

**1 April 2026**  
**By email**

Dear Deputy First Minister

Thank you for your letter of 17<sup>th</sup> February. Carnegie UK was grateful for the opportunity to contribute to this phase of the NPF review; I want to commend the open and engaging approach that the team has taken to explore what can be learned from international good practice, as well as from experience closer to home in the UK.

The integration of wellbeing approaches is a process and not an event; aspects of this work will need constant attention as they evolve and become more routine and accepted in practice. Carnegie UK has recently published our current thinking on this in "[A Maturity Model for Wellbeing policy](#)" which might be of interest to you and your colleagues.

We are grateful for the opportunity to comment on this latest iteration of the proposals. In our response, we focus on those questions and issues where we feel we have something distinctive to contribute; other respondents will be better placed to comment on specific areas which best engage their respective expertise.

### The role and purpose of the Wellbeing Framework

Beyond the core team, it has been evident (perhaps unsurprisingly) that there remains an uneven understanding within Scottish Government about the role and purpose of a wellbeing framework for policy governance, and in particular what it means to "have regard to the national outcomes".

I thought it might be helpful to rehearse the overall case here as it provides context for Carnegie UK's comments on the specific proposals and questions in the document. In simple terms, a wellbeing framework helps government work towards improving people's lives in a systematic way. It does so by re-orientating public policy away from focussing solely on managing siloed activities and short-term outputs, towards a broader approach which takes a long-term view and builds population wellbeing over time. It does this by:

1. **Establishing a shared, explicit vision** of societal success. The vision clarifies what government is ultimately for, providing a unifying reference point across political cycles, portfolios and functions of government, and legitimising long-term decision-making.
2. **Defining long-term population outcomes** that describe what that success looks like for people, communities and the environment. This broadens accountability from individual programmes to include population-level change, and from short-term delivery to stewardship for the long-term.

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3. **Embedding an indicator set** that tracks whether outcomes are improving or worsening over time, making progress (and trade-offs) visible and contestable. The indicators are best understood not as performance targets, but as data points to support decision making and an assessment of collective national progress, in a context where no single body controls what happens.
4. **Rewiring ways of working** across government so that decisions, budgets and accountabilities align with the outcomes as well as with shorter term goals. These ways of working are the enabling conditions that turn a wellbeing framework from aspiration into practice.

The NPF is often described as “conceptual” and thereby removed from the everyday business of government. It is therefore important to understand how and why it should manifest in routine practices. For the Scottish government – or indeed any Scottish public body or organisation aligned to the framework - *“having regard to the national outcomes”* should mean the following:

- Embracing the vision that the primary purpose of government is to improve the wellbeing of the people living in Scotland now and in the future.
- Knowing what the national indicator set says about how Scotland is currently performing in its journey towards that vision (as translated into the concrete descriptions of societal conditions which the national outcomes represent).
- Exploring and learning which strategies, policy interventions and activities will make positive (and negative) contributions to national progress – and identifying where trade-offs exist between the various domains.
- Codifying, implementing and valuing ways of working which are necessary to make progress on the outcomes, including designing policies with long-term impacts in mind; aligning budget processes to outcomes; collaborating cross-organisation and cross-sector around the shared evidence and shared outcomes; and involving people and communities in shaping decisions.
- Aligning sectoral and local strategies, performance frameworks and budgets to the over-arching national wellbeing framework.
- Anticipating and accepting accountability for all these practices as a core part of overall accountability to audit and scrutiny bodies, Parliament and the public.

### Concept and vision

Carnegie UK supports the proposed definition of collective wellbeing and the way that the vision is described in the paper, although we suggest that it would be better framed as “our vision **is improved wellbeing** of people living in Scotland etc” – the current version is an action, rather than a vision of a future state.

We have argued for many years that the name “National Performance Framework” does not properly describe the purpose and role of a wellbeing framework in policy governance. Not only that, but it risks misleading others as to what it is for and thereby undermines the potential value of the approach. This is the right moment to change the name to something which better describes the function of the framework.

Wellbeing frameworks are commonly known by that name where they are used by governments in other parts of the UK and across the world. We therefore favour "Scotland's Wellbeing Framework", reflecting the clarity and focus of the proposed vision.

### Outcomes

Carnegie UK is strongly supportive of the reduced outcome set which we believe will be more effective than the previous iteration in encouraging bodies to think broadly and holistically about their contribution to multiple outcomes.

We do not have any further comments on the drafting of the individual outcomes, other than to commend the version of the "prosperous" outcome which does not include the superfluous "wellbeing".

We hope that the indicator set will reflect the importance of democratic wellbeing, with measures relating to issues such as trust in institutions and citizens' perception of their scope to influence decisions that affect them. This dimension is implied by the "Connected" outcome but will need careful monitoring with relevant data.

It will be important to ensure that the cross-cutting lenses are embedded in the practice of all bodies; we don't have strong views about how they are represented in the framework itself which is of secondary importance compared to how they are used.

### Understanding our progress

While we understand the sequencing that has been applied to the NPF reform process, the absence of the proposed indicator set makes it harder to explain and understand how the revised framework should work as a whole.

The indicators will be critical to telling the story of what life is like for people living in Scotland, and for tracking progress over time and between different groups and places. We recognise and respect the role of analytical advisers in making recommendations about the appropriate indicators to incorporate in the NPF. However, given the critical importance of the indicator set in conveying the narrative about population wellbeing, it is essential that the measures are regarded as relevant and easily understood.

We strongly recommend that the process of indicator consideration and selection is conducted in an open, engaging and transparent way with a broad community of interests. We do not believe that this would compromise the ability of the final set to meet the identified technical requirements, but it would make a very significant difference to the extent to which the overall framework is understood beyond (and no doubt within) the Scottish Government.

Accountability should be less about assessing individual contributions to movements in the data (although this will be interesting to explore), and more about the extent to which the data is visibly used to inform decision making. Public bodies - including policy makers within the Scottish Government - should be held to account for how they apply the insights from the data to inform policy choices, service design and funding decisions, and for modelling leadership that creates the conditions for this work to be done well.

## Ways of working

International evidence suggests that a multi-pronged approach is necessary to ensure that a wellbeing framework achieves its intended purpose. Key to this is the alignment of the culture and people in public bodies with the purpose of the framework. We have suggested in the past that this requires public bodies and public servants to be skilled and confident in:

- Long-term and whole-of-government thinking and strategy development.
- Cross sectoral and cross-functional collaboration.
- Design and funding of preventative programmes and activities.
- Involving people in policy development and service design.

This is not an exhaustive list; Carnegie UK will shortly be convening a group of people with relevant expertise and interests to debate what a core set of ways of working for the Scottish context should comprise. We will offer further considered advice on this question thereafter.

Whatever the chosen core ways of working, it will be important that these become part of the ongoing organisational development plans of relevant bodies, including the Scottish Government. While there is a role for guidance materials, this should not be overstated in comparison to the influence of championing and role modelling by the political and executive leadership of organisations, and the re-alignment of incentives, recognition and accountabilities.

## Relationship to other strategies and priorities

The Wellbeing Framework is designed to sit "above party politics", but it should have a clearly understood relationship with the priorities of the elected government of the day. Those policy and delivery commitments describe how elected ministers will make progress towards the long-term vision and outcomes for Scotland during their term in office. That "how" may well vary from party to party and from government to government and is proper material for political debate and party differentiation.

It is however important to recognise and respect the hierarchy of policy governance. There needs to be a clear, logical and consistent flow through from vision to strategy(ies), to programmes, to action plans and activities – and back up again to the contribution to indicators and outcomes.

Therefore, the wellbeing framework cannot be both "at the apex of decision making" and "a key component of the Public Service Reform strategy" which is itself intended to contribute to the successful realisation of the wellbeing outcomes. The aims of the PSR strategy are well aligned with the NPF, but the relationship between the two needs to be clarified and disentangled. The PSR strategy tail is currently trying to wag the NPF dog (for example in relation to work on accountability and leadership) and causing unnecessary confusion both internally and externally.

We have seen similar confusion in relation to the concept of the "wellbeing economy". In launching this iteration of the Framework, it would be helpful to clarify that economic

strategies, programmes and activities are nested within and flow from the top-level wellbeing vision and outcomes, along with all the other key areas of government responsibility. Indeed, given the proposed overall vision, there should be no need for “wellbeing” to prefix any individual portfolio.

### Other relevant issues

As we have noted during this review, the current legislative underpinning of the NPF in the Community Empowerment Act is no longer fit for purpose. Once this review/reform process is concluded, it seems likely that the following issues will remain outstanding:

- The fact that the provisions of the 2016 Act do not apply to the Scottish Ministers.
- The narrow focus of the Act on a quinquennial review of the National Outcomes specifically, which no longer feels appropriate or useful.
- The gaps in responsibility for formal assurance and scrutiny in relation to the Framework.

There is also further work to be done to define who the wellbeing framework is for. Our comments in this response focus on policy governance within and between agencies of national and local government, but there is also a role for the third sector and broader civil society. Government needs to lead by example by getting its own house in order, but the question of coverage also needs to be addressed in collaboration with those other players.

I hope that these comments are helpful to the Scottish Government, and that the reformed National Performance Framework will play a key role in policy governance in Scotland following the election, whatever the outcome.

Yours sincerely,



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