

SHRC

Scottish
Human Rights
Commission

Feedback on the Proposed Refreshed National Performance Framework

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Table of Contents

Executive Summary	3
Introduction	5
1. Concept and overall framework design	5
2. Outcomes and cross-cutting perspectives.....	7
3. Understanding progress.....	9
Use a human rights-informed indicator model: Structure, Process and Outcome (SPO).....	9
Make rights and equality measurable through minimum standards, distribution, and “no backward steps”	10
Connect indicators to budgeting in a way that supports scrutiny (beyond “tagging”)	11
Localising the outcomes: make the framework meaningful beyond national averages.....	12
SDG localisation: move from claim to method	12
What should happen next	13
4. Ways of working	13
Overall assessment	14
Appendix 1: Summary of SHRC recommendations.....	16

Executive Summary

The National Performance Framework (NPF) has been internationally recognised as an important model for measuring national wellbeing and guiding long-term policy direction. The current reform process offers an opportunity to strengthen its role as Scotland's overarching framework for decision-making across government and public bodies, particularly in the context of the anticipated Human Rights Bill, Scotland's commitment to the Sustainable Development Goals (SDGs), the wider Public Service Reform agenda, and Scotland's Open Government commitments.

While the engagement paper contains some positive elements, the proposals overall represent a significant step backwards in the treatment of human rights within the framework. In the existing NPF, human rights are explicitly recognised as a national outcome. In the proposed model human rights appear only once, as part of a broad cross-cutting perspective alongside fairness and equality. This represents a significant conceptual shift.

Human rights are not simply policy themes or social aspirations; they are legal obligations that should shape how decisions are made, how resources are allocated and how trade-offs between priorities are assessed. Reducing human rights to a general "lens" risks weakening their practical influence on policy and decision-making. It also sits uneasily alongside the Scottish Government's recently reaffirmed commitment to mainstream human rights across government and to incorporate international human rights treaties into domestic law.

More broadly, the proposals do not yet demonstrate how the framework will move from aspiration to implementation. There is insufficient clarity on:

- how indicators will drive decision-making and accountability
- how budgets and outcomes will be connected
- how inequalities will be made visible
- how the framework will operate meaningfully at local level
- and how delivery and accountability will be shared across government and public services

There is a clear opportunity through this review to strengthen the proposed framework. In particular, the next phase of the review should:

- restore the visibility of human rights within the framework architecture
- clarify how the NPF operationalises Scotland's commitments to the SDGs

- adopt an indicator model that connects commitments, implementation and outcomes (such as a Structure–Process–Outcome approach)
- strengthen the links between outcomes, indicators, budgeting and accountability
- ensure inequalities are visible through robust disaggregation and localisation
- develop a clearer implementation and governance model across national and local levels

If these changes are made, the refreshed NPF could become a more effective framework for measuring Scotland's progress and guiding long-term policy choices. Without them, there is a risk that the framework will lose some of the features that have previously made it innovative and internationally respected.

A summary of the SHRC's key recommendations is included in Appendix 1.

Introduction

The SHRC welcomes the opportunity to provide feedback on the proposed refreshed National Performance Framework (NPF). The NPF has long been an important articulation of Scotland's ambitions for collective wellbeing and has been internationally recognised as an example of a wellbeing-oriented policy framework.

Given Scotland's commitments to human rights, the Sustainable Development Goals (SDGs), and the ongoing Public Services Reform agenda, the current reform process represents a significant opportunity to strengthen the role of the NPF as a meaningful framework guiding decision-making, accountability and long-term policy direction.

While the proposals contain some welcome elements, this response focuses on several areas of concern, particularly the treatment of human rights within the framework. Taken as a whole, the proposals significantly weaken the visibility and role of human rights within Scotland's national wellbeing framework and represent a backward step from the current NPF, where human rights are explicitly recognised as a core outcome.

More broadly, the proposals risk reducing both human rights and the Sustainable Development Goals to references in the narrative of the framework rather than embedding them in its architecture: the outcomes, the indicators and the mechanisms that guide decision-making.

Over the course of the reform process and throughout much of the lifetime of the NPF, the SHRC has shared a number of practical proposals with the NPF team on how human rights and inequality could be embedded more meaningfully within the framework, including options for rights-framed outcomes and the use of Structure–Process–Outcome (SPO) indicators to strengthen accountability. It is therefore particularly disappointing that the current engagement paper does not appear to reflect this work and the contribution of the National Human Rights Institution, and that the resulting model risks reducing human rights to a largely rhetorical reference rather than a structural element of the framework.

1. Concept and overall framework design

Will this proposed approach support better decision making that will improve wellbeing? Will this renewed focus help with long-term thinking? Will having a more focused wellbeing framework at the apex of decision making enable the reduction of inequalities in Scotland?

The intention to strengthen the role of the NPF as the overarching strategic framework for Scotland is welcome. Placing the framework at the “apex of decision making” could help improve coherence across public policy and align strategies, budgets and performance management more effectively. However, without a clear human rights grounding, the current proposals risk weakening the framework’s normative foundation and its ability to guide accountable, rights-based decision making.

The previous NPF explicitly recognised human rights as a national outcome. This created a clear anchor linking Scotland’s wellbeing ambitions to internationally recognised legal standards. In the proposed framework, human rights have been removed from the outcomes and instead appear only as one element within a broad “cross-cutting perspective” alongside fairness and equality.

This single reference is the only place where human rights appear anywhere in the entire engagement paper. Their absence from the rest of the document is striking and suggests that human rights are not being treated as a central organising principle of the framework. This is a significant conceptual shift and one which sits at odds with the Scottish Government’s stated commitment to embedding human rights across public policy and decision making.

Human rights are not simply a policy theme or social objective. They are legal obligations that structure how governments should make decisions, allocate resources and balance competing priorities. Treating human rights as a generalised cross-cutting concept risks weakening their practical influence on policy and decision-making.

More fundamentally, the proposals show little evidence of an embedded understanding of what a human rights based approach to policymaking means. There is no explanation of how rights standards should shape decisions, no reference to rights obligations in governance or accountability, and no indication that rights will influence budgeting, prioritisation or trade-offs.

If the NPF is intended to sit at the apex of decision-making, then it should reflect the normative frameworks that guide Scotland’s governance. Human rights should therefore be embedded explicitly within the framework’s core architecture rather than referenced indirectly.

Without this, it is difficult to see how the framework will meaningfully support rights-based decision making or contribute to reducing inequalities.

Should the name of the framework change?

Changing the name of the framework may improve accessibility, but this should not distract from the more substantive issue of ensuring the framework's underlying principles are robust.

The current proposals risk simplifying the framework at the expense of clarity about its normative foundations. Whether the framework is called the National Performance Framework, Scotland's Wellbeing Framework or another title is less important than ensuring it clearly reflects the Scottish Government's human rights commitments and obligations under international human rights frameworks.

2. Outcomes and cross-cutting perspectives

Can you see how and where your work would contribute towards these outcomes? Is there something missing that isn't captured by any of the above outcomes?

The proposed outcomes cover many of the social, economic and environmental conditions that are important to the realisation of human rights and wellbeing. However, several key issues are missing. Most notably, human rights have been removed as an explicit outcome. The current NPF includes a clear human rights outcome which states that Scotland will respect, protect and fulfil human rights and live free from discrimination.

Removing this outcome represents a clear regression.

Human rights are not simply one policy objective among many. They provide the overarching framework through which wellbeing, equality, justice and sustainability should be understood.

It is particularly disappointing that this change has been made despite extensive discussion during the reform process about how the outcomes themselves could be framed through a human rights lens. Each of the proposed outcomes could easily be expressed in rights terms. For example:

- health reflects the right to the highest attainable standard of health
- education and skills reflect the right to education
- safety reflects rights to security and justice
- prosperity relates to rights to work and an adequate standard of living
- participation reflects civil and cultural rights
- sustainability relates to environmental and intergenerational justice

These connections have been repeatedly highlighted during the development process, yet they do not appear in the final proposal. By removing human rights as an outcome and relegating them to a cross-cutting “lens”, the framework reduces their visibility and weakens their structural role within Scotland’s national vision. This suggests that the opportunity to embed human rights meaningfully as a core organising principle of the framework has not been taken.

In practice, this change narrows the apparent scope of human rights within the framework. Rights become implicitly associated only with areas such as justice, safety or participation (for example within “Secure” or “Connected”), rather than being recognised as equally relevant to health, housing, education, work, culture and the environment SHRC’s recent work on economic, social and cultural rights, including its [Spotlight Projects](#) and [State of the Nation reporting](#), has demonstrated the extent to which these rights are interconnected and central to people’s everyday lives across Scotland.

Similarly, the removal of the previous international outcome weakens Scotland’s ability to demonstrate its global responsibilities and undermines the claim that the NPF localises the SDGs.

How should cross-cutting perspectives be represented in the final model?

The idea of cross-cutting perspectives is useful. However, the current approach raises concerns. Grouping fairness, equality and human rights together risks conflating concepts that have distinct meanings and implications, including the distinction between important policy principles and legal obligations. Human rights are grounded in international law and create obligations on governments. They provide concrete standards against which policy decisions can be evaluated.

By merging human rights with broader concepts such as fairness, the framework risks diluting the specific legal and institutional significance of human rights.

It is also notable that human rights do not appear anywhere else in the framework diagram or summary of the proposals. The visual summary that sets out the “what” and “how” of the framework does not reference human rights at all. This omission reinforces the impression that human rights are peripheral rather than foundational to the model.

3. Understanding progress

How can indicators better tell the story and influence policy change?

Indicators are not neutral. They shape what is prioritised, what gets attention, and what gets funded. If the refreshed NPF is intended to sit at the apex of decision-making, the indicator approach is the point at which the framework either becomes operational or remains aspirational.

At present, the engagement paper states that the outcomes “localise the UN Sustainable Development Goals.” However, this claim is not evidenced elsewhere in the document. The SDGs are not meaningfully described as shaping indicator choice, interpretation, reporting or accountability. Beyond a brief statement of alignment, there is little explanation of how the SDGs have informed the design of the framework, including indicator selection, interpretation, reporting or accountability arrangements, and this therefore risks repeating the largely symbolic integration of the SDGs that occurred when they were first included in the NPF in 2018.

If the Scottish Government wants the indicator set to “influence change in policy” rather than simply describe progress, then the NPF needs a clearer indicator approach that connects commitments, effort, investment and outcomes in people’s lives.

Use a human rights-informed indicator model: Structure, Process and Outcome (SPO)

Scotland’s approach to indicators has historically been dominated by “result” indicators. These matter, but they do not explain why progress is or is not happening.

International human rights practice is clear that outcomes alone never tell the full story. Guidance from the UN Office of the High Commissioner for Human Rights, uses a three-part model of indicators: Structure, Process and Outcome (SPO). This would strengthen accountability without overloading the framework:

- Structure indicators describe the formal commitments in place that should enable progress (laws, strategies, duties, governance arrangements).
- Process indicators track the actions taken to implement those commitments. They show what is actually being done (policy implementation, participation, workforce capacity, monitoring arrangements and crucially, the allocation and use of public resources).

- Outcome indicators show the real-world results experienced by people and communities (including distribution).

Using SPO indicators strengthens accountability because it allows progress to be explained. If outcomes improve, it becomes possible to understand what contributed to that improvement. If progress stalls or reverses, it becomes possible to identify whether the cause lies in weak policy design, insufficient resources, or failures in implementation.

This also creates the missing link between national outcomes and the budget. Process indicators can make visible whether resources are actually being deployed in ways that support the outcomes, turning the NPF from a narrative framework into a practical accountability tool.

This is not a theoretical concern. Scotland has already seen examples where structures and resources existed, but outcomes did not improve because implementation failed. SHRC's work, including the [Tick Tock report](#) and its [measurement and monitoring toolkit work](#), has highlighted how gaps in implementation, accountability and delivery can persist even where formal commitments and institutional structures are in place. In those circumstances, outcome indicators alone would have suggested limited progress, without revealing the underlying issues in policy delivery or resource use. Process indicators allow those gaps to be identified and addressed.

Make rights and equality measurable through minimum standards, distribution, and “no backward steps”

If the NPF is to support meaningful progress on human rights and equality, indicators need to do more than measure average outcomes. They should be capable of identifying whether rights are being realised in practice.

In particular, indicators should allow Scotland to monitor four core dimensions of rights-based progress.

First, they should show whether minimum essential levels are being met. For key areas such as housing, food security, healthcare access and education participation, indicators should make it possible to identify whether people are falling below acceptable standards of provision. This would help align the NPF with wider [Scottish Government proposals on human rights incorporation](#), including the development of minimum standards linked to ICESCR core requirements.

Second, indicators should allow progress to be tracked over time. Human rights frameworks recognise the principle of progressive realisation: governments are expected to make continuous progress in improving conditions. Stagnation should therefore not be treated as neutral, particularly where inequalities are already entrenched.

Third, indicators should allow risks of regression to be identified. If indicators show deterioration in essential services or widening inequality, this should trigger explanation and mitigation. This is particularly relevant where policy or spending decisions reduce access to essential support.

Fourth, inequality should be visible by default. Disaggregation by geography, deprivation and relevant population groups is essential if the framework is to reflect the stated commitment that outcomes should apply equally to everyone in Scotland.

Without this level of visibility, national averages can conceal significant disparities between communities and population groups and further maintain the lack of intersectional data and policy analysis.

Connect indicators to budgeting in a way that supports scrutiny (beyond “tagging”)

The engagement paper refers to the role of budget tagging in linking spending to national outcomes. This can be a useful transparency tool, but on its own it remains descriptive.

Budget tagging shows where money is allocated. It does not show whether spending decisions are aligned with Scotland’s priorities, whether essential levels of provision are being protected, or whether spending patterns are reducing or widening inequality or contributing to rights realisation or protection.

Within an SPO approach, budget-related information becomes part of process indicators. This allows scrutiny not only of where resources are allocated, but of how those allocations relate to the outcomes the government is seeking to achieve.

Examples could include whether proposed allocations are expected to advance specific outcomes, whether spending aligns with commitments to reduce inequalities of outcome, and whether potential reductions in key areas are assessed for their human rights and equality impacts before implementation.

This moves the framework beyond simply describing spending and towards explaining how policy choices, resources and outcomes relate to each other.

Localising the outcomes: make the framework meaningful beyond national averages

A long-standing weakness in the NPF has been the gap between national indicators and local meaning. Scotland is not uniform, and the drivers of progress differ between places. If the NPF is intended to guide decision-making across Scotland's public services, it must be usable not only by the Scottish Government but also by local government, community planning partnerships and other delivery partners. At present, the engagement paper does not explain how national outcomes will translate into locally meaningful measures of progress, nor how the NPF will shape local decision making or integrate with existing planning, accountability and performance frameworks. A practical way to address this would be through a two-level indicator system.

The first level would consist of a national "spine" of indicators that allows Scotland-wide comparison, long-term trend tracking and national accountability.

The second level would enable local partners to define how national outcomes translate into their own context. Local indicators could reflect local priorities, geographic access to services, and inequalities specific to particular communities.

Localisation would not mean creating thirty-two separate frameworks. Rather, it would involve interpreting national outcomes through locally relevant indicators and evidence, linked to existing local planning and accountability structures such as Local Outcome Improvement Plans, community planning arrangements and wider place-based approaches informed by the Christie principles. This would help ensure that the NPF supports and informs local decision making rather than operating as a parallel national framework disconnected from delivery practice.

Done well, this approach could strengthen the relevance and ownership of the framework among local partners, support prevention by identifying local drivers of poor outcomes, and allow communities to see whether progress is happening where they live rather than relying solely on national averages.

It would also improve the legitimacy of the framework by allowing people to recognise their lived experience in the data that is used to describe Scotland's progress.

SDG localisation: move from claim to method

High-level conceptual alignment between outcomes and SDG themes is not enough. SDG localisation requires method and transparency.

A robust approach would include:

- a clear mapping between national outcomes and SDGs (two-way, acknowledging gaps)
- explicit decisions on which SDG targets will be tracked through the national indicator spine
- clarity on how “our place in the world” and international responsibilities will be measured (not only narrated)
- a statement of how indicator choices will avoid cherry-picking and cover the SDGs as an integrated framework, not a menu

Indicator selection will ultimately determine whether SDG localisation is meaningful in practice. At present, the engagement paper does not provide sufficient information to assess how the SDGs will shape the design of the indicator framework.

What should happen next

To support the Scottish Government's stated ambition that indicators “tell the story and influence change in policy”, the next phase should include:

- a transparent method for indicator selection (including how rights and SDGs shape choices)
- explicit adoption of SPO logic so indicators can explain progress and expose implementation failure
- a clear plan for localisation so national outcomes are meaningful at local level
- a governance and scrutiny model that ensures indicators are not simply reported, but used to drive decisions and justify trade-offs

4. Ways of working

Is this level of ambition enough? Could we go further?

The ambition around implementation and ways of working is welcome. The recognition of an “implementation gap” in the previous NPF is important. However, the proposals do not yet explain how the framework will influence real decisions.

For example:

- how will the national outcomes shape budget decisions?

- how will trade-offs between decisions and outcomes be assessed?
- how will public bodies demonstrate compliance with the framework?

Without clearer mechanisms linking the NPF to governance, budgeting and accountability, the framework risks remaining aspirational rather than operational.

If the NPF is to change how decisions are made, it will need to embed practical mechanisms such as rights and equality impact assessment, participatory decision-making processes, and transparent reporting on how policy choices affect different groups and places.

What opportunities and barriers exist for implementation?

One of the key barriers to implementation in the previous NPF was the lack of clear accountability mechanisms. The current proposals recognise this challenge but do not yet set out how accountability will be strengthened.

In particular, the framework does not explain how it will interact with Scotland's evolving human rights architecture, including the commitment to a forthcoming Human Rights Bill. This represents a missed opportunity to align Scotland's wellbeing framework with its legal commitments. This disconnect is surprising given the intention that the NPF should sit at the apex of decision making across government.

Overall assessment

The refreshed NPF has the potential to strengthen Scotland's approach to long-term wellbeing and strategic governance. However, the current proposals represent a significant step backwards in one critical respect: the invisibility of human rights within the framework.

Human rights appear only once in the engagement paper and are absent from the central architecture of the model, including the summary framework diagram, the outcomes themselves, and the proposed mechanisms for implementation. In the current NPF, human rights are explicit and visible; in the proposed framework they are peripheral.

A similar concern arises in relation to the Sustainable Development Goals. While the paper states that the outcomes "localise" the SDGs, there is little evidence that the goals have meaningfully shaped the design of the framework, the indicator approach, or the implementation model.

Taken together, this creates the impression that both human rights and the SDGs are acknowledged rhetorically but not embedded in the architecture of the framework. For a model intended to sit at the apex of decision-making, this distinction matters.

The opportunity now is to correct this. A strengthened NPF would make human rights visible within the outcomes themselves, use indicators that connect commitments, resources and outcomes, and demonstrate clearly how the framework operationalises Scotland's commitments to human rights and the SDGs.

Without these changes, the refreshed framework risks becoming a statement of intent rather than the practical engine room of decision-making that Scotland needs.

Appendix 1: Summary of SHRC recommendations

- Human rights within the framework: Restore human rights within the framework's core architecture, treating them as legal obligations with accountability standards, not a cross-cutting 'perspective'.
- Human rights-based decision making: Ensure the NPF is grounded in Scotland's human rights obligations and supports accountable, rights-based decision making across government and public bodies.
- Outcomes framework: Frame outcomes more explicitly through a human rights lens, recognising the relationship between outcomes and internationally recognised rights standards.
- SDG localisation: Develop a transparent methodology for SDG localisation, including clear mapping between outcomes and SDGs, explicit indicator alignment, and reporting arrangements.
- Indicator framework: Adopt a Structure–Process–Outcome (SPO) approach to indicators to connect commitments, implementation, public spending and outcomes.
- Budget accountability: Integrate budget and resource information into process indicators so that spending decisions can be linked to outcomes and rights realisation.
- Human rights and equality measurement: Ensure indicators measure minimum essential levels, progressive realisation, risks of regression, and inequalities through systematic disaggregation.
- Localisation: Develop a two-level indicator model combining a national "spine" of indicators with locally defined indicators reflecting local priorities, inequalities and service access
- Local governance integration: Ensure the NPF connects meaningfully with existing local planning, accountability and performance frameworks.
- Accountability and implementation: Strengthen governance and scrutiny mechanisms so the NPF actively informs decision making, prioritisation, trade-offs and accountability.
- Human Rights Bill alignment: Clarify how the refreshed NPF will align with Scotland's evolving human rights architecture, including the anticipated Human Rights Bill.