

How to be an effective commissioner

About this report

Governments often appoint commissioners following a scandal or tragedy. But unless these roles are set up properly, with sufficient powers, resources and independence, the post holder may be unable to make a positive impact on how government works. This report looks at how government can establish commissioner roles to be successful, and how commissioners themselves can make the most of the post. In particular, it considers the proposed Migrants' Commissioner, a recommendation of Wendy Williams in her review of the Home Office following the Windrush scandal.

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Contents

Summary	4
Introduction	6
The evolution of commissioner roles	8
Being a commissioner	12
A Migrants' Commissioner	21
Recommendations	23
Annex 1: Commissioners	26
References	33
About the authors	35

Summary

In recent years, governments have created a series of 'commissioner' posts – individuals appointed by government and given statutory powers to ensure the interests of a potentially neglected group are not overlooked by government. Often the origins of such posts lie in the response to a scandal or a tragedy.

It was therefore not surprising that in her detailed report into the lessons from the Windrush scandal¹ – which saw the appalling treatment of undocumented but legal migrants to the UK by the Home Office as part of its 'hostile environment' approach to immigration enforcement – Wendy Williams recommended the creation of a Migrants' Commissioner to ensure government policy takes proper account of migrants' interests.

This report looks at how government can establish commissioner roles to be successful, and how commissioners themselves can make the most of the post. It then outlines the specific challenges facing the government as it goes about appointing a Migrants' Commissioner (assuming it still plans to do so). It concludes with 10 key recommendations – five for departments hiring commissioners and five for commissioners themselves.

Recommendations in brief

Advice to departments

- **Give the commissioner a well-defined but not overly restrictive remit and be clear where they fit in – organise a proper induction to establish both.**
This will allow the appointee to define the role and respond to emerging concerns while avoiding conflict with other bodies. An induction should help them to hit the ground running.
- **Ensure that the role has adequate resources and powers to fulfil its remit.**
The powers of a commissioner are important – as is staff resource, the ability to commission independent research and to publicise the role and reach affected groups. Assurance on future budgets may be an important element of this.
- **Appoint an individual who has credibility with represented groups and can manage complicated relationships.** These are highly individual appointments – very different from chair/chief executive roles. The appointee needs to be able to hold their own with campaign groups but also be seen as a credible voice for their concerns.
- **Reinforce the independence of the commissioner.** Commissioners must be able to investigate without needing to seek permission or resource from their sponsor department; be able to publish reports under their own authority; and have a direct link to parliament, particularly relevant select committees.

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- **Take commissioner recommendations and input seriously – and be seen to do so.** There should be a formal commitment to respond to reports within a limited time period, as well as to involve the commissioner in advance in relevant policy discussions. Failing to do so risks the role losing credibility.

Advice to potential commissioners

- **Make sure that the job is set up to succeed before taking on the role.** Commissioners need to look at the key ingredients of powers, resources, remit, access and independence before they accept the post. That means agreeing some of the ground rules with the government. They are in their strongest position before they are appointed.
- **Establish credibility and independence from the start.** A new commissioner needs to hit the ground running by reaching out to under-represented groups, setting out the principles and priorities that will guide their work and establishing early on a reputation for evidence-based interventions.
- **Invest in relationships.** Effective relationships are a key route to influence. Commissioners need to take time to invest in relationships based on mutual understanding with departments and public service providers, stakeholder groups and parliamentarians, including key select committee chairs.
- **Develop a predictable media strategy.** It is important to have a clear strategy on how to use the media, consider when to help journalists on background and when to go on the record. 'No surprises' will be an important element of maintaining relationships with ministers and officials.
- **Network with other commissioners.** These are lonely roles with no handbook. But there are other people across the UK performing similar roles and, for some posts, people across the world with similar functions. They provide a potentially invaluable resource to draw on.

Introduction

Recommendation 9 of the Williams report states that:

“The Home Secretary should introduce a Migrants’ Commissioner responsible for speaking up for migrants and those affected by the system directly or indirectly. The commissioner would have a responsibility to engage with migrants and communities, and be an advocate for individuals as a means of identifying any systemic concerns and working with the government and the Independent Chief Inspector of Borders and Immigration (ICIBI) to address them.”²

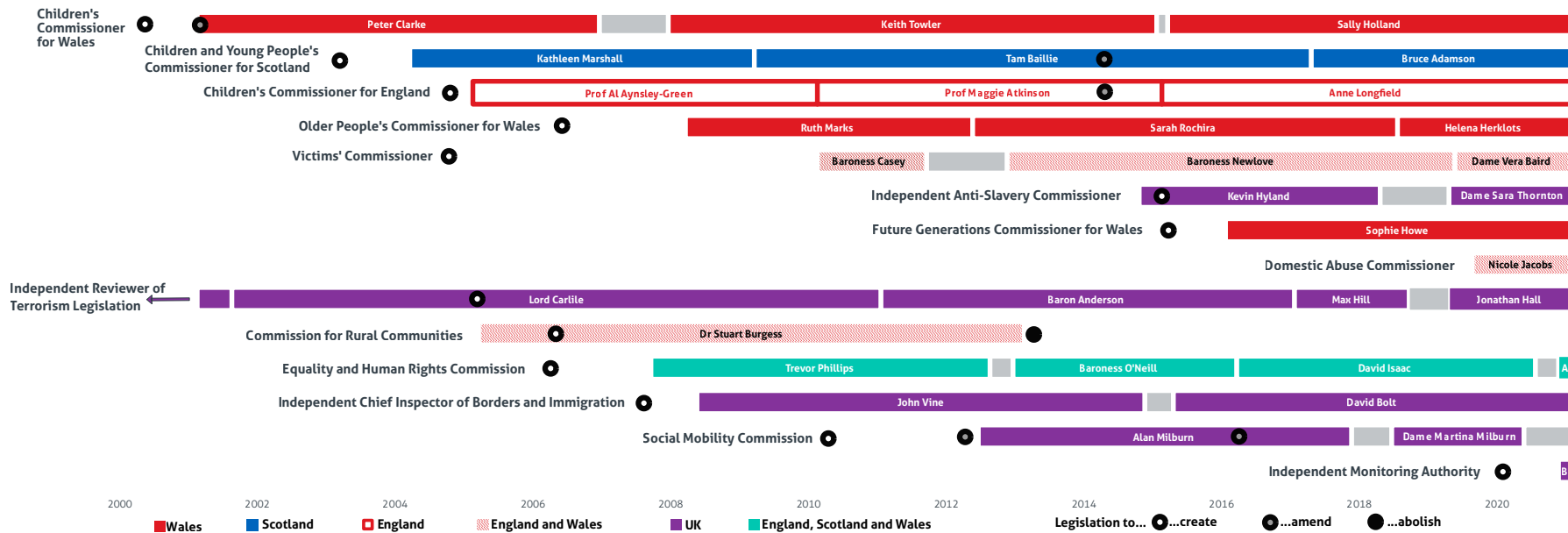
The Home Secretary, Priti Patel, committed to implement the findings of the review in full and set out her “comprehensive improvement plan” on how the Home Office proposed to do so in September 2020. On the Migrants’ Commissioner, the plan said: “We agree that this would be a valuable role, to engage with migrant communities directly and facilitate their feedback into the Home Office to be considered in our policy development and operational activity.”³

The following month, however, Williams told the Home Affairs Select Committee that she felt “there was an absence of detail as to what will be done and when it will be done”.⁴ In that same hearing, she said: “I was thinking of a role that is modelled on other commissioners’ roles, such as the Children’s Commissioner or the Victims’ Commissioner.”⁵

This report does not look into the specifics of Williams’ proposal. Rather it looks at the experience of people who have held commissioner posts – or worked in similar organisations established by government to promote the interests of groups of people – and draws on that experience to make recommendations about how to ensure that a Migrants’ Commissioner (or indeed any new commissioners) can perform their role effectively.

There is very little published research on commissioners, and no handbook or indeed blueprint within government for designing the role. This short report is based on a roundtable we held, with the support of Unbound Philanthropy, with a number of current and past postholders, or people from their organisations, and interviews with others. The annexed table sets out the commissioners and analogous organisations we identified who have played this role at central and devolved government level. We also spoke to a number of organisations representing migrants about what their hopes for and expectations of the new Migrants’ Commissioner are.

Figure 1 **Timeline of selected commissioners, commissions and similar organisations**



Source: Institute for Government analysis of gov.uk, legislation.gov.uk, commissioners'/commissions' websites, LinkedIn and news reports. A = Baroness Falkner of Margravine. B = Sir Ashley Fox. The first Independent Anti-Slavery Commissioner was appointed commissioner designate before the relevant legislation reached Royal Assent. The legislation to create the Domestic Abuse Commissioner is currently under consideration in parliament. The role of the Independent Reviewer of Terrorism Legislation stretches back to the 1970s but was only established in law in 2005. The Commission for Rural Communities was originally part of the Countryside Agency before being set up as a standalone body. The Equality and Human Rights Commission replaced the Commission for Racial Equality, the Equal Opportunities Commission and the Disability Rights Commission. The Social Mobility Commission was created in 2010 as the Child Poverty Commission. It was renamed the Social Mobility and Child Poverty Commission in 2012 when its first chair took office. It was renamed the Social Mobility Commission in 2016.

The evolution of commissioner roles

There is no formula or handbook for the establishment and development of commissioner roles. There is also no induction process for incoming commissioners to help them make an impact in their role.

Nevertheless, there are common themes around when and why the government chooses to turn to a commissioner (or commission). Some of the models it can use to create a degree of independent scrutiny of government activity and promote a particular interest include:

- Independent statutory **arm's length bodies (ALBs)** scrutinise government performance on a particular issue, such as the Equality and Human Rights Commission or the Social Mobility Commission.
- **"Tsars"** are personal ministerial appointments that aim to drive progress and bring coherence to a specific issue; for example, Dame Louise Casey being appointed as homelessness tsar during the Blair government and more recently a number of newly created tsars during the Covid crisis.⁶ Governments appoint a lot of these – more than 180 between 1997 and 2010 – but the positions are not based in statute.
- **Individual commissioners** have been used increasingly as advocates for a clear constituency – such as the Victims' Commissioner, the Children's Commissioner or the independent Anti-Slavery Commissioner. Some of these are UK-wide while others are focused on one UK nation or region.

The powers and functions of these sorts of bodies and individuals can overlap – but in this report we are focusing on the role of individual named commissioners. The distinction can be blurred: the Commission on Rural Communities comprised a number of commissioners, and was designed to raise awareness of the concerns of people living and working in rural areas, but its chair was also designated the Rural Advocate.

Wendy Williams' recommendation of a Migrants' Commissioner as part of her review of the Windrush scandal follows precedent. The 2000 *Lost in Care* report led to the establishment the following year of the Children's Commissioner for Wales, the first such commissioner in the UK;⁷ in 2003, the Laming report into the death of Victoria Climbié led to an equivalent role being created for England.⁸

But now they appear frequently as manifesto commitments. For example, the Domestic Abuse Commissioner, due to be formally established by the Domestic Abuse Bill, was a 2017 Conservative manifesto commitment, and echoed similar commitments in the Labour 2015, 2017 and 2019 manifestos. The Conservative 2017 manifesto also highlighted the creation of the independent Anti-Slavery Commissioner as a success. These all suggest that parties see political benefit in the roles.

Commissioner roles often evolve over time

Because the roles of commissioners are often vaguely defined, they can change over time. The original Children's Commissioner for England role was, for example, very limited in scope, but its remit was reviewed a few years after establishment (see Box 1).

Because these are such individual roles, appointments can make a big difference to how the role is undertaken. Often commissioners are established experts in area – the current Children's Commissioner for England, Anne Longfield, and the designate Domestic Abuse Commissioner, Nicole Jacobs, both ran prominent charities in their field prior to being appointed. Other commissioners use their lived experience to advocate on behalf of their constituent group – for example, Baroness Newlove, the former Victims' Commissioner, whose campaigning prior to her appointment was prompted by the murder of her husband. In other cases, there can be big (and inexplicable) lags between creating a post and filling it. An example is the Victims' Commissioner. Despite being created under 2004 legislation, no one was appointed to the role until 2010.

Changes to the profile and operation of a commissioner are often the product of an individual postholder's preference, rather than a legislative change. Different commissioners take different approaches, and as all of the potential power of the position is vested in them this has significant practical implications.

Commissioners are usually created to give under-represented groups a voice

Many commissioners have a clear constituency whom they exist to represent. This is generally groups who are less able to speak effectively for themselves and are accordingly under-represented in policy making.

This is articulated in Dr John Dunford's 2010 *Review of the Office of the Children's Commissioner (England)*, which began by evaluating the need for a Children's Commissioner – outlining the four most compelling reasons in favour of the position:

- That children and young people are more vulnerable to human rights violations than adults
- that their needs and interests are often not on the radar of policy makers and are usually given a lower priority than adults
- that they do not have the same means to effect systemic change through the political process as adults
- that they usually find it more difficult to access the judicial system or use other means of legal redress.⁹

Some or all of these features are common to the constituencies of most of the commissioner roles we examined – for example, victims of modern slavery or of domestic abuse. The 2015 Well-Being of Future Generations (Wales) Act established the Future Generations Commissioner for Wales, a role that aims to give a voice to those who have not yet been born.

The roles often have overlapping remits – both with other commissioners and/or other statutory bodies active in the same space. It may fall to the commissioners to make sense themselves of how to carve up the territory or to co-ordinate with others. There are signs those who work with commissioners are recognising the value of this; the Children’s, Victims’ and Domestic Abuse Commissioners appeared jointly in front of the Home Affairs Select Committee in April 2020 to discuss domestic abuse and child abuse during the coronavirus crisis, for example.

Commissioner roles are proliferating

At a UK-wide level, there is a clear trend towards commissioner roles being seen by politicians as a useful way of addressing representation problems (see Figure 1).

That experience is typical internationally. The world’s first Children’s Ombudsman was created in Norway in 1981, with powers to investigate complaints and to incorporate the UN Convention on the Rights of the Child into legislation and society. As of 2018, the European Network of Ombudspersons for Children had 43 institutions from 34 countries as full or associate members.¹⁰

There is also evidence that commissioner models have transferred between the different nations of the UK – an example of devolution as a means of promoting policy change.¹¹ The precedents of the powers given to the Children’s Commissioners for Wales, Scotland and Northern Ireland were used to criticise the weak role given to the Children’s Commissioner for England in 2004. Similarly, in 2012, former Voice for Older People – a weaker, non-statutory role – Dame Joan Bakewell referenced the Welsh Older People’s Commissioner, first appointed in 2008, when arguing for a similar role in England.¹²

Other countries have in turn looked at the UK’s use of commissioners. The 2017 Hidden in Plain Sight report published by the Australian Joint Standing Committee on Foreign Affairs, Defence and Trade used evidence from a UK commissioner, Kevin Hyland, to propose that Australia appoint an Independent Anti-Slavery Commissioner, with powers and resources to undertake a range of functions similar to the UK commissioner.¹³

Box 1 **Children's Commissioner for England**

The office of the Children's Commissioner for England was established by the Children's Act 2004 in response to Lord Laming's 2003 inquiry, which looked into the child protection system following the murder of eight-year-old Victoria Climbié in 2000. Children's Commissioners for Wales, Scotland and Northern Ireland had already been established.

The 2004 Act gave the commissioner the responsibility to "represent the views and interests of children", along with the power to advise ministers and others, conduct research, gain entry to premises where children are cared for and initiate inquiries.

The framing of the role as simply representing the views and interests of children – as opposed to promoting their rights under any framework such as the United Nations Convention on the Rights of the Child – was criticised in parliament. It was described in its second reading in the House of Lords as "discriminatory" against the children of England in comparison to those in the devolved nations, "castrated" and "like a public relations consultant".¹⁴

Tim Loughton, a future children's minister, told the Commons that "a glorified children's television presenter could, on the face of it, do the same job. Children will, in effect, have no rights in this Bill."¹⁵

In 2010, the newly elected coalition government asked Dr John Dunford to conduct a review of the Children's Commissioner's powers, remit and function, relationship with other functions of government and value for money. The review concluded that the current model was flawed and that consequently the impact of the position had been disappointing.¹⁶ These weaknesses were largely attributed to the role's limited remit set out in the 2004 legislation and a failure to establish credibility with policy makers.

The Children and Families Act 2014 strengthened the remit, power and independence of the office, turning it into a rights protection body. It also gave it special responsibility for the rights of children who are in or leaving care, living away from home or receiving social care services.

It is rare for the powers and responsibilities given to a commissioner to change like this. However, a recent report commissioned by the Victims' Commissioner and carried out by the University of Essex argued that "the evolution of the office [of the Children's Commissioner] since [the 2010 review] provides a valuable precedent for the adaptation and increase in powers to change the role of a Commissioner".¹⁷

Being a commissioner

In this section we look at how the commissioners themselves see the role and how they perform it.

Powers and resources

There are two key initial things to get right when establishing a commissioner post: powers and resources. The commissioner roles we looked at were established in primary legislation – so had statutory powers and duties, as discussed above. This statutory basis is important as it helps reinforce the independence of the commissioner and reassure external groups that the government is taking the role seriously.

Budgets vary considerably, but for any commissioner the bulk of their money goes on staff costs. Some also have a budget that allows them to commission research externally. Inevitably, the budget can become controversial where the commissioner thinks they do not have what they need to perform their duties. One of Dame Vera Baird's first acts as Victims' Commissioner was to bid for a larger team, using her annual report to argue (unsuccessfully) that this was critical to the effectiveness of the role and to meeting its statutory duties.

Others reported a near total lack of preparedness on the part of the government when they started the role – one commissioner described how she was even forced to use her own credit card to cover early set-up costs. When she left office, another former Victims' Commissioner, Baroness Newlove, said that when she started "I didn't have a desk, I didn't have any staff, I was going back to Number 10 saying this is really ludicrous, because I was passionate about this role".¹⁸

Commissioners need hard, as well as soft, powers

Commissioner posts are generally established to highlight wrongs and ensure that marginalised groups can voice their concerns. This means that they are likely to want to be involved in sensitive cases where at least some parties – inside and outside government – may have an interest in concealing or glossing over what has happened.

The first question, then, is what powers commissioners have to require information and co-operation. Commissioners have a varied range of powers that can include:

- **Power to gather data and make it public.** This can be reinforced by imposing a duty on public sector bodies to make information available to them. Without this the process of investigating issues can become very 'clunky' and that can impede a commissioner's ability to pursue issues.
- **Power to call a statutory inquiry and to compel people to give evidence.** One commissioner we spoke to highlighted the need for clarity on the degree of protection provided to people who gave evidence. This concerned whether the commissioner's office was a 'safe place' for evidence disclosure by whistleblowers.

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- **Power of entry.** This is an important power to enable commissioners who may be dealing with vulnerable people in regulated settings – such as prisoners or looked after children – to ‘gain entry’ to various often closed-off institutions.

Once powers to investigate are established the next question is what power the commissioner has to make anything happen as a result of their work. For the majority of commissioners, their most significant power is that of publicity – to produce reports on issues that have come to their attention. Most produce annual reports. Some commissioners have to submit reports via their sponsor department, which in many cases will be the department whose performance they need to critique, before they go to parliament, which raises questions about their independence.

Beyond reporting on their findings, commissioners can make recommendations for change. Some commissioners find their reports languishing without a government response – so a statutory requirement that the government should respond within a specified period is important to ensure that issues raised are not simply ignored. This can also help demonstrate to stakeholders that the commissioner, and by extension the groups they represent, are being taken seriously. This requirement does not exist for every commissioner.

In some cases, powers go further and allow the commissioner to issue guidance to public bodies to change practice. This allows the commissioner not just to highlight wrongs but also require changes to address them. But there is no standard set of powers that each commissioner has.

Commissioners need a clear remit

Legislation usually goes beyond the powers of the commissioner – it also sets out their role and remit. Given these are public-facing roles it is very important that there is absolute clarity in the public domain on what is and is not in scope of the role. This is also important where commissioners are operating in a crowded landscape with a number of bodies operating with apparently overlapping remits. Without clarity there is a risk of scope creep and competition between commissioners – deliberate or unintentional ‘power grabs’.

Some commissioners preferred a tightly drawn remit to avoid uncertainty over their role and make it easier to manage – and complained that where the legislation lacks precision around the role it can be harder to make an impact. They suggested that boundaries between different roles are important and that overlapping responsibilities – inevitable, for example, between roles with related remits such as the Victims’ Commissioner and the Independent Anti-Slavery Commissioner – should be clearly defined.

However, there are drawbacks where roles are too tightly defined. This can reduce the scope for individual commissioners to define the role themselves and to fit current expectations – and potentially, where the original remit is wrongly defined, require new legislation to rectify. While the Children’s Commissioner for England demonstrates new, better legislation is possible, such wholesale changes to the role and remit of a commissioner are rare.

A number of commissioners are specifically excluded from investigating individual cases, expected to focus instead on systemic issues. This is also true of the new Independent Monitoring Authority, which ensures EU citizens' rights as defined by the Withdrawal Agreement are protected. This can be helpful to prevent commissioners getting tied up in detailed case work that they are not resourced to address. However, one commissioner commented that the legislation establishing their role had a longer list of exclusions and prohibitions than it did positive powers, which was frustrating.

However it cannot just fall to legislation to define a commissioner's remit. Commissioners agreed that they needed to make clear from the outset who they were speaking for and how they would speak for them.

Commissioners need to have sufficient resources – and discretion over how they use them – to do the job they are being asked to do

Budgets need to be commensurate with the scale of the task a commissioner is being asked to undertake: those with a remit to investigate individual complaints would typically need bigger budgets. However, budgets seem to vary considerably between seemingly alike bodies.

There are two concerns about budgets. The first is adequacy. Some commissioners felt that they did not have the resources to do their job. Some have seen their funding reduced over time, with a reduction in the Equality and Human Rights Commission's (EHRC) budget from £70 million when it was formed in 2007 to £17m by 2013 being a particularly dramatic example. One big difference between commissioners was whether they had a budget to allow them to commission external research – reported budgets varied from as little as £15,000 in the case of one commissioner to £2m in the case of the Social Mobility Commission.¹⁹

The second was flexibility – one of the questions that emerged was whether commissioners could hold reserves to enable them to act quickly when an unforeseen issue emerged, without having to ask their sponsor department for extra resources.

The main cost for all commissioners is staffing – 90% of the budget in one case. Sizes of staff also vary enormously. The Children's Commissioner for England has 30 staff, and the EHRC around 70, but others were largely unsupported. Some had small policy teams. There are also differences in how staff are recruited. In one case the commissioner's office started up with staff on secondment so that they could decide the work programme before they committed to permanent hires.

Commissioners noted that they were Accounting Officers for their organisations, which meant significant responsibility to parliament. They also had to ensure the right processes were in place to manage staff employed in the organisation and to ensure value for money in back office services.

Making an impact

Absolutely critical for commissioners is the ability to establish their independence from government – and their credibility with those they represent.

These are much more individual roles than most public appointments

Commissioner roles are potentially powerful – but that power is vested in one person rather than the organisation that supports them. That makes them quite different from other public appointments and means that the role is much more defined by the appointee's style and approach.

Commissioners need to use the tools they have at their disposal to maximise their impact: some prefer a much more public route, using the media and issuing a lot of public calls for action – others (or the same commissioners, on other issues) find it more effective to work behind the scenes. But in all cases it is the personal voice of the commissioner that makes a difference. This makes the role very different from being the CEO or even the chair of a bigger organisation.

Individuals coming into these roles with no prior experience of working with government can find it a steep learning curve to work out how to navigate the system to have an impact. Each commissioner needs to make their choice about how they work. People are expected to take on these roles with no formal induction and there is no standing network of commissioners to share experience. This risks the same mistakes being repeated.

Some find their task eased where their predecessors have already established the position in the minds of the public and of decision makers – meaning that people are ready to engage with the commissioner. Managing a new commissioner's role or taking on a position that had been 'dormant' means that they have to try to establish the position.

Some commissioners told us there was an issue with the length of terms – in some roles, such as the Victims' Commissioner, people are appointed for only three years, meaning they may have very little time to establish themselves before thinking about their reappointment. One commissioner suggested that the particular nature of these posts might lend them better to a single five-year term – it would also remove the pressure to try to secure reappointment. A similar recommendation, not taken forward, was made in Dunford's review of the Children's Commissioner role, which argued for a single seven-year term.

Commissioners need to prioritise and work out how they can best make an impact

Approaches to making an impact differ. Using cases to highlight systemic issues is a good way of both bringing issues to life and showing the value of the commissioner role in giving voice to people who otherwise would go unheard in the system. Individual cases can act as a 'thermometer' for what is going on in the world.

When taking this approach, it is important to have established criteria for when to get involved to maximise impact. It is also important to work out whether the issue lies in the policy or in its implementation, to understand where to target criticism and whether the case points to specific or wider systemic issues.

There is a balance to be struck between looking backwards at what government has done and setting the future agenda. There is also a balance between supporting best practice and good policy and trying to challenge and drive the agenda. Commissioners have an important role to play in 'surfacing' issues – this can have a long-term effect in reshaping agendas, as once the profile of an issue is raised it might never sink back again. And they must also consider the range of issues covered: organisations can struggle to have an impact when they fail to prioritise – in 2013 the then Chief Executive of the EHRC, Mark Hammond, said that "in the past the commission has tried to spread itself too thinly".²⁰

However, instant change is hard to achieve – particularly where it involves a change of culture in the department or organisation concerned. It is easy to produce reports saying 'never again' but this leaves the question of how to make enduring change happen. Patience is essential – it can be necessary to push the same message again and again.

Commissioners need 'credibility to annoy'. This comes from basing everything on evidence and on connecting back to the constituencies that commissioners are there to represent. But balance is needed here too: some commissioners suggested that governments did not listen when commissioners were overly critical.

Much of the role involves examining performance – but commissioners can also be influential if they are involved in policy making. There, it is important to be involved before the public, as governments are more willing to listen before they have publicly committed themselves to a course of action.

Managing relationships

There are four critical relationships that commissioners have to manage:

- with the **department** that sponsors them, but that may also be the focus of their criticism
- with the **constituency** they need to speak for
- with **parliament**, which has the potential to hold government to account for failings put forward by a commissioner
- with the **media**, which can play a useful role in amplifying concerns.

Relationships with government departments are critical but potentially fraught

Governments are responsible for the establishment of commissioner roles – but often appear unwilling to accept the criticism inherent in the role, losing sight of their function. Some commissioners reported that as a result it was, paradoxically, sometimes easier to establish a positive working relationship with departments other than the one that set up the commissioner in the first place and that acted as its sponsor and funder. However, having too wide a remit and ranging across departments and constituencies can prevent the development of deeper relationships that are critical to trust.

The challenge is to ensure that the inherent tension between government and commissioner is creative rather than destructive. This underlines the problem commissioners often experience: in theory departments want high-profile people making an impact but in practice they do not like living with the consequences. Commissioners reported that relationships can be eased where it is possible to establish a sense that the department can benefit from the commissioner's work and use it as cover for difficult decisions. There is also scope for co-operation going beyond statutory requirements – for example, when requesting unpublished information.

Time can also make a difference. A commissioner established to focus on issues of concern to one government can find it hard to raise interest when the government changes. And shifts in the political agenda can mean commissioners find themselves working on issues that have lost political salience.

This appeared to be the case in 2017 when the Chair of the Social Mobility Commission, Alan Milburn, stated in his resignation letter that the government “seems unable to commit to the future of the commission as an independent body or to give due priority to the social mobility challenge facing our nation”.²¹ Despite these concerns, the Social Mobility Commission seems to be gaining a new prominence: it has moved from being sponsored by the Department for Education to the Cabinet Office to support the government's flagship 'levelling-up' agenda, in a move echoing a recommendation the commission itself made.²²

In extremis changes of government can lead to the position being abolished – as the coalition government did to the Commission on Rural Communities and the associated position of Rural Advocate, designed to ensure government incorporated

rural concerns into policy making. In that case the government justified the decision on the basis that coalition ministers were better attuned to rural concerns than Labour ministers representing predominantly urban seats, rendering the commission redundant.

Relationships with departments can compromise independence

The ability of commissioners to act independently can be hampered by the fact that they often rely on the department they are supposed to challenge for budget support. Some have to go through their sponsor departments before they can lay their reports through parliament, something they would prefer to be able to do under their own authority. In his resignation letter, the previous Independent Anti-Slavery Commissioner cited Home Office interference, commenting that “at times independence has felt somewhat discretionary from the Home Office, rather than legally bestowed”.²³

There are also issues around the control of appointments of commissioners and their staff by departments. David Isaac, former Chair of the EHRC, said: “My view is that an independent regulator shouldn’t be in a position where the government of the day can actually influence the appointments of that body to support a particular ideology.”²⁴ He suggested that the Women and Equalities Select Committee, not the Secretary of State, should be responsible for appointing the EHRC board. Some commissioners suggested that it might be better to move sponsorship of commissioners en bloc to the Cabinet Office – which was much less the focus of their activities. That would avoid the sense that poachers are appointing their own gamekeepers.

Commissioners need to represent their constituents, not campaign for them

The most important relationship for commissioners is with the group they represent. This is easier where they represent an identifiable group (though definition may not be so clear cut) as opposed to an issue.

In many areas commissioners are already entering a landscape populated with a large number of representative and campaigning organisations – and it is important to understand that these play a different role from commissioners. Commissioners have to make clear that they are always driven by facts and evidence rather than political incentives, and are not simply there to add their voice to campaigner concerns. This can lead to problems with NGOs who might then tend to see the commissioner as just another part of government. Nonetheless, it is important to maintain a distance from campaigning organisations. One commissioner has established a rule that they do not join calls for action or petitions launched by external parties to avoid any role confusion.

One issue that looms large for commissioners is being able to communicate the limitations in their remit; in particular, where they do not do casework. In such cases, to avoid disappointing potential complainants it is useful to be able to signpost to organisations that can, though for some small commissioners’ offices even this has resource implications.

It is important to develop a stakeholder strategy (though resources can be a limiting factor) and to be aware that some constituencies do not readily identify themselves. That risks always talking to the usual suspects. One commissioner recommended the use of surveys rather than events as a way of reaching out more widely: to deliver a much more representative set of voices in terms of age and ethnicity.

Parliament can be a useful forum for commissioners – if MPs are interested in their work

In theory, parliament should play a vital role both in ensuring that government and public bodies can be held to account when commissioners find problems, and in overseeing the work of commissioners themselves. Commissioners can be and are called to select committees and most of them present their reports to their relevant parliament or assembly. UK-wide commissioners also have relationships with the devolved parliaments, though that means navigating the complex relationship between reserved and devolved matters.

But commissioners noted that hearings are sporadic rather than systematic and parliament does not consistently hold commissioners themselves to account for their activities. As unelected roles with statutory powers and public money, it is important that they are scrutinised themselves, for example, on whether they are delivering value for money.

Commissioners' understanding of otherwise hidden issues means they can be a valuable resource for parliament. Parliament therefore offers commissioners a potentially important 'bully pulpit' to highlight failings in government and suggest improvements.

Many would prefer more direct access, though, in particular the ability to lay their reports directly before parliament without going through departments (where they do not already have this power). They also told us there would be benefits in developing closer relationships with relevant select committees. Commissioners said it was useful to forge relationships with individual, interested MPs and essential to work cross-party. On some issues, it might also be productive to build relationships with regional mayors and other local leaders.

Media profile can increase impact with government and represented groups

Commissioners agreed that media profile can be a very important route to influence – public pressure can help ensure that an issue gets traction with ministers who inevitably have limited bandwidth. But the media has to be used strategically and it is important to think about the purpose of media engagement. Sensationalism might boost profile but undermine the purpose.

The media is also an important way of raising the commissioner's profile with people whose views they represent – and media attention can lead to an increase in the volume of correspondence, as well as underlining the independence of the role. That independence can also work in government's interests – when, for example,

a commissioner backs a potentially controversial policy decision. This can be seen in the support the Children’s Commissioner for England gave in August 2020 for the government’s policy of prioritising the opening of schools.²⁵

But it is important to have ground rules – for example, a ‘no surprises’ policy with the sponsor department to ensure that they are not caught off guard by a commissioner’s intervention.

Many of the issues that commissioners deal with are complicated and nuanced, and do not lend themselves to the ‘easy certainty’ of the media. On some occasions it will make more sense to do off-the-record briefings – there is a risk that if an issue became a straight fight with the government that the commissioner would lose. It is also helpful to establish the commissioner’s office as a go-to source of background expertise for journalists on the issues they deal with.

A Migrants' Commissioner

The experience of past commissioners offers some clear pointers to establishing future roles – both for departments and for people taking on those roles. This insight will prove vital in supporting the government when it appoints its next high-profile commissioner: the UK Migrants' Commissioner recommended in the Williams report.

The Migrants' Commissioner will be a uniquely demanding role

The design and appointment of a Migrants' Commissioner role as recommended in Wendy Williams' "lessons learned" review of the Windrush scandal is likely to be particularly difficult. When the Institute for Government discussed this with groups who represent migrants and migrant interests, it was clear that there was an extremely high level of scepticism about the Home Office, its ability to change its culture and the degree of commitment to make a real difference to migrants' lives.

As one participant noted, ministers are on the side of children, victims and domestic abuse survivors, but many migrants' concerns are a direct result of government policy. This presents a particularly difficult challenge when considering whether the Migrants' Commissioner should speak on behalf of those deemed irregular migrants, sometimes referred to as illegal migrants.

It was clear from most groups that they felt the Migrants' Commissioner should have a broad constituency of all migrants, and be able to speak on behalf of those who were naturally more reluctant to engage with state institutions. If the Commissioner could not represent and engage those people with status deemed illegally resident by the Home Office, then by definition the Commissioner would not be able to identify those in a similar position to the people who suffered during the Windrush scandal. Organisations also expressed a hope that the commissioner would be able to feed in the views and voices of migrants early on in Home Office policy making processes, and provide feedback on the implications of policies under consideration, rather than simply reacting to decisions by ministers and explaining their implications after the fact.

It is also a crowded landscape. There is already an Independent Chief Inspector of Borders and Immigration (ICIBI), and the new Independent Monitoring Authority for the Citizens' Rights Agreements, established on 1 January 2021 to oversee the implementation of the guarantees to EU citizens in the UK in the EU–UK Withdrawal Agreement. The Williams report noted the need for the ICIBI to make sure the Migrants' Commissioner was aware of the implications of their findings. But the role potentially also overlaps with other commissioners – including the Children's and Anti-Slavery Commissioners, the EHRC and the Parliamentary and Health Service Ombudsman.

The Home Office has also said it will follow up on the review of the Borders, Immigration and Citizenship System complaints procedure recommended by Williams with the establishment of an Independent Case Examiner. There will need to be close working between that case examiner and the Migrants' Commissioner. Clear remits and definitions of roles and responsibilities will be essential.

Finally, the commissioners we spoke to noted that, even speaking for their constituency groups who the government ostensibly want to help, the Home Office was more defensive and resistant to criticism than many other government departments. This points to some real issues if the Home Office sponsors, resources and is the principal focus of a new Migrants' Commissioner.

But it also highlights another area where the Migrants' Commissioner can help the Home Office. One of the themes of the Williams review was the need for profound culture change in the Home Office to reduce the risks of 'future Windrushes', and the Migrants' Commissioner could play an important role in helping Home Office staff to better appreciate the migrant experience.

The first appointment to this post, if it is established, will make a huge difference to whether this is seen as a credible development. As we have seen, commissioners tend to either be experts or people with lived experience. A lot of migrant groups take the view that an appointee can only be an effective Migrants' Commissioner if they have personally experienced the sharp end of the immigration system. There was also a lot of scepticism about the appointment being in the sole gift of the Home Secretary and made behind closed doors. There was a strong belief that it needed to include migrant views in the appointing process.

Those are the specific issues that will need to be borne in mind when setting up the role – and will be issues for parliament to consider if the government follows precedent and puts the commissioner on a statutory basis. But the commissioners we spoke to warned that there were clear dangers that legislation might raise expectations too high – particularly when so much of the success of the Migrants' Commissioner depends on achieving culture change.

The Home Office could potentially re-task some existing bodies to perform the functions that might be expected of a Migrants' Commissioner. The most similar body – at least in terms of remit – would be the newly established Independent Monitoring Authority (IMA) for the Citizens' Rights Agreements, set up under the terms of the UK's Withdrawal Agreement with the European Union. Its remit is to focus on systemic problems that EU citizens in the UK may have as a result of the UK's exit. That remit could broaden to all people impacted by the migration system. But it would be a big change of focus for the IMA, which has yet to lodge itself in the public consciousness and although there are some similarities of experience between EU citizens and other migrant groups, there are also very significant differences. Another option would be to broaden the role of the Independent Chief Inspector of Borders and Immigration, but that would again be a big change of focus. Given the profile of the Migrants' Commissioner recommendation, and the expectations of the sort of person who might fill the role, either of these options look like very second best.

One option though that the Home Office might consider, as the Institute for Government has recommended before,²⁶ is to establish an expert committee, along the lines of the Social Security Advisory Committee or perhaps an independent reviewer,

as happens in the case of anti-terrorism legislation, of migration regulations, to make sure that the impacts are well thought through in advance. The committee or reviewer could complement the Migrants' Commissioner.

The Home Secretary should proceed only if she and her department are genuinely committed to making a success of the role. There is excitement in some groups about the potential for this role to make a real difference to the extent to which policy making and service delivery take account of migrant concerns. But there are also strong reservations. A series of focus groups conducted by the group Migrant Voice articulated the scepticism the new commissioner would need to overcome, given the troubled starting point:

"Many of our members do not currently trust that the Home Office has genuine interest in change and in engaging with migrants' rights. There is therefore a concern that the establishment of this role could be a fruitless exercise or, even worse, that the presence of a Migrants' Commissioner could be used to avoid implementing real change. One member said: 'I am not sure what is to be gained by lobbying for this role given there is no genuine interest from the HO in improving.'"²⁷

In this context the Home Office will need to make sure it sets up the new role on the most robust basis possible, and any appointee will need to be convinced they are not being given an impossible mission.

Recommendations

Advice to departments

There are five key things departments need to bear in mind when they set up or recruit commissioners.

- 1. Give the commissioner a well-defined but not overly restrictive remit, be clear where they fit in and organise a proper induction.** A clear remit will allow the appointee to define the role and be able to respond to emerging concerns while avoiding overstretch and conflict with other bodies. A well thought through induction, which draws on the experience of previous commissioners, should enable them to hit the ground running, help someone coming in with little experience of government understand better how government works and how to make an impact and help them understand their formal responsibilities as Accounting Officer.
- 2. Ensure that the role has adequate resources and powers to fulfil its remit.** There is nothing more frustrating for external groups than raising expectations that the role will make a difference and then under-resourcing it to perform its functions. So, the powers of a commissioner – particularly in relation to co-operation from public bodies, and information provision – and their statutory basis are important, as is staff resource, the ability to commission independent research and to publicise the role and reach out to involve affected groups. Assurance on future budgets may be an important element of this – to avoid any suggestion that a department might seek to curb a critical commissioner by reining in their budget.
- 3. Appoint an individual who has credibility with represented groups and can manage complicated relationships.** These are highly individual appointments – very different from chair/chief executive roles. The appointee needs to be able to hold their own with campaign groups but also be seen as a credible voice for their concerns. They also need to be politically savvy enough to manage the complicated web of relationships and know when to influence from the inside and when to go public.
- 4. Reinforce the independence of the commissioner.** Commissioners are effective only if they are genuinely independent of government. That means they must be able to investigate without needing to seek permission or resource from the department; be able to publish reports under their own authority, rather than going through the department; and have a direct link to parliament, particularly relevant select committees. There may also be a case for considering which department acts as sponsor – to make it a department that will not be the prime focus of the commissioner’s work and consider a single, longer-term appointment to allow them to do the job unhindered by the need to consider reappointment.

5. Take commissioner recommendations and input seriously – and be seen to do so.

There is no point in establishing a commissioner to give voice to under-represented groups if government is not committed to responding to recommendations and listening to what they say. That means there should be a formal commitment to respond to reports within a limited time period, as well as to involve the commissioner in advance in relevant policy discussions. If the department – particularly the sponsor department for the commissioner – does not take them seriously they will rapidly lose credibility in the role.

Advice to potential commissioners

There are five key considerations for would-be commissioners.

1. Make sure that the job is set up to succeed before taking on the role.

Commissioners should establish whether the role is being set up to succeed or fail. Commissioners need to look at the key ingredients of powers, resources, remit, access and independence. That also means agreeing some of the ground rules with the government. It will be difficult if those basics are flawed and any incoming commissioner is likely to face an uphill battle to have any influence. If a commissioner needs to change anything, and extract new commitments, they are in their strongest position before they are appointed. That may mean an honest chat with their predecessor about what they have found frustrating.

2. Establish credibility and independence from the start. The challenge any commissioner faces is to be taken seriously in government and beyond. A new commissioner needs to hit the ground running by reaching out to under-represented groups, setting out the principles and priorities that will guide their work and establishing early on a reputation for evidence-based interventions. Transparency about working methods and evidence base will provide a firm basis for this.

3. Invest in relationships. Effective relationships are a key route to influence. Commissioners need to take time to invest in relationships based on mutual understanding with departments and public service providers, stakeholder groups and parliamentarians, including key select committee chairs. Those relationships will be vital in working out the best routes to impact on individual issues. Commissioners need to work with the groups they represent, but must also be careful not to become just another campaigning voice. It can also be useful to build relationships with researchers who are expert in areas that are relevant to the work of the commission. This also means ensuring that consultation and engagement efforts go well beyond 'usual suspects' to reflect the range of interests at stake.

4. Develop a predictable media strategy. Media profile is potentially a hugely important part of the role – but done badly it can also poison critical relationships and undermine trust. So it is important to have a clear strategy on how to use the media, consider when to help journalists on background and when to go on the record. 'No surprises' will be an important element of maintaining relationships with ministers and officials.

5. Network with other commissioners. These are lonely roles with no handbook. But there are other people across the UK performing similar roles and, for some posts, people across the world with similar functions. They provide a potentially invaluable resource to draw on.

There is no sign that politicians' enthusiasm for creating commissioner roles is diminishing. But if they are to live up to the expectations that that commitment makes, they need to realise that creating the role is not job done. They need to be committed to making a success of the role, and be prepared to appoint people who will make life potentially uncomfortable for them. Following through on Wendy Williams' recommendation to create an effective voice for migrants in the shape of a Migrants' Commissioner will be a stern test for the Home Office of its genuine commitment to learn and change as a result of the Windrush experience. Given the degree of suspicion and distrust that scandal has created, the new commissioner has a daunting task in front of them.

Annex 1: Commissioners and similar bodies

Commission	Legal basis	Sponsor	Remit	Formal powers*	Parliamentary relationship and reporting	Staff and budget**	Current holder
Children's Commissioner for Wales	Care Standards Act 2000. Significantly amended by Children's Commissioner for Wales Act 2001	Welsh government	Safeguard and promote the rights and welfare of children	<ul style="list-style-type: none"> Review the effect of public bodies on children Review and monitor safeguarding functions effectiveness Examine individual cases in certain circumstances and to make representations to Welsh government about matters affecting children for which they do not have the power to act If a public body fails to respond to a report, the commissioner can publish their dissatisfaction 	<ul style="list-style-type: none"> No pre-appointment hearing, but First Minister must take into account the views of children Gives evidence to the Senedd's Children, Young People and Education Committee Gives briefings to members of the Senedd on children's legislation 	26 staff £1.543m	Sally Holland
Children and Young People's Commissioner for Scotland	Commissioner for Children and Young People's (Scotland) Act 2003. Modified by Children and Young People (Scotland) Act 2014	Education Scotland	Protect and promote rights of under-18s by promoting awareness and understanding, reviewing law, policy and practice, promoting best practice, research, investigation and reporting to parliament	<ul style="list-style-type: none"> Power to investigate public bodies Power to challenge laws 2014 Act allowed them to use powers to investigate cases involving human rights of individual young people, rather than just groups 	<ul style="list-style-type: none"> Nominated by the Scottish parliament and cannot be removed without a two-thirds majority Reports laid before Scottish parliament Provides evidence to the Education and Skills Committee Requires parliamentary approval of budget every year 	18 staff £1.288m	Bruce Adamson

Children's Commissioner for England	Children's Act 2004. Substantially amended by the Children and Families Act 2014	Department for Education	Promotes and protects the rights of children in England, especially the most vulnerable, and stands up for their views and interests. Also speaks for children in all nations of the UK on non-devolved issues such as immigration	<ul style="list-style-type: none"> • Power to produce reports and conduct inquiries • Power to enter premises where children are accommodated or cared for, to interview children • People exercising public functions have a duty to provide information to the commissioner 	<ul style="list-style-type: none"> • Pre-appointment hearing • Reports laid directly before parliament • Regularly sits in front of the Education Select Committee • Must publish a version of their annual report that is suitable for children 	38 staff £2.764m	Anne Longfield
Older People's Commissioner for Wales	Commissioner for Older People (Wales) Act 2006	Welsh Department of Health and Social Services	Promotes awareness of the rights and interests of older people, challenges discrimination, encourages best practice and reviews the law affecting the interests of older people	<ul style="list-style-type: none"> • Power to enter homes with consent • Power to decide whether to publish recommendations • Power to compel public bodies to reply to reports • Power to require public bodies to reply to information requests and assist in legal proceedings where it may affect the wider interests of older persons 	<ul style="list-style-type: none"> • Scrutinised by the Senedd Health and Social Care Committee and the Equality, Local Government and Communities Committee 	20 staff £1.518m (2018/19)	Heléna Herklots
Victims' Commissioner for England and Wales	Domestic Violence, Crime and Victims Act 2004	Ministry of Justice	Promote the interests of victims and witnesses – listens to victims, promotes good practice across criminal justice services and reviews the Victims Code and campaigns for change	<ul style="list-style-type: none"> • Power to make proposals for amending the victims code, to make recommendations and reports and to consult any person they think appropriate • Cannot champion individual cases or challenge criminal justice agencies to make different decisions 	<ul style="list-style-type: none"> • No pre-appointment hearing • Secretary of state lays annual report before parliament • Appears in front of the Justice Select Committee on their own work, and other committees to provide expert advice 	7 staff (2 vacancies) £542,000	Dame Vera Baird

Independent Anti-Slavery Commissioner	Modern Slavery Act 2015	Home Office	UK-wide remit to encourage good practice in the prevention, detection, investigation and prosecution of slavery and human trafficking offences and the identification of victims	<ul style="list-style-type: none"> • Power to make and publish a report, so long as it is requested by government or in their strategic plan • Power to make recommendations to any public authority • Power to undertake or support research • Does not exercise any function in relation to individual cases save to draw conclusions for the purpose of considering a general issue 	<ul style="list-style-type: none"> • No pre-appointment hearing • Secretary of state lays annual report and strategic plan before parliament • Limited public engagement with select committees 	9 staff £575,000	Dame Sara Thornton
Future Generations Commissioner for Wales	Well-being of Future Generations (Wales) Act 2015	Welsh government	Promote the sustainable development principle, in particular to act as a guardian of the ability of future generations to meet their needs and encourage public bodies to take greater account of the long-term impact of the things they do	<ul style="list-style-type: none"> • Power to provide advice to public bodies • Power to carry out reviews into long term impact of decisions and makes recommendations • Power to force policy makers to justify decisions 	<ul style="list-style-type: none"> • Welsh ministers must consult national assembly before appointment 	35 staff £1.690 million (2018/19)	Sophie Howe

Domestic Abuse Commissioner (proposed)**	Domestic Abuse Bill 2019-2021 (Not yet passed)	Home Office	Provide public leadership on domestic abuse issues and play a key role in overseeing and monitoring the provision of domestic abuse services in England and Wales. Encourage good practice, identify victims, survivors and perpetrators, and improve provision of support to those affected by domestic abuse	<ul style="list-style-type: none"> • Map and monitor provision of services, make recommendations to public bodies about their response, carry out research, work jointly with public authorities and voluntary organisations, and raise public awareness of domestic abuse • Specified public bodies will have a duty to respond to reports within 56 days 	<ul style="list-style-type: none"> • No pre-appointment hearing • Commissioner can lay reports before parliament • Designate commissioner has given evidence to Home Affairs Select Committee, but broader relationship is not yet clear • The government will set out a statutory framework document to safeguard the commissioner's independence 	n/a £1 million	Nicole Jacobs (designate)
Independent Reviewer of Terrorism Legislation	Prevention of Terrorism Act 2005, but tradition stretches back to 1970s	Home Office	Scrutinise and report on terrorism legislation to inform the public and political debate	<ul style="list-style-type: none"> • Given access to secret and sensitive national security information and personnel • Statutory requirement to review certain pieces of legislation annually, while other 'snapshot' reports can be conducted at the request of the minister or on the reviewer's own initiative 	<ul style="list-style-type: none"> • No pre-appointment hearing • Annual report and other reports prepared for department before being laid before parliament • Called to give written and oral evidence to various committees including Home Affairs, European Affairs, Northern Ireland and Bill committees 	Salary and option, not currently taken up, of an administrative assistant and room in the Home Office	Jonathan Hall

Commission for Rural Communities	Natural Environment and Rural Communities Act 2006, abolished by the Public Bodies (Abolition of the Commission for Rural Communities) Order 2012	Department for Environment, Food and Rural Affairs	Promote awareness of rural needs among decision makers across and beyond government	<ul style="list-style-type: none"> • Represent and monitor rural needs in government, undertake research and provide information 	<ul style="list-style-type: none"> • Regularly gave evidence to the EFRA Committee before abolition 	74 staff £6.08m (2009/10 – before decision taken to abolish)	Abolished 2013
Equality and Human Rights Commission	Equality Act 2006	Department for Education	The promotion and enforcement of equality and non-discrimination laws across England, Scotland and Wales. Safeguards and enforces the laws that protect people's rights to fairness, dignity and respect	<ul style="list-style-type: none"> • Power to provide advice and guidance, publish information and undertake research • When these are ineffective, enforcement powers include taking and assisting in legal action, judicial review and the ability to undertake inquiries and investigations 	<ul style="list-style-type: none"> • Chair subject to pre-appointment hearing • Close relationship with parliament, providing detailed briefings outlining whether government policies align with requirements of human rights law. Works closely with the Women and Equalities Committee 	201 staff £17.431m	Baroness Falkner of Margravine (Chair) Rebecca Hilsenrath (CEO)

Independent Chief Inspector of Borders and Immigration (ICIBI)	UK Borders Act 2007	Home Office	Monitors and reports on the efficiency and effectiveness of immigration, asylum, nationality and customs functions carried out by the Home Secretary and officials on their behalf	<ul style="list-style-type: none"> • Power to write reports and make recommendations • Power to send non-interference notices – but the Home Secretary can overrule them • Follows a public inspection plan – agreed with the Home Secretary – but can deviate from that plan 	<ul style="list-style-type: none"> • Pre-appointment hearing • Reports submitted to the Home Office before being laid out before parliament 	30 staff £2.085 million	David Bolt
Social Mobility Commission	Welfare Reform and Work Act 2016 (in current form – previous body established by the Child Poverty Act 2010)	Department for Education (currently transitioning to the Cabinet Office)	Monitors progress towards improving social mobility in the UK and promotes mobility in England	<ul style="list-style-type: none"> • Power to publish an annual report • Power to carry out research on social mobility • Provides advice to ministers 	<ul style="list-style-type: none"> • Chair subject to a pre-appointment hearing • Report laid before parliament • Subject to Education Committee inquiry on its future in 2017 	8-person secretariat Large research budget of £2m announced in 2018	Sandra Wallace and Steven Cooper (interim co-chairs)
Independent Monitoring Authority for the Citizens' Rights Agreement	European Union (Withdrawal Agreement) Act 2020	Ministry of Justice	Monitor the UK's application of the citizens' rights parts of the agreements and identify any breaches	<ul style="list-style-type: none"> • Power to receive complaints • Power to launch inquiries to hold public authorities to account – with a particular focus on instances where there have been general or systemic failings in the implementation of the citizens' rights agreements • Power to bring judicial review proceedings against public bodies 	<ul style="list-style-type: none"> • Pre-appointment hearing of chair • The board will submit an annual report to the UK parliament and the devolved legislatures, the UK-EU specialised committee on citizens' rights 	Due to have 65 staff Budget unknown	Sir Ashley Fox (Chair) Kate

* Non-exhaustive list of commissioners' powers. ** All budgets and staff are 2019/20 unless stated otherwise. *** The Domestic Abuse Bill 2019-2021 has not yet received Royal Assent. Table outlines role as currently proposed.

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