



Estimating fraud and error in the Scottish social security system

Citizens Advice Scotland Response

June 2026

Citizens Advice Scotland welcomes this opportunity to contribute to the development of social security auditing processes.

Key points

- Social security is an investment in all of us, it provides both a safety net and springboard to enable people to realise their potential as well as navigate the challenges of life. Advice services play an essential role in enabling people to engage with the system and access their entitlements. Information for audit processes must be developed anchored within this framework.
- Information gathered for auditing must be collected in ways that are flexible, tailored to individual communication needs, and as unobtrusive as possible. People should expect active listening, trust in their account of their lives, and a process that is as stress free as possible¹.
- People selected during audits must be enabled to access the advice and support that they need by being actively signposted to this when information is requested.
- Digital connectivity and literacy, learning difficulties, specific communication requirements, language barriers, mental health and the impact of abuse must all be fully accounted for within the auditing process.
- Individuals who have received a determination notice within the last three months, or who have participated in a review in the last twelve months, should be exempt from audit.
- Victim survivors of abuse, those who have experienced homelessness within the previous year, and those who have been admitted to hospital as an inpatient within the previous twenty-six weeks, should be exempt from audit for twelve months, with discretionary extensions available.

¹ [Our Charter - Social Security Scotland](#)



- Communication about the reviews must emphasise that the process is to enable Social Security Scotland (SSS) to work as effectively as possible and is not targeted at individuals suspected of fraud.
- The process for estimating fraud and error in the Scottish social security system should complement audit processes that ensure decision-making is accurate and consistent with legislative and caselaw requirements.

Background

In the period 2025-2026, our network supported 28,400 people with advice about Adult Disability Payment (ADP) alone. We have consistently been the third largest provider of ADP and Pension Age Disability Payment (PADP) support after friends and family and Social Security Scotland (SSS)². These two payments are the most complex to assess for fraud and error levels, largely due to the communication barriers experienced by many in receipt of these payments.

Also, in the period 2025-2026, our network supported more than 44,500 people with advice about Universal Credit (UC), providing us with unique insight into people's experiences. To compile this response, we have drawn upon this evidence, particularly in relation to the Department of Work and Pension's (DWP) UC Claim Review process. These Reviews, which can occur at any time while a UC claim is ongoing, are conducted to ensure that people receiving UC remain eligible and receive the correct level of payment; where errors have occurred, claims are corrected or closed. The process begins with online requests for bank statements, followed by telephone appointments. Examining this process provides significant advance warning about the potential risks involved in the introduction of an information for audit system in Scotland, while offering learnings to help build an effective process.

Consultation Questions

1. *Do you agree or disagree that a **written response** should be required where other methods - face to face, telephone, or video - have been considered and are not appropriate?*

Disagree

Enabling people to exercise choice and control empowers both individuals and the agency to communicate more effectively. It follows that a written response

² [Client Survey: Disability Payments \(April 2025 - September 2025\) - Social Security Scotland](#)



“could” rather than “should” be required where this is the most appropriate method. Which method is employed to initiate and complete the request for information must be led by the needs and preferences of the person in receipt of a social security payment. In some cases this may involve a home visit or an in-person appointment in the community with a member of SSS’s local delivery team.

2. *Do you think there are any **other circumstances where a written response** would be appropriate?*

Our evidence of the interactions between the people that we support and the DWP concerning UC Claim Reviews demonstrates the importance of a clear pathway, digital and postal, for written responses to be submitted by a person authorised to act on behalf of a claimant. Written responses are likely to be appropriate in the majority of cases in which a person was supported to make their claim by an authorised third-party, or has an acting appointee.

For some people with additional communication needs, including those not using English as a first language, written responses can be the simplest way to provide accurate information, particularly with the help of aids or another person.

Failure to facilitate written responses risks a breakdown in communication between people in vulnerable circumstances and the agency, with potentially devastating financial losses if payments are suspended or terminated as a result. Nina’s experience illustrates the risks for people navigating a language barrier. Had Nina been provided with an opportunity to provide a written response and access support from an advice agency, severe financial harm could potentially have been avoided.

Nina attended her local CAB after her Universal Credit (UC) payments were suspended, having struggled to engage effectively with a UC claim review process. Nina arrived in the UK from Ukraine in 2022 with her husband and their two children. Nina has since separated and is now a lone parent in education. Nina believes that she has provided all the requested information for her UC claim, but she confirmed to the CAB that she feels uncertain about the process as English is not her first language, and due to confusion over requirements- for example she was asked for a council tax bill despite having a student exemption. The CAB offered Nina a face-to-face appointment, but cannot support her during a DWP call-back, which will occur at an unspecified time. At the time that Nina attended the CAB it had been over one month since her last



UC payment; she was facing severe financial hardship and struggling to pay rent.

Graham's experience reinforces the critical importance of enabling people to arrange for third party representatives to submit a written response on their behalf.

Graham approached his local CAB for advice. He lives with significant mental ill health and explained that, feeling unheard and misunderstood, he had become angry with the DWP while trying to convey by phone that he was unable to access information requested to complete a UC claim review process.

His UC claim subsequently ended. Graham's grandmother and carer wrote to the DWP on at least seven occasions requesting support, but received no response. Had this communication elicited a response, Graham's grandmother could have provided the required information on his behalf, meaning the claim would still be active. Nearly eight months after the claim ended, Graham is still not receiving UC and his grandmother is struggling financially.

The impact of limited digital connectivity and literacy, learning difficulties, specific communication requirements, language barriers, the consequences of abuse, mental ill health and homeless for communication, need to be fully accounted for if information for audit is to be gathered effectively. Designing in accessibility and flexibility for people concerning how they communicate will be vital.

- 3. Do you agree or disagree with the proposal that individuals whose benefit had a **recent determination (within the last 3 months) should not be required to provide fresh information for audit?***

Agree

Three months is a useful definition of what is meant by a recent determination- forty-two days and thirty-one days being the general timeline for the submission of re-determination and appeal requests respectively. However, more clarity is needed.

The proposed approach should be extended so that individuals with a recent determination are not required to provide fresh information for audit before their next scheduled review date. Requesting additional audit information during this period risks duplication and confusion-for example if a late re-determination or appeal request related to a recent decision is accepted, the claim will become a claim under active consideration.



Scheduled review dates therefore provide a more comprehensive reference point- they are set with regard to how likely and how quickly a person's circumstances may change, ensuring that information is requested at a meaningful stage in the journey.

We propose extending this proposal so that people who have a recent determination are not required to provide fresh information for audit prior to their next scheduled review date. Using the scheduled review date is helpful since scheduled review dates are set according to the varied factors that might shape the speed at which a person's circumstances may change.

4. *Do you agree or disagree with the proposal that **an individual who has already provided information for audit within last 12 months for any benefit should not be required** to provide fresh information for audit?*

Agree

Responding to requests for information focused on verifying eligibility for payments can be intensive, and in some cases intrusive. Asking people to repeat this process within one-year risks causing significant harm. Alice's experience of DWP information gathering for audit processes illustrates the risks and what can be learned from this process about how to avoid those risks.

Alice attended her local CAB for help navigating a UC claim review process related to a property that she inherited, but which her father legally occupies. As a lone parent of a disabled child, Alice has found the process exhausting and stressful. Despite providing requested documentation, including four years of bank statements, multiple times over the last six months, she continues to face repeated requests for information. Since Alice lives in a rural area journeying to the bank to obtain the statements sought is logistically difficult, expensive and time consuming. Alice explained to the CAB that if communication was clear and transparent about what information was needed and why, she would be better able to manage requests.

Another reason we support this proposal is because eligibility criteria for Scottish social security payments often overlap. This means that information used to audit one payment is usually sufficient to verify eligibility for other payments, avoiding repeated requests for the same details. Where this is not the case-for example people in receipt of Adult Disability Payment and Scottish Child Payment-information gathered for audit concerning household circumstances can be used to fill any gaps.



5. Do you agree or disagree with the proposal that **an individual whose entitlement to a benefit is already actively under review** should not be required to provide fresh information for audit?

Agree

Undergoing a scheduled review or a review triggered by a change in circumstances can be a stressful time for many people. This is a juncture at which people are required to engage with an intensive information gathering process and are aware that their award may be reduced or ended as a result. Aaron's case illustrates the overwhelm and distress that can occur when this process is happening alongside a separate, onerous audit-related review.

Aaron approached his local CAB for help managing his social security entitlements, reporting that financial insecurity and feeling unheard were pushing him "over the edge". Aaron had informed DWP of a deterioration in his health in July 2024; yet by July 2025 a re-assessment had still not taken place, and the CAB had to support Aaron to restart the process. Soon afterward, Aaron was selected for a UC claim review and asked to provide documentation including bank statements. Aaron explained via his journal "I had a relapse with PTSD and will reach out to my veteran adviser for support. I have had a really horrible last few weeks"; this disclosure of distress did not elicit any easing of requirements or additional time to access support. The adviser observed that Aaron's "mental health is so unstable that any stressors will put him at risk of harm."

However, scheduled reviews also offer an opportunity to gather information for audit in a less intrusive manner that will feel seamless to a person already being asked to, and expecting to, provide information at this point. In this scenario, only any additional information not already collected through the scheduled review process would need to be gathered. Sampling could be carried out across a group of cases with the same scheduled review date.

CAS proposes that information for audit purposes should be gathered almost invisibly alongside information for a scheduled review, minimising the amount of information needed and linking it to a process already associated with requests for information.

It is important to note that the scheduled and unscheduled review process is itself a subject of continuous learning work to improve the accuracy of decision making. The



process for estimating fraud and error in the Scottish social security system should complement quality assurance processes that ensure decision-making is accurate and consistent with legislative and caselaw requirements.

6. *Do you agree or disagree with the proposal that an individual who is **entitled to benefit but is not receiving any payments because it has been suspended or nil rated should not be required** to provide fresh information for audit?*

Agree

The example of Adult Disability Payment demonstrates that the suspension of complex Scottish social security payments occurs only in specific circumstances where requesting audit information would be inappropriate. This includes situations where required information has not been provided in respect of a scheduled or unscheduled review process, or when Social Security Scotland becomes aware that a person is experiencing financial abuse. These are circumstances in which obtaining accurate additional information is unlikely, and work to ensure payments are correct is already ongoing.

A payment is nil rated if, for example, a person entitled to Pension Age Disability Payment or Child Disability Payment is settled in a care home beyond twenty-eight days. Legal detention and overlapping payments provisions can also result in nil rated awards in some circumstances. Since there is no risk of an overpayment, but there are risks of an underpayment (for example when periods in detention end), communication with people in these circumstances is important. An audit processes would potentially be difficult to complete and create unnecessary distress, whereas clear communication and guidance about how to report a change, combined with strategic data sharing arrangements, would be more likely to promote accurate payments.

7. *Are there any **other categories of individual you think should not be required to provide fresh information for audit** that have not been identified in the proposed categories?*

Individuals who have left an abusive relationship, or experienced homelessness, within the last twelve months, should be exempt from audit. Discretionary extensions must be built in. Michaela's experience illustrates the specific barriers victim-survivors face when engaging with information for audit requests. Michaela's case also highlights the limited value of making such requests at a time when significant engagement with the agency is likely to be happening anyway.



Michaela approached her local CAB for support to reach financial stability after fleeing an abusive relationship. Michaela is caring for a baby on her own, while also managing her own ill health. Her ex-partner continues to claim Carers Allowance despite no longer acting as Michaela's carer. Michaela attempted to report the change but couldn't as the claim is in her ex-partner's name. Michaela was advised to contact her ex-partner to request that he end the claim; given that she has fled abuse, it is clearly not reasonable for her to do so. Meanwhile, she is having to manage the process of transferring responsibility for a child-related social security payments into her name. Michaela has found this process overwhelming; she still feels as though her ex-partner has a form of control over her.

People whose Scottish Child Payment (SCP) award has been put back into payment within 12 weeks of ending should be exempt. This matters because short breaks in payment are often caused by how UC eligibility is assessed rather than a genuine change in circumstances. People in this situation-like Sarah- are already dealing with an unstable income and navigating a stressful DWP administrative process.

Sarah sought advice from her local CAB about managing her SCP claim. Sarah is a lone parent in receipt of UC; she works on a part-time basis and is paid four weekly. She received a letter from Social Security Scotland stating that she doesn't qualify for SCP as she doesn't receive a qualifying benefit. Sarah is paid 4 weekly, meaning that there are some months where it appears she receives two wages in one UC month, reducing her UC entitlement to nil. This left Sarah acutely anxious about how to make ends meet.

Given the importance of Scottish Child Payment in tackling child poverty, it is vital that auditing does not reduce the simplicity of the payment.

Summary

Advice services, which offer the essential support when required by people to navigate requests for information, will play a vital role in achieving the objectives of the new audit powers while optimising outcomes for people.

Scotland's social security system has been built on a set of foundational values³ which recognise that social security provides a vital safety net and springboard, and as such is an investment in Scotland's people. These principles are reflected in Social Security

³ [Social Security \(Scotland\) Act 2018](#)



Scotland's Charter, which sets out what people can expect when engaging with the agency. The development of the audit process be undertaken within this framework.

If the audit process is to effectively estimate fraud and error it must be very clear from the outset how it will operate in practice - what sort of information might be requested and the level of detail that will be required. Information requested for audit must not be so extensive as to be in essence a duplication of the scheduled review process. It must be made very clear that the information is being gathered to support Social Security Scotland to discharge its legal duty to ensure that payments are correct-not to investigate individuals.

The aim of these audit powers is to produce robust measures of fraud and error, without placing unnecessary or unfair burdens on people. This must be the anchoring principle of the use of the new powers. Requests for information must be proportionate-which must mean that the manner in which information is gathered must be proportionate as well as the type of information. The overriding consideration must be to ensure that the process treats people with dignity, fairness and respect.

Asim is receiving ongoing support from his local CAB. Asim fled conflict and has been living in Scotland for the last ten years; he lives with PTSD and paranoid thoughts. His UC claim was selected for review. Asim speaks English as a second language and he struggled to engage with the requests received-his CAB adviser was prevented by the DWP from speaking on his behalf. Asim was subject to what the adviser describes as a line-by-line interrogation of his bank statements-his religion was referenced. It took more than five attendances at the CAB to complete the review. Asim is eager for support to access work, having found purpose in supporting property maintenance. He has now lost trust in available support to find a job, having experienced the review process as distressing, humiliating and degrading.

It will be critical to be fully aware when developing the process that, for the UK equivalent of ADP, Personal Independence Payment, levels of underpayments⁴ (most frequently due to underreporting of a deterioration in health) are substantially higher than levels of fraud⁵. The audit process must therefore be communicated and delivered in a way that incentivises rather than deters people from reporting changes. It must

⁴ [Unfulfilled eligibility in the benefit system: financial year ending \(FYE\) 2026 estimates - GOV.UK](#)

⁵ [Fraud and error in the benefit system: Financial Year Ending \(FYE\) 2026 estimates - GOV.UK](#)



empower people and the agency to communicate, rather than placing an additional strain on people and fostering mistrust.

About Citizens Advice Scotland

Citizens Advice Scotland (CAS) is the membership body that represents The Citizens Advice network, Scotland's leading advice charity. Advisers across all corners of the country work in Citizens Advice Bureaux (CAB) to provide free, impartial and confidential advice. The Extra Help Unit (EHU) is a statutory service supporting people and small businesses in vulnerable circumstances with energy and postal complaints across Great Britain. They also support heat network customers in Scotland. Each year our network helps hundreds of thousands of people, putting millions of pounds back in people's pockets. By looking at a person's complete circumstances, CAS has an unparalleled insight into the scale and complexity of what's happening in communities throughout Scotland.

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