

**Ethical Standards Commissioner Strategic Plan 2021-24 draft consultation response by South East Scotland Transport Partnership (SEStran).**

SEStran welcomes the opportunity to contribute to the development of the Ethical Standards Commissioner's Strategic Plan 2021 – 24 and supports the need to bring forward consideration of this Plan ahead of the usual timetable to address the altered operational context, as set out within the consultation document.

Overall, SEStran is supportive of the content of the Plan and welcomes the key changes set out on page 5 of the consultation document:

- 'Greater assurance on quality than currently provided via targets, indicators and review systems all of which will be consulted on and published;
- Improved governance designed to oversee and ensure delivery of our strategic objectives;
- Recruiting and developing staff to ensure consistent high quality of our professional skills base;
- Better complaints handling via a streamlined, high quality service
- More meaningful engagement with MSPs, local authority councillors and public body board members to inform and shape our work and our performance;
- Codifying a coherent, comprehensive suite of procedures which we'll publish so people know what to expect;
- Revising the Code and guidance on Ministerial Appointments to Public Bodies in Scotland and promoting and supporting its implementation.'

However, these are high level aspirations, and SEStran would welcome the opportunity to further engage with the Ethical Standards Commissioner as these changes, and the timeframe set out at page 13 of the consultation document, are fleshed out. It would be good to know the detail of how these matters are to be addressed.

We recognise that the past couple of years have been challenging for the Ethical Standards Commissioner's Office, and a number of issues have caused members of public bodies subject to the ESC's investigations concern:

- The decision in 2019 (under the previous Commissioner) to terminate the contracts of several experienced investigators, coupled with subsequent staff turnover;
- Under the previous Commissioner, a seeming reluctance to engage with stakeholders;
- Arising from the loss of the previous investigators and time taken to recruit new ones, significant delays in investigations, with those under investigation being given little by way of explanation for the delay.

Issues like these have caused a lack of confidence in the Office and its ability to investigate complaints swiftly and effectively. The commitments, noted above, particularly to codify procedures and make these publicly available alongside improved governance and assurance is therefore welcomed.

The commitment to recruit and develop staff to ensure consistent high-quality investigations is also welcomed and will help rebuild the confidence in the investigation process and the Office's willingness to consider and respond to issues when raised. The

implementation of a high-quality complaints system is also welcomed to consider feedback and builds trust that stakeholder views are being acted upon.

SEStran is keen to input to this and future consultations and looks forward to helping the Ethical Standards Commissioner, along with representative bodies such as SOLAR, SOLACE and the Standards Commissioner for Scotland to rebuild trust and confidence in the Office as well as the complaints system itself.

Contact for follow up queries:

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