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Dear Convenor,

Thank you for your letter of 13 March 2026, requesting further information relating to the Scottish Government's response to the Independent Review of Adult Disability Payment (ADP).

As set out in the response, the recommendations are addressed thematically reflecting the structure of the final report and grouped into three categories depending on the nature and scale of action required to deliver them. I have summarised each category below. In line with the Committee's request please see in annexes A – C, tables summarising our response to each individual recommendation for the three categories.

Recommendations Starting Within Three Months

These recommendations focus on operational improvements that can begin to be implemented within the remaining Parliamentary term and are intended to enhance clients' experiences of accessing ADP. They include measures on the redesign of determination letters, increasing client choice around consultations, strengthening decision-making guidance, and embedding trauma-informed practice throughout Social Security Scotland.

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Longer Term Recommendations

These recommendations relate to major structural or legislative changes that cannot be delivered within the current parliamentary session. They include proposals to review or reform eligibility criteria – including the mobility component – activities and descriptors, and the wider entitlement framework. This work requires detailed analysis, policy development, consultation, and consideration of implications for passported benefits.

Recommendations not being implemented

These recommendations are not being progressed because they are either not deemed to be in clients' best interests or have the potential to cause risks to the operational delivery of ADP – or disability benefits more widely. Where appropriate, the Scottish Government will continue to monitor these areas as ADP evolves, but no immediate action is planned.

I hope you find this additional information useful. I would like to take this opportunity to thank you and the Committee for your assistance and cooperation in the development and implementation of our social security system, helping the Scottish Government to deliver real change for the people of Scotland.

Yours sincerely,

SHIRLEY-ANNE SOMERVILLE

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Annex A – Recommendations Starting Within Three Months

Summary of Recommendation	SG position
<p>Recommendation 1 - Strengthen lived-experience involvement</p>	<p>Current research is focused on people experiencing homelessness, survivors of domestic abuse, and individuals living in rural areas. Upcoming research will explore care leavers, veterans, and people with experience of legal detention. Across all groups, intersectionality has been a key theme, highlighting the complex and overlapping identities and needs of clients. The expertise of the Client Panels team will ensure that lived experience remains central to the future of ADP</p>
<p>Recommendation 2 - Develop strategies to engage seldom-heard voices & address stigma</p>	<p>Measures will be included in the 2026 Benefit Take Up Strategy to improve access for people for whom traditional approaches may be less effective. By adopting tailored approaches to encourage take-up among those least likely to apply for ADP, or who face the greatest barriers in doing so, the Scottish Government aims to reduce obstacles to access and enhance the service for all clients.</p>
<p>Recommendation 3 - Review understanding of take-up among seldom-heard groups</p>	<p>To assess the effectiveness of efforts to maximise take-up of ADP, including among seldom heard groups, the Scottish Government must be able to estimate the total number of people who could be entitled to the benefit. This is not a straightforward task and, critically, depends on the development of a robust methodology for producing reliable estimates. Work on this is underway, and the Scottish Government will provide an update on progress by the middle of 2026 at the latest.</p>
<p>Recommendation 4 Strengthen trauma-informed practice</p>	<p>Social Security Scotland has been working collaboratively with other public sector organisations to embed a national framework</p>

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	<p>for implementing trauma-informed practice in line with a developed roadmap, and work is ongoing to ensure this approach is consistently embedded across the organisation.</p> <p>. The Dundee Fairer Futures Pathfinder and the Ask and Act pilot will provide an opportunity to test processes and develop solutions that support clients.</p>
<p>Recommendation 5 Strengthen Local Delivery partnerships</p>	<p>Beyond signposting, work is on-going to explore supporting the safe and secure sharing of client data with relevant organisations that may be able to provide further support. The Dundee Fairer Futures Pathfinder and the Ask and Act pilot will provide an opportunity to test processes and develop solutions that support clients.</p>
<p>Recommendation 7 Improve promotion of Local Delivery & Independent Advocacy</p>	<p>The Scottish Government will continue to strengthen the promotion of Local Delivery and Independent Advocacy services through a range of materials and approaches embedded across core activity.</p> <p>This will include the use of leaflets, social media, stakeholder engagement, and community events to ensure that people are aware of and able to access the support available. Beyond signposting, work is on-going to explore supporting the safe and secure sharing of client data with relevant organisations that may be able to provide further support.</p>
<p>Recommendation 9 Improve Local Delivery staff training on specific conditions</p>	<p>Social Security Scotland regularly reviews the professional knowledge and skills of staff to ensure learning resources remain current and will continue to deliver awareness-raising through regular learning sessions for Local Delivery staff.</p>
<p>Recommendation 11 Improve decision-making and call wait times</p>	<p>The Report recognises the work already undertaken to reduce the time clients wait for a decision about their ADP entitlement. Social Security Scotland is committed to consolidating this progress, reducing both</p>

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	decision waiting times and the time people wait to get through by phone.
Recommendation 15 Balance fairness and discretion in decision making	Social Security Scotland regularly updates guidance and training to reflect policy developments and in response to feedback. This recommendation will be addressed through these channels, ensuring that staff are able to make fair decisions.
Recommendation 16 Ensure undue weight is not placed on clinical support	There are six recommendations relating to the decision-making process and the guidance and training that underpin it, four relate specifically to the DMG and are intended to ensure staff have a holistic understanding of how health conditions or disability can affect all aspects of a person's life, and how eligibility criteria relate to these impacts. For example, recognising that someone with chronic fatigue may experience exhaustion hours after an activity, even if they are able to complete it at the time. Work on the four priority recommendations [16, 20, 22 and 23] will begin within the next three months.
Recommendation 18 Apply reliability criteria	As part of its commitment to continuous improvement, Social Security Scotland regularly updates guidance and training to reflect policy developments and in response to feedback. This recommendation will be implemented through guidance and training to ensure staff can apply the reliability criteria consistently in practice.
Recommendation 20 Make clear in guidance how inability in one activity affects others	As in relation to recommendation 16: There are six recommendations relating to the decision-making process and the guidance and training that underpin it ... four relate specifically to the DMG and are intended to ensure staff have a holistic understanding of how health conditions or disability can affect

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	all aspects of a person's life, and how eligibility criteria relate to these impacts. For example, recognising that someone with chronic fatigue may experience exhaustion hours after an activity, even if they are able to complete it at the time. Work on the four priority recommendations ... will begin within the next three months.
Recommendation 22 Ensure caselaw is reflected in guidance	As in relation to recommendation 16: There are six recommendations relating to the decision-making process and the guidance and training that underpin it ... four relate specifically to the DMG and are intended to ensure staff have a holistic understanding of how health conditions or disability can affect all aspects of a person's life, and how eligibility criteria relate to these impacts. For example, recognising that someone with chronic fatigue may experience exhaustion hours after an activity, even if they are able to complete it at the time. Work on the four priority recommendations ... will begin within the next three months.
Recommendation 23 Remove bias between mental and physical conditions	As in relation to recommendation 16: There are six recommendations relating to the decision-making process and the guidance and training that underpin it ... four relate specifically to the DMG and are intended to ensure staff have a holistic understanding of how health conditions or disability can affect all aspects of a person's life, and how eligibility criteria relate to these impacts. For example, recognising that someone with chronic fatigue may experience exhaustion hours after an activity, even if they are able to complete it at the time. Work on the four priority recommendations ... will begin within the next three months.
Recommendation 24	Social Security Scotland will continue to involve stakeholders in strengthening

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Engage charities/specialists to support training	feedback mechanisms through clear engagement plans.
Recommendation 25 Improve clarity about the purpose of consultations	Where required, a telephone consultation is usually arranged to minimise inconvenience and stress. The Report's findings are noted, and while clients will continue to be offered choice, further work will ensure they are aware that they can request a consultation, in a format that suits them.
Recommendation 26 - Increase client choice over consultations and format	As above - Where required, a telephone consultation is usually arranged to minimise inconvenience and stress. The Report's findings are noted, and while clients will continue to be offered choice, further work will ensure they are aware that they can request a consultation, in a format that suits them.
Recommendation 29 – Increase prominence of appeals and re-determinations information	Recommendations relating to appeals, re-determinations, and award duration will be addressed by a new ADP determination letter, to be introduced by Spring 2026. Further research with clients will assess the effectiveness of these improvements once the new letter has been in use for an appropriate period.
Recommendation 32 Review the 28-day hospital rule	A review of the 28-day hospital rule will consider the policy rationale, potential costs, client impacts, and operational requirements. As the rule also applies to Child Disability Payment (CDP), Pension Age Disability Payment (PADP), and Scottish Adult Disability Living Allowance, it will be examined in the wider context of disability assistance.
Recommendation 34 – Improve clarity of award duration and review information	Recommendations relating to appeals, re-determinations, and award duration will be addressed by a new ADP determination letter, to be introduced by Spring 2026. Further research with clients will assess the effectiveness of these improvements once the

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	new letter has been in use for an appropriate period.
Recommendation 36 – Improve support for clients requiring additional help	In addition to the existing inclusive communication hub and learning sessions, Social Security Scotland will soon launch an Inclusive Communication Pack to help colleagues embed inclusive practices in service delivery. Work will also continue with the Stakeholder and Partner Engagement Team, via the Operational Reference Group, to understand the needs of diverse clients and build an inclusive
Recommendation 39 Build capacity for policy makers and front-line staff to undertake training on stigma	All Social Security Scotland staff who interact with clients receive training about benefit stigma as part of their induction, reflecting the organisation’s commitment to understanding issues affecting people applying for support. The Scottish Government’s Disability Equality Plan 2025 includes a strategic objective to improve disability competence across the organisation. An intersectional approach will be taken, with projects building capacity around stigma—particularly as it relates to poverty, inequality, race, gender identity, and disability. Social Security Scotland and the Social Security Directorate will contribute to this work to deliver the Report’s recommendation on stigma training.
Recommendation 44 Regularly refresh case manager and practitioner training and materials to ensure consistency and improve understanding of the impact of fluctuating conditions on clients’ lives and wellbeing	As part of its commitment to continuous improvement, Social Security Scotland regularly updates guidance and training to reflect policy developments and in response to feedback.
Additional Recommendation (59) Improve training on specific conditions	As part of its commitment to continuous improvement, Social Security Scotland regularly updates guidance and training to reflect policy developments and in response to feedback. The nine recommendations will be implemented through guidance and

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	training so staff can apply them consistently in practice.
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Annex B – Longer-Term Recommendations

Summary of Recommendation	SG Position
Recommendation 6 Promote independent advice services	As reflected in the Response further consideration will be given to this recommendation.
Recommendation 10 Review application form length and framing	This recommendation is accepted in principle. While the current form is the result of years of research and balancing client needs, we recognise the feedback from disabled people. Reviewing the form will take time and resources, so Social Security Scotland will consider how this work can be taken forward within existing programmes.
Recommendation 12 Provide estimated processing times and proactive updates	As reflected in the Response further consideration will be given to this recommendation.
Recommendation 13 Develop an online “Track Your Application” portal	As reflected in the Response further consideration will be given to this recommendation.
Recommendation 14 Improve service experience for clients and representatives by: (a) Reviewing differences in consent processes (implicit vs unavailable) (b) Assessing consistency of guidance on unavailable consent (c) Considering a third-party escalation route based on pilot learning.	As reflected in the Response further consideration will be given to this recommendation.
Recommendation 17 Ensure each letter is self-contained and clear	As reflected in the Response further consideration will be given to this recommendation.
Recommendation 19 Explain reliability criteria with examples	As reflected in the Response further consideration will be given to this recommendation.

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Recommendation 21 Ensure explicit reference to the reliability criteria in all decision correspondence so clients and representatives understand if, and how, the criteria have been applied.	As reflected in the Response further consideration will be given to this recommendation.
Recommendation 31 Clarify change of circumstances guidance	As reflected in the Response further consideration will be given to this recommendation.
Recommendation 33 Consider automatic entitlement when certain conditions met	As reflected in the Response further consideration will be given to this recommendation.
Recommendation 40 Confirm whether activities, descriptors and points will be made more prominent and accessible	As reflected in the Response further consideration will be given to this recommendation.
Recommendation 41 Conduct a thorough review of eligibility & decision-making criteria	As reflected in the Response further consideration will be given to this recommendation.
Recommendation 42 Replace 50% rule with improved reliability-based approach	As reflected in the Response further consideration will be given to this recommendation.
Recommendation 43 Improve application questions to reflect variability, triggers and condition management	As reflected in the Response further consideration will be given to this recommendation.
Recommendation 45 Introduce “substantial risk” provision	This proposal would require significant policy, legal and financial analysis due to its potential impact on entitlement. It will be considered as part of the longer term work to review the entitlement framework.
Recommendation (46 – 54) All relate to Recommendation 41 – Conduct a thorough review of the eligibility and decision-making criteria.	Recommendations 46–54 are part of the wider eligibility review under Recommendation 41. These proposals will be considered collectively as part of

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	the longer-term work to review activities, descriptors, and decision-making criteria in the next Parliament.
Recommendation 55 Review “planning and following journeys” mobility descriptor	As reflected in the Response further consideration will be given to this recommendation.
Recommendation 56 Remove fixed distance from mobility eligibility	As reflected in the Response further consideration will be given to this recommendation.
Recommendation 57 Review guidance and training to improve understanding of delayed impact, exhaustion, pain and anxiety	As reflected in the Response further consideration will be given to this recommendation.
Recommendation 58 Consider learning from Blue Badge scheme to assess mobility needs	Learning from the Blue Badge scheme will be incorporated into the wider review of mobility criteria.

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Annex C – Recommendations Not Being Taken Forward

Summary of Recommendations	SG Position
<p>Recommendation 8 Introduce a dedicated route to speak to Social Security Scotland about Local Delivery and book appointments.</p>	<p>Clients currently contact Social Security Scotland through the main helpline, which ensures their information is recorded accurately and payments are processed from the correct date. Local Delivery appointments can be arranged during the same call, providing a single streamlined route that reduces the risk of fragmented service or duplicated records.</p>
<p>Recommendation 27 Mitigate the risk of removing an award by allowing case managers to focus only on disputed areas and retain previous rationale for undisputed elements.</p>	<p>Limiting re-determinations to disputed elements would risk producing inaccurate or potentially less favourable outcomes. Case managers must be able to consider all relevant information to ensure a fair, accurate and legally robust decision for the client.</p>
<p>Recommendation 28 Improve re-determination timescales.</p>	<p>The current 56-day legislative timescale for disability benefit re-determinations reflects extensive consultation, including the 2016 Consultation on Social Security in Scotland and feedback from Experience Panels. It is designed to balance timely client payments with the need for careful evidence-gathering and accurate decision-making.</p> <p>Performance remains strong: around 95% of re-determinations were completed within this 56-day period in the latest quarter. The Scottish Government will continue monitoring performance to ensure the process remains efficient and fair.</p>
<p>Recommendation 30 Introduce automatic awarding of Short-Term Assistance with an opt-out clause.</p>	<p>Automatically issuing Short Term Assistance (STA) without explicit client confirmation risks making payments where a client does not intend to pursue</p>

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	<p>an appeal. Retaining an opt-in approach ensures payments reflect client choice and avoids unnecessary operational and financial risk.</p>
<p>Recommendation 35 Update client guidance to ensure information is <i>always</i> available in Braille, BSL, Easy Read, other languages, etc.</p>	<p>Social Security Scotland already provides an ADP factsheet containing essential information in accessible formats including BSL, Easy Read and multiple languages. Stakeholder engagement indicates that many organisations prefer to produce their own tailored materials where appropriate. However, the availability of formats will remain under review through ongoing engagement and continuous improvement work.</p>
<p>Recommendation 37 Provide a single point of contact for clients throughout their application/re-determination.</p>	<p>Adult Disability Payment is a long-term benefit, and clients may interact with Social Security Scotland at several points over time. These interactions require input from different specialist teams to ensure efficiency, accuracy and expertise. Separating functions also protects the integrity of re-determinations, as these must be undertaken by staff who have had no involvement in the original decision.</p>
<p>Recommendation 38 Make written translation options for determination letters more prominent.</p>	<p>Demand for written translation services is low but steady, suggesting that current signposting - already included in the ADP application process - is effective. Nonetheless, the Scottish Government will continue to monitor awareness and consider further improvements if evidence indicates this is required.</p>

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