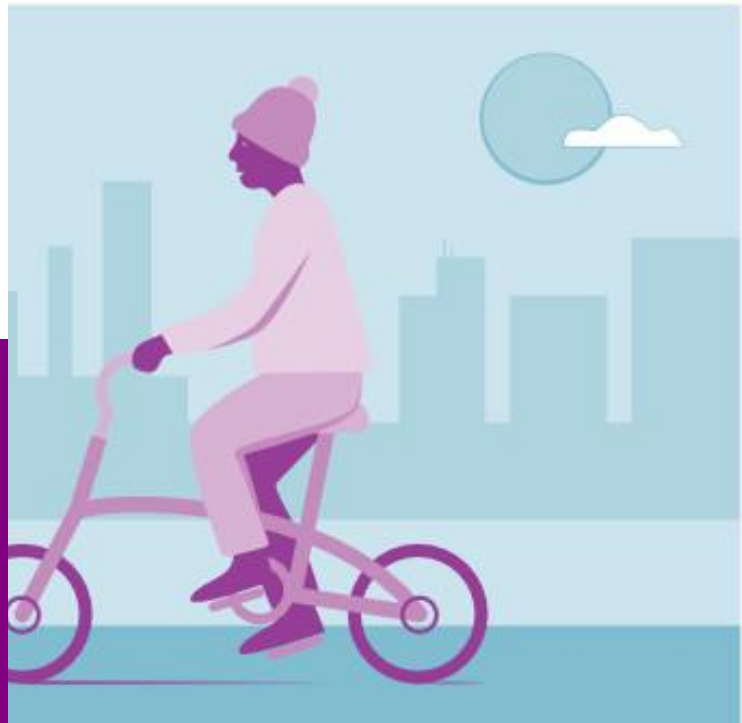




**The Health and  
Social Care  
Alliance  
Scotland  
(the ALLIANCE)**



**Scotland's Commissioner  
Landscape: A strategic approach  
Call for views ALLIANCE response**

**7 March 2024**

## Introduction

The Health and Social Care Alliance Scotland (the ALLIANCE) welcomes the opportunity to respond to the Finance and Public Administration Committee's call for views to inform their inquiry into Scotland's Commissioner Landscape. The ALLIANCE have offered our support to several calls for commissioners in recent years, including the Patient Safety Commissioner, Older People's Commissioner, and a Disability Commissioner, which we believe have the potential to deliver positive outcomes for the groups they would support.

We recognise however that taken as a whole, the range of calls for new commissioners represents a very significant increase in numbers. We have also become increasingly aware of concerns raised by the Scottish Parliament Corporate Body (SPCB) and the Finance and Public Administration Committee as to the sustainability of this growth. In addition, we have consistently called for the existing Scottish Human Rights Commission (SHRC) to be further empowered and better resourced, bringing it in line with other National Human Rights Institutions in the UK.

In this response, the ALLIANCE:

- Notes that the increasing number of proposed Commissioners reflects public service failures impacting the rights and wellbeing of many groups across society.
- Suggests that in principle, the introduction of new Commissioners can lead to awareness raising and positive change for the people they are intended to support.
- Recommends that the committee consider defining explicitly what roles may be appropriate for Commissioners, what powers they should be given as standard, and what powers may optionally be conferred depending on the role.
- Recommends that a clearer distinction be drawn between the role and powers of Commissioners, suggesting that two of the primary roles would be Regulatory and Rights-Based Commissioners, whilst



areas such as investigations and policy should be powers granted to Commissioners as a matter of course.

- Notes that some of the proposals for new Commissioners do not necessarily align with the criteria “that no new officeholder should be proposed unless it can be clearly demonstrated that the function cannot be carried out by an existing body,” on the basis that the SHRC could, with adequate powers and funding, deliver such functions.
- Recommends that rights holders and people with lived experience be heard in accountability processes, and that scrutiny of Commissioners involve the whole Scottish Parliament, not simply relevant subject committees.
- Highlights concerns that if all the proposed new Commissioners were introduced, the Commissioner landscape may become highly fragmented, in a way that does not reflect the need for an intersectional approach that recognises that individuals may belong to multiple groups whose rights are at risk.
- Recommends that the Scottish Parliament, Scottish Government and SHRC investigate the potential of the “Rapporteurship model” the Commission outlined in its ‘At a Crossroads’ report in 2023.
- Recommends that regardless of the exact structure of the SHRC, it be further empowered and adequately resourced in line with other Commissioners and other National Human Rights Institutions in the UK.



**Question 1: Why is the Commissioner model chosen over other approaches, such as a public body or government department, and why do you consider there has been such a growth in Commissioners in recent years?**

There is a clear commonality between most of the additional Commissioners currently in the process of being established or which have been proposed. The Patient Safety Commissioner, Victims and Witnesses Commissioner, Disability Commissioner, Older People’s Commissioner, and the Learning Disability, Autism and Neurodiversity Commissioner all clearly relate to population groups that face specific challenges in society, very often related to barriers to realising their human rights.

For each of these groups there is clear evidence in recent years that they have been let down or left behind by public services. The Patient Safety Commissioner for example arose from the recommendations contained within the Cumberlege Review, which investigated the serious medical failures related to Promidos, sodium valproate and pelvic mesh<sup>1</sup>. Similarly, the proposal for the Disability Commissioner must be understood in the context of long-established inequalities experienced by disabled people and people living with long term conditions, which have been greatly exacerbated both by the COVID-19 pandemic<sup>2</sup> and the cost of living crisis<sup>3</sup>.

We consider it likely that the significant increase in established and proposed Commissioners is rooted in this pattern of service failure. Many people have experienced significant hardship, often to the point of breaching their human rights and dignity, when they should instead have been able to trust in essential public services and the people delivering them. Faced with the seeming inability to address these failures otherwise, a Commissioner may be seen as the only remaining possibility for redress, to have their voices heard, and their experiences taken seriously.

This is what the Scottish Human Rights Commission (SHRC) argue in their 2023 paper ‘At a Crossroads – which way now for the human rights system in Scotland?’<sup>4</sup> Amongst the reasons they identify as driving demand for new Commissioners they highlight the “implementation gap between policy



and legislation”, “the need for a champion”, and “dissatisfaction with accountability mechanisms.” The term “champion” frequently recurs in calls for Commissioners, and the ALLIANCE has itself used that term when offering our support to such calls.

They further note the possibility of Commissioners being seen as a “perceived ‘easy win’ for Government” and “the influence of comparative policy and new public bodies elsewhere in the UK”. The relative ease of establishing a new Commissioner versus addressing the issues at the root of calls for one may encourage the Scottish Government to support this particular solution. At the same time Scottish political debate often centres around degrees of divergence from and alignment with the rest of the UK, which may explain proposals to follow for example the Welsh experience of a Wellbeing of Future Generations Commissioner.

Crucially, Commissioners are understood to be independent of the Scottish Government and public bodies. Particularly where governments or public bodies are felt to be failing to uphold people’s rights and ensure their wellbeing, it would not be appropriate for them to “mark their own homework” and say whether that is the case or not. By virtue of their independence, Commissioners are perceived to be more able to honestly and openly challenge these failings where they arise, and therefore potentially encourage meaningful change to address them.

We would also highlight that the SHRC, as Scotland’s National Human Rights Institution (NHRI), is the only body of its kind in the United Kingdom which does not have the power to raise legal proceedings in its own name. Combined with other limitations on its powers and resources, we would agree with the SHRC “that there may be a causal link between this gap in legal powers, and the frustrations experienced by rights holders in accessing justice<sup>5</sup>.” The ALLIANCE have repeatedly called for the SHRC to be given greater powers and more resource, which may equip it to begin addressing some of these failures, and we explore this theme more fully in our answers to later questions.



## **Question 2: What are the implications of this growth on Scotland's finances, other organisations and wider society?**

Any increase in the number of Commissioners will naturally have an impact on public finances, due to the costs associated with a Commissioner and their office. Whilst the total budget for parliamentary Commissioners, given as £16.6 million in the financial year 2023/24 represents only a very small proportion of public expenditure in Scotland, it represents one-eighth (12.4%) of the entire budget for the Scottish Parliament as an institution, which sets budgets for Commissioners through the Scottish Parliament Corporate Body (SPCB).

If the number of Commissioners that the SPCB is responsible for continues to grow, the proportion of the Parliament's budget which is dedicated to Commissioners will too. Even if this growth is appropriately accounted for in the overall Scottish Budget each year, it will nonetheless add significantly to the responsibilities of the SPCB which may not necessarily have the capacity or scope to properly manage the separate budgets of an increasing number of Commissioners.

In terms of the effects on other organisations and wider society, it could reasonably be argued that the proposed Commissioners will bring additional attention to the challenges faced by specific groups, or in the case of the Future Generations Commissioner, the wider principles they stand for. This could have several positive effects such as increasing public awareness and building pressure for change, increasing the level of direct engagement with groups whose rights are most at risk and organisations representing or advocating for them, improving the breadth and depth of policy development, and furthering the progressive realisation of human rights.

Where proposed Commissioners would have powers of investigation, to compel the provision of information, and to issue binding guidance or recommendations, they may have a more direct impact on public service provision. This could similarly lead to positive outcomes in many cases, if



the actions of Commissioners were able to force changes in practice that improve people's experiences of public services.

It is also important to consider that there are costs inherent to ongoing, unchallenged infringements of people's rights. These costs are both human, in terms of negative impacts on wellbeing, rights and dignity, and financial, as for example failures in provision of social care for disabled or older people often lead directly to more expensive crisis interventions. Where Commissioners have helped drive forward changes in practice that prevent these failures from arising in the first place, by holding public bodies to account and monitoring policy and practical implementation, that may lead to longer term savings for the public purse, and Commissioners may therefore represent an investment rather than a cost.

### **Question 3: Currently, there is a mix of regulatory, investigatory, rights-based, and policy-focused Commissioners in Scotland.**

**What should the role of Commissioners be and which should report directly to Parliament (and why)?**

**Looking across the entire model of Commissioners, do you consider it to be a coherent approach? What, if any, improvements could be made to the Commissioner landscape in the future to ensure a coherent and strategic approach?**

Taking the current Commissioner landscape into account, the ALLIANCE would suggest there should be a clearer distinction drawn between the role and the powers of Commissioners. The exact powers available to a given Commissioner should of course relate to their specific role, with an appropriate degree of flexibility rather than taking a one size fits all approach. Nonetheless, Commissioners would benefit from greater coherence and consistency than exists at present, as well as more certainty that they will have sufficient resources to fulfil their role and use these powers effectively.

Within the categorisations listed within the question, we would consider "regulatory" and "rights-based" to best identify some, though not



necessarily all, of the potential roles for a Commissioner. The role of Regulatory Commissioners, such as the Scottish Information Commissioner, should be to monitor and enforce compliance with the relevant legislative frameworks, standards and codes of conduct.

The role of a Rights-Based Commissioner, such as the Children and Young People's Commissioner Scotland (CYPCS), would similarly be to monitor and enforce compliance with human rights and equalities frameworks, as well as supporting other groups identified as being at risk. Although the ALLIANCE considers human rights to be universally relevant, we recognise that there is a distinction between regulators governing the functioning, transparency and behaviour of governments and public bodies under purely domestic legislation, versus commissions promoting and advocating for the rights, including international treaty rights, of individuals and groups.

By contrast, we would consider “investigatory” and “policy-focused” to relate more to the potential powers of Commissioners. We would argue that for any Commissioner role to have sufficient “teeth” it should have investigatory powers. Similarly, we would consider informing and shaping the development of relevant policy to be something that should be within the remit of any Commissioner. On balance we are not convinced that either of these are sufficient justification by themselves for the role of a distinct Commissioner.

For policy-focused Commissioners in particular, we would be concerned about the potential mismatch between expectations and reality. The stated justification in many of the calls for new Commissioners is to have an individual to stand up for a particular group. In such cases, people belonging to that group would reasonably expect the Commissioner to be able to investigate issues and, where necessary, open legal proceedings. Yet a policy-focused Commissioner would have no such powers, potentially undermining the trust of the very people they are supposed to support and leaving serious breaches of rights unaddressed.





We would suggest that at a minimum, all Rights-Based Commissioners should report directly to the Scottish Parliament. This would help ensure that there is two-way accountability between the Commissioners, as the appointed individuals charged with upholding rights, and MSPs, as the directly elected representatives of the Scottish people.

Direct reporting would help to give MSPs a greater awareness of the issues the Commissioners have identified, as well as the possible actions they may need to take as legislators to address them. This would also mean MSPs would not be able to claim ignorance of any failings identified, and support the public to hold them to account where they have not acted to resolve them.

There may also be a case for direct reporting by Regulatory Commissioners, but many of those lie outwith the ALLIANCE's area of expertise.

**Question 4: Criteria were developed by the Session 2 Finance Committee to help guide decisions on whether to create a new commissioner. These criteria are considered by the Scottish Government and Members when proposing Commissioner related bills.**

**How are the criteria working in practice and where do you consider improvements can be made to the criteria, its use, or its status?**

We particularly note the recommendations in the Finance Committee's 2006 report:

- “that no new officeholder should be proposed unless it can be clearly demonstrated that the function cannot be carried out by an existing body.”
- “that bodies with similar roles and responsibilities should be amalgamated wherever possible; the potential to pool the resources of existing bodies (such as sharing staff) should be considered wherever possible.”



These criteria have not necessarily been followed in some of the proposals for new Commissioners, specifically with regards to Rights-Based Commissioners. For example, we would agree that there are currently no bodies which specifically uphold the rights of older or disabled people and that the proposed Commissioners would fulfil those functions. However, we would accept that it cannot be clearly demonstrated those functions could not be carried out by the SHRC – if the SHRC was adequately resourced and organised in a way that enabled it to do so. Indeed, equipping the SHRC to carry out these functions would clearly align with the criteria to amalgamate responsibilities and pool resources.

We would however note that some of the proposed Commissioners, including the Older People's and Disability Commissioners, have arisen from member's bills which have yet to be reported on by a committee or put to a vote of the Scottish Parliament, and thus have not yet had the opportunity for full parliamentary scrutiny in relation to these criteria. We would encourage the relevant committees to specifically consider how the proposed bills fit these criteria in their Stage 1 reports.

These criteria also do not include any recommendations as to financial assessment of the risks that may relate to not establishing a proposed office or to the consistency and coherence for Commissioners. With reference to our response to questions 1 and 2, many of the calls for Commissioners have arisen from service failures that have had serious negative impacts on people, and in many cases significant related financial costs of addressing those failures after the fact. Insofar as some Commissioners may help to prevent those failures arising in the first place, they may represent an investment that reduces costs overall, rather than solely a cost themselves.

Building on the points we made in our response to question 3 about clarity regarding the role and powers of Commissioners, it may be helpful to augment these criteria with recommendations in these areas. For example, the Committee may wish to consider if there are any other roles they



foresee Commissioners reasonably being able to carry out in addition to the “Regulatory” and “Rights-Based” roles we identified in that answer. These may then form the basis for a small number of consistent roles that any future Commissioners would be expected to take up.

Similarly, the Committee may wish to consider outlining some of the powers that proposed Commissioners may be granted. These could include both “standard” powers, that would be expected to be held by any Commissioners, and “additional” powers, that would give flexibility to tailor a given Commissioner to their particular area of focus. The ALLIANCE would recommend that “standard” powers include investigation, policy development and data gathering, whilst “additional” powers include to produce statutory guidance or to issue unlawful act and compliance notices.

**Question 5: Are the existing governance and oversight arrangements adequate and, if not, what improvements are required?**

Due to the wide variation in Commissioner models at present, the ALLIANCE do not feel fully equipped to answer this question. That in itself may indicate a deficiency in the arrangements, with a lack of easily accessible information that clearly sets out the differences between structures and oversight arrangements for each Commissioner. Similar to our responses to other questions, we would suggest that a more consistent and coherent approach across different Commissioners would make it easier for individuals and stakeholders to understand governance and oversight arrangements.

**Question 6: How appropriate are existing lines of accountability and how does the process work in practice? What other accountability models should be considered?**

The ALLIANCE does not have detailed knowledge or recommendations relating to the current lines of accountability for Commissioners. However, we would as a general rule recommend that when considering accountability of any form of public body, particular those explicitly rooted in



rights, that accountability mechanisms should be co-produced alongside and involve rights holders and people with lived experience.

Some of the existing Commissioners clearly involve the people they are intended to support in their work, providing both accountability and direction for their work. We note that for example the CYPSC includes “participation” as one of their five key values, and that young advisors aged 12-17 share their views to help shape the Commissioner’s work, as well as having active involvement in recruitment processes<sup>6</sup>. We believe this is a positive approach, and would suggest similar approaches could be adopted across the Commissioner landscape.

**Question 7: To what extent is the current model of Parliamentary committee scrutiny of the performance and effectiveness of how Commissioners exercise their functions appropriate?**

In broad terms, we would consider committee scrutiny to be an appropriate mechanism for evaluating the performance and effectiveness of Commissioners. Given their focus on specific subject areas, committees are likely to have the capacity and context required to properly scrutinise Commissioners within their remit, as well as to produce detailed analysis of performance.

With specific regard to Rights-Based Commissioners, committee scrutiny should go beyond simply the MSPs on the committee and the relevant Commission, and include wider engagement with rights holders, experts including experts by experience, and the third sector. In our response to the consultation on the Human Rights Bill<sup>7</sup>, we argued that consideration should be given to embedding the voice of lived experience in public body reporting against human rights obligations. We believe this principle would also apply to committee scrutiny of Commissioners and could help ensure that the voice of lived experience is at the centre of all stages of reporting and scrutiny.



We do not however consider that parliamentary scrutiny should be limited to committees. We believe that it is important that the parliament as a whole is actively engaged in ongoing discussion around human rights, and that a human rights-based approach is embedded in all of the parliament's work. If it is not already the case, we would encourage the parliament to consider scheduling time for committee-led debates following the conclusion of committee scrutiny.

This would give all MSPs the opportunity to scrutinise reporting from Commissioners, the contributions from others including rights holders and people with lived experience, and to be kept informed as to the state of human rights in Scotland. We would also refer back to recommendations 33 and 34 from the 2018 report of the Equalities and Human Rights Committee, "Getting Rights Right: Human Rights and the Scottish Parliament."<sup>8</sup> These relate to the need to ensure children's voices are heard by the Scottish Parliament, the principle of which can easily be applied to other rights holders, and to develop a monitoring mechanism for the Parliament's participation work related to human rights, and should be taken forward for parliamentary scrutiny of commissioners.

### **Question 8: Does the current Commissioner model in Scotland deliver value for money?**

We do not believe there is enough information available to fully determine whether current Commissioners deliver value for money. For example, as we have noted in our response to other questions, the SHRC has much more limited powers and funding than its counterparts elsewhere in the UK. The current impacts of the SHRC may therefore be limited in comparison to its counterparts, but that may represent value for money in the context of limited funding. It could also be the case that increasing the powers and funding of the SHRC and enabling it to operate more effectively would offer greater value for money, if it was more able to challenge infringements on human rights.



In line with our response to question 2, we would also note that in order to determine the value for money of Rights-Based Commissioners, it would be necessary to produce a cost/benefit analysis of how much current Commissioners are estimated to have saved through their actions. Where Commissioners have held public bodies to account and been able to bring about changes in policy and practice which have mitigated or prevented poor practice and human rights violations, that is likely to represent a saving on costs.

**Question 9: Are the processes for setting and scrutinising the budgets of each Commissioner adequate?**

Although the ALLIANCE does not have experience in directly scrutinising the budgets of Commissioners, we would reaffirm our consistent recommendation in all areas of public spending to take a human rights budgeting approach<sup>9</sup>. Although like human rights themselves human rights budgeting is universally relevant, we would consider it especially important that Rights-Based Commissioners take this approach to budgeting.

**Question 10: To what extent is there overlap and duplication of functions across Commissioners, and across other organisations in Scotland and how can this be avoided?**

Within what we would consider to be the Rights-Based Commissioners, there is currently only relatively limited overlap between Commissioners. Both the SHRC and the CYPCS could be expected to have an interest in the human rights of children and young people, and therefore could potentially overlap in their work. As yet we are not aware of this causing any particular difficulties and note that there is a working agreement between the two offices.

If all the proposed Commissioners were introduced however, there could be significantly more risk of duplication. The ALLIANCE have highlighted some of these in our responses to consultations. For example, in our response to the consultation on the proposal for a Disability Commissioner, we noted the potential for overlaps with the proposals for a Commissioner



in the Learning Diversity, Autism and Neurodiversity Bill<sup>10</sup>. At that time, we had suggested potential overlaps could be addressed through joint working and a memorandum of understanding between the Commissioners.

However, with at least ten different additional commissioners or commissions proposed or recently established, there is an increasing risk of embedding fragmentation. We have since noted the findings and suggestions in the SHRC's 'At a Crossroads' report<sup>11</sup>. For example, in our response to the Wellbeing and Sustainable Development Bill consultation we highlighted that a human rights breach impacting children and young people could be argued to fall within the remit of all of the SHRC, CYPCS and the proposed Future Generations Commissioner, arguing that:

“In such cases, it could be difficult to establish which commission the issue sits with. In addition, the legislative framework regulating the CYPCS specifically limits its ability to investigate where another body is able to do so. Further adding to this landscape may weaken rather than strengthen accountability and scrutiny, as different commissioner's offices take up different issues, apply different approaches, and have less opportunity to develop institutional knowledge and expertise<sup>12</sup>.”

With specific regard to Rights-Based Commissioners, it is important to understand that human rights are interdependent and interrelated rather than fragmentary. Similarly, people are also not fragmentary and can belong to several different groups. A disabled child for example may experience barriers related both to their disability and their age, and these two aspects of their person will jointly shape their experiences. Approaches to understanding, realising and defending human rights must therefore be intersectional, accounting for the often complex and overlapping characteristics of each individual.

On this basis, the ALLIANCE consider the “Rapporteurship model” outlined by the SHRC in the 'At a Crossroads' report has merit. This model, inspired by the approach taken by NHRIs including Costa Rica, Mexico, the Netherlands and Peru, would see teams within the SHRC given a particular



focus on specific groups or UN human rights treaties. They argue that this model allows for continuous and comprehensive monitoring of key human rights issues, the recruitment of champions and experts in their field, and stability in leadership combined with flexibility in resource.

We would particularly draw attention to the SHRC's specific use of the word "champion" in this section, which as per our responses to other questions reflects the language used in many of the calls for Commissioners. We therefore believe this model has the potential to deliver on the principle of those calls, without the costs of establishing a range of separate Commissioners offices, and with the benefit of building up knowledge, expertise, skills and effective ways of working within a single organisation. This is also likely to support an intersectional approach to rights, reducing the risks of siloed working that might exist between completely separate Commissioner's offices. It may also be worth considering whether to formally adopt the term "Champion" rather than "Rapporteur" under this model, both to reflect the widespread use of that term in calls for commissioners and as a matter of using terminology that will be more accessible and understandable for rights holders.

The SHRC argue that this structure would not necessarily need new legislation, and it may be wise for reasons of flexibility not to enshrine organisational structure too rigidly in statute. Nonetheless, it is likely to have resource implications, albeit not nearly so much as would be required for separate Commissions. We would encourage the Scottish Parliament, Scottish Government and SHRC to further investigate the possibilities of the Rapporteurship model, and to identify the level of funding necessary to ensure it functions adequately.

Regardless of whether the SHRC adopts the Rapporteurship model, the ALLIANCE firmly believe it should be given additional powers and resources. In our response to the consultation on the Human Rights Bill<sup>13</sup>, we argued that the SHRC should be given a range of additional powers, including to intervene in civil proceedings; an investigatory power; the ability to provide advice; a role to monitor and scrutinise implementation of





rights; issue binding guidance; compel the provision of information; and issue binding recommendations. These additional powers must be accompanied by the resource necessary to make full and effective use of them.

## About the ALLIANCE

The Health and Social Care Alliance Scotland (the ALLIANCE) is the national third sector intermediary for health and social care, bringing together a diverse range of people and organisations who share our vision, which is a Scotland where everyone has a strong voice and enjoys their right to live well with dignity and respect.

We are a strategic partner of the Scottish Government and have close working relationships with many NHS Boards, academic institutions and key organisations spanning health, social care, housing and digital technology.

Our purpose is to improve the wellbeing of people and communities across Scotland. We bring together the expertise of people with lived experience, the third sector, and organisations across health and social care to inform policy, practice and service delivery. Together our voice is stronger and we use it to make meaningful change at the local and national level.

The ALLIANCE has a strong and diverse membership of over 3,500 organisations and individuals. Our broad range of programmes and activities deliver support, research and policy development, digital innovation and knowledge sharing. We manage funding and spotlight innovative projects; working with our members and partners to ensure lived experience and third sector expertise is listened to and acted upon by informing national policy and campaigns, and putting people at the centre of designing support and services.

We aim to:



- Ensure disabled people, people with long term conditions and unpaid carers voices, expertise and rights drive policy and sit at the heart of design, delivery and improvement of support and services.
- Support transformational change that works with individual and community assets, helping people to live well, supporting human rights, self management, co-production and independent living.
- Champion and support the third sector as a vital strategic and delivery partner, and foster cross-sector understanding and partnership.

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<sup>1</sup> Independent Medicines and Medical Devices Safety Review, ‘First Do No Harm’ (June 2020), available at:

[https://www.immdsreview.org.uk/downloads/IMMDSReview\\_Web.pdf](https://www.immdsreview.org.uk/downloads/IMMDSReview_Web.pdf)

<sup>2</sup> The ALLIANCE, ‘ALLIANCE tells Scottish COVID-19 Inquiry of “invisible” and “forgotten” voices of the pandemic’ (November 2023), available at: <https://www.alliance-scotland.org.uk/blog/news/alliance-tells-scottish-covid-19-inquiry-of-invisible-and-forgotten-voices-of-the-pandemic/>

<sup>3</sup> The ALLIANCE, ‘Disabled People, Unpaid Carers and the Cost of Living Crisis’ (October 2022), available at: <https://www.alliance-scotland.org.uk/wp-content/uploads/2022/10/ALLIANCE-Cost-of-Living-Report.pdf>

<sup>4</sup> Scottish Human Rights Commission, ‘At a Crossroads – which way now for the human rights system in Scotland?’ (June 2023), available at:



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<sup>5</sup> As above

<sup>6</sup> Children and Young People’s Commissioner Scotland, ‘Participation and Engagement’, available at: <https://www.cypcs.org.uk/participation-and-engagement/>

<sup>7</sup> The ALLIANCE, ‘The ALLIANCE responds to the Human Rights Bill Consultation’ (October 2023), available at: <https://www.alliance-scotland.org.uk/blog/news/the-alliance-responds-to-the-human-rights-bill-consultation/>

<sup>8</sup> Scottish Parliament, Equalities and Human Rights Committee, ‘Getting Rights Right: Human Rights and the Scottish Parliament’ (November 2018), available at: <https://digitalpublications.parliament.scot/Committees/Report/EHRiC/2018/11/26/Getting-Rights-Right--Human-Rights-and-the-Scottish-Parliament-3>

<sup>9</sup> Scottish Human Rights Commission, ‘Human Rights Budget Work’, available at: <https://www.scottishhumanrights.com/projects-and-programmes/human-rights-budget-work/>

<sup>10</sup> The ALLIANCE, ‘ALLIANCE response to the Disability Commissioner Consultation’ (August 2022), available at: <https://www.alliance-scotland.org.uk/blog/news/alliance-response-to-the-disability-commissioner-consultation/>

<sup>11</sup> Scottish Human Rights Commission, ‘At a Crossroads – which way now for the human rights system in Scotland?’ (June 2023), available at: [https://www.scottishhumanrights.com/media/2456/crossroads\\_what-next-for-human-rights-protection-in-scotland-shrc-june-2023.pdf](https://www.scottishhumanrights.com/media/2456/crossroads_what-next-for-human-rights-protection-in-scotland-shrc-june-2023.pdf)

<sup>12</sup> The ALLIANCE, ‘ALLIANCE responds to the Wellbeing and Sustainable Development Bill consultation’ (February 2024), available at: <https://www.alliance-scotland.org.uk/blog/news/alliance-responds-to-the-wellbeing-and-sustainable-development-bill-consultation/>

<sup>13</sup> The ALLIANCE, ‘The ALLIANCE responds to the Human Rights Bill Consultation’ (October 2023), available at: <https://www.alliance-scotland.org.uk/blog/news/the-alliance-responds-to-the-human-rights-bill-consultation/>

