



**August 2025**

## **Responding to the [call for views](#)<sup>i</sup> launched by the Social Justice and Social Security Committee on the [Wellbeing and Sustainable Development \(Scotland\) Bill](#)<sup>ii</sup> proposed by [Sarah Boyack MSP](#)<sup>iii</sup>.**

The suggested responses below have been drawn up by the Wellbeing and Sustainable Development Working Group, including representatives from Carnegie UK, Oxfam Scotland, the Wellbeing Economy Alliance Scotland (WEALL Scotland), Scotland's International Development Alliance (SIDA), and others.

This document is designed to offer some suggested responses which you or your organisation might find helpful to draw on in preparing a response to the call for views from the Scottish Parliament's Social Justice and Social Security Committee on Sarah Boyack's Members Bill which is open until 24 August 2025. The response portal can be found at:

[Wellbeing and Sustainable Development \(Scotland\) Bill - Scottish Parliament - Citizen Space](#)<sup>iv</sup>.

As organisations that have lobbied for the merits of a WSD Bill since 2020, we feel we have some background to share that might be useful. Please feel free to use the following text (or not) as you see fit.

This document also draws on a range of previous position papers and consultation responses, including:

- May 2022: A [briefing paper](#)<sup>v</sup>, Towards a Wellbeing and Sustainable Development (Scotland) Bill and a [timeline of work](#)<sup>vi</sup> on the issue by Scotland's International Development Alliance
- June 2024: A [briefing by the same organisations](#)<sup>vii</sup> behind this current paper, responding to proposals from both the Scottish Government and Sarah Boyack MSP.
- March 2025: An [options paper](#)<sup>viii</sup> commissioned by our working group exploring ways to revitalise Scotland's approach to the wellbeing of future generations and sustainable development.

Other resources which might be helpful include:

- July 2024 - [Analysis of responses](#)<sup>ix</sup> to the Scottish Government's Consultation on a proposed Wellbeing and Sustainable Development Bill
- November 2023 – [Summary of Responses](#)<sup>x</sup> to the consultation on Sarah Boyack MSP's proposed Wellbeing and Sustainable Development Bill

## Guideline Responses to Questions set out in the Call for Views

### **1. Do you think that more needs to be done to embed sustainable development and wellbeing as primary considerations into public policymaking? Please tell us why**

Yes, more needs to be done to embed sustainable development and wellbeing as primary considerations into policy making. More than two thirds of OECD countries now account for progress through national measures of collective wellbeing.<sup>xi</sup> This is in part a response to the global commitment to the implementation of the Sustainable Development Goals (SDGs) which set out 17 goals, 169 targets for all national and subnational governments to achieve by 2030, and 234 unique globally agreed indicators to measure performance. It also forms part of the understanding of how the 2015 Paris Agreement on climate change should be adhered to. Scotland has a duty and an obligation to respect planetary boundaries to sustainable development for the future of people and planet. Collective wellbeing and sustainable development are fundamental principles that citizens expect their governments to pursue.

Through the evolution of the National Performance Framework (the NPF) into Scotland's wellbeing framework and the introduction of an outcome-based approach to government in 2018, Scotland was a timely responder and developed an international reputation as a dynamic, resourceful nation. However, more recently Scotland has failed to maintain the momentum and as the report of the [Supported Bodies Landscape Review Committee](#)<sup>xii</sup> on 19 June 2025 noted, there has been an increased perception of a failure of government (a failure of the system) to respond to people's needs. This Bill represents a chance to change direction once more and help Scotland once again become a leader in this space.

As (*organisations/ x organisation*) working to promote the wellbeing of individuals, communities, and the environment, both here and globally, we firmly believe that clear legislation is essential to create a more equitable, resilient, and sustainable Scotland.

A Bill embedding sustainable development and wellbeing into policy making would help to ensure actions in Scotland contribute to the betterment of wellbeing, in Scotland and elsewhere, as the world deals with converging crises. By enshrining principles of sustainable development and wellbeing in law, we can ensure that these concepts are considered during the policy process and embed a long term and preventative approach in all decision-making; while also giving clarity to how public bodies and other actors deliver policy on the ground to support a positive impact on the wellbeing of people and the planet.

This legislation should define sustainable development and make it a statutory requirement for all public bodies and local authorities in Scotland to take full account of the short and long-term sustainable development impact of their decisions, both in Scotland and elsewhere.

The best way for legislation to support public bodies and local authorities to achieve the goals of wellbeing and sustainable development is by building on and strengthening the existing National Outcomes and the National Performance Framework in which they sit. The National Outcomes are the key to translating the overarching goals of sustainable development and wellbeing into concrete outcomes for Scotland.

However, the existing duties (in the [Community Empowerment \(Scotland\) Act 2015<sup>xiii</sup>](#)) are too weak to establish the National Outcomes as key drivers of decision making, and thus concrete outcomes for Scotland. The duties are also not streamlined with other duties creating a complicated, and sometimes contradictory, landscape of duties for public bodies. This is unhelpful both for public bodies and for the advancement of wellbeing and sustainable development by Scottish Ministers.

It is also the case that the Outcomes are currently not developed based on strong participatory processes. Such processes are vital if they are to be made to reflect and secure a democratic mandate. A key goal of the legislation must be to ensure that the National Outcomes are developed and shaped using a deliberative participatory process that has both breadth and depth.

The legislation should also relocate and strengthen the duties on Ministers and public bodies to promote *and* deliver the National Outcomes, as revised, so that they more clearly drive policy and spending decisions on the one hand and implementation on the other. To do this, requires the duty to use more tangible, directional and affirmative language than ‘have due regard to’.

The legislation should also place requirements on Scottish Ministers to: show how they support wellbeing and sustainable development when they set new national outcomes; to produce delivery plans for the National Outcomes; to engage in meaningful and ongoing public engagement on the National Outcomes; to ensure regular and accessible reporting on progress; and to strengthen the links between the National Outcomes and the Scottish Budget.

Ultimately, we believe this legislation can help us ensure the National Outcomes become the golden thread underpinning public life in Scotland. It should be Scotland’s contract with current and future generations everywhere and ensure long-term societal outcomes.

## **2. What is your view on the policy objectives of the Bill, as set out in the Policy Memorandum?**

(We) agree that more needs to be done to accelerate progress on climate change and agree that a more coherent approach to policy making and implementation across government can make an important contribution to ensuring such progress as well as improved outcomes for the people of Scotland and others elsewhere in the world. We also agree that government is too often driven by short termism and that there is a need to include an obligation on public bodies and others accountable to the Scottish government to reflect on long term impacts of policy and proposed actions. We agree that sustainable development should be defined and that public duties towards ensuring sustainable development and collective wellbeing should be clarified.

In addition, we agree that the proposed role of Futures Generation Commissioner represents a clear way to deliver such aims. However, the creation of a Future Generations Commissioner is not the only option, and there is a case for tightening up existing legislation as well as looking at alternative means of delivering the aims of improved policy coherence and greater accountability to future generations. [Six possible alternatives](#) were set out in the research by Max French and Jennifer Wallace, commissioned by Carnegie UK, Oxfam Scotland, the Wellbeing Economy Alliance Scotland (WEALL Scotland), Scotland's International Development Alliance (SIDA) and published by on 31 March 2025<sup>xiv</sup>.

We believe that it is important to coordinate and tie in the approach to sustainable development and wellbeing with a revised National Performance Framework and to see the National Outcomes as the primary vehicle for delivering wellbeing and sustainable development in a clear and accountable manner. With the current proposed review of the NPF by the deputy First minister there is an opportunity to clarify obligations and approaches across government at every level in Scotland.

It is also important to be clear that the delivery of sustainable development or the pursuit of wellbeing does not stop at Scotland's borders or should only apply to those living in Scotland. We believe that the collective wellbeing of present and future generations in one place is wholly dependent upon the wellbeing of others elsewhere, and the planet.

**3. Which of the following best expresses your view on section 1, which requires public bodies to have due regard for the need to promote wellbeing and sustainable development ( the categories range from strongly support to strongly oppose)**

Strongly oppose

The requirement to “have due regard for the need to promote wellbeing and sustainable development” is wholly inadequate to give proper effect to the aims of the Bill. The proposed legislation can only be truly effective if this requirement becomes a duty to make decisions that will *deliver* wellbeing and sustainable development. This duty must apply to both the Scottish Government itself, and to all public bodies accountable to the Scottish Government. The duty should also be applied to any third sector organisations and private companies procured to deliver services by or on behalf of the Government, its agencies and local authorities.

The National Outcomes, currently set out in the National Performance Framework, are the key to translating the overarching goals of sustainable development and wellbeing into concrete outcomes for Scotland. We are also concerned that the existing duty on public authorities to “have regard to the national outcomes” in the Community Empowerment (Scotland) Act 2015 is not strong enough to deliver their ambition.

These duties, in Part 1 of the Community Empowerment (Scotland) Act 2015, should therefore be relocated into the WSD Bill, and be amended to support a more unified approach to delivering the National Outcomes and to support greater clarity over the contribution made by different actors towards the delivery of all of the National Outcomes, as a complete wellbeing framework, rather than particular National Outcomes in isolation.

To do this, requires the duty to use more tangible, directional and affirmative language. One approach might be to adopt similar wording to the Well-being of Future Generations (Wales) Act 2015 which requires each public body “*to carry out sustainable development*” and includes requirements for “*Setting and publishing objectives [in relation to the wellbeing goals]*” and “*taking all reasonable steps to meet those objectives*”. However, we argue that even this wording is not strong enough and does not emphasise the need to ensure policy coherence in pursuit of the National Outcomes, wellbeing and sustainable development.

Therefore, we propose that the existing duty on the National Outcomes should be rephrased so that public authorities are required to:

***“promote and deliver sustainable development while protecting the wellbeing of current and future generations, ensuring that they take all reasonable steps to support the realisation of the national outcomes, minimise trade-offs, and resolve policy conflicts in a way that does not undermine sustainable development or the wellbeing of current and future generations.”***

**4. What is your view on the definition of “public body” (in section 17(2))? Is there a need for statutory definitions of wellbeing, and sustainable development?**

The definition needs to be clear that “public body” includes the Scottish Government, local authorities, all bodies accountable to the Scottish government or local authorities as well as any third sector or private sector organisations working for or paid by the Scottish Government. *In addition, consideration should be given to an advisory duty to the private sector to consider the impact of activities on future generations*

**5. What is your view on the definition of “sustainable development” (in section 2)?**

The definition in the Bill of Sustainable Development as “development that improves wellbeing in the present without compromising the wellbeing of future generations” is too narrow and misses several important aspects. It lacks any reference to planetary boundaries, the environmental limits within which humanity must operate. Without this, the definition fails to acknowledge the climate and nature crises that threaten both current and future wellbeing.

It also fails to recognise that the wellbeing of people in Scotland is tied to the wellbeing of people and ecosystems elsewhere. Decisions taken here can have far-reaching consequences beyond our borders. The Bill should recognise Scotland’s responsibilities as a good global citizen and its commitment to the UN Sustainable Development Goals.

The current definition also overlooks the principle of equity within and between generations, and across nations. Sustainable development must be pursued in ways that reduce inequalities and share resources fairly.

We therefore believe that Sustainable Development can be defined as “the development of human societies based on **fair shares of planetary boundaries**, and which **equitably support** the capability of present and future generations across the world to meet their needs.”

## **6. What is your view on the definition of “wellbeing” (in section 3)?**

The definition of “wellbeing” in the Bill must go further to ensure clarity, accountability, and alignment with the Bill’s ambition to shift public decision-making towards a more equitable, sustainable future.

A legal definition of wellbeing must reflect collective rather than purely individual wellbeing, and be grounded in the principles of equity, long-termism, participation, and interdependence. These principles underpin international best practice, including the OECD’s Wellbeing Framework, and are essential to delivering the National Outcomes and the UN Sustainable Development Goals in a meaningful way.

Collective wellbeing should be understood as the progressive realisation of social, economic, environmental, and democratic (SEED) outcomes, achieved in ways that reduce inequalities and respect the rights and needs of both current and future generations, in Scotland and beyond. Wellbeing must be viewed as shared and relational, shaped by our communities, institutions, and natural environment.

Crucially, wellbeing outcomes must reflect what matters to people, and be periodically reviewed in consultation with communities, particularly those furthest from decision-making. Embedding this participatory principle ensures that the definition of wellbeing remains dynamic, inclusive, and relevant.

The Bill represents a vital opportunity to anchor collective wellbeing as Scotland’s guiding purpose - one that recognises planetary boundaries, and integrates environmental sustainability, social justice, and democratic accountability.

To reflect the concerns outlined above we propose the following as an example of a definition:

“Collective wellbeing is the progressive realisation of social, economic, environmental and democratic outcomes which enable people to meet their needs, as identified through consultation with the people of Scotland, pursued in a way that reduces inequalities in wellbeing between different groups. It also recognises the importance of protecting the interests and needs of future generations and fostering intergenerational equity.”<sup>xv</sup>

**7. Which of the following best expresses your view on section 4, which establishes a Future Generations Commissioner? (the categories range from strongly support to strongly oppose)**

Support.

We support the inclusion of a Future Generations Commissioner in principle, as it offers arguably the strongest and most coherent mechanism for driving the aims of the Bill: embedding long-termism, improving accountability, and ensuring sustained focus on the wellbeing of future generations. International evidence, particularly from Wales, suggests that a well-resourced commissioner with statutory powers can help shift institutional behaviours and foster joined-up, preventative approaches to policymaking.

However, we recognise that the Supported Bodies Landscape Review Committee report (19 June 2025) and the current moratorium on new SPCB-supported bodies present political and fiscal obstacles to establishing a Commissioner in the immediate term.

In this context, we support phased or alternative approaches, as outlined in the [Carnegie UK-commissioned options paper](#)<sup>xvi</sup>. These include:

- Expanding Audit Scotland’s mandate to scrutinise progress on wellbeing and sustainable development.
- Embedding wellbeing responsibilities within existing parliamentary committees or creating a new cross-cutting committee to oversee long-term outcomes.
- Establishing an independent advisory council or roundtable convened by civil society, academia, or government to champion and monitor progress.
- Fostering joint working between existing SPCB-supported bodies, such as the Children and Young People’s Commissioner, Consumer Scotland, and the Public Services Ombudsman.

These lower-cost alternatives could still make a significant impact and be implemented now while building political consensus and practical infrastructure for a statutory Future Generations Commissioner in a later parliamentary term.



**8. Do you have views on the general function (as set out in section 5), powers, structure, and duties of the Commissioner?**

As currently set out, and without clarity on the duties of public bodies to implement a requirement to consider future generations in policies and actions, the role of the Commissioner is not strong enough to have an impact on how policy is crafted, nor to ensure the accountability of public bodies to implement the requirements of the proposed bill. (arguably this role could be taken on by others, eg a parliamentary committee, or individual responsible departments). The proposed powers to investigate are welcome but it is not clear to whom the Commissioner reports and/or what power the role has to ensure implementation of recommendations.

It is important that the Commissioner has a public education role which might be more clearly set out.

**9. Taking account of the Bill's Financial Memorandum, what is your view on the financial implications (i.e. likely costs and savings) of the Bill?**

We recognise the significant financial constraints currently faced by public bodies and the Scottish Government. The Bill's aims of embedding wellbeing and sustainable development into decision-making could, however, result in substantial long-term value by prioritising prevention, coherence, and efficient use of public resources.

The creation of a Future Generations Commissioner is costed at a relatively modest £1.5–2 million annually. If the moratorium on Commissioners continues, the Carnegie UK-commissioned options paper identifies alternative accountability models that may be more feasible in the current financial context. These include:

- Expanding Audit Scotland's role to include scrutiny of wellbeing and sustainability (estimated additional cost: £200–250k annually).
- Establishing a cross-committee parliamentary function on wellbeing of future generations (cost aligned with typical committee budgets: ~£100–150k).
- Creating an independent advisory council or roundtable, convened by NGOs or academia (estimated at £50–100k).

These models offer different combinations of accountability, support, and representation, and could be combined or sequenced depending on available resources and political appetite.

These cost-effective alternatives to a full commissioner model can still deliver meaningful accountability. Regardless of model, long-term savings and public value that could be realised by the Bill will depend on properly resourcing support, implementation, and monitoring.

## 10. Do you have any other comments about the Bill?

Setting outcomes and duties alone will not be enough to achieve the aims of this bill. To achieve collective wellbeing in a way that is sustainable requires a future generations approach and different ways of working for public bodies and beyond. This will require an adherence to ‘policy coherence for sustainable development’ and agreement on high level ‘ways of working’ which should be facilitated by comprehensive support, training and toolkits for the public bodies tasked with implementation.

We need to work in a way that is based on evidence and long-term thinking, is collaborative, can effectively identify and resolve trade-offs and deal with complexity, and which considers global impacts.

We propose to include the following ways of working in the legislation:

- participation: recognising that everyone in society has a role to play and actively engaging voices that often go unheard;
- integration: achieving policy coherence for sustainable development by aligning public bodies’ efforts, collaborating and committing to shared learning;
- long-term: balancing the needs of today with those of future generations;
- global citizenship: proactively considering the full range of impacts resulting from our decisions and actions, and - at a minimum - doing no harm internationally;
- prevention: focusing on and investing in early action rather than just reacting to problems;
- openness: enabling engagement and accountability through openness and transparency;
- evidence-based: making decisions based on the best evidence available.

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<sup>i</sup> <https://yourviews.parliament.scot/sjssc/wellbeing-and-sustainable-development-bill/>

<sup>ii</sup> <https://www.parliament.scot/bills-and-laws/bills/s6/wellbeing-and-sustainable-development-scotland-bill>

<sup>iii</sup> <https://www.parliament.scot/msps/current-and-previous-msps/sarah-boyack>

<sup>iv</sup> <https://yourviews.parliament.scot/sjssc/wellbeing-and-sustainable-development-bill/>

<sup>v</sup> <https://intdevalliance.scot/resource/towards-a-wellbeing-and-sustainable-development-scotland-bill/>

<sup>vi</sup> <https://intdevalliance.scot/our-work/influencing-policy/wellbeing-sustainable-development/>

<sup>vii</sup> [https://www.weallscotland.org/\\_files/ugd/e2bd6b\\_3e92de89591e4daa9a1e82da61470944.pdf](https://www.weallscotland.org/_files/ugd/e2bd6b_3e92de89591e4daa9a1e82da61470944.pdf)

<sup>viii</sup> <https://carnegieuk.org/publication/putting-collective-wellbeing-and-sustainable-development-into-action-an-options-paper-for-scotland/>

<sup>ix</sup> <https://www.gov.scot/publications/wellbeing-sustainable-development-bill-consultation-analysis/>

<sup>x</sup> [https://www.parliament.scot/-/media/files/legislation/proposed-members-bills/final\\_proposedwellbeingsustainabledevelopmentbill\\_consultationsummary.pdf](https://www.parliament.scot/-/media/files/legislation/proposed-members-bills/final_proposedwellbeingsustainabledevelopmentbill_consultationsummary.pdf)

<sup>xi</sup> OECD (2024), *How's Life? 2024: Well-being and Resilience in Times of Crisis*, OECD Publishing, Paris, <https://doi.org/10.1787/90ba854a-en>

<sup>xii</sup> <https://digitalpublications.parliament.scot/Committees/Report/SSBLRC/2025/6/19/ebc80c58-7bea-4a4a-9c6d-b5811cd016ac>

<sup>xiii</sup> <https://www.legislation.gov.uk/asp/2015/6/contents>

<sup>xiv</sup> <https://carnegieuk.org/publication/putting-collective-wellbeing-and-sustainable-development-into-action-an-options-paper-for-scotland/>

<sup>xv</sup> [https://www.weallscotland.org/\\_files/ugd/e2bd6b\\_3e92de89591e4daa9a1e82da61470944.pdf](https://www.weallscotland.org/_files/ugd/e2bd6b_3e92de89591e4daa9a1e82da61470944.pdf)

<sup>xvi</sup> <https://carnegieuk.org/publication/putting-collective-wellbeing-and-sustainable-development-into-action-an-options-paper-for-scotland/>