

Response to the Finance and Public Administration Committee's National Performance Framework Inquiry into proposed National Outcomes

June 2024

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Executive Summary

The Commission's response to the Scottish Government's National Performance Framework (NPF) consultation provides a detailed analysis of the proposed updates and offers recommendations for enhancing the Framework to ensure it comprehensively addresses wellbeing, human rights, and sustainable development.

Key Points:

- The updated NPF purpose "To improve the wellbeing of people living in Scotland now and in the future" is simple and better aligned with global trends focusing on wellbeing rather than purely economic metrics.
- Emphasis is placed on the need for a holistic understanding of wellbeing, encompassing social, economic, and environmental rights.
- The proposed National Outcomes are well-aligned with the updated purpose, covering essential areas like health, education, economy, environment, and human rights.
- New elements such as care, housing, climate action, and a focus on mental health are important additions.
- The proposed National Outcomes have the potential to reduce inequality by embedding equity considerations across various domains.
- The narrative should be clearer that human rights considerations should inform the development of policy to achieve the Outcomes, and not be considered in a post development impact assessment model.
- More explicit connections are required between all of the Outcome narratives and human rights to ensure a rights-based approach to wellbeing.
- Effective implementation requires clear, time-bound targets and indicators, detailed guidance, regular monitoring, and robust accountability frameworks.
- Resources and support for capacity building across public bodies will be essential to align operations with the National Outcomes.
- The inclusion of human rights-based indicators is recommended to enhance analytical potential and evidence-based policymaking.
- Implementation plans must address the gaps between ambition and reality through accountable developments in law, policy, and practice.
- To ensure meaningful impact, the NPF must be integrated into policy development and adequately funded.
- The National Outcomes framework could support joined-up policymaking by aligning various sectors and levels of government, but it must be recognised as a central tool in policy development and supported by top-level commitment.

- The proposed National Outcomes could align well with the SDGs, particularly in areas like climate action, wellbeing, and human rights.
- There is room for improvement in explicitly linking each Outcome with relevant SDG targets and indicators.

In conclusion, the Commission wishes to emphasise the importance of integrating a rights-based approach throughout the NPF, ensuring explicit connections to human rights in each Outcome, and establishing robust implementation and accountability mechanisms to realise the framework's full potential.

1. What are your views of this updated purpose for the National Performance Framework?

The updated Purpose of the National Performance Framework (NPF) as proposed, "To improve the wellbeing of people living in Scotland now and in the future," appeals as a more streamlined, simple and bold statement. This aligns with global trends focusing on wellbeing rather than purely economic metrics, making it more relevant to contemporary challenges and aspirations.

However, the Framework cannot take for granted that everyone has the same understanding of wellbeing. It will, therefore, rely on the associated narrative within the Framework clearly articulating a holistic understanding of wellbeing, which encompasses social, economic, and environmental rights.

2. In your view, do the proposed National Outcomes match the purpose of the National Performance Framework? Please explain your answer.

Yes, the proposed National Outcomes align well with the updated purpose of the NPF. They cover a comprehensive range of areas essential for improving wellbeing, including health, education, economy, environment, and human rights. The integration of new elements such as care, housing and climate action as well as the explicit inclusion of mental health are all important additions to be welcomed.

Each Outcome inherently supports the realisation of rights-based wellbeing economy. However, making these connections explicit throughout the narratives sitting around the National Outcomes would help to improve a wider understanding of the human rights foundations of this framework amongst duty bearers in Government and Scotland's public bodies, as well as wider society. This would help to ensure that social inclusion, economic success, and environmental sustainability are approached through a rights-based lens. A more explicitly connected alignment, would also help to ensure that the framework is not only about measuring economic success but also about fostering a sustainable and inclusive society that respects, protects, and fulfils human rights.

3. What do you think of the changes being proposed?

The proposed changes are commendable as they reflect an evolution towards a more inclusive and comprehensive framework. The emphasis on wellbeing, inclusion of care, housing and climate action, as well as a clearer focus on mental health are particularly noteworthy. However, it is disappointing to note that almost ten years on from the Commission's initial input about the narratives - whilst they have generally improved in clarity and content, they continue to fail to show their human rights foundations. Human rights and equality are often perceived as an add-on consideration in policy issues, informing assessment post development of policy, rather than being viewed as a central framework to start and to build from. Developing this understanding and building capacity on the foundational relevance of the human rights framework remains key to the Commission's ambition for the NPF.

The integration of human rights considerations into each Outcome would highlight a commitment to ensuring that policy efforts contribute to the realisation of human rights for all, as well as support wider capacity building on how human rights are relevant in all of our lives. These connections are highlighted below.

3.1. Care

This narrative should include reference to the rights of carers, including their rights to work and to just and favourable conditions of work, fair remuneration, and social security, particularly for vulnerable groups.

It should also make reference to the rights of persons with disabilities to live independently and be integrated into the community.

Reference to access to care should also note that people should have access to affordable, accessible, acceptable and quality care.

This Outcome would align in particular with the following Articles:

- Article 23 of the Universal Declaration of Human Rights (UDHR)
- Article 19 of the Convention on the Rights of Persons with Disabilities (CRPD)
- Articles 4 and 15 of the Council of Europe (CoE) European Social Charter (ESC)
- Article 5 of the UN Convention on the Elimination of Racial Discrimination (CERD)
- Article 11 of the UN Convention on the Elimination of Discrimination Against Women (CEDAW)
- Articles 3 and 18 of the UN Convention on the Rights of the Child (CRC)

3.2. Children and Young People

Whilst there is reference to Children's rights in this Outcome narrative, further connections could be made to the following Articles within the human rights framework. The focus is on creating equal opportunities for children to develop and participate in society:

- UN Convention on the Rights of the Child (CRC) – all of which is relevant to this Outcome
- Article 7 of the CoE ESC
- Article 7 of CRPD

Children are also noted by their absence throughout many of the Outcome narratives. Many of these Outcomes have direct relevance to the wellbeing of children, and reference to them should permeate the NPF Outcomes (as reflected in the highlighted Articles in this section) and should not be solely limited to this Children and Young People's Outcome.

3.3. Climate Action

This narrative should make a clear connection to the need for Climate Justice in reducing our impact on the climate change that disproportionately harms more vulnerable communities across the world. It would be useful to make reference to the recent groundbreaking judgement on climate change and human rights which underlined the States' responsibility to combat climate change effectively in order to protect rights enshrined in the European Convention on Human Rights.¹

In addition, reference could be made to protection from natural disasters; awareness raising, education and human/ institutional capacity on climate change and justice; the right to enjoy the benefits of scientific progress and of access to sustainable modern energy.

The following articles highlight the responsibility of states to address climate change and ensure environmental protection. They emphasise education, awareness, and public participation in environmental matters. The focus is on the right to a healthy environment and sustainable living conditions for all, particularly protecting vulnerable populations from the adverse effects of climate change.

- Article 2 of the Paris Agreement
- Article 6 of the UN Framework Convention on Climate Change (UNFCCC)
- Article 1 of Protocol No. 1 to the European Convention on Human Rights (ECHR): Protection of property (interpreted to include environmental considerations in some cases).
- Article 5(f) of CERD
- Article 14(2)(h) of CEDAW
- Article 11 of CRPD
- Article 24 of CRC

3.4. Communities

This narrative refers to community empowerment and involvement in decision making. Reference should therefore be made to the fundamental human rights principle of participation: Everyone has the right to participate in decisions which affect them. The following Articles emphasise the importance of community involvement and empowerment, ensuring that everyone has the opportunity to participate in decision-making processes that affect their lives and communities.

- Article 25 of the International Covenant on Civil and Political Rights (ICCPR).
- Article 21 of the UDHR
- Article 5(c) of CERD
- Article 7 of CEDAW
- Article 29 of CRPD
- Articles 12 and 15 of CRC

3.5. Culture

This Outcome should make reference to people's right to participate in cultural life. The following Articles underscore this right, emphasising the importance of cultural participation and the right to enjoy and contribute to cultural life, ensuring that everyone has the opportunity to engage in cultural, recreational, and sporting activities.

- Article 27 of the UDHR
- Article 15 of the International Covenant on Economic, Social and Cultural Rights (ICESCR)
- Article 13 of the CoE ESC
- Article 5(e)(vi) of CERD
- Article 13(c) of CEDAW
- Article 30 of CRPD
- Article 31 of CRC

3.6. Wellbeing Economy and Fair Work

An Outcome about fair work should really reference the rights to work, fair and favourable working conditions, including equal pay for equal work. Articles relevant here emphasise the right to safe and healthy working environments, protection against unemployment, and social security. The focus is on ensuring economic wellbeing and fair treatment in the workplace.

- Article 23 of the UDHR
- Article 7 of the ICESCR
- Articles 1, 2 & 3 of the CoE ESC:
- Article 5(e)(i) of CERD
- Article 11(1)(a) & (d) of CEDAW
- Article 29 of CRPD
- Articles 27 & 32 of CRC

People are the economy, and we must ask questions of what the economy is and who it serves. A wellbeing economy as well as embedding circularity, sustainable use of resources, responsible consumption and community wealth building – must also be rights-based. The economy shapes how we organise society and how widely rights are enjoyed by people in society.²

3.7. Education and Learning

The right to education is a fundamental right. Where the current narrative speaks of meeting needs, it is important to remember that needs are contextual, open-ended and can always be prioritised to the most in need – rights are universal and legally established claims and entitlements.

A rights-based education system prioritises dignity, empowerment, and holistic development – which can all contribute to a more just and equitable society.³

The following articles highlight the right to education and vocational training. They emphasise equal access to education at all levels, ensuring that everyone has the opportunity to pursue education and training. The focus is on eliminating discrimination in education and providing quality educational opportunities for all:

- Article 26 of the UDHR
- Article 13 of the ICESCR
- Article 10 of the CoE ESC
- Article 2 of Protocol No. 1 to the ECHR
- Article 5(e)(v) of CERD
- Article 10 of CEDAW
- Article 24 of CRPD
- Articles 28 & 29 of CRC

3.8. Environment

This Outcome mentions “Access to a healthy, high-quality environment is a right available to all” – rather than using the official wording of the UN of a right to a safe, clean, healthy and sustainable environment. Using internationally agreed language can help to make connections to globally accepted norms as well as to the sustainable development goals.

The substantive elements of this right include clean air, safe climate, healthy ecosystems and biodiversity, safe and sufficient water, healthy and sustainable food, non-toxic environment and recognition of the right to a health environment.

The following articles emphasise the responsibility of states to protect the environment and ensure that everyone has the right to a general satisfactory environment conducive to health and wellbeing:

- Article 12 of the ICESCR
- Article 11 of the CoE ESC
- Article 5(f) of CERD
- Article 14(2)(h) of CEDAW
- Article 9 of CRPD
- Article 24 of CRC

3.9. Equality and Human Rights

In the “Consultation with Parliament in connection with the Review of National Outcomes” – the very final paragraph of analysis on human rights states – *“A choice needs to be made: do we articulate human rights as a distinct national outcome, or do we ensure than human rights commitments and language and culture permeate every other stated national outcome?”*

The Commission argued at the time of the last review and reiterates the same concern at this point - it is not a simple choice of one or other.

As the Commission has stated previously, - whilst it should indeed permeate the content and aims of every National Outcome – it is very hard to mainstream something that is not well understood. At this point in Scotland’s journey towards becoming a rights-respecting society, a National Outcome in its own right is necessary for change to happen.

The idea of mainstreaming something, can only come when a country’s institutions are in a position where concepts are well understood, and practice is well established. Neither can be said to be the case currently for human rights in Scotland. Indeed, it is fair to say that if human rights are only permeated throughout the Outcomes, without an explicit human rights Outcome (and corresponding indicators), it is likely that nothing will meaningfully change nor progress.

Every National Outcome has relevance with regard to advancing the realisation of human rights (and should be presented as such within the narratives – as highlighted

earlier in this response), whether it be about the right to health, an adequate standard of living, education, work, business & human rights, climate justice, or the promotion of our cultural rights. However, that is not well understood or articulated by public bodies, including the Scottish Government and Parliament, nor the public – which is precisely why we need an Outcome on human rights at this point in time.

We support the addition of equality in this Outcome for the same reason – whilst it should permeate all Outcomes, the inclusion of this Outcome allows for a concentrated focus on equality and human rights as a key pillar of our social progress and our statement of values as a country.

With that said, the narrative for this Outcome has been improved and we welcome those changes. Three small amendments that we feel would further improve are as follows:

It would be useful to elaborate on “We recognise that human rights are universal, indivisible, interdependent and interrelated.” - To – “We recognise that all human rights (Civil, Political, Economic, Social, Cultural, and Environmental) are universal, indivisible, interdependent and interrelated”.

Also – we suggest strengthening the paragraph that commences with “We live in a well governed society.” - to - “We live in a well governed society, that respects the rule of law and where duty bearers are held accountable for their actions”.

Accountability is a key principle of a human rights based approach.

Finally – “We have a fair, effective and accessible justice system” – should be amended ideally to spell out that accessible means both physically and financially.⁴

The human rights framework in Scotland includes:

- European Convention of Human Rights, incorporated through the Human Rights Act 1998
- European Social Charter
- Universal Declaration of Human Rights
- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social and Cultural Rights
- Convention on the Elimination of Racial Discrimination
- Convention on the Elimination of Discrimination against Women
- Convention against Torture
- Convention on the Rights of the Child

- Convention on the Rights of Persons with Disabilities

3.10. Health

Everyone has the right to the highest attainable standard of physical and mental health – this should be included in the narrative – nowhere is it currently mentioned that we have the right to health, which seems a missed opportunity. Public health Scotland recognises that the right to health is a fundamental human right. They also recognise that the triple AAAQ Framework (services and systems need to be accessible, available, appropriate and quality) are standards that public health should aim to deliver if we are to create the fairer healthier Scotland.⁵

The relevant Articles focus on the right to the highest attainable standard of health, including access to healthcare services and social security. They emphasise the importance of public health and medical care, ensuring that everyone has the right to conditions conducive to good health, including clean and safe environments:

- Article 12 of the ICESCR
- Article 25 of the UDHR
- Article 11 of the CoE ESC
- Article 5(e)(iv) of CERD
- Article 12 of CEDAW
- Article 25 of CRPD
- Article 24 of CRC

3.11. Housing

The right to adequate housing is a key element within the right to an adequate standard of living – this should be noted. Most of the elements of the right are covered in the narrative, but you could add to this to ensure that all elements are covered:

We ensure that everyone has housing that is safe, secure (does this mean security of tenure? – which it should), accessible, affordable, habitable, suitably located, culturally adequate and has the necessary services, materials, facilities and infrastructure (e.g. safe drinking water, adequate sanitation, energy for cooking heating, lighting and food storage and refuse disposal.)

The following Articles emphasise the right to adequate housing as part of an adequate standard of living. They highlight the importance of ensuring that everyone has access

to safe, secure, and affordable housing with adequate living conditions. The focus is on protecting housing rights, particularly for vulnerable groups:

- Article 11 of the ICESCR
- Article 25 of the UDHR
- Article 31 of the CoE ESC
- Article 5(e)(iii) of CERD
- Article 14(2)(h) of CEDAW
- Article 28 of CRPD
- Article 27 of CRC

3.12. International

The narrative for the "International" Outcome emphasises global interconnectedness, promoting peace, democracy, human rights, international development, climate action, international trade, and welcoming diversity. A wide variety of relevant Articles from across the UN and CoE human rights framework are potentially relevant here. The relevant articles focus on the principles of non-discrimination, equality, and the protection of human rights on an international scale.

They emphasise the importance of promoting peace, democracy, and human rights globally, as well as ensuring the protection and assistance for refugees and migrants. Overall, the articles underscore the commitment to global interconnectedness, leadership in international relations, and welcoming diversity, while ensuring the rights and well-being of all individuals, including children and persons with disabilities:

- Articles 1, 13, 14, 28 of UDHR
- Articles 1, 2 & 12 of ICCPR
- Articles 2, 11 & 5 of ICESCR
- Articles 2, 5 & 7 of CERD
- Articles 2, 3 and 9 of CEDAW
- Articles 18 & 21 of CRPD
- Articles 22, 37, 38 & 39 of CRC
- Articles 3, 4, 5, 10,11 & 14 and Article 1 of Protocol No. 12 of ECHR;
- Articles 7 & 19 of the CoE ESC

3.13. Reduce Poverty

Poverty is a human rights issue. It undermines access to essential rights such as the right to an adequate standard of living, education, housing, and health, perpetuating inequality and limiting individuals' ability to fully participate in society. Addressing poverty is crucial for ensuring the realisation of economic, social, and cultural rights for all.

The following articles emphasise the need to protect individuals from poverty and social exclusion, ensuring social security and economic opportunities for all, particularly the most disadvantaged:

- Article 11 of the ICESCR

- Article 25 of the UDHR
- Article 30 of the CoE ESC
- Article 5(e)(i) of CERD
- Article 13(a), (b) of CEDAW
- Article 28 of CRPD
- Article 27 of CRC

4. Are there any policy priorities that should be reflected in the proposed National Outcomes but which, you consider, are not?

In the 2023 Review of the National Performance Framework National Outcomes Call for Evidence, the Commission set out three further Outcomes that we felt were missing from the NPF: Freedom from violence in all its forms, Care and Tackling of persistent inequalities.

We were pleased to see the inclusion of the Care as a National Outcome in its own right (although the narrative could be improved as noted in response to question 3).

In relation to violence - we previously noted that a considerable number of Targets and Indicators within the SDGs focus on violence reduction, especially in relation to Violence Against Women and Girls, Child abuse, Sexual and Psychological abuse of young people, FGM, Trafficking, Hate crime, Discrimination and Harassment. We acknowledge that concerns around violence, especially gender-based violence have now been housed within the Equality and Human Rights National Outcome. Given the range of areas this could cover – it will be important that this is adequately covered by the suit of indicators necessary to monitor progress.

We had also previously raised concern that the decision not to include a focus on 'equality/ inequalities' as an Outcome in its own right in 2018 was an error. Since that review point the COVID-19 pandemic graphically exposed the extent of prevailing and persistent structural inequalities, providing a stark illustration of the effects of indirect discrimination that have been harmful for people and their human rights, especially their economic, social and cultural rights. As with the issue of violence, we acknowledge the inclusion of both equality in the title of the human rights National Outcome, as well as the reference to tackling persistent inequalities within the narrative. As with the inclusion of violence, however, monitoring inequalities will require a broad suite of indicators – many of which may sit across (or as elements of) measuring progress within a number of the other National Outcomes. A wide range of data is already collected that could

support the quick identification of relevant indicators, including those contained within SDG Goals 5 and 10.

Therefore, whilst we acknowledge that these areas of focus do make sense within the Outcome on Equality and Human Rights – how progress is measured here (and across all Outcomes) needs careful consideration and re-conceptualisation, so as to ensure it is possible to effectively measure progress without a significant increase in the number of indicators.

One final area that we wish to highlight is the unique challenges faced by those living in remote and rural Scotland and the need to reflect on these within the monitoring of the National Outcomes. The current National Indicators do helpfully summarise the urban/rural classifications disaggregation which is reported on as standard on the NPF website for indicators where it is available. However, the narrative that sits around the National Outcomes themselves contain no reference to the challenges faced by remote and rural Scotland which could result in the underrepresentation of these areas in policy planning and resource allocation. By including these considerations more explicitly, the National Outcomes can better reflect the diverse needs of all Scottish communities and promote more balanced and inclusive development across the country.

5. What are your views on the Scottish Government's consultation on the proposed National Outcomes?

The Scottish Government's consultation process has been relatively comprehensive, making good use of existing sources. In the absence of a budget sufficient to allow the team to undertake any meaningful participative process to inform the review, the NPF team have made use of the data from a range of engagement projects, re-analysing this data through the lens of the NPF, an online written consultation (aimed at individuals), a call for evidence (aimed at organisations) and a series of stakeholder meetings.

However, it is far from ideal nor good practice for a significant process such as this not to undertake a meaningful participative process with a wide range of stakeholders. Without such a process, voices such as those children (younger than the age of Members of the Scottish Youth Parliament) and marginalised communities risk not being heard.

6. How do you think the proposed National Outcomes will impact on inequality?

The proposed National Outcomes have the potential to positively impact inequality by embedding equity considerations across various domains such as health, education, and economic participation, which will hopefully be accompanied by robust indicators and targets related to inequality within each Outcome. It is important that these indicators also continue to explicitly address the disparities faced by remote and rural communities to be truly effective. This approach will help ensure that all communities, regardless of their geographic location, benefit from national progress and have equal opportunities for wellbeing and development.

The Commission had previously argued for a dedicated National Outcome on inequality and therefore we do welcome the explicit reference to tackling inequalities within the Equality and Human Rights Outcome. The real potential to positively impact inequality, however, will depend on the forthcoming plans to tackle the implementation gap.

The National Outcomes have, since their inception, promoted the kind of Scotland we want to live in. However, translating such a vision into reality requires accountable developments in law, policy and practice that are adequately funded. Making meaningful connections between significant policy commitments (e.g. as set out within the annual Programme for Government), the annual budget and the National Performance Framework will be crucial to delivering the kind of change we are stating we want within the NPF.

7. Do you think the proposed National Outcomes align with the UN Sustainable Development Goals? Please explain your answer.

The proposed National Outcomes could align well with the UN Sustainable Development Goals (SDGs). The inclusion of climate action, wellbeing, and human rights directly reflects the SDGs' core themes.

However, the last NPF review presented connections with the SDGs that felt superficial at best – with no real understanding as to how and why certain goals were or were not connected to certain National Outcomes. Explicitly linking each Outcome with relevant SDG Goals within the narrative and then with suitable targets and indicators is still needed to enhance coherence and accountability, ensuring Scotland's progress aligns with global efforts.

8. To what extent do the proposed National Outcomes support joined-up policy making in Scotland?

The proposed National Outcomes have the potential to support joined-up policymaking by providing a common framework that aligns various sectors and levels of government. This holistic approach of the Outcomes could encourage cross-sector collaboration and integrated policy responses to complex issues such as climate change, health, and economic development.

However, for the NPF to move beyond being a statement of ambition, towards being a tool for transformational change – the importance and value of the NPF needs to be recognised and put front and centre in policy development throughout all government directorates including finance. This requires buy-in from the top which permeates throughout government and a commitment to implementation (including adequate resources).

9. What should the implementation plan contain to make sure that the National Outcomes are used in decision-making?

The implementation plan should include:

- Clear, time-bound targets and indicators for each National Outcome to measure progress.
- Detailed guidance on how each sector can contribute to the National Outcomes.
- Mechanisms for regular monitoring and public reporting of progress.
- A robust framework for accountability, including the roles of various stakeholders.
- Provision for periodic review and adjustment of strategies based on performance data.
- Resources and support for capacity building across public bodies to align their operations with the National Outcomes.

By introducing Specific, Measurable, Achievable, Relevant and Time-bound (SMART) Targets to the National Outcomes, everyone will have a much clearer idea of what, how

and by when the NPF is aiming to achieve. A clearer sense of purpose could help to refocus efforts on implementation at all levels of government.

The Commission understands the potential of the NPF to support a vision for progress in Scotland and its importance in measuring progress towards delivery of the SDGs. As it stands though, it only presents a snapshot of result outcome and doesn't allow for an analytical understanding of why these results are what they are, or importantly how to change them where necessary.

As in the previous two reviews, the Commission is again recommending the inclusion of human rights based indicators to support this analytical potential. Best practice explains that such indicators help to measure progress across three levels, namely:

- having the right structures in place with regards to law and policy,
- ensuring that the correct processes can support effective implementation (including resources – connecting the budget)
- result outcome.

Together they address the essential aspects of human rights implementation, namely: commitment, effort and result.

The focus on commitment and effort, as opposed to only measuring result outcome, is one of the areas which make human rights indicators distinct. Result outcome indicators look backwards at results, whereas Structure and Process indicators help governments to look forward and make more progress, e.g. by removing barriers to better outcomes such as systemic discrimination as a result of law or policy, intended or unintended; or identifying insufficient resourcing of good law or policy intentions.

Process indicators also strengthen evidence-based policymaking by assisting governments in determining whether their interventions are actually leading to improved outcomes or whether they need to be adjusted.

Result outcome indicators demonstrate “the what” which by themselves do not take us very far to where we want to go. Structure tells us “why” we have not made more progress and Process tells us “how” we can make more progress. This is the “power tool” of a human rights based approach to monitoring progress.

Reflecting the SDGs' emphasis on means of implementation, the inclusion of structure and process indicators would also better support delivery of some Targets which focus on policies and laws for example around gender equality (SDG indicator 5.1.1), youth employment strategies (8.b.1), or integration of biodiversity into policymaking (15.9.1).

Identification of relevant delivery plans and actors might also have benefits for the wider take-up and effectiveness for the NPF across government.

If accountability is to be improved, the Scotland Government has to be willing to set NPF Targets and be held accountable for their contribution in meeting them – but those Targets must be developed in agreement with local authorities and other public bodies so as not to be imposed from the top-down. Working with Local Authorities and other public bodies to map out what targets already exist locally and nationally and how they fit within the NPF could support a better localisation of what the aims of the NPF are – as well as build better buy-in at the local level to increase a willingness to support implementation. National Targets with local variance places an accountability structure at both levels.

End.

Endnotes

¹ See [The Grand Chamber of the European Court of Human Rights issues groundbreaking judgment on climate change and human rights - ENNHRI](#)

² See the following for previous work by the Commission in this area: [Submission to Advisory Group on Economic Recovery \(scottishhumanrights.com\)](#).

³ See work by CYPCS for further discussions around rights-based approach to education – e.g. [Response to Scottish Government consultation on the provisions of the Education Bill. - The Children and Young People's Commissioner Scotland \(cypcs.org.uk\)](#)

⁴ See [Access to Justice For Everyone \(scottishhumanrights.com\)](#) for an exploration of how a new Human Rights legal framework improve could access to justice in Scotland today?

⁵ See for further info [Public Health Scotland, The right to health \(healthscotland.scot\)](#)