



Scottish Commission on Social Security

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Charter report:

People with communication needs and the Scottish social security system: fulfilling the expectations of ‘Our Charter’

**Submitted to the Scottish Government and the Scottish
Parliament’s Social Justice and Social Security Committee on 4
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About the Scottish Commission on Social Security

The Scottish Commission on Social Security plays an essential role in the development and delivery of a Scottish Social Security system based on fairness, dignity and respect by providing independent scrutiny of the Scottish social security system. Our full functions are set out in the Social Security (Scotland) Act 2018.¹

We are separate from the Scottish Government, and carry out our work independently of both Scottish Ministers and the Scottish Parliament.

For more information about the Scottish Commission on Social Security visit: <https://socialsecuritycommission.scot/>

¹ [Social Security \(Scotland\) Act 2018](#)

Summary

This is our first report under our function to review whether people are getting the service the Social Security Charter says they should expect.

Research focus

This first Charter report is a small-scale, scoping research report focusing on people with communication needs arising from an impairment. Using qualitative information, this report also highlights areas for future research and investigation.

For six months in 2024 we worked with third sector organisations to hold focus groups with people with communication needs and their advisers. We also undertook five structured interviews with people in the third sector with expertise in communication needs and with VoiceAbility, which delivers advocacy support.

Key findings

Overall, participants in the research said their experiences of Social Security Scotland were better than with the Department for Work and Pensions. Staff were friendly, there were clearer and less intrusive questions, and no face-to-face assessments. However there were specific concerns about how Social Security Scotland works with people with communication needs, listed below.

Interactions with staff (Section 2)

Participants felt that staff had not responded to their particular access or communication needs. Some participants said they had been in contact with multiple advisers and had to either repeat the same information they had already given, or were given information which appeared to them to be inconsistent with what another adviser had said. Participants also felt that staff should proactively identify communications needs and accessibility requirements where possible rather than waiting for someone to ask (particularly as people may be reluctant to ask).

Recommendation 1: To ensure people don't need to repeatedly tell Social Security Scotland about their individual communication needs, Social Security Scotland should ensure an accurate record of people's communications and access requirements is kept, maintained and used by staff.

Some participants also reported a lack of flexibility by Social Security Scotland staff in how clients were communicated with, perhaps from not personalising standard information to take individual needs and

circumstances into account, or staff not understanding communications and access needs. Participants recommended that staff should have specific impairment awareness training (such as sensory loss).

Recommendation 2: To enable individuals to receive appropriate communications, support Social Security Scotland should monitor and regularly review the types of support its client base may require.

Some participants also had support from a support worker or a welfare rights adviser from a third sector organisation, requiring them to give consent for Social Security Scotland to speak to their adviser on their behalf. Some participants felt that the way that Social Security Scotland required consent to be given was inaccessible given their communication needs. For example, a Deaf client was told to make noises on the phone to indicate consent, which both the client and their adviser felt was inappropriate and undignified. Participants who were also welfare rights advisers also stated that Social Security Scotland staff varied in their responses to handling consent and ongoing 'mandates' to communicate with an adviser, with some staff being more accommodating than others. In some cases this was resolved only by going through the complaints process.

Recommendation 3: To enable people with communication needs to express consent for a third party to act on their behalf, Social Security Scotland should consider if there are ways to improve the way it obtains consent.

Barriers faced by people with communication needs (Section 3)

The overall service by Social Security Scotland was regarded positively, with user-friendly language, though experiences could also depend on the staff member dealing with the claim.

Participants said that having information in accessible formats is crucial, as being able to understand information can have consequences for benefit entitlement. Whilst welcoming the range of channels of communication with Social Security Scotland (website, phone letter etc), some participants said that one or more channels were inaccessible due to their communication needs.

Participants also mentioned instances where a request for accessible communications had been made but had not been met. For example, clients who had told Social Security Scotland they could not read or could not use the phone were still communicated with in that way, and Easy Read resources / British Sign Language support was not always available.

Recommendation 4: To ensure no claimant is unable to access information due to their communication needs, Social Security Scotland should review its inclusive communication practices with a view to ensuring they are not a barrier to people with communication needs interacting with the Scottish social security system.

Recommendation 5: To understand and address any barriers to the take-up of benefits by people with communications needs, Social Security Scotland and the Scottish Government should undertake further research

Application process (Section 4)

There were concerns arising from the complexity of benefit rules and application processes; long hold times on the phone; waiting for a decision which could cause additional anxiety. Such concerns are likely to be common experiences for many other claimants. However, these issues and their impact could be amplified for people with communication needs, especially if not receiving information in the appropriate format. Many participants also spoke about the difficulties in getting support and the time taken to get support in place, e.g. British Sign Language interpretation. Participants feared that delays in getting support could delay their application or cause them to miss deadlines relating to their claim.

Recommendation 6: To ensure people with communications needs can access support from external organisations as quickly as possible, Social Security Scotland should work with stakeholders and partners to identify the causes of any delays and address them.

Participants were generally unaware of the advocacy service provided by VoiceAbility and felt that the service and the right to advocacy could be promoted more.

Recommendation 7: To gather evidence on people's understanding and availability of advocacy support, Social Security Scotland should include awareness of and use of advocacy in its client survey and other research.

1. Overview

The Scottish Commission on Social Security is pleased to present our report on the experiences of people with communications needs of the social security system in Scotland.

Since our formation in 2019, our role has focused on scrutinising new social security regulations. This is the first report of its kind prepared under our function as set out in the Act.² This allows us to “prepare and submit..., from time to time, a report containing an assessment of the extent to which any or all of the expectations set out in the Scottish Social Security Charter are being fulfilled, and recommendations for improvement where the assessment is that those expectations are not being fulfilled”.

We undertook exploratory research into the experiences of people with communication needs, linking these to the expectations in the Social Security Charter, known as ‘Our Charter’.³

1.1 Social Security Charter

‘Our Charter’ aims to explain in clear terms how Social Security Scotland and the Scottish Government “uphold the Principles in the Act... (take) a human rights based approach and... demonstrate dignity, fairness and respect.” It sets out 51 expectations under 4 headings:

- A people’s service
- Processes that work;
- A learning system; and
- A better future.

These expectations aim to give people accessing the Scottish social security system clarity over what they are entitled to expect from the service.

Hard copies of ‘Our Charter’ are shared with clients and an electronic version is available via the Social Security Scotland website.⁴ Social Security Scotland produces ‘Our Charter’ in “a range of accessible formats including video with British Sign Language, audio, large print, Easy Read” and these are directly linked to on its website.

Social Security Scotland measures its progress towards fulfilling the Charter expectations by collecting data from a variety of sources, including client and staff surveys. It uses this data to publish a

² [Social Security \(Scotland\) Act 2018](#), Section 22 (1) (d)

³ [Social Security Scotland - Our Charter \(2019\)](#)

⁴ [Social Security Scotland - Our Charter \(2019\)](#)

Measurement Framework setting out key data that will be collected and published to highlight whether Social Security Scotland is achieving these aims. The most recent framework measurement statistics were published in November 2024.⁵

The Act requires the Scottish Government to undertake a review of the Social Security Charter and the Charter Measurement Framework every five years. The Scottish Government published the results of its first review in March 2024.⁶ While there have not been significant changes to ‘Our Charter’ as a result, this research was undertaken during the period covered by the first iteration of ‘Our Charter’, and refers to client survey data from 2022-23. The second iteration of ‘Our Charter’ was published in February 2025.⁷

While general awareness of the role of the charter was not a key part of this research, we note that interview participants described it as ‘groundbreaking’, particularly for its influence on shaping the culture within Social Security Scotland and contributing to Social Security Scotland’s assessment of its own performance. They also said, however, that the Charter was not widely known about or referred to by clients. Advisers may know about the Charter, but were more likely to refer to regulations rather than charter expectations when dealing with Social Security Scotland. This is an area that we and other researchers may wish to return to in future reports.

1.2 Inclusive communication

The Act requires information to be given in a format which is accessible to people with a ‘sensory, physical or mental disability’.⁸ Social Security Scotland has committed to designing services to meet the expectations of people who need to communicate in a variety of ways. Social Security Scotland intends to ensure that it designs services “so that as many people as possible understand what we do and can communicate with us and access our service in the way they want to.”⁹

Social Security Scotland co-produced an Inclusive Communication Action Plan with its stakeholders. This outlines how they intend to embed inclusive communication good practice across Social Security

⁵ [Social Security Scotland - Measuring Our Charter 2023-24](#)

⁶ [Social Security Charter Review: research findings](#)

⁷ [Social Security Scotland - Reviewing Our Charter for the future](#)

⁸ Sections 3 and 4, Social Security (Scotland) Act 2018. This is also consistent with the duty to make reasonable adjustments to enable disabled people to access a service or public function ([Equality Act 2010, Section 20](#))

⁹ [Social Security Scotland - Inclusive Communication](#)

Scotland.¹⁰ An e-Learning module has also been specifically developed for Social Security Scotland staff. This was co-produced with members of the Inclusive Communication External Stakeholder Reference Group who provide advice on being inclusive in all of Social Security Scotland's communications.

1.3 Research focus

Social Security Scotland's 2022-23 Client Survey highlighted a notable pattern of lower satisfaction ratings among certain demographic groups, including people with communication needs.^{11 12} Among this group, the client survey highlighted that:

- The overall experience rating for people with communication needs (84%) was lower than that for those without (90%).¹³
- Respondents with communication needs were less likely than those without to agree that they had a choice of how to communicate with Social Security Scotland.¹⁴
- Respondents with communication needs were less likely than those without to rate their experience as good/very good.¹⁵
- Whilst most respondents gave high ratings to the impact that receiving a benefit had had on their lives, the proportion providing a positive rating was lower for those with communication needs than those without.¹⁶
- 30% of respondents with communication needs reported barriers getting help from Social Security Scotland, compared with 16% of those without.¹⁷
- 8% of those with communication needs said they had experienced discrimination, compared with 3% of those with no communication needs.¹⁸
- Comments in free text boxes also highlighted issues of communications and information.¹⁹

¹⁰ [Social Security Scotland - Inclusive Communication Action Plan 2022-2025](#)

¹¹ [Social Security Scotland - Client Survey 2022-2023](#)

¹² The client survey question asking about someone's 'communication needs' refers to needing: time to understand; time to say what I want to say; to write things down; to see people's faces; clear, simple language; to be able to speak to a person; to have things written down for me to read; an interpreter or language assistance; different formats (eg large print, Braille); assistive technology (eg screen reader); augmentative and alternative communications (for people who find it difficult to speak); other.

¹³ [Social Security Scotland - Client Survey 2022-2023](#) Table 3.5 Page 27

¹⁴ *ibid* Page 40

¹⁵ *ibid* Page 55

¹⁶ *ibid* Table 10.6 page 83

¹⁷ *ibid* Page 88

¹⁸ *ibid* Page 97

¹⁹ *ibid* Section 3.4, starting on Page 29

The pattern of lower client survey scores across each of these metrics, which is broadly repeated in the 2023-24 client survey²⁰, prompted us to focus our research on the experiences of people with communications needs. The client survey shows that people with communication needs are more likely to face barriers to positive interactions with the Scottish social security system. Our smaller-scale, qualitative study may act as a first step towards identifying some of the reasons why this might be the case.

The desirability of exploring the experiences of clients with communication needs is further reinforced by the cross-governmental work already underway in this area. In 2023, the Scottish Government committed to improving inclusive communications across the public sector.²¹ It might be helpful to consider progress made by Social Security Scotland in this context.

1.4 Research methods

This research explored the experiences of communications to, and from, Social Security Scotland. The aim was to gather first-hand views from people with communication needs who have used Social Security Scotland's services and representatives of organisations with expertise in communication needs and of the social security system in Scotland.

This report takes a snapshot of the experiences of people who use, or may use, Social Security Scotland's services at a particular point in time. It does not aim to represent the view of all users, but indicates issues arising for people with communication needs.

1.4.1 Focus groups

The research focuses on communication needs relating to an impairment with a specific focus on the experiences of people who would be likely to require inclusive communications. This includes people with sensory impairments (e.g. sight or hearing loss), people with dual sensory loss and people with a learning disability.

From March 2024 to September 2024, four partner organisations (ENABLE, the Health and Social Care Alliance Scotland, RNIB Scotland and YoungScot) convened focus groups with their members across Scotland, including people with communication needs and their support workers or advisers. In total these groups reached 71 people with varying levels of engagement with Social Security Scotland.

²⁰ [Social Security Scotland - Client Survey 2023-2024](#)

²¹ [Scottish Government - Public sector equality duty: stakeholder letter](#)

The focus groups considered:

- Whether people feel they have been treated with dignity, fairness and respect
- Experiences of stigma or any barriers in applying for Scottish social security
- Views and experiences around the social security system being understood as a human right
- Views on the communication and promotion of social security
- Views on any improvements needed to fully address people's needs.

Each of the three ALLIANCE events were run with a particular group of people with sensory impairments, ENABLE held a focus group specifically for people with learning disabilities to attend and YoungScot's focus group focused specifically on young people with communication needs. Focus groups were held in Edinburgh, Dundee, Falkirk, Langholm and Kirkintilloch with invitations extended to groups beyond this and travel expenses reimbursed for those who travelled.

This research does not include people who experienced possible communication barriers because their first language is not English, although these barriers are also highlighted in the client survey.²² We spoke to a limited number of clients with communication needs resulting from neurodivergence. It may be helpful to consider these experiences further in future research.

1.4.2 Structured interviews

We spoke to representatives of organisations with knowledge of the needs of people with these impairments. We held five structured interviews²³ with experts in the field of communication needs, third sector organisations with an interest in communication needs and the independent advocacy organisation commissioned to offer advocacy support to access benefits across the whole of Scotland.

The structured interviews considered:

- Their perceptions of the strategies, policies, processes and delivery of Social Security Scotland services to people with communication needs

²² [Social Security Scotland's Client Survey \(2022/2023\)](#) notes that people whose main language is not English are more likely to experience barriers to claiming (e.g. page 120 of the main report). Accessing information, forms and support in an appropriate language can also be a barrier to take up ([Scottish Government - Social Security \(Scotland\) Act 2018: benefit take-up strategy](#), page 25,). Getting information in the right language can be a particular barrier for older clients whose first language is not English ([Social Security Experience Panels - ethnic minorities: report](#)).

²³ Structured interviews were held with Sally Witcher, Director and Founder of Inclusive New Normal; representatives of The Action Group, Glasgow Disability Alliance, RNIB Scotland and VoiceAbility.

- The role of interviewees and their organisations in ensuring people with communications needs can access the Scottish social security system and how this is delivered
- How interviewees and their organisations ensure that all communication materials are fully accessible to individuals with different communication needs and whether these could be reasonably delivered by Social Security Scotland.
- Their views about Social Security Scotland's inclusive communications engagement, action plan and overall environment
- Their views about, and public awareness of, the Social Security Charter.

1.4.3 Discussions with Social Security Scotland

We met with Social Security Scotland twice to understand the work they are doing on inclusive communications and discuss our research.

Early research findings were considered at the first meeting, whilst the second meeting highlighted more detailed findings and areas where we felt further clarification was needed.

Feedback from Social Security Scotland is included in this report, alongside the views gathered in focus groups and structured interviews. We are grateful to officials in Social Security Scotland who responded to questions and provided detailed and up to date information on their work.

In the following sections we explore some of the themes highlighted in client surveys, starting with interactions between individuals and their welfare rights advisers and Social Security Scotland staff.

2. Interactions with Social Security Scotland staff

The culture, skills, and attitudes of staff play a key role in making sure 'Our Charter's' goals are met. The Scottish Government has invested significant resources in developing a staff team as a front door to Social Security Scotland's services – with the aim of providing support throughout the process. How well is this approach serving people with communication needs?

Relevant Charter expectations

A people's service

Social Security Scotland and the Scottish Government will:

1. be patient, kind and consider how you might feel.
2. listen to you, trust you and treat you as an individual.
3. treat everyone equally, fairly and without discrimination.
4. support you through your application, keeping you updated and explaining what will happen and why.

Processes that work

Social Security Scotland and the Scottish Government will:

3. adapt processes and ways of communicating as much as we reasonably can to meet your needs and preferences, for example by providing interpreters.
4. support your wellbeing and make your contact with us as positive and stress-free as possible.

A learning system

Social Security Scotland and the Scottish Government will:

5. ensure staff understand the needs of different people and the barriers they face - so that no-one experiences discrimination because of who they are.

2.1 The current evidence base

Research published in April 2019 highlighted that people accessing support from Social Security Scotland expected that staff should be 'welcoming', 'open-armed', 'non-judgemental' and 'willing to help'.²⁴

²⁴ [Scottish Government - Social Security Experience Panels: Social Security Scotland Staff](#)

Client survey data from 2022/23²⁵ allows us to compare the experiences of people with communication needs to those without.

- 46% (compared with 34%) of people with communication needs had been in contact with a staff member.
- 88% (compared with 92%) of those with communication needs rated their overall experience with staff as 'good'/'very good'.
- 82% (compared with 86%) of those with communication needs said staff were able to help them.

People with communication needs were also less likely than those without such needs to agree that they were treated with dignity, fairly or with respect.

2.2 Interactions with Social Security Scotland staff

During the research, participants with communication needs often considered their initial experience – whether positive or negative – of dealing with Social Security Scotland call handlers. This highlights the importance of this initial interaction.

Participants often contrasted individuals' experiences with Social Security Scotland with their interactions with the Department for Work and Pensions, noting positive call handlers and clarity of approach by Social Security Scotland as positive steps forward.

“The tone is positive and respectful from Social Security Scotland... they [call handlers] are more compassionate and patient than before.” **Focus group participant (client)**

“Overall the experience of engagement with Social Security Scotland is more positive than with the Department for Work and Pensions, but room for improvements remains.” **Structured interview participant**

“One good thing I would say... is that there's no in-person assessments now, there's no actual health assessments now which is really positive.” **Focus group participant (client)**

Less positive experiences were also reported.

We heard that communications were not always delivered in an appropriate way. Often, this seemed to be due to a lack of understanding or flexibility in relation to the person's communication needs. In one case, focus group participants highlighted that Social Security Scotland staff members had suggested they could not go

²⁵ [Social Security Scotland - Client Survey 2022-2023](#)

further in the process unless the individual for whom the application was being made came to the phone.

"...just think about the impact that it can have on someone being told you need to use your voice - that's just really inappropriate. It can really affect someone's self-esteem because it makes you feel like you're taking second place to a hearing person." **Focus group participant (client)**

Social Security Scotland has internal guidance on communicating with clients who are deaf, deafened, deafblind or hard of hearing. It covers the range of diverse needs people who are deaf or hard of hearing may require, and the services available for communicating with them.

In some cases, however, our research highlights that this may not have been followed.

While Social Security Scotland's policies allow for this level of flexibility of approach to support for people with communication needs, in some cases this is not being experienced by clients. Some reported experiences suggest that the charter expectation to treat people equally, fairly and without discrimination may not always be wholly fulfilled.²⁶ The aim of "dignity, fairness and respect" could be undermined when the communication needs of people interacting with Social Security Scotland (whether to make a claim or simply a query) are not fulfilled.

"Agency want to be fair and consistent – but it's arguably not a fair process if it's not being made clear in communications about what this means to them." **Structured interview participant**

In some cases participants felt that information that they had provided about their own condition was not used efficiently and that they often had to repeat their communication requirements as a result.

For example, when an individual had told one client adviser they had hearing loss, they thought it should be possible for all client advisers they dealt with in future to be made aware of this. Participants felt that more consistent use of this information would not only improve their experiences but also assist advisers' understanding of the barriers the individual faced.

"The most important thing is to ask people what they specifically need and ensure this is recorded." **Structured interview participant**

²⁶ See also [Social Security \(Scotland\) Act 2018](#) s1(g) and the Social Security Scotland strapline of 'dignity, fairness, respect'.

“There should be something that they can flag up on their system that someone is a Deaf sign language user, or is Deaf and doesn't use their voice.” **Focus group participant (client)**

Focus group participants suggested that clear markers on claims indicating individual requirements would improve clients' experiences and assist advisers in providing better support.

We understand that Social Security Scotland has a communications needs indicator that is included on a client record and clients are invited to share any communications needs or preferences during the application process. Clients are able to contact them to add a need or preference to their record and this can also be done through a change of circumstances form.

We noted some reluctance to needing to ask for help among participants, often a result of desiring to maintain independence and autonomy. Offering proactive assistance, rather than waiting for clients to make requests, was seen as a meaningful way to provide reassurance and leave clients feeling supported and at ease by the end of any interaction. This, however, is only going to be effective if there is sufficient (individual or institutional) knowledge of the sort of assistance that will be effective to the person in the circumstances.

Having to request help was described as impacting individuals' sense of independence, often leading to a reluctance to seek assistance. However, participants indicated that proactively offered support might be more readily accepted.

"I think they should be taking on board the fact that there needs to be some flexibility when they're communicating with us. They need to make sure that we're comfortable in the way that we're communicating with them." **Focus group participant (client)**

This could, partly, be addressed by the actions Social Security Scotland have set out in their Inclusive Communication Action Plan 2022-2025, in particular, that they will set out what good inclusive communication looks like and monitor it,²⁷ as well as delivering a plan for staff to learn inclusive communication skills.²⁸

2.3 Consent for someone to act on your behalf

²⁷ [Social Security Scotland - Inclusive Communication Action Plan 2022-2025](#), Asset 2, point 6: Ways of delivering inclusive communication 6. Set out what good inclusive communication looks like for us and how we will keep track of what we are doing.

²⁸ [Social Security Scotland - Inclusive Communication Action Plan 2022-2025](#), Asset 4, point 16: Create and deliver a plan for staff to learn inclusive communication skills, including finding new ways for staff to learn.

Some individuals may have a welfare rights adviser or support worker to assist them in making a claim. In such situations Social Security Scotland has to ensure that the individual has consented to have someone else act on their behalf. Social Security Scotland policies should allow for both authorised consent (where the client has provided clear consent for information to be shared with the third party representative) and unavailable consent (which is used to describe situations where Social Security Scotland cannot verify that consent has been given by the client, but an exceptional circumstance has occurred that allows Social Security Scotland to share general information with a third party representative to help them support the client)²⁹. In some circumstances, however, participants highlighted that there were more barriers to obtaining consent than they had experienced under the Department for Work and Pensions benefits system.

"Social Security Scotland will not use implicit consent,³⁰ as the Department for Work and Pensions does, to speak to an adviser. [You] have to send a mandate." **Focus group participant (adviser)**

"In one case, a family faced an issue where the father, who was the appointee for Department for Work and Pensions benefits was told by a Social Security Scotland representative they did not believe that the person needed an appointee for their claim. To address this, the father and son decided to list the son as a 'nominee' rather than an appointee. The father and son managed this adjustment on their own to continue with the process. Initially, the son was shocked and distressed at having to deal with Social Security Scotland without his father's support." **Structured interview participant**

Interview participants highlighted their concerns about waiting for, getting and using a 'mandate' (a form authorising third party representatives to have discussions with Social Security Scotland directly). Such delays could result in welfare rights advisers using the complaints process as a way to obtain a mandate, though this could further delay the process.

"We've had difficulties in e.g. ensuring that Welfare Rights Officers are copied into communications with recipients of social security

²⁹ [Social Security Scotland - Client representative guidelines](#)

³⁰ The Department for Work and Pensions' staff guidance on working with representatives notes that where explicit consent has not been previously obtained staff should use their experience and judgement to decide whether a call is acting on behalf of the client. [Department for Work and Pensions - Working with representatives: guidance for DWP staff](#)

payments, even with a specific mandate in place. When we've raised that e.g. over the phone, some Agency staff have said that it's not possible to do that, others have agreed to. If we raise the lack of copying in as a complaint, the complaints team resolve it, but it's ineffective to have to do this each time that's needed."

Structured interview participant

"Some Agency staff don't understand the role and/or aren't clear about what can or can't be shared with a Welfare Rights Officer with/without a mandate and/or legislation around unavailable consent." **Structured interview participant**

In some cases this was attributed directly to staff interpretation of data protection rules.³¹

2.4 Raising staff awareness

Participants emphasised the importance of creating an inclusive environment where everyone's rights are fully recognised and upheld. To achieve this, they expected that disability equality training should be mandatory for Social Security Scotland staff including a focus on specific impairments such as sensory loss and neurodivergence.

In discussion with us, Social Security Scotland officials noted that measures are in place to review the quality of learning and development and that inclusive communication is a key part of training for staff joining Social Security Scotland.

Such awareness training should ensure a deeper understanding of individuals' diverse needs and align with the Social Security Charter's principles of dignity, fairness, and respect. Social Security Scotland should keep the appropriateness of its training under review and consider what can be done to ensure staff consistently act in accordance with it.

2.5 Fulfilling charter expectations

Relevant charter expectations are highlighted in bold.

Focus group participants highlighted positive experiences of **patience, kindness and consideration**.

There were, however, instances where people with communication needs did not feel they were **listened to, trusted or treated as an individual**. Whilst consistent advice on how to apply, appeal or manage

³¹ Participants specifically mentioned the General Data Protection Regulation 2018 – which require any organisation that processes personal data to follow detailed handling rules.

each benefit is important, this could be balanced with a more flexible, individualised approach to take account of their needs.

In such circumstances, participants felt that this experience could be improved by training to extend staff **understanding the needs of different people and the barriers they face**, and that this in turn would help ensure everyone is treated **fairly and without discrimination**.

It was noted that in some cases advice about consent was inconsistent and did not reflect publicly stated policies. This could undermine attempts to ensure that people know they are **entitled to ask someone that they know to support them**.

2.6 Recommendations

Recommendation 1: To ensure people don't need to repeatedly tell Social Security Scotland about their individual communication needs, Social Security Scotland should ensure an accurate record of people's communications and access requirements is kept, maintained and used by staff.

Recommendation 2: To ensure individuals receive appropriate communications support, Social Security Scotland should monitor and regularly review the types of support its client base may require.

Recommendation 3: To enable people with communication needs to express consent for a third party to act on their behalf, Social Security Scotland should consider if there are ways to improve the way it obtains consent.

3. Barriers faced to getting help

Fair and equal treatment and addressing the barriers people face are key parts of 'Our Charter'. Social Security Scotland has prioritised the design of services in an inclusive way to ensure people can access the service in the way they want to. How well are the barriers experienced by people with communication needs being addressed by Social Security Scotland?

Relevant Charter expectations

A people's service

Social Security Scotland and the Scottish Government will:

3. treat everyone equally, fairly and without discrimination

Processes that work

Social Security Scotland and the Scottish Government will:

1. make communications, processes and systems as simple and clear as possible by testing them with the people who will use them
3. adapt processes and ways of communicating as much as we reasonably can to meet your needs and preferences, for example by providing interpreters

A learning system

Social Security Scotland and the Scottish Government will:

5. ensure staff understand the needs of different people and the barriers they face - so that no-one experiences discrimination because of who they are.

3.1 The current evidence base

Disabled people and people with long term conditions face structural and cultural barriers across society which can worsen their life experiences and prevent them from achieving their goals.³²

Participants in previous research³³ by Social Security Scotland highlighted that claiming benefits could have a significant 'stressful' and

³² [Joseph Rowntree Foundation - Unlocking benefits: Tackling barriers for disabled people wanting to work](#)

³³ [Scottish Government - Social Security Experience Panels: About Your Benefits and You - Qualitative Research Findings](#)

‘anxiety-inducing’ impact on clients, which was often not understood by staff. They also wanted staff to understand that a client’s interaction with the agency often comes at a time in their lives where there has been an extreme and abrupt change in their circumstances.

Of the respondents to the 2022/23 client survey, 17% noted that they faced barriers to getting help from Social Security Scotland. Those with a communication need were far more likely to say that they had experienced such a barrier (28%, compared with 13% of those with no communication needs).

People with communication needs were less likely than those without such needs to agree that the website was easy to navigate (77% compared to 87%), easy to understand (77% compared to 89%) or made it clear whether they were eligible or not (75% compared to 85%).

People with communication needs were less likely than those without such needs to agree they had enough choice about how to communicate with Social Security Scotland (74% compared to 80%), that it was easy to contact Social Security Scotland (63% compared to 68%) or that they got the support they needed (73% compared to 77%).

3.2 Barriers faced by people with communication needs

Having information in an accessible format is a key aspect of inclusive communications.

“[It’s] crucial to recognise the impact of not providing information in the appropriate format. If individuals do not receive information in a format that meets their needs, their benefits could be stopped and lead to significant consequences for their lives.” **Structured interview participant**

We were given examples where Social Security Scotland did not communicate with the person in a manner which reflected their needs. Some participants shared their frustration at receiving information in inaccessible formats, such as letters or leaflets they could not read due to print sizes unsuitable for visual impairments, therefore, in those instances, potentially not meeting section 4 of the 2018 Act and section 20 of the Equality Act (reasonable adjustments) (this is further discussed in section 3.4 (asking for support and getting it) below).

“Clients say they can’t read but still get [a] letter.” **Structured interview participant**

“You get things through the post and they are not always in an accessible format. You might need Braille or Moon or extra-large print.” **Focus group participant (adviser)**

Under the Social Security (Scotland) Act 2018, Social Security Scotland must inform people about their claim in writing. Where Social Security Scotland is aware of a communication need, however, the letter can automatically be produced in other formats to meet that need, for instance large print or Braille.

The experience of interacting with advisers by phone or web chat was described as varied. Some advisers require minimal explanation, while others need you to explain your communication needs and circumstances in detail. It is unclear whether this inconsistency is due to standard procedures or individual differences among advisers. The overall experience was seen as dependent on the member of staff handling the claim, highlighting a lack of consistency.

Participants emphasised the importance of investing in Easy Read resources to explain benefits, entitlements, application processes, and appeals procedures in a clear and accessible way.

They expressed frustration when receiving letters or leaflets they could not understand. Some disliked telephone support, and most agreed that online applications and portals can be extremely challenging and frustrating for people with learning disabilities.

Additionally, it was noted that people with anxiety are more likely to worry about the application process and may contact the service more frequently for updates. This can be especially stressful for young people with communication needs arising from neurodivergence, who may find it difficult to constantly follow up on progress by phone. In recognition of this, Social Security Scotland have introduced “new text and email updates to let people know how their applications for Adult Disability Payment and Child Disability Payment are progressing.”³⁴

3.3 Problems using each channel

Whilst having multiple channels of communication with Social Security Scotland can be helpful, different channels can present different problems to people with communication needs.

The provision of information in electronic formats was largely viewed positively, particularly because it supports the use of assistive technologies such as screen magnifiers. However, there was some

³⁴ [Social Security Scotland - New text and email updates for applicants](#)

disappointment expressed regarding the lack of alternative formats, Easy Read versions, and dictation tools.

The online portal was recognised as being in its early stages of development, with feedback highlighting optimism about its potential to evolve. Many see opportunities for future improvements that could better meet user needs as additional features are introduced.

Participants highlighted their reliance on alternative communication methods, and explained the difficulties they encounter with phone calls:

“I prefer texting if possible or emails. I can’t use the phone. Texting is better.” **Focus group participant (client)**

“It’s common for Social Security Scotland to have multiple options and long hold times during telephone contact. This can be especially challenging for individuals with mental health conditions, neurodiversity [and it can] often discourage them from proceeding.” **Structured interview participant**

Another participant shared their approach to managing communication needs, detailing the tools and adjustments they use to improve accessibility:

“A memory stick [with audio files], and a player that would play it. Or I’m fine on the phone now because I’ve got myself a new phone with a big button for loudness and I’ve got these new hearing aids and I pay for all of that.” **Focus group participant (client)**

Consistent concerns were raised about the lack of Easy Read versions and alternative formats, which limit accessibility for some users. Similarly, the absence of dictation tools on the platform was identified as a significant gap, creating challenges for individuals who rely on speech-to-text functionality.

A lack of accessible communication could prevent claimants, especially those with communication needs, from understanding their rights and responsibilities related to their benefits. For example, they may be unaware of how to challenge a decision, on when to report a change of circumstances:

“Advisers [could] reiterate and make clear to customers with communication difficulties what to do and how to do it in the event of a change of circumstances occurring.” **Focus group participant (adviser)**

Accessibility challenges with online platforms were also a recurring theme, particularly for individuals with specific needs. These included

general usability concerns and difficulties in adapting digital services to cater to a diverse range of requirements.

Concerns were expressed about the reliability of captions, which are not always accurate. This lack of consistency reduces their effectiveness for individuals with hearing impairments.

It was suggested that the system be modernised to offer multiple options for people to connect and apply. Participants emphasised that younger individuals, particularly those with anxiety or other communication needs, often feel more at ease using text-based chat on websites rather than making phone calls.

The web chat function was highlighted as helpful; however, participants noted inconsistencies among agency staff in terms of the actions they could take. Some agents were able to handle requests directly through the chat, while others required clients to follow up by making telephone contact.

People with visual impairments highlighted that letters from Social Security Scotland include a dedicated phone number for Typetalk, but this service frequently experiences long delays or goes unanswered, often requiring clients to call back at a later time.

3.4 Asking for support and getting it

Feedback from focus groups and interviews highlighted a positive reception to the variety of channels of communication with Social Security Scotland. However, opportunities for improvement were identified.

Focus group participants praised the user-friendly language employed by call handlers and featured in written correspondence, describing it as clear and accessible. However, during interviews some noted that the language used in the system remains difficult to navigate, with many people lacking the necessary context about the benefits with this gap often making it challenging for them to fully understand what they are being asked or told.

“..people do not know what is going on, and this sense of confusion can be amplified for those with communication needs.”

Structured interview participant

It was noted that support typically needs to be actively requested or sought out by individuals, rather than being proactively offered by Social Security Scotland as standard practice. Whilst requests to Social Security Scotland for support or for a particular form of communication (e.g. letters in large font or not via a phone call) were often met, we were

told there were instances when such requests had not been met, or were not subsequently followed through, potentially not meeting section 4 of the 2018 Act and section 20 of the Equality Act on reasonable adjustments.

“There have been cases where people received phone calls from Social Security Scotland as part of the decision-making process, despite explicitly requesting on the claim form not to be contacted this way due to anxiety triggers. It's important to clarify that such contact is inappropriate, as it could exacerbate certain conditions.”

Structured interview participant

In addition, inconsistencies were reported. There were instances where clients felt obliged to repeatedly explain their communication support needs during calls. Participants emphasised the importance of having clear and consistent processes to ensure communication requirements are consistently recorded and easily accessible to call handlers, reducing the need for repeated explanations.

Issues were identified with Social Security Scotland's Local Delivery service.³⁵ For example, it was noted that in some cases, clients were only provided with general morning or afternoon time slots, rather than specific appointment times. This approach was seen as impractical, particularly for advocates with busy schedules, and could significantly hinder the client's ability to receive the necessary support.

3.5 Awareness of entitlements

Feedback from participants revealed a general lack of awareness about Social Security Scotland benefit entitlements, with many individuals relying on others for information.

Whilst lack of awareness is likely to apply to many claimants or potential claimants, this can be magnified for people with communications needs who often require specific communications support.

“Many people with communication needs are simply unaware of their entitlements and often feel reliant on others for assistance.”

Focus group participant (client)

“..what benefits were in place, how people could apply and where they could go for support to do so. They wanted to see benefits promoted to people in places where they go.” **Focus group participant (adviser)**

³⁵ mygov.scot - [If you need help from Social Security Scotland: Local Delivery](https://mygov.scot)

Participants also expressed confusion about the different benefits, particularly between those offered by the Department for Work and Pensions and Social Security Scotland, with many still unclear about the distinction between the two organisations.

Some participants noted that their awareness of benefits in the past was typically communicated through social workers, rather than via digital methods or written communication.

"All of these new benefits that you've talked about, they're not something that I was aware of. And there are a lot of Deaf older people that are in the same situation." **Focus group participant (client).**

Focus group participants expressed concern that as devolution continues, understanding these differences could become even more complicated and confusing, highlighting a widespread lack of public awareness about devolved benefits.

Young people felt that Social Security Scotland sends out too many letters and booklets, creating an overwhelming amount of information that can be especially stressful to process, particularly for those with anxiety.

3.6 Fulfilling Charter Expectations

Relevant charter expectations are highlighted in bold.

In many cases participants highlighted the user-friendly language adopted by Social Security Scotland staff in order to **make communications, processes and systems as simple and clear as possible**. It was generally acknowledged, however, that language relating to specific benefits was often difficult to understand and communicate, particularly in writing.

This concern was further emphasised by examples of inaccessible information, formats and leaflets which had not been **adapted to meet their needs and preferences**. As discussed in section 2, this indicates a need to consider policies and processes within Social Security Scotland and the scope to be more proactive in offering alternative, accessible forms of communication to meet individual needs.

Participants told us that they had to rely on support from friends and family to progress through the system, which affected their independence and they felt it was an example of them not being **treated fairly, equally and without discrimination**. This practice creates privacy concerns for individuals.

3.7 Recommendations

Recommendation 4: To ensure no claimant is unable to access information due to their communication needs, Social Security Scotland should review its inclusive communication practices with a view to ensuring they are not a barrier to people with communication needs interacting with the Scottish social security system.

Recommendation 5: To understand and address any barriers to the take-up of benefits by people with communications needs, Social Security Scotland and the Scottish Government should undertake further research.

4. Issues with the application process

Clear and accessible application processes are an important part of the social security system as outlined in 'Our Charter'. Social Security Scotland has prioritised that 'processes that work' should include a supportive application process that will ensure people can apply in ways that suit their needs. Are the aims reflected in the experiences of people with communication needs?

Relevant Charter expectations

A people's service

Social Security Scotland and the Scottish Government will:

1. be patient, kind and consider how you might feel
4. support you through your application, keeping you updated and explaining what will happen and why.
6. refer you to independent advice and support if you want extra help with your application or appeal. You are also entitled to ask someone that you know to support you.
7. make decisions in a way that is consistent and accurate – and aim to get them right first time

Processes that work

Social Security Scotland and the Scottish Government will:

2. recognise that your time is precious and handle your application and enquiries as quickly as we can.
5. ensure that disabled people who need help with the application process can get independent advocacy.

The majority of Social Security Scotland benefits have an application process, through which individuals apply to have their entitlement to benefits determined.³⁶

As the research was undertaken during the process of transferring cases from the Department for Work and Pensions,³⁷ some participants may

³⁶ Benefits such as the Carer's Allowance Supplement and Winter Heating Payment, are paid if the claimant get another qualifying benefit, without needing to apply.

³⁷ For example, "Management information at end November 2024 shows that there had been 323,500 clients from the Department of Work and Pensions who had been selected for transfer to Adult Disability Payment and had their case data sent to Social Security Scotland as part of this case transfer process... Social Security Scotland has now completed the case transfer process for 76% of those who were in receipt of Personal Independence Payment." [Social Security Scotland - Adult Disability Payment: high level statistics to 31 October 2024](#)

not have been through an application process. There was, however, some helpful feedback from those who had experienced applying for a Scottish benefit.

4.1 The current evidence base

The client survey data noted that 85% of those with communication needs rated their experience of the application process as 'good or 'very good' compared to 93% of those without communication needs.

People with communication needs were less likely than those without such needs to agree that the application process was clear (83% compared to 93%), the application process asked only relevant questions (82% compared to 93%) and that it did not take too long (77% compared to 93%).

4.2 Overall application experiences

Focus group participants reported feeling more supported when submitting their applications and generally found this to be a more dignified process, noting this as a welcome change from their experiences with the Department for Work and Pensions services.

"More compassionate and patient than previous engagements with the Department for Work and Pensions." **Focus group participant (client)**

"The nature of the questions being asked is clearer and less intrusive [than with the Department for Work and Pensions]." **Focus group participant (client)**

Some participants acknowledged improvements in the process, noting positive changes to the application form:

"Forms for disability benefits make it a much easier process – it has certainly been simplified and it's been improved, certainly compared to what we had previously." **Focus group participant (client)**

However, the length and complexity of the online application form presented challenges. For example, participants found it unclear that the form had to be saved manually, and the requirement to fill in mandatory fields could be confusing. Inserting placeholder information and returning later was noted as potentially difficult for individuals with specific communication needs. Some participants said that the volume of information provided made it unclear what to focus on.

The overall size and scope of the application form in particular was noted as lengthy and complex for those with communication barriers.

Participants expressed concerns about the overall quality of communication, noting:

"Communication is poor with letters of entitlement sometimes arriving very late." **Focus group participant (client)**

In relation to telephone contact, participants highlighted the professionalism of the call handlers, noting:

"Call handlers are very helpful and understanding." **Focus group participant (client)**

"Call handlers are extremely pleasant and understanding." **Focus group participant (client)**

However, as discussed earlier, some participants also mentioned having to repeat information.

"People have reported difficulties when they don't speak to the same person across multiple calls, leading to repeated explanations and information sharing. Navigating the initial phone menus can be time-consuming, which can pose a challenge."

Structured interview participant

One participant also mentioned the difficulty of having multiple queries dealt with in the same phone call. This can be more challenging for people who experience anxiety about their communication needs when making such a call.

".. when you call Social Security Scotland with a query, you can only address one issue per call. This can slow down the process, as you may need to call again or be redirected, leading to an unspecified wait time. If advisers were able to address multiple questions in one call, it would speed things up"

Structured interview participant

Participants also shared concerns about the Social Security Scotland website, stating:

"The Social Security Scotland website currently feels formal and bureaucratic, catering more to stakeholders than addressing the needs and preferences of young people." **Focus group participant (client)**

It was noted that, at times, the initial letter of determination, at the end of the application process, is not provided in the necessary format, potentially leading to delays in lodging appeals. Some participants

reported receiving their award in their bank account before the arrival of the award letter, leading to making additional calls for reassurance.

Participants also commented about the length of time it can take to get support arrangements (such as British Sign Language interpretation) in place, as discussed above. There was also a fear that this could have implications for the progress of someone's application.

“Additional time is often required, such as waiting for alternative format information, which can cause delays in accessing other benefits or assistance. Occasionally, the initial determination letter is not sent in the required format, delaying the possibility of appeals or other actions.” **Structured interview participant**

“BSL or hands-on communicators are hard to access so [access to] benefits are delayed further”. **Focus group participant (client)**

Social Security Scotland has written guidance on identifying sound reasons for applications or information submitted late for disability benefits which is publicly available on its website.³⁸ The guidance notes that individual circumstances will be considered in each case.

4.3 Awareness of and access to advocacy

To fulfil its statutory expectation “to ensure that independent advocacy services are available” under section 10 (2) of the Act, the Scottish Government funds an independent advocacy service, VoiceAbility. The service itself intends to support people to better engage with Social Security Scotland in terms of access, information, and assistance.

Participants, particularly those with learning disabilities, noted that advocacy helps to address their anxieties before any interaction with social security systems.

“People with learning disabilities may feel intimidated in [reviews or face to face determinations] settings, may forget to mention important details and may not fully understand decisions made or things communicated to them.” **Focus group participant (client)**

Participants also noted that this service remaining independent was important to them, “to make sure people felt supported to get full access to benefits they were entitled to”.

However, people with communication needs were often unaware that this support was available to them during the process. This concern has

³⁸ For example, [Social Security Scotland - Child Disability Payment decision making guide - Late completion of application](#)

also been reflected in the findings of the interim review of Adult Disability Payment.³⁹

Participants generally felt that more should be done to promote the advocacy service to people with communication needs and that the starting point for this should be greater visibility of the service in communications received from Social Security Scotland.

4.4 Fulfilling charter expectations

Relevant charter expectations are highlighted in bold.

When compared to experiences of other benefits systems, people with communication needs highlighted that Social Security Scotland provided a greater level of **support through the application process** and various improvements whilst also noting that the volume of information required was significant. Participants suggested that improvements could be made in these processes, for example clearer direction that manual saving of application processes was required to save progress.

Participants raised concerns about **the time taken to obtain support with their communication needs**, such as receiving information in a format which is accessible to them. This could affect whether deadlines could be met and potentially their eventual entitlement.

Furthermore, participants often highlighted the amount of time they were required to invest in making an application, and that this did not **recognise that your time is precious** and they did not feel their **enquiries were dealt with as quickly** as possible. This was particularly raised in relation to call waiting times and the handling of consent for someone else to contact Social Security Scotland on their behalf.

Disabled people who need help with the application process can get independent advocacy and this was valued by participants. Whilst the contractual relationship is with the Scottish Government, it is also clear that Social Security Scotland could learn more from the information gathered by VoiceAbility in undertaking its independent advocacy role.

4.5 Recommendations

Recommendation 6: To ensure people with communications needs can access support from external organisations as quickly as possible, Social Security Scotland should work with stakeholders and partners to identify the causes of any delays and address them.

Recommendation 7: To gather evidence on people's understanding and availability of advocacy support, Social Security Scotland should

³⁹ [Independent Review of Adult Disability Payment - Interim Report](#)

include awareness of and use of advocacy in its client survey and other research.

5. Conclusions

This initial research set out to explore the experiences of people with communication needs and relate them to relevant expectations in the Scottish Social Security Charter. The Charter places challenging expectations on Social Security Scotland.

Our research suggests the Charter itself does not seem to be particularly prominent in the minds of the public, or of clients and potential clients, when they interact with Social Security Scotland. However, the Charter and associated activities (such as the Inclusive Communications Action Plan) have laid the foundations for a more inclusive approach to social security.

These foundations can be seen in the findings that people with communication needs describe their interactions with Social Security Scotland overall as positive, and better than their experiences with the Department for Work and Pensions. Generally, participants viewed Social Security Scotland as listening, respectful and friendly and the questions they asked as clearer and less intrusive.

Nonetheless, this initial research has also discovered instances where some of the Charter expectations may not be fulfilled as fully or as consistently as we would hope. For example, some people had to repeatedly ask for specific support or had requested a particular format which was not delivered. On other occasions, participants with third party assistance (such as a support worker or welfare rights adviser) encountered difficulties with staff accepting their consent for someone else to communicate with Social Security Scotland on their behalf.

Everyone involved in the Scottish social security system is committed to the principle of continuous improvement. Our findings and recommendations point to some ways in which the experiences of people with communication needs may be improved. We encourage both the Scottish Government and Social Security Scotland to engage with our recommendations and conduct further user-focused research in the areas proposed throughout the report.

5.1 Acknowledgements

Finally, we end with a note of gratitude to the people and organisations who participated in or organised interviews, arranged or attended focus groups or supported our efforts to produce accessible versions of this report. We are also grateful to our colleagues from the Scottish Commission on Social Security Secretariat, particularly Andrew Strong and Chris Galloway, who supported us throughout the project.

We would also like to thank colleagues in Social Security Scotland who made time in their busy schedules to meet with us and provided additional information about inclusive communications.

We hope that this initial research, the experiences it outlines and the recommendations we have outlined make a contribution to the ongoing process of continuous improvement of the Scottish social security system.