



# Ethical Standards Commissioner

## COMMUNICATIONS STRATEGY 2024-2028

Ethical, empathetic, effective



How we'll  
communicate  
our role in  
public life in  
Scotland

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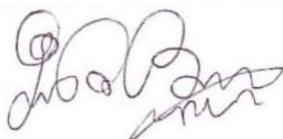
## Commissioner's Foreword

Following extensive consultation, I published my strategic plan for 2024 to 2028 in April 2024. This communications strategy is intended to complement our strategic plan and has been designed and updated to help the public and our stakeholders more readily understand what we do, how and why we do it and how well we are doing it.

Our role is multi-faceted. We investigate, without fear or favour, whether complaints about lobbying, the conduct of MSPs, local authority councillors and public body board members represent a breach of the respective Codes of Conduct or other relevant provisions. We report on our findings to other bodies, such as the Scottish Parliament itself in the case of MSP and lobbying complaints and the Standards Commission for Scotland in the case of councillor and board member complaints. These bodies then take a view on whether my findings are upheld and, where they agree that a breach has occurred, which sanction should be applied. We are therefore part of a system of checks and balances intended to both promote good conduct and to hold individuals to account when that conduct falls short of what is expected. Each part of this system has to work effectively in order for the public to have trust in it.

We also oversee the system made to appoint chairs and board members to the majority of the boards of public bodies in Scotland. Whilst not elected, the members of the boards of nearing 100 regulated public bodies in Scotland have responsibility for providing the governance oversight of vital services that affect us all. These touch every aspect of our lives; from health to housing, the environment to education, the economy to enterprise, the creative and cultural sectors to crofting, or policing to public transport. Each Board within its different sector and particular remit provides strategic direction, scrutiny of performance and of course, stewardship of significant amounts of public money. It is in everyone's interests that these important public bodies are led by people who have a diverse range of the most appropriate skills and experience, who act with independence of thought, integrity and commitment and who are reflective of Scotland's geography, demography and breadth of experiences and insights. Our role is to promote good practice in the making of these appointments, to encourage and enable improvements in board diversity and to report publicly when such practice isn't followed. Such reports present the Scottish Government and ourselves with opportunities to learn and to improve on the appointments process.

This strategy aims to inform MSPs, local authority councillors, public body board members and, of course, the people of Scotland, upon whose trust every elected individual and public authority relies, about our important work. It reflects our commitment to transparency in all that we do.



Ian Bruce  
Ethical Standards Commissioner  
November 2024

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## Our purpose, values and strategic objectives

Our overarching purpose, values and strategic objectives are set out below. Our communications strategy is intended to help the public and our stakeholders to understand these and how they can raise concerns with us or ask questions about our work. This in turn is intended to increase confidence in the ethical standards framework that our office is a part of.

### OUR PURPOSE

- To investigate without fear or favour complaints about lobbying and about the ethical conduct of MSPs, councillors, and board members in public life in Scotland, through timely, proportionate, evidence-based investigations, and to report openly and transparently on our findings.
- To oversee public appointments in Scotland providing assurance that such roles are filled on merit, following a fair, respectful, open and inclusive appointments process that also ensures that those appointed are fit and proper persons.
- To facilitate good practice in public appointments, in Scotland and more widely, through guidance and support for Scottish Ministers and others.
- To run an effective parliamentary office-holder's office in accordance with our values and the principles of public life, good governance and best value.

### OUR VALUES

- We will conduct all of our activities in an ethical way, characterised by effective stewardship of public money, accountability, honesty, integrity, propriety, fairness and transparency.
- We will treat each individual and organisation that comes into contact with us with empathy, kindness and respect, recognising that we must earn their trust and ensure that our commitment to equality, diversity and inclusion informs all of our work.
- We welcome constructive criticism and challenge. If we get things wrong we will remedy our errors and learn from these in order to improve our future performance.

## OUR STRATEGIC OBJECTIVES

1. We will engage meaningfully with our stakeholders and the public to promote high standards in public life and adherence to the principles of public life in Scotland. We will take on board feedback, listen to others' views and work constructively to improve our systems and processes.
2. We will ensure that we have sufficient staff and resources in place to deliver on all of our objectives, building resilience and flexibility across roles and remits. We will also work with other Parliamentary Officeholders with a view to embracing efficiency and innovation through shared services. We value people and recognise that unless we have staff who are valued and supported to maintain their wellbeing, feel happy in and proud of our work and the way in which we do it, we will have failed.
3. We will ensure that our staff are properly trained, supported and developed to fulfil the requirements of their role and their career progression.
4. We will make the best use of up to date and secure digital technology to support our work, enhance our users' experience and safeguard our systems.
5. We will operate highly efficient and effective complaints handling processes that deliver consistent, evidence-based responses: ensuring fair and trusted outcomes.
6. We will ensure appropriate systems of governance, quality review frameworks and robust external accreditation are in place, providing assurance to the public and stakeholders that our objectives are being met. We will also demonstrate our commitment to acquitting our environmental and social responsibilities.
7. We will contribute significantly to the maintenance of an effective ethical standards framework through supportive and constructive engagement with equivalent bodies both here and in other administrations.
8. We will, through supportive and constructive regulation, make a significant contribution to a public appointments system that produces effective and diverse boards that are reflective of the communities that they serve.
9. We will strive to be recognised leaders in the regulation of a system that is effectively run to achieve the appointment of the most able people to our boards and that is managed in compliance with the highest ethical standards.

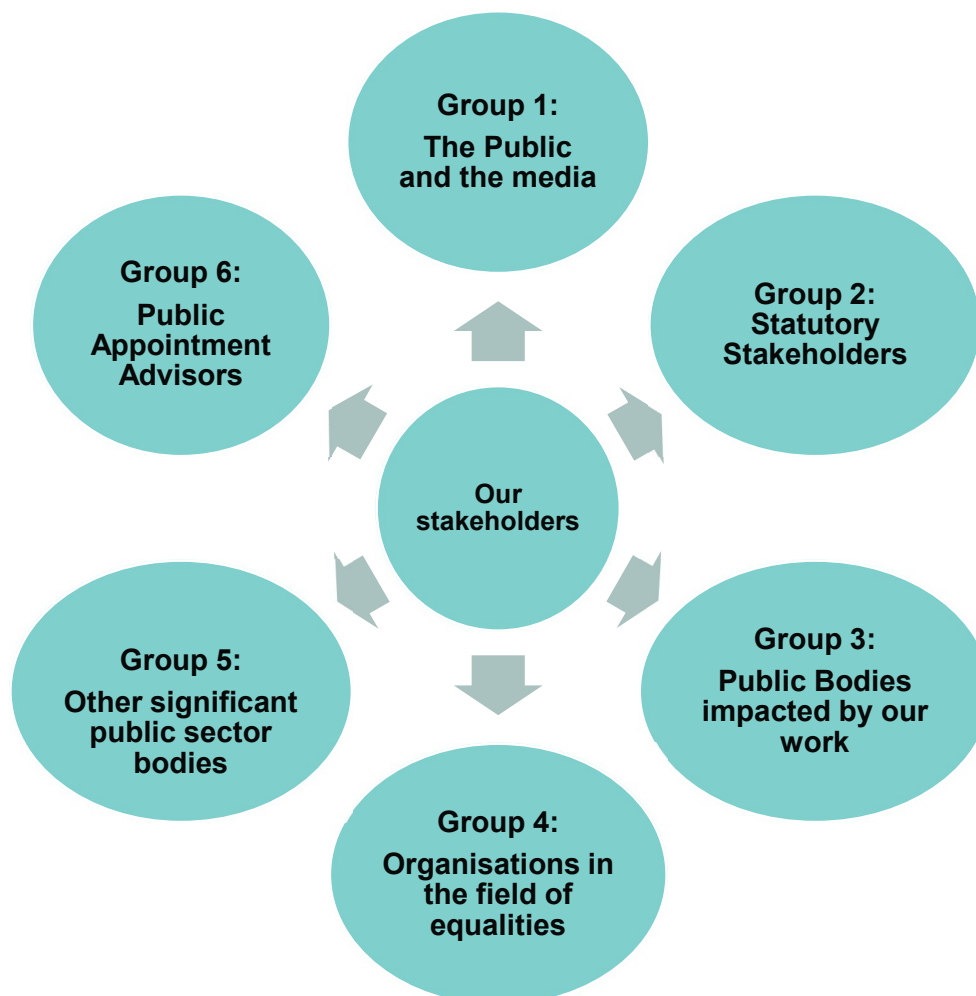
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## Our Stakeholders

We first mapped our key stakeholders in early 2021 in order to consult them on our draft strategic plan for 2021-2023. They include all of the organisations in Scotland who have a clear interest in, or who may be affected by, the work that we do. Key to effectively communicating and engaging with them is recognising that they encompass diverse audiences that communicate in different ways.

In deciding who we should communicate with regularly for the purposes of this strategy, we concluded that we should add the general public and the media.

Our stakeholder groups are listed in Appendix One to this document alongside some illustrative examples. For the purposes of this strategy, they have been grouped together as follows and labelled 1 to 6 for reference only as no group has priority over the others (a full list of the individuals and organisations under each group heading is available on request):



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## Our Communication Objectives

There are five overarching objectives of the Communications Strategy 2024-2028, which aims to help the public and our stakeholders to more readily understand what we do, how and why we do it and how well we do it. In all that we do, we will continue to be open and transparent, modelling the behaviours, principles and values that we seek to promote. Our objectives are as follows:

1. We want all our stakeholders to know what our purpose, strategic objectives, principles and values are.
2. We want all our stakeholders to know how important ethical conduct in public life is, that misconduct is damaging to our democracy and that adhering to high levels of ethical conduct benefits everyone in society.
3. We want our stakeholders to know how we are performing – not just in terms of our statutory functions but also how we fulfil them.
4. We want members of the public to know about our complaint handling functions and how to make a complaint if they wish to.
5. We want members of the public to know more about the board roles that we regulate appointments to, what difference it makes to have us regulate the process and be able to see what difference our regulation of public appointments has made over time.

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## Our timetable and communication channels

This strategy sets out our five communication objectives and the developments we will make over its period. These aim to ensure that we communicate with all our stakeholders in the most accurate and appropriate way.

We understand that the way in which we should communicate with each stakeholder should vary according to their needs and the messages that we want to convey to them. We also recognise that over the last 5-10 years there have been significant changes in how people receive, understand and share information. These include the growth of social media and other digital platforms. We also recognise that communications with our stakeholders should vary over time and we will continue to adapt our communications approaches to meet these evolving demands. With this in mind, we will review this strategy at least every two years.

Through this strategy, we aim to do more to explain our role, increase our profile, manage stakeholder expectations and emphasise our value, benefit and place in upholding the ethical standards framework

Set out on the next two pages are the key strategic activities required to meet each of our communication objectives. More detailed activities are included in our business and action plans. This communication strategy is intended to cover the period 2024 to 2028 and to complement our Strategic Plan covering the same period.

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## Objectives, illustrative actions and timetable for completion (a full set of associated actions is included in our business and action plans)

Key Objectives	Actions	Stakeholders						Completion Timescales
		Gr 1	Gr 2	Gr 3	Gr 4	Gr 5	Gr 6	
We want all our stakeholders to know what our purpose, our strategic objectives, principles and our values are. In short, we want them to know about our work and how we go about it.	<ul style="list-style-type: none"> <li>Keep website regularly updated.</li> <li>Make information on our website as accessible as possible, including translations into easy read and BSL.</li> <li>Develop internal guidance to ensure that our accessible information is consistent across the organisation.</li> <li>Establish an accessibility working group to ensure that our published materials are open to as wide an audience as practicable.</li> <li>Use animated videos and infographics to communicate important key messages.</li> <li>Use established channels to engage with identified stakeholders and seek new channels where appropriate.</li> </ul>	✓	✓	✓	✓	✓	✓	<ul style="list-style-type: none"> <li>Update website regularly – on-going</li> <li>Ensure information on website is as accessible as possible – on-going</li> <li>Develop internal guidance for our accessible information – March 2024</li> <li>Establish accessibility working group – November 2024</li> <li>Introduce videos and infographics – March 2025</li> <li>Engage with stakeholders – on-going</li> </ul>
We want all our stakeholders to know how important ethical conduct in public life is, that	<ul style="list-style-type: none"> <li>Write jointly with the Standards Commission for Scotland (SCS) to all political party leaders during pre-election periods to offer to meet and to encourage more</li> </ul>	✓	✓	✓	✓	✓	✓	<ul style="list-style-type: none"> <li>Ongoing during pre-election periods.</li> <li>Periodically write or contribute to blogs (quarterly from Autumn 2024).</li> </ul>

Key Objectives	Actions	Stakeholders						Completion Timescales
		Gr 1	Gr 2	Gr 3	Gr 4	Gr 5	Gr 6	
<p>misconduct is damaging to our democracy and that adhering to high levels of ethical conduct benefits everyone in society.</p>	<p>respectful debate when engaging with political opponents. Publish these letters as open letters.</p> <ul style="list-style-type: none"> <li>• Write blogs and contribute to SCS blogs about the importance of ethical standards in public life and about the damage that misconduct can do and about the difference that acting with integrity and kindness can make.</li> <li>• Seek to revise the Ethical Standards in Public Life etc. (Scotland) Act 2000.</li> <li>• Work alongside the SCS to provide training to Councils, devolved public bodies, Monitoring Officers and Standards Officers on the provisions of the Codes and the importance of adhering to them.</li> <li>• Provide training, alongside the SCS, to new public body board members at induction events run by the Scottish Government.</li> <li>• Continue to contribute to guidance on running the “fit and proper person test” for applicants applying to serve on the boards of public bodies in Scotland. Help officials engaged in making these appointments on behalf of Ministers to understand the helpfulness and importance of running these tests in avoiding future concerns.</li> </ul>							<ul style="list-style-type: none"> <li>• Seek to revise the 2000 Act during the course of the next session of the Scottish Parliament.</li> <li>• Presentation at new board member induction events biannually.</li> <li>• Ongoing guidance to officials about the fit and proper person test in appointment rounds seeking board chairs and members.</li> <li>• Assist the SCS on its request with Code promotional activities and events.</li> <li>• Support the Scottish Government’s NHS Chairs of the future programme, including an annual presentation by ESC to prospective NHS Chairs on the importance of ethical conduct at board level.</li> <li>• SCS assistance – ad hoc on request.</li> <li>• Support for NHS Chairs programme – ongoing each year for each new cohort.</li> </ul>

Key Objectives	Actions	Stakeholders						Completion Timescales
		Gr 1	Gr 2	Gr 3	Gr 4	Gr 5	Gr 6	
	<ul style="list-style-type: none"> <li>Assist the SCS on its request with Code promotional activities and events.</li> <li>Support the Scottish Government's NHS Chairs of the future programme, including an annual presentation by ESC to prospective NHS Chairs on the importance of ethical conduct at board level.</li> </ul>							
<p>We want to provide assurance to stakeholders about how we are performing – not just in terms of our statutory functions but also how efficiently and effectively we fulfil them.</p>	<ul style="list-style-type: none"> <li>Continue to report on our performance through the annual audit report and other key publications.</li> <li>Report publicly on average waiting times for complaints investigations, making this information easily accessible on our website.</li> <li>Maintain a quality assurance framework and report publicly on outcomes from quality related activities that take place through this such as benchmarking and cold case reviews.</li> <li>Seek feedback from those who encounter us through customer surveys and use the results to inform future ways of working.</li> </ul>	✓	✓	✓	✓	✓	✓	<ul style="list-style-type: none"> <li>Report on our performance - annually</li> <li>Report waiting time and other KPI's - monthly</li> <li>Maintaining a quality assurance framework and report publicly on its outcomes – June 2024 onwards</li> <li>Develop and rollout a Customer Survey from October 2023</li> <li>Analyse results of Customer Survey and publish in Annual Reports from 2024-25 onwards.</li> </ul>

Key Objectives	Actions	Stakeholders						Completion Timescales
		Gr 1	Gr 2	Gr 3	Gr 4	Gr 5	Gr 6	
We want members of the public to be aware of our complaints handling function and how to make a complaint if they wish	<ul style="list-style-type: none"> <li>Regularly update the website.</li> <li>Make information on our website as accessible as possible, including translations into easy read and BSL.</li> <li>Use animated videos and infographics to help make our approach to complaint handling more accessible and easier to understand.</li> <li>Develop a database and provide helpful information on our website, about other public bodies we can signpost the public to, if their complaint is out with our remit.</li> <li>Consider use of social media to increase our reach and to signpost the public to our work and how to complain.</li> <li>Work with other parliamentary officeholders to develop a single web page that signposts the public to the relevant one that they can approach about their concerns.</li> </ul>	✓						<ul style="list-style-type: none"> <li>Update website regularly – on-going</li> <li>Ensure information on website is as accessible as possible – on-going</li> <li>Introduce videos and infographics – March 2025</li> <li>Develop and maintain database of public sector bodies for signposting purposes – February 2024 then update ongoing.</li> <li>Consider social media approaches – December 2024</li> <li>Officeholder webpage development – June 2025.</li> </ul>
We want members of the public to know more about our role in regulating board appointments, what difference it makes	<ul style="list-style-type: none"> <li>Engage with organisations working in the field of equalities to promote board opportunities, seeking to increase the diversity of the people who may apply.</li> <li>Enhance our website with information to explain the history of regulation in public appointments</li> </ul>	✓			✓			<ul style="list-style-type: none"> <li>Engage with organisations working in the field of equalities – on-going</li> <li>Publish history of public appointments on website – December 2025</li> </ul>

Key Objectives	Actions	Stakeholders						Completion Timescales
		Gr 1	Gr 2	Gr 3	Gr 4	Gr 5	Gr 6	
to have us regulate the process and be able to see what difference our regulation of public appointments has made over time	<p>since the beginning, detailing reports, research and other forms of influence which have resulted in positive change.</p> <ul style="list-style-type: none"> <li>Enhance our website with good practice (guidance and case studies) to help the public understand the difference it makes to apply for a position that is regulated and where high levels of good practice are required.</li> <li>Consider use of social media to increase our reach, signpost the public to our work and the difference that regulation makes and how to apply to become a board member.</li> <li>Post informative content about our work to social media channels (LinkedIn and YouTube)</li> </ul>							<ul style="list-style-type: none"> <li>Publish good practice on website – December 2024 then ongoing.</li> <li>Consider social media approaches – October 2024</li> <li>Post content to LinkedIn and YouTube from March 2025 then ongoing.</li> </ul>

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## Appendix 1: Our stakeholder groups with examples of their members

### **Group one – the public and the media**

- The general public
- The media, such as the press

### **Group two – statutory stakeholders**

- The Scottish Parliament
- The Scottish Government
- The Standards Commission for Scotland

### **Group three – organisations directly affected by our work**

- Political parties
- COSLA
- The Society of Local Authority Lawyers & Administrators in Scotland
- SOLACE Scotland
- Chief Executives and Council Leaders of all Local Authorities in Scotland
- The Chairs of Public Bodies

### **Group four – organisations working in the field of equality such as**

- the Equality and Human Rights Commission Scotland
- the Equality Network

### **Group five – other significant organisations such as**

- Commissioner for Standards (Northern Ireland Assembly, Gurnsey and States of Jersey)
- Independent Complaints and Grievances Scheme
- Northern Ireland Public Services Ombudsman
- Parliamentary Commissioner for Standards
- Scottish Public Services Ombudsman
- Senedd Wales
- Wales Public Services Ombudsman

### **Group six – our consultants, tasked with sharing our messages**

- Public Appointments Advisers
- Leading Kind

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