guidance on the parameters for officeholders' budget bids, including where the context is one of fiscal constraint.
- Officeholders, along with all public sector organisations, find it challenging to undertake medium and long-term financial planning in the absence of multi-year budgets.
- It was suggested that, in examining performance, progress against their functions and four-year strategic plans should be assessed.
- Where it takes place, parliamentary scrutiny of performance is robust, however, officeholders would welcome more regular committee scrutiny.
- Witnesses noted that the SPCB, rather than committees, undertakes scrutiny of officeholder budgets. The SPSO suggested that it would be helpful if committee scrutiny of performance linked into scrutiny by the FPA Committee of their budgets, efficiency and effectiveness.
- Asked whether rights were being prioritised over outcomes, some witnesses argued that "rights should provide the basis for improving outcomes".
- Witnesses argued that they are responsible to the people of Scotland through the Scottish Parliament and that their work is complementary and adds value to that of the Parliament and its MSPs.

#### Overlap, duplication, and gaps in functions

- Witnesses explained that, where there is commonality or overlapping functions, current officeholders work together to co-ordinate their activities.
- However, they have concerns regarding the potential for duplication arising from the creation of additional commissioners, which they suggested could lead to a 'hierarchy' of rights and the possibility of conflicting views on the same or similar issues. It was further noted that the proposed commissioners do not have their basis in human rights.
- Some gaps in the functions of the SPSO and SHRC were also highlighted.

#### Sharing office space and services

- It was suggested that a strategic approach to back-office functions should be taken. Commissioners who are responsible to government can access its services and accommodation and the Standards Commission for Scotland (SCS) is located within the Scottish Parliament and shares many of its services. Both were highlighted as more cost-effective models.
- Enabling legislation should mandate any new commissioners to enter into 'back-office' support arrangements with other organisations.
- Significant progress has been made by the SPCB and current officeholders in sharing office premises and services. Discussions amongst officeholders continue regarding how to progress this issue further. It was suggested however that the unravelling of back-office and support functions can often be challenging and time-consuming for established organisations.
- Statute requires separate audit functions, and therefore primary legislation would be required to allow auditing to be shared across officeholders.

- Hybrid working provides greater opportunities to share offices. The SIC provided the example of recently freeing up space within his office to potentially accommodate new officeholders.

## Round-table session (7 May 2024)

36. On 7 May 2024, the Committee took evidence in round-table format from Age Scotland, the ALLIANCE<sup>8</sup>, Alzheimer Scotland, Carnegie UK Trust, Common Weal, and the National Autistic Society. The following issues were raised—

### Creating new commissioners

- Some witnesses who support creating new commissioners explained this was due to insufficient focus on meeting the needs of particular groups, public service failure due to limited public finances, and seeing the benefits of similar commissioners in Wales and Northern Ireland.
- It was suggested that an Older People’s Commissioner (OPC) is necessary as this group makes up 40% of the population, experience ageism and poverty, and a commissioner can bring legal powers and greater resourcing compared to charities. An ideal OPC model would be akin to the Children and Young People’s Commissioner Scotland, which has “made inroads, improved outcomes, and is a positive advocate or champion”.
- Asked what the Welsh and NI Older People’s Commissioners have been able to achieve as compared to Scotland which has no Commissioner, one witness highlighted their work on ageism and digital exclusion, national campaigns, uptick of pension credit, gravitas, and locus.
- Those supporting the establishment of a Future Generations Commissioner said it could drive long-termism, by prioritising prevention, being outcomes-based and better using the National Performance Framework. This approach, they suggested, could lead to cost savings, though it was recognised these are difficult to quantify.
- Calls for a Learning Disabilities, Autism and Neurodiversity Commissioner are a result of limited progress being made and “voices unheard”.
- New commissioners could also prevent people being “pushed from pillar to post”, with some having investigatory powers and rights to raise legal proceedings.
- Other witnesses were less convinced that new commissioners are the best option, expressing concerns that their funding may not reach those ‘on the ground’. They noted a lack of evaluation of the difference commissioners have made, lack of understanding around how commissioners meet individuals’ needs, and challenges in being able to identify and assess other options.
- Some felt that other options, such as strengthening the Scottish Human Rights Commission (SHRC), through a ‘rapporteur’ model, should be considered. Those calling for this intersectional ‘champion’ approach suggested that it could prevent people “falling through the gaps”, while others were sceptical that “bolting functions onto the SHRC would improve things”.

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<sup>8</sup> Health and Social Care Alliance Scotland

- Commissioners need to work collaboratively to deliver the best outcomes and may just be a “sticking plaster” until improvements in services are achieved.

**Scrutiny, accountability, and value for money**

- It was argued that committees should have a greater role in scrutiny of performance, with a focus on delivery of outcomes. Difficulties in assessing their performance was also noted.
- Some witnesses felt that commissioners could potentially save costs, through prevention “rather than getting to a crisis point”. It was also suggested that commissioners can use money differently and more efficiently, though having a commissioner does not necessarily mean more resourcing for a particular group.
- Witnesses explored how a layer of commissioners could “shift democratic accountability”, particularly if they were created instead of dedicated Ministers.
- Commissioner reports should be examined by committees and the whole Parliament, through for example, committee-led debates.
- One witness suggested that those with lived experience should have a role in the accountability model.
- Some had concerns that the SPCB has limited resources to be able to support and hold officeholders to account.

**Committee Clerking Team  
May 2024**