

Scottish Parliament Social Justice and Social Security Committee

Wellbeing and Sustainable Development (Scotland) Bill

Written submission by Max French, November 2025

I am writing as an author, alongside Jennifer Wallace, of the report '[Putting collective wellbeing and sustainable development into action: An options paper for Scotland](#)' (henceforth, 'the report'), and also as a contributor of research evidence to previous Finance and Public Administration Committee inquiries relating to the uptake and use of the National Performance Framework (NPF). This letter is to:

1. Clarify this report's conclusions in relation to three claims it was used to support in the Committee's proceedings.
2. Address the Scottish Government's revised position to carry forward the intent of the Bill through the National Performance Framework (NPF) reform process.

1. The report's use within Committee proceedings

Having reviewed the Committee's proceedings to date, I felt it important to correct and clarify three claims the report was attached to:

Claim 1: The report offers five viable alternatives to resourcing an independent SPCB-supported commissioner.

Of the six options reviewed, the report concluded, '*that a Future Generations Commissioner for Scotland (Model 1) would make the greatest impact.*' (p.26). Only this option, or a multi-commissioner approach involving far more substantial legislative changes, could address the fundamental challenges we addressed (accountability, representation, promotion of future generation interests, and support). Other options were indeed lower cost but, operating in isolation, none would be a viable alternative to carry forward the full intent of this Bill.

Claim 2: A new Commissioner would overlap with existing SPCB-supported bodies.

The report found an '*absence of representation of future generations within [the remit of] the current set of SPCB-supported bodies and the strategic agendas of 15 Scottish Parliament Committees*' (p.8). It also questioned the ability of current SPCB-supported bodies to accommodate a new long-term 'Future Generations' remit. The report's position would therefore support the 'clarity of remit' 2006 Finance Committee requirement for creating a new SPCB-supported body (acknowledged in the 2025 SPCB Supported Bodies Landscape Review Committee report), as having been met.

Claim 3: New statutory duties would increase administrative burden on public bodies.

At present, Scottish public bodies develop strategic plans and account for their actions in the absence of clear statutory directives linked to a shared, long-term national vision. The NPF has no statutory basis in legislation, and there is no guidance on how public bodies ought to “have regard” to the National Outcomes to accord with the Community Empowerment (Scotland) Act 2015. In addition, our report found, *‘There is no legislative requirement to systematically consider the needs of future generations, beyond a limited duty within the Consumer Scotland Act 2020’* (p.8). The eventual provisions of this Bill could address this gap by refocusing and integrating existing strategic planning and accounting processes, rather than layering on top.

In fact, the Scottish Government’s proposal to pursue the NPF’s integration without revising existing statutory duties also risks redundancy and duplication. For example, Community Planning Partnerships would continue to produce Local Outcome Improvement Plans and Locality Plans in accord with the Community Empowerment (Scotland) Act 2015, then *additionally* be asked by Scottish Government Ministers to account for the NPF in a separate process.

2. The Scottish Government’s proposed non-legislative route

Addressing this Committee, Richard Lochhead MSP argued in favour of a “non-legislative route” involving NPF reform. However, without careful consideration, this approach risks reinforcing a norm of superficial NPF adoption in Scotland. In a previous [Carnegie UK report](#) which considered how to maximise the use of the NPF in decision making, I reported “we could not locate a single national policy in Scotland that the NPF has significantly impacted”.

[My previous academic research](#) found that Wales’ wellbeing framework (its national Wellbeing Goals and Indicators) was far more systematically integrated in decision making than the NPF was in Scotland. Wales accomplished this through legislation: stronger, clearer duties on public bodies enabled the support and challenge powers of the Welsh Future Generations Commissioner and Audit Wales to influence strategic thinking and challenge decisions. In contrast, Scotland has relied on a small NPF team whose impact has been undercut by competing statutory obligations and countervailing performance incentives within the current system.

The Committee has been advised to put faith in NPF Reform work to take forward the intent of this Bill, however have been offered little detail on the forthcoming implementation plan, nor how this might be resourced. The danger is that, should the

Scottish Government not prove able to offer a sufficiently strategic alternative, the legislative window will have passed.

An alternative would be, if this Bill were to pass to Stage 2 scrutiny, to revise the Bill's provisions alongside and in conversation with NPF reform efforts in early 2026. This would ensure that both legislative and NPF Reform options remain open in the common pursuit of a more strategic, joined-up and long-term approach to governance in Scotland.

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