



Chief Executive's Office
Glasgow City Council
City Chambers
George Square
Glasgow G2 1DU

Chief Executive
Susanne Millar
MA (Hons) CQSW

28 January 2026

Clare Haughey MSP
Convener, Health, Social Care and Sport Committee
Scottish Parliament

Dear Ms Haughey

The Public Bodies (Joint Working (Integration Joint Bodies) (Scotland) Amendment Order 2025 (Draft)

I understand that at a meeting of the Health, Social Care and Sport Committee on 20 January 2026 it was agreed to carry out a targeted call for evidence from various stakeholders on the above draft statutory instrument and that this would include Local Authorities, Health Boards, Integration Joint Boards and third sector organisations. I understand that responses are required by 28 January. Unfortunately we have no record of having received this call for evidence despite having submitted views to the Scottish Government on the proposal to extend voting rights on IJBs during the short window for consultation carried out in December of last year.

I believe it is essential that the views of local authorities should be considered by the Committee as part of their scrutiny of the draft statutory instrument and it is regrettable that a more extensive call for evidence has not been undertaken.

Glasgow City Council recognises the need to hear the perspectives of those within the city who are affected by health and social care services, and that those voices should represent communities as widely as possible. However, we do have reservations as to whether the extended voting rights set out in the draft statutory instrument would actually enable this to happen and whether it is a necessary and desirable change in the dynamic of how IJBs currently operate.

From a Council perspective, there is a very real concern that altering the current voting arrangements of IJBs could lead to a weakening of political accountability for social care, with elected members who have been democratically elected to represent their constituents at a local level being in a minority. Under the current arrangements, locally elected members are responsible for, and answerable to, the local electorate in relation to the provision of care services within Glasgow, ensuring valuable accountability and responsibility in the decision making of the IJB.

There is also an important principle that IJB members are there to represent and act in the best interests of the IJB. While our elected members are subject to the Councillors' Code of Conduct and the Ethical Standards Framework, it is not clear how accountability and ethical

OFFICIAL

standards would be regulated and upheld where voting rights are extended to service users and third sector representatives, particularly in the context of avoiding conflicts of interest. The extension of voting rights to members who have neither been elected nor publicly appointed provides no obvious accountability in terms of the performance of their role as voting members. This is particularly important given the statutory duty on IJBs to set a balanced budget at a time when there are considerable pressures on finances and resources, inevitably meaning that difficult decisions require to be made, some of which could be at risk of legal challenge.

There are also legitimate concerns which would need to be addressed as to how members representing large, varied and possibly complex networks or communities could manage a singular voice and vote on the Board. Greater understanding would also be needed as to how such members would be supported in order to facilitate meaningful representation on complex or contentious issues where a vote may be required, particularly in relation to the setting of budgets.

It is noted that the draft statutory instrument will also provide these new voting members with the right to appoint a *"suitably experienced proxy"* if they are unable to attend a meeting of the IJB. It is unclear as to how suitable experience would be determined and gives further significant concern regarding accountability and ethical decision making.

The Council, like the Glasgow IJB, fully supports the principle that people with lived and living experience need to have a greater voice in IJBs, and that there should be greater (or improved) representation from members of the public on Boards. However, there may be other ways in which this can be achieved but these other options do not appear to have been explored prior to the laying of the draft statutory instrument.

The Council strongly believes that there should be a meaningful review of these proposals, with proper consultation and engagement undertaken in order to fully understand the implications which changes to voting rights would inevitably have on IJBs, as well as councils and health boards.

It is the Council's view that the extent of the limited consultation and call for views undertaken on this issue to date does not allow for the appropriate level of scrutiny that such a fundamental change to IJBs deserves.

I should be grateful if these views could be taken into account by the Committee's in their further consideration of the draft statutory instrument.

Yours sincerely



Mairi Millar
Director of Legal and Administration

OFFICIAL