

Social Security Scotland  
Agnes Husband House  
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05 December 2025

Dear Ed,

Thank you for your first scrutiny report of the Scottish Government's delivery of the commitments set out in the **Social Security Charter**.

Firstly, I welcome observations that the Scottish Government and Social Security Scotland have laid the foundations for a more inclusive approach to social security. This is reflected in findings that people with communication needs described their interactions with Social Security Scotland as positive overall.

There is, of course, still more to do to address any barriers people with communication needs may experience when accessing social security. I am reassured your findings align with both Social Security Scotland and the Scottish Government's recognition that those with communication needs often face compounding issues when accessing social security and that these challenges can affect their ability to access entitlements or engage confidently with services.

Social Security Scotland's recent **Mainstreaming Equality Report**, published in June 2025, demonstrates that while there is positive progress to highlight, further improvements can be made to mainstream inclusive communication and equality as part of everyday practice.

I have attached a table which provides an overview of responses to the recommendations provided within your helpful report, including an indication of work already underway and future work that is planned.

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I would like to thank the Commission once again for its valuable work to scrutinise delivery of the commitments set out in the Social Security Charter and for highlighting the needs of those with communication needs.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'DW', with a stylized, cursive flourish extending to the right.

**David Wallace**

Chief Executive

Social Security Scotland

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Scottish Commission on Social Security Recommendations	Accept/Partially Accept/Reject	Response
<p>Recommendation 1:</p> <p>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.</p>	<p>Accept</p>	<p>Social Security Scotland accepts that people should not have to repeatedly tell us about their communication needs and that an accurate record should be kept, maintained and used by staff. There are currently limitations in how we capture information on communication preferences and how complex communication needs are captured, therefore we cannot currently commit to capturing this information for every client.</p> <p>Recognising the importance of capturing preferences, currently if clients are making an application this includes a section where they can express a communication preference from a list which includes:</p> <ul style="list-style-type: none"> <li>• phone call / phone call in a different language</li> <li>• letter / letter in a different language</li> <li>• letter in large print / Braille / Easy Read / Audio</li> <li>• video call for British Sign Language.</li> </ul> <p>It is acknowledged that the current process may not capture every variation of communication need. Client research on communication preferences has been conducted over the last year to understand possible improvements. Using the research evidence, some improvements were identified including changes to the low-income application forms which were introduced in November this year.</p> <p>Research has indicated possibility for improvement in relation to capturing and storing communication preferences. There is no further work planned at the moment, however this may be considered beyond the end of the completion of the current programme of delivery. This recommendation will remain under consideration for future improvement.</p>

		Therefore we cannot currently undertake the steps required to meet the recommendation in full, but it will remain under consideration.
<p>Recommendation 2:</p> <p>To ensure individuals receive appropriate communications support, Social Security Scotland should monitor and regularly review the types of support its client base may require.</p>	Accept	<p>Social Security Scotland is working on how to improve communication options and interactions for all clients, including those with communication needs. This work is currently in the trial phase and incorporates testing alternative communication methods such as text and email.</p> <p>Social Security Scotland will continue to undertake a variety of user and social research projects to monitor and understand the types of support clients may require.</p>
<p>Recommendation 3:</p> <p>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.</p>	Accept	<p>Social Security Scotland recognises that expressing consent for a third party to act on their behalf is important, especially for those with communication needs. Clients are currently able to express consent for a third party to act on their behalf verbally and in writing.</p> <p>This authorisation can be provided in the following ways:</p> <ul style="list-style-type: none"> <li>○ signed letter from the client</li> <li>○ authorisation given on the application form</li> <li>○ Social Security Scotland's online mandate</li> <li>○ an organisation's own mandate which would be signed by the client (providing the mandate explicitly allows Social Security Scotland to share information with the third party representative)</li> <li>○ verbally by the client on the provision that Social Security Scotland are satisfied that it is the client providing the consent.</li> </ul> <p>If a client is unable to engage with the above processes due to disability or impairment, Social Security Scotland will signpost to the Scottish Government funded independent advocacy provider, currently VoiceAbility, to support them with their application.</p>

		<p>Social Security Scotland has also launched a pilot with third party organisations, including Local Authorities, Citizens Advice Bureaus and other charities who can contact us directly on behalf of clients with complex or challenging circumstances. To date, this pilot has involved 13 organisations, and a further expansion is under consideration.</p>
<p>Recommendation 4:</p> <p>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.</p>	Partially Accept	<p>Social Security Scotland aims to design its services so that as many people as possible understand what it does and can communicate and access services in the way they want to.</p> <p>While Social Security Scotland is not currently planning to undertake a full, separate review of its inclusive communications practices as set out in the recommendation, we continue to take steps to improve how we communicate with our diverse range of clients and regularly monitor the effectiveness of our inclusive communications practices through our Mainstreaming Equality reporting. Social Security Scotland's <u>Mainstreaming Equality Report 2025</u> outlines positive progress we have made in terms of inclusive communication practices, and highlights areas for further improvement. By incorporating inclusive communication obligations as part of wider equality obligations, including for monitoring and report, we have developed a set of outcomes that will enable it to fulfil legal obligations in this area while delivering improvements for all clients.</p> <p>Social Security Scotland will continue to formally report on performance in relation to inclusive communication through our next Mainstreaming Equality Report due in 2027.</p>
<p>Recommendation 5:</p> <p>To understand and address any barriers to the take-up of benefits by people with communications needs,</p>	Accept	<p>Social Security Scotland continues to enhance our understanding of communication-related barriers. Benefit take-up is a key priority in the <u>2025-26 Business Plan</u>, and we will work closely with the Scottish Government Social Security Directorate to understand why people are less likely to apply for benefits and payments they are entitled to, and take steps to support clients to receive the payments they qualify for.</p>

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<p>Social Security Scotland and the Scottish Government should undertake further research.</p>		<p>This work is supported by user research with clients that was undertaken in early 2025 to better understand the needs and experiences of people who use alternative communication formats and have additional communication needs. This is part of wider work that aims to improve the accessibility of Social Security Scotland’s service and make sure it is communicating with people in a way that works for them. The Scottish Government published a commissioned evidence review into the experiences of 'seldom-heard groups' within the social security system, including people with disabilities, impairments and chronic ill-health conditions in 2024, to further our understanding of the barriers these groups face to accessing benefits, including communication barriers. The Scottish Government published a <b><u>response</u></b> to this research in August 2025, with actions covering the run-up to the publication of next Benefit Take-Up Strategy, due by October 2026. Learning from these actions will inform the next Benefit Take-Up Strategy and its outcomes. Together, these actions reflect our ongoing commitment to continuous improvement, ensuring that people with communication needs are recognised, understood, and supported at every stage of their journey through Scotland’s social security system.</p>
<p>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.</p>	<p>Accept</p>	<p>Social Security Scotland recognises that external organisations such as local authorities and third sector organisations may be accessed for support by clients during their application journey. Social Security Scotland undertakes a survey of stakeholder organisations, including those who support clients directly, every year for Charter Research, with findings shared both publicly and throughout the organisation. Officials also engage with a variety of external organisations via stakeholder roadshow offerings to support the launch of new benefits. Currently there is pilot project underway exploring providing an escalation route for external organisations to highlight complex cases, including identifying and addressing causes of delays. Social Security Scotland continues to explore how to work effectively with external organisations for the benefit of our clients.</p>

<p>Recommendation 7:</p> <p>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.</p>	<p>Accept</p>	<p>Social Security Scotland acknowledges that the current Client Survey does not include specific questions about awareness and use of our independent advocacy service. The Scottish Government accepts that it is important to understand the reach and effectiveness of the advocacy service. Social Security Scotland and Scottish Government will explore the feasibility of including a question on advocacy in a future iteration of the Client Survey. It may be appropriate to consider this in line with the implementation of the next contract for independent advocacy provision, which is due to begin in January 2026, following a procurement process undertaken in summer 2025.</p>
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