



Scottish Commission on Social Security (SCoSS): Annual Report and Accounts 2024 - 2025

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1. Chairs' Statement and overview of the performance report

I am pleased to present my first annual report and accounts as Chair of the Scottish Commission on Social Security (SCoSS) for 2024-25 and the Commission's sixth annual report and accounts since the establishment of the Commission in 2019.

Since taking up the position of Chair, in August 2024, it has been clear that the focus of the Commission is beginning to shift from scrutiny of the initial devolution of social security benefits to consideration of draft regulations that seek to amend existing devolved benefits. This has a subsequent impact of the depth and extent of our scrutiny workload with reports often within restricted timescales. We anticipate that this change in focus will continue in 2025-26 as the initial devolution of benefits approaches its conclusion.

The 2024-25 financial year marked a number of significant milestones in the development of the Commission. Firstly, the Charter Sub-Committee which met for the first time in April 2024 published our first report under our duty to, from time to time, consider whether the expectations in the social security charter are being met. We considered the experiences of people with communication needs interacting with the devolved social security system, and our report represents not only the culmination of an extensive period of scrutiny work but also a positive milestone in the development of our scrutiny work.

Secondly, the conclusion of the parliamentary passage of the Social Security (Amendment) (Scotland) Act 2025 will result in significant, welcome changes to the governance of the Commission. The 2025 Act provides for an extension to the Commission's remit and for the removal of the Commission's 'body corporate' status and the requirement for external audit of the Commission's annual report and accounts. We expect that regulations will come into force in 2025-26 that will commence these provisions. Once the regulations have come into force, we intend to review our governance arrangements. Accordingly, it is our expectation this annual report and accounts will be the last occasion when the Commission is subject to external audit. On behalf of SCoSS, I thank colleagues in Audit Scotland for the exceptional work they have undertaken in delivering the external audit requirement.

We are able to undertake effective scrutiny thanks to the expertise of our members and the engagement of stakeholders with our scrutiny work. Our annual report and accounts for 2024-25 demonstrate that SCoSS is utilising the public monies we are allocated in an effective and responsible manner that is achieving best value and bringing about positive change for those who receive social security assistance. The SCoSS Board has reviewed this report and is satisfied that it provides an accurate account of its work and finances in 2024-25.



Ed Pybus, Chair, Scottish Commission on Social Security

2. Performance Report

2.1 Overview

The Performance Report describes the Scottish Commission on Social Security's—

- Purpose: its main statutory roles and its membership
- Performance: how well it exercised its functions, performed its statutory roles and contributed towards improving the system for social security in Scotland
- Continuous improvement: the steps the SCoSS Board has taken to ensure its work can be as effective as possible
- Risks that could affect SCoSS's performance and the action taken to mitigate them
- Strategies and governance: the strategies SCoSS has agreed to ensure strong governance
- The Chairs' statement and overview of the performance report also form part of the Performance Report.

Purpose and Structure

The Scottish Commission on Social Security (SCoSS) is an independent public body established by the [Social Security \(Scotland\) Act 2018](#) ('the 2018 Act'). It provides expert advice to Scottish Ministers and the Scottish Parliament on devolved social security matters.

The 2018 Act sets out the functions of SCoSS which can be summarised as follows—

1. SCoSS must be consulted by the Scottish Government on most regulations about social security assistance made under the 2018 Act. SCoSS scrutinises and reports on draft regulations. The Scottish Government may change its regulations after considering SCoSS's recommendations. When it lays the regulations in the Scottish Parliament, it must publish its response to SCoSS's report at the same time. The Scottish Parliament's Social Justice and Social Security Committee then scrutinises the regulations and may take evidence from SCoSS members when it does so.
2. SCoSS must report, from time to time, to Scottish Ministers and the Scottish Parliament on whether the expectations in the [Scottish Social Security Charter](#) ('Our Charter') are being met and make recommendations for improvement if they are not. It must consider reporting if it receives evidence that the Charter expectations are frequently not being fulfilled.
3. In addition, Scottish Ministers and the Scottish Parliament can ask SCoSS to report on any matter relevant to social security.

In undertaking its statutory duties, SCoSS takes full account of the social security principles contained within the 2018 Act and of relevant human rights obligations as defined by the 2018 Act.

SCoSS Board members are non-executive public appointments made by the Scottish Ministers in line with the Code of Practice for Ministerial Public Appointments in Scotland. The 2018 Act allows up to five Commissioners to be appointed. The Chair is responsible for providing leadership to ensure that the Board delivers its functions efficiently and effectively. The Chair is also accountable to the Scottish Ministers. The role of Board members is to provide direction, support and guidance to ensure that SCoSS delivers its functions effectively and efficiently, in accordance with the 2018 Act. SCoSS members were originally appointed for periods of three or four years. Members may devote up to 36 days a year to perform their functions, apart from the Chair, who may devote up to 60 days per annum. SCoSS is supported by a secretariat employed by the Scottish Government.

As noted in last year's annual report, Judith Paterson and Dr Mark Simpson were appointed as Interim Co-Chairs in August 2023 until 31 July 2024. At the same time, a temporary Board Member, Dr Jackie Gulland, was appointed to the Board by the Cabinet Secretary for Social Justice with the term of appointment also ending on 31 July 2024. Following a successful recruitment exercise, the Cabinet Secretary appointed Ed Pybus as Chair and Adam Bennett as a Member of the Commission with both terms of appointment starting on 1 August 2024. On 1 August 2024, Judith Paterson and Dr Mark Simpson reverted to their original positions as Members of the Commission. Accordingly, since August 2024 the Board has consisted of a Chair and four permanent members. References to the Board in this report refer to the Board as from 1 August 2024.

During the course of the reporting year, SCoSS scrutinised and reported on nine draft regulations. The Commission established a Charter Sub-Committee, which met for the first time in April 2024, and supported the Commission's scrutiny of the operation of the Social Security Charter in line with the Commission's statutory function in this regard. The Commission produced its first report under this statutory function, considering the experience of people with communication needs who had engaged with the devolved social security system, in March 2025.

SCoSS has held eleven Board meetings during the reporting period as well as a number of ad-hoc meetings. Ad-hoc meetings tend to be held to consider draft scrutiny reports or to undertake line-by-line scrutiny of draft regulations in order to ensure that scrutiny deadlines are met.

In 2024-25, all Board meetings were conducted virtually with the exception of the November Board meeting which was held at the Scottish Government building at Atlantic Quay in Glasgow. To ensure that all Commission decision-making and proceedings are transparent, the minutes of all formal SCoSS Board and Sub-Committee meetings are published on the SCoSS website. All SCoSS scrutiny reports and corporate documents are also available on the SCoSS website.

SCoSS's vision and strategic objectives

The SCoSS [Business Plan 2024-25](#) set out the vision, strategic objectives and key priorities for the reporting period. The SCoSS Board reviews progress, on a quarterly basis, against the objectives and priorities set out in the Business Plan and this is considered later in this report. The vision set out in the 2024-25 Business Plan was—

“We want a robust, effective, efficient Scottish social security system that meets its full potential to improve outcomes for the people of Scotland. We want to help achieve this by providing independent expert advice”.¹

Governance

The 2018 Act provides the legislative basis for SCoSS. As an advisory Non-Departmental Public Body (NDPB), the SCoSS Framework Document sets out the broad framework within which SCoSS operates and defines key roles and responsibilities which underpin the relationship between SCoSS and the Scottish Government. SCoSS Standing Orders govern the operation of the Board and the Audit and Charter Sub-Committees. SCoSS adheres to best practice principles and relevant guidance regarding corporate governance, primarily as set out in [‘On Board: a guide for members of statutory boards’](#). The Audit Sub-Committee provided oversight of SCoSS finances and governance. The Board also considered the Commission’s budgetary position and risk register on a quarterly basis.

The Commission’s [‘Framework Document’](#) sets out the broad framework which the Commission operates within specifically with regard to the Scottish Government. The framework document was updated and, following approval from the Cabinet Secretary for Social Justice, published in June 2024.

The Social Security (Amendment) (Scotland) Act received royal assent on 23 January 2025. The 2025 Act provides for the extension of the scrutiny remit of the Commission as well as removal of the body corporate status of the Commission and the requirement to produce externally audited annual reports and accounts. The 2025 Act replaces this latter requirement with a duty to publish an annual report. Regulations giving effect to the provisions of the 2025 Act came into force on 10 May 2025².

In terms of the Secretariat staffing complement, the 2023-24 annual report noted the decision not to fill a vacant post. Accordingly, in 2024-25 the Secretariat consisted of five members of staff. In December 2024, the Analysis and Participation Officer post within the Secretariat became vacant. As a result, the Secretariat consisted of four members of staff from December 2024 to the end of the reporting period.

¹ SCoSS Business Plan 2024-25, p.4.

² [The Social Security \(Amendment\) \(Scotland\) Act 2025 \(Commencement No. 1 and Saving and Transitional Provisions\) Regulations 2025](#)

Overall Performance

During the reporting period, SCoSS reported on all draft regulations that were referred by Scottish Ministers. Therefore, SCoSS performance met expectations over the reporting year. Further information on our performance is detailed below.

Within the reporting period of these accounts, SCoSS produced nine substantive reports on draft regulations.

During 2024-25, SCoSS made 53 recommendations to the Scottish Government. Four reports were submitted to the Scottish Government in the last quarter of 2024-25 and responses to three of these reports are expected later in 2025. Due to changing circumstances no response was required from the Scottish Government to our letter in respect of the Winter Heating Assistance (Pension Age) (Scotland) Regulations 2024 which did not include any recommendations.

In the remaining five reports which the Scottish Government has responded to in 2024-25, SCoSS made 34 recommendations of which 22 (65%) were accepted, five (15%) partially accepted and five (15%) rejected. A further two recommendations (5%) were considered not applicable because of changes in Scottish Government policy in the intervening period. SCoSS made a further six observations. SCoSS appeared before the Social Justice and Social Security Committee once in May 2024 to discuss the Pension Age Disability Payment regulations.

Best Value

The principles of best value are firmly embedded across all of SCoSS's operations. Instead of reporting best value against specific projects and initiatives, we look at best value holistically.

2.2 Analysis of SCoSS's performance

The objectives and priorities for the year were set out in the SCoSS [Business Plan 2024-25](#). Performance against the strategic objectives and priorities in the Business Plan is considered below.

Strategic Objectives

Strategic Objective One - We will provide expert, independent and evidence-based scrutiny of draft social security regulations that is driven by the social security principles and human rights.

This approach has been taken to scrutiny of all nine sets of draft regulations in 2024-25 ensuring that the social security principles and equalities and human rights are central to scrutiny. These issues have, subsequently, been central to each scrutiny report.

In the course of producing scrutiny reports, the Commission has provided detailed insight as a result of the expertise provided by Commissioners and frequently drawn on feedback from stakeholder evidence s in interpreting the technicalities of social

security legislation at a practical level. Where appropriate, reports have detailed the relationship between the regulations and existing human rights laws. In addition, during 2024-25, the Commission would explicitly scrutinise a draft set of regulations via the use of a scrutiny template which provided for scrutiny of the draft regulations through the lens of the social security principles.

For example, our response to the draft Disability Assistance (Scottish Adult Disability Living Allowance) Regulations 2024 recommended that the Scottish Government monitor and consult with stakeholders on the potential impact on people in situations where they cannot reinstate entitlement to Scottish Adult DLA, in order to help meet the social security principle of continuous improvement. In response, the Scottish Government accepted the requirement to continue to monitor these provisions.

Meanwhile, our report on the draft Winter Heating Assistance (Pension Age) (Scotland) Regulations 2024 recommended that the Scottish Government should give consideration to the aims of the Public Sector Equality Duty and collect further relevant data to inform longer-term development of Pension Age Winter Heating Payment, as part of ongoing revisions of its equality impact assessment. The Scottish Government accepted this recommendation, highlighting that the three aims of the Public Sector Equality Duty would continue to inform its ongoing evaluation of the impact of the benefit.

Strategic Objective Two - We will provide independent challenge and advice on whether people are getting the service from the social security system that the Social Security Charter says they should expect.

Scrutinising whether the expectations set out in the Social Security Charter are being met informs all SCoSS scrutiny. Accordingly, assessing progress in ensuring people are obtaining the service the Charter says they should expect is a regular feature of our scrutiny reports.

The Commission established a Charter Sub-Committee which met for the first time in April 2024 and on a total of ten occasions in 2024-25. In March 2025, the Commission published a report on [‘people with communication needs and the Scottish social security system: fulfilling the expectations of ‘Our Charter’](#). This represents the Commissions’ first report, since the establishment of SCoSS, meeting the statutory requirement to report from time to time on whether the expectations in the Charter are being met. The report represented the culmination of a substantial scrutiny process undertaken by the Charter Sub-Committee in 2024-25. It is anticipated that the work of the Charter Sub-Committee will be an expanding area of the Commissions’ scrutiny in 2025-26 and subsequent years.

Strategic Objective Three - We will work alongside Scottish Ministers, the Scottish Government and the Scottish Parliament as well as other key stakeholders, such as people with lived experience, to ensure our work constructively supports the development of a Scottish social security system based on dignity, fairness and respect.

In May 2025, we published our first [‘Stakeholder Engagement Strategy’](#). The strategy outlines objectives and priorities to ensure the involvement of a variety of

stakeholders in the work of SCoSS with the aim of effective, appropriate and consistent engagement.

SCoSS has continued to develop external engagement with stakeholders, including people with lived experience, in undertaking scrutiny of draft regulations in 2024-25. For example, ten organisations attended a roundtable discussion in January 2025 offering views that supported our response to the draft Carer's Assistance (Young Carer Grant and Carer Support Payment) (Miscellaneous Amendment and Saving Provision) (Scotland) Regulations 2025. It is anticipated that our approach to stakeholder engagement will be further adapted based on such events.

As noted above, external engagement was also central to the work of the Charter Sub-Committee in the development of a report on people with communication needs. In the course of this work, we gathered first-hand views from over 70 people and direct quotes were used throughout our report highlighting key areas of interest raised in focus groups with people with communication needs themselves and structured interviews held with representatives of organisations with a specific interest in the experiences of people with communication needs. Stakeholder engagement is expected to continue to be an on-going feature of the Sub-Committees' scrutiny work in 2025-26.

SCoSS has sought to develop constructive relationships with Scottish Government officials and sought feedback from officials on the impact of all our scrutiny work. Commissioners provided oral evidence once on our scrutiny reports to the Social Justice and Social Security Committee in 2024-25.

Strategic Objective Four - We will make engagement with people with lived experience of the Scottish social security system and engagement with other stakeholders central to our scrutiny.

SCoSS has continued to develop engagement with relevant external stakeholders and with people with lived experience of the devolved social security system across a range of scrutiny of draft regulations in 2024-25, for example engaging ten organisations in a roundtable discussion in January 2025 on the draft Carer's Assistance (Young Carer Grant and Carer Support Payment) (Miscellaneous Amendment and Saving Provision) (Scotland) Regulations 2025, as well as taking written evidence from other organisations.

Engagement with people with lived experience has also been central to the work of the Charter Sub-Committee. For example, in 2024-25, the Sub-Committee worked closely with ENABLE, the Health and Social Care Alliance Scotland and Young Scot to host a series of focus groups with people with communication needs to consider their experiences of the social security system. In total, we met around 70 people and their views and experiences were built directly into the report published in March 2025.

In order to promote its charter research report among stakeholders, SCoSS hosted a webinar on 12 May 2025. This was addressed by the Chair and SCoSS members who shared the research background and how it was undertaken, as well as findings and recommendations. Fifty-six stakeholders joined the event, with attendees from

across the Scottish Government, Social Security Scotland, other Commissions and third sector organisations. The webinar has also been made available through SCoSS's YouTube channel to allow for further engagement from stakeholders.

Strategic Objective Five - We will be transparent about how we make our decisions and make our information accessible and inclusive.

The Minutes of all SCoSS Board and Sub-Committee meetings are published on the SCoSS website and promoted via Twitter / X. All SCoSS scrutiny reports and corporate documents are available online. We have sought to promote the work of SCoSS via a quarterly newsletter to external stakeholders who have expressed an interest in receiving information about the work of SCoSS. Currently, we have 49 external stakeholders signed up to receive the newsletter and 4,718 followers on Twitter / X.

Strategic Objective Six - We will make the improvements to how we work that were recommended by the independent review of SCoSS, making sure we can deliver statutory functions within our budget.

The Improvement Plan, agreed following the independent review of SCoSS, has continued to be implemented during 2024-25. A revised Framework document setting out the relationship between SCoSS and the Scottish Government was published in June 2024. A review of all corporate documentation was concluded in April 2025. Recruitment to the SCoSS Board was completed in August 2024 including the appointment of a new Chair.

The Social Security (Amendment) (Scotland) Act 2025 received royal assent in January 2025. Secondary legislation giving effect to the provisions relating to the Commission came into effect on 10 May 2025. As a consequence, we will review the Framework Document in 2025-26 to take account of the new governance structure of the Commission and review and simplify our governance structures more generally.

The SCoSS budget allocation for 2024-25 was £450K. However, the budget allocation letter included provision for a mid-year finance review to review the in-year finance position and year-end projections. This review was completed in October 2024 and highlighted forecast budget pressures in 2024-25. Accordingly, the Accountable Officer proposed that the SCoSS budget allocation be revised to £480K. The SCoSS Board agreed a revised budget allocation letter in October 2024. The Commission delivered its statutory functions within the allocated budget in 2024-25.

Priorities

Scrutiny of draft social security regulations

We will undertake expert, independent, evidence-based scrutiny of draft regulations referred to us by the Scottish Government, including—

- **Draft Scottish Adult Disability Living Allowance Regulations**
- **Draft Funeral Expense Assistance Regulations**
- **Draft Pension Age Winter Heating Payment Regulations**
- **Draft Up-rating Regulations**
- **Draft regulations following from the parliamentary passage of the Social Security (Amendment) (Scotland) Bill.**

We will review our scrutiny processes to improve efficiency and make sure that reports and recommendations are clearly founded on human rights and the Scottish social security principles.

SCoSS has scrutinised and reported on all draft regulations referred to SCoSS within agreed timescales. The draft regulations scrutinised in 2024-25 were—

- Funeral Expense Assistance (Scotland) Amendment Regulations 2024;
- Disability Assistance (Scottish Adult Disability Living Allowance) Regulations 2024;
- Winter Heating Assistance (Pension Age) (Scotland) Regulations 2024 and a further response we produced to a second set of draft Winter Heating Assistance (Pension Age) (Scotland) Regulations 2024 (which were subsequently not enacted);
- Social Security (Up-rating) (Miscellaneous Amendments) (Scotland) Regulations 2025;
- Social Security (Best Start Grants, Best Start Foods, Funeral Support Payment, Scottish Child Payment and Winter Heating Payment) (Miscellaneous Amendment) (Scotland) Regulations 2025;
- Carer's Assistance (Young Carer Grant and Carer Support Payment) (Miscellaneous Amendment and Saving Provision) (Scotland) Regulations 2025 and a further response on an additional provision subsequently included in the Carer's Assistance (Young Carer Grant and Carer Support Payment) (Miscellaneous Amendment and Saving Provision) (Scotland) Regulations 2025; and
- Social Security (Cross-border Provision, Case Transfer and Miscellaneous Amendment) (Scotland) Regulations 2025.

Accordingly, we have formally reported on nine sets of draft regulations in 2024-25. We anticipate that scrutiny will be required, in 2025-26, for draft regulations arising from the parliamentary passage of the Social Security (Amendment) (Scotland) Act 2025.

In 2024-25, the Scottish Government accepted 22 out of 34 of SCoSS recommendations in 2024-25 to which it has responded to date. The Scottish Government also partially accepted 5 out of 34 recommendations made by the Commission.

We also provided informal commentary on proposed regulations to support the delivery of free school meals to Primary Six and Seven pupils in receipt of Scottish Child Payment.

The SCoSS Board regularly reviews its approach on conclusion of any scrutiny process, with time taken at Board meetings to consider improvements. Commissioners successfully trialled, in 2024-25, a more structured approach to consideration of the social security principles in relation to draft regulations as part of consideration of the original Draft Pension Age Winter Heating Payment Regulations and this has been adapted for other scrutiny processes.

Social Security Charter

- **We will expand the ways we learn directly from stakeholders and people with lived experience on whether people are getting the service that the Social Security Charter says they should expect.**
- **We will report on improvements that the Scottish Government could make to better deliver commitments in the Charter.**

In 2024-25, SCoSS undertook research with people with communications needs on their experiences of the social security system in Scotland in the context of commitments made in the social security charter. This provided an opportunity to expand our approach to learning directly from stakeholders and people with lived experience. In particular, with support from third sector organisations, SCoSS has hosted focus groups and undertaken direct interviews which have sought to gather their views and reflect on their experiences. Feedback from events is considered on an ongoing basis to consider where improvements can be made.

The Commission published a report on the experience of people with communication needs during 2024-25. This report represents the Commission's first report, since our establishment in 2019, on whether the expectations contained in the Social Security Charter are being delivered and improvements that could be made.

Work alongside Scottish Ministers, the Scottish Government, Scottish Parliament and key stakeholders.

- **We will develop a longer-term work programme, which we will share with Scottish Ministers and the Scottish Parliament, with a framework for dealing with requests for reports on social security that may be requested from us.**
- **We will engage proactively with, and when requested provide evidence to, the Scottish Parliament's Social Justice and Social Security Committee.**
- **We will hold workshops with Scottish Government and Social Security Scotland staff to improve the shared understanding of the role of SCoSS as our remit expands under proposals in the Social Security (Amendment) (Scotland) Bill.**

The Commission considered, in 2024-25, developing a longer-term work programme. However, we recognised that given we have a very limited awareness of forthcoming draft regulations in the medium term that developing such a programme is problematic. Accordingly, we do not consider that it is feasible to develop a longer-term work programme at present.

Commissioners have provided evidence to the Scottish Parliament's Social Justice and Social Security Committee when requested. In 2024-25, the Committee took oral evidence from us on The Disability Assistance for Older People (Scotland) Regulations 2024.

All scrutiny reports are proactively shared with the Committee including our charter research reports.

An extension to the SCoSS remit, as proposed in the Glen Shuraig review recommendations, is contained within the provisions of the Social Security (Amendment) (Scotland) Act 2025. The Chair has held, and will have further, discussions with Scottish Government and Social Security Scotland staff to improve the shared understanding as to the role and remit of SCoSS, following the commencement regulations giving effect to the relevant provisions of the 2025 Act having come into force.

Stakeholder engagement

- **We will implement our updated stakeholder engagement strategy which includes embedding lived experience within our scrutiny work.**
- **We will gather feedback from Scottish Government, Scottish Parliament and all stakeholders who contribute to SCoSS scrutiny.**
- **We will engage with the wider policy community to gather feedback on the impact of SCoSS scrutiny work.**

The Commission agreed a Stakeholder Engagement Strategy early in 2024-25 which is being implemented and includes ensuring that lived experience is at the heart of our independent advice. To date, implementation of the strategy has largely been embodied by charter research work which, as detailed above, has enabled us to directly engage with a range of people with experience of the social security system.

Feedback is proactively sought from officials following each scrutiny process through a survey of officials and this information is used to consider our approach to future scrutiny of draft regulations. Improvements to date have included the introduction of regular meetings between the Secretariat and officials during the scrutiny period and changes to our 'Engaging with SCoSS' document, further explaining the role officials play in supporting effective scrutiny.

The SCoSS Secretariat attended the Child Poverty Action Group Scotland conference in June 2024 and received positive feedback from Scottish Fiscal Commission and Scottish Parliament officials on the impact of SCoSS reports and our approach to communication.

Since August 2024, the Chair has initiated a process of engagement with the wider policy community, including the Scottish Human Rights Commission, the Poverty and Inequality Commission and the Social Security Advisory Committee to consider our respective roles and ongoing working relationships. The Chair also met with organisations providing direct advice and support to clients of Social Security Scotland to strengthen our relationships with these groups and learn more directly from individuals' experiences.

SCoSS sought to engage with stakeholders in the promotion of its charter research report on the experiences of people with communication needs of the Scottish social security system, including hosting a webinar on 12 May 2025. The event, which placed priority on ensuring accessibility among stakeholders (including through the provision of a sign language interpreter and an option to watch later) was attended by 56 people from across the Scottish Government, Social Security Scotland, various Commissions and third sector organisations.

Transparency and accessibility

- **We will publish all Minutes of SCoSS Board meetings, Sub-Committee meetings and scrutiny reports on the SCoSS website.**
- **We will improve the accessibility of the SCoSS website.**
- **We will make sure that we engage with stakeholders in an inclusive way.**

The minutes of all Board, Audit and Charter Sub-Committee meetings and all scrutiny reports were published on the SCoSS website in 2024-25. The Secretariat continues to monitor if there are ways to improve the accessibility of the website. Measures have previously been taken to improve the accessibility of the website and documents are provided in HTML and PDF formats and in alternative formats if requested.

SCoSS utilises 'X' (formerly Twitter) to promote all minutes of meetings and scrutiny reports. The SCoSS account has 4,718 followers on that social media platform. We also provide a quarterly newsletter to 49 individuals and stakeholder organisation that have signed up to receive the newsletter.

A key tenet of the aforementioned Stakeholder Engagement Strategy is ensuring that we engage with stakeholders in an inclusive way. As part of our recent charter research work we engaged closely with third sector partners, including RNIB Scotland, the Health and Social Care Alliance Scotland (and its members) and Young Scot, to design focus groups with inclusive research methods. For example, we held three separate focus groups with people with hearing loss in order to support different types of communication support needed by these groups. During this process we have shared initial findings with people who have engaged with us and we produced British Sign Language versions of the final report.

Governance

- **We will deliver on our corporate responsibilities, ensure that we create a sound governance framework and demonstrate value for money through our audited accounts.**
- **We will review governance, finance, performance and assurance framework and risk register on a quarterly basis at meetings of the Audit Sub-Committee.**
- **We will provide induction to new Board members and identify training opportunities for Members to support their role as a Board Member of an advisory NDPB.**
- **We will streamline our governance procedures as legal requirements on SCoSS for external audit are removed under proposals in the Social Security (Amendment) (Scotland) Bill.**

SCoSS has completed the external audit process which provides evidence that a sound governance framework is in place and operational as well as demonstrating value for money via the externally audited accounts. The 2023-24 annual report and accounts was laid in the Scottish Parliament on 13 September. Audit Scotland's 2023-24 Annual Audit report made one recommendation which has been implemented. A new framework document has been agreed in 2024-25. A review of all corporate documentation was completed in April 2025, including updating the Commission's Code of Conduct and Standing Orders.

Governance, finance, performance and assurance framework and risk register have been reviewed at all Audit Sub-Committee meetings. The Board also considers finance updates and the risk register on a quarterly basis.

An induction programme was put in place for a new Chair and Board Member who joined SCoSS on 1 August which was completed at the end of 2024. This included undertaking training provided by the Scottish Government Public Bodies Unit for new Board members.

Lastly, we intend to streamline our governance procedures once commencement regulations to give effect to the provisions in the 2025 Act have come into force and the 2024-25 external audit process has concluded. There will be a substantial reduction in governance following the removal of 'body corporate' status and the requirement to undergo external audit. This process will require the agreement of a new Framework Document, in 2025-26, to reflect the new governance status of the Commission.

Finance

Our current budget provides funding to cover all expenditure associated with operating SCoSS within the guidance of an advisory Non-Departmental Public Body. The SCoSS Board is supported by a secretariat of Scottish Government civil servants. The secretariat, along with our operational costs and members' fees, is funded from a Commission budget which is provided by the Scottish Government.

In 2024-25, the SCoSS Budget is £450,000. SCoSS will undertake a full mid-year review of its budgetary position in 2024-25, in what is anticipated to be a challenging financial environment.

SCoSS will fully comply with the requirements of external audit, undertaken by Audit Scotland, and will publish an Annual Report and Accounts which will also be laid in the Scottish Parliament.

SCoSS received, in April 2024, a budget allocation of £450K in 2024-25. The 2024-25 budget allocation letter was agreed by the Board in April 2024. The budget allocation letter included provision "to hold a mid-year finance review in October, with full support from the Sponsor Unit, to review the in-year finance position and year-end projections"³.

A mid-year review was undertaken jointly by the SCoSS Secretariat, Finance and Sponsor Unit and completed in October 2024. As a consequence the SCoSS Board and Accountable Officer agreed that the SCoSS budget allocation be revised to £480K in 2024-25.

SCoSS has fully complied with the requirements of the external audit process during the 2024-25 external audit process.

SCoSS scrutiny of draft regulations

In 2024-25, SCoSS produced nine substantive reports on draft regulations. Of the 34 recommendations made in these reports to which the Scottish Government has responded, 80% of SCoSS's recommendations were accepted, at least in part, by the Scottish Government (65% of recommendations were agreed to and 15% were partially agreed to). This high rate of acceptance, by the Scottish Government of our recommendations, combined with the provision of oral evidence to the Social Justice

³ Scottish Commission on Social Security Budget Allocation letter 2024-25, p.2.

and Social Security Committee, we consider to be indicative of a high level of impact resulting from our scrutiny work.

In undertaking scrutiny, SCoSS has not just made recommendations on the wording of draft regulations or on direct policy considerations, but has also considered the bigger picture. This reflects the fact that we are obliged to scrutinise draft regulations against the principles in the 2018 Act and these span the whole policy cycle from policy design through to continuous improvement.

This year, this has included the introduction of a new scrutiny template, explicitly highlighting the interaction between draft regulations, the social security principles⁴ and charter expectations.⁵ This has enabled SCoSS members to consider the broader impact of draft regulations and the consideration that has been given to them in the drafting of regulations when undertaking scrutiny. Each scrutiny report details these considerations.

Risks facing SCoSS

The SCoSS risk register is considered by the SCoSS Board on a quarterly basis following advice from the Audit Sub-Committee. The Audit Sub-Committee review the risk register at each meeting. Following the Audit Sub-Committee, the risk register is considered, including any changes proposed by the Sub-Committee, at the next meeting of the SCoSS Board.

Following the February 2025 meeting of the Audit Sub-Committee and subsequently the SCoSS Board, eight risks were identified and are reported upon in the risk register. These remained the risks contained in the risk register at the end of the reporting period and are detailed in the table below.

Risk	Response
Non- compliance with SG-SCoSS Corporate Governance Framework.	<p>There are regular meetings between the Secretariat and Scottish Government Sponsor Unit at which corporate governance issues are discussed. The Secretariat work closely with the Sponsor Unit to ensure that the governance framework, as set out primarily in the Framework document, is complied with.</p> <p>The Framework document was updated in 2024-25 to take account of recommendations resulting from the Glen Shuraig review. The coming into force of the provisions in the Social</p>

⁴ [Social Security \(Scotland\) Act 2018, Section 1.](#)

⁵ Social Security Scotland, 'Our Charter'.

	<p>Security (Amendment) (Scotland) Act 2025 relating to SCoSS will require the Framework Document to be updated to reflect the changed status and remit of SCoSS arising from the 2025 Act.</p>
<p>Failure by SCoSS to apply the relevant statutory controls and other controls that prevent fraud or mismanagement, misuse of the Budget. Caused by deliberately false claims, poor controls and operational procedures/guidance.</p>	<p>The Audit Sub-Committee agreed a range of recommendations, made by the Audit Adviser who left post in March 2024, to ensure that appropriate controls are in place. These recommendations have been implemented in 2024-25.</p> <p>These controls include bi-monthly meetings between Finance, Sponsor Unit and Secretariat at which SCoSS finances are discussed in detail.</p> <p>The Audit Sub-Committee receives a performance and assurance update at each meeting of the Sub-Committee. The update paper, which considers governance and finance issues, is jointly signed off by Finance, Sponsor Unit and Secretariat. The Sub-Committee also has a standing agenda item on 'losses and special payments'.</p> <p>Lastly, the external auditors from Audit Scotland also regularly hold private discussions with members of the Audit Sub-Committee at which Sub-Committee members have the opportunity to raise any concerns regarding the management of the SCoSS budget or any other relevant issues.</p>
<p>The Scottish Government is transitioning to a new IT system (Oracle Cloud) between end July to the start of October. This requires the closure of a number of SG corporate systems at various points during this transition period. Potential impacts could include delayed payments to Board Members and / or of payments to third parties for the provision of goods and services,</p>	<p>The Secretariat had regular contact with Oracle Cloud experts and the Pay Admin team to ensure an emergency payment process was put in place during the initial implementation of Oracle Cloud to ensure that fee claim payments continued to be made to Commission members.</p> <p>A range of 'workaround measures' have been put in place to enable payments to</p>

<p>such as assisting Charter research events.</p>	<p>'third parties' to be made although these are considerably more bureaucratic and time-consuming than was the case before the introduction of Oracle.</p> <p>Impacts arising from the introduction of Oracle Cloud are discussed at bi-monthly budget meetings with issues relating to Member's fee payments being incorrectly allocated. Finance have, and continue to, investigate these impacts.</p> <p>Lastly, we have been meeting with other advisory NDPB Secretariats of a similar size to meet and discuss issues associated with the transition and to relay issues jointly to Oracle Cloud experts.</p>
<p>Cyber Security - the potential of the website being hacked or breached in some manner by an external actor or of personal devices or email accounts being breached.</p>	<p>SCoSS has a contract in place with a third-party organisation, 'the Gate', for the maintenance and security of the SCoSS website. In addition, no personal data is hosted on the SCoSS website. All other IT systems, HR, Finance etc. are managed by the Scottish Government and subject to wider SG governance and risk frameworks. The importance of cyber-security, particularly with regard to the use of personal devices and e-mail addresses to conduct SCoSS business, is regularly communicated to Board Members and advice and support is provided by the Secretariat as necessary.</p>
<p>Loss of key Secretariat staff and Board Members may negatively impact effective management of the Commission's workload and meeting of statutory requirements and deadlines, including strategic objectives and priorities within the business plan.</p>	<p>The SCoSS Board is currently at full capacity, with a Chair and four Board members, after a successful recruitment round in Summer 2024.</p> <p>Within the Secretariat, the post of Analysis and Participation Officer which has been vacant since mid-December 2024 is expected to be 'filled' in August 2025.</p> <p>The size of the Board is set out in statute however the SCoSS Board is</p>

	<p>considering other means of bringing external expertise into the work of the Board. The resilience of the small Secretariat team is a regular subject of discussion between the Secretary of SCoSS and the Sponsor Unit.</p> <p>More generally, the implementation of the Glen Shuraig recommendations are intended to assist in providing improved resilience within the Board and Secretariat.</p>
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Finance report

In 2024-25, SCoSS was delegated a budget of £0.48m by Ian Davidson as the Accountable Officer. Last year's annual report and accounts stated that—

“SCoSS has been delegated a budget of £450K in 2024-25. Given the pay awards made in 2023-24 and 2024-25, staffing costs will increase in 2024-25. As of June 2024, forecast expenditure in 2024-25 is forecast to be £470K. The Audit Sub-Committee and Board are actively monitoring this position. As noted above, the Secretariat and Sponsor Unit will undertake a mid-year review of the financial position whilst the Secretariat and Scottish Government finance officials meet on a bi-monthly to monitor the budgetary position”.⁶

As noted earlier in this report, the mid-term review resulted in the Accountable Officer and SCoSS Board agreeing a revised budget allocation of £0.48m.

At year end, SCoSS had spent £0.43m, a £0.05m underspend against the budget. This underspend was “re-absorbed” into the overall Scottish Government spend at year end. It is worth noting that staffing costs have, in previous years, tended to account for the vast majority of SCoSS expenditure. This remained the case in 2024-25 when staffing costs accounted for 92% of SCoSS expenditure. For a full breakdown of SCoSS expenditure in 2024-25, please refer to Section 5 – Financial Accounts.

Forecast underspends presented to the Board during the reporting period tended to be higher than the end-year position. For example, the SCoSS Board was advised in February 2025 that expenditure in 2024-25 was forecast to be £444,796 as opposed to the end year position of £428,648. The level of underspend, against the allocated budget of £480K, reflected the impact of a staff vacancy in the Secretariat from December 2024 to the end of the reporting period. In addition, costs relating to the migration of the SCoSS website to Oracle Cloud in March 2025 were substantially lower than forecast.

⁶ SCoSS, Annual Report and Accounts 2023-24, p.17.

In terms of the variation in the pattern of spend, the Secretariat staff costs were broadly similar to the previous year albeit lower than forecast due to a vacancy within the Secretariat from December 2024 to the end of the reporting period. Board member fees increased as a consequence of an increase in the size of the Board in August 2024 from four to five members. Overall, this resulted in staff costs, including Board member fees, that were slightly higher than the previous year.

Non-staff cost expenditure increased by just under £9,000 as compared to expenditure in 2023-24. This increase was primarily due to costs associated with Charter scrutiny work and the costs associated with the publication and promotion of the report. There was also an increase in website costs related to the migration of the website to Oracle Cloud. Due to the challenging overall financial position, the Scottish Government sought collective action to reduce expenditure throughout 2024-25. This resulted in a substantial reduction in 'other expenditure' during the reporting period.

Projects

No projects were undertaken in 2024-25.

Ian Davidson

Ian Davidson

Accountable Officer (Deputy Director, Social Security Policy)

02 September 2025

3. Accountability Report

3.1 Corporate Governance Report

This section reports on who the Members and Accountable Officer are for SCoSS's governance framework and the Accountable Officer's responsibilities. SCoSS's governance, audit functions and risk management arrangements are discussed in the Performance Report and further expanded upon in the Framework Document.

The Co-Chairs' and Members' Report

The Co-Chairs and Members

The Social Security (Scotland) Act 2018 provides that there shall be a Chair and at least two but no more than four other members. The Chair and Members have been appointed to SCoSS by Scottish Ministers in line with the Code of Practice for Ministerial Public Appointments in Scotland. As of 31 March 2025 there were five Commissioners: Ed Pybus (Chair), Adam Bennett, Dr Marilyn Howard, Judith Paterson, and Dr Mark Simpson.

On 1 April 2024, the Board of the Commission consisted of four Commissioners: Judith Paterson (Interim Co-Chair), Dr Mark Simpson (Interim Co-Chair), Dr Marilyn Howard and Dr Jackie Gulland (Temporary Member). As noted in last year's annual report, appointments as Interim Co-Chairs ended on 31 July 2024. In addition, Dr Gulland's appointment as a temporary member also ended on the same date. The Chair, Ed Pybus, and Adam Bennett took up their positions on 1 August 2024.

The SCoSS Commissioners register any relevant interests in the SCoSS 'Register of Interests' which is published on the SCoSS website at—
[Register of Interests - Scottish Commission on Social Security](#)

The Accountable Officer for SCoSS is Ian Davidson, Deputy Director, Head of Social Security Policy, Scottish Government.

There were no personal data related incidents formally reported to the Information Commissioner's Office (ICO) during the reporting period (2024-25).

Statement of Accountable Officer's responsibilities

Under Schedule 1, Chapter 4 of the Social Security Act (Scotland) 2018, the Scottish Ministers have directed SCoSS to prepare for each financial year a statement of accounts in the form and on the basis set out in the Accounts Direction. The accounts are prepared on an accruals basis and must give a true and fair view of the state of affairs of SCoSS and of its income and expenditure, Statement of Financial Position and cash flows for the financial year.

In preparing the accounts, the Accountable Officer is required to comply with the requirements of the Government Financial Reporting Manual and in particular to—

- Observe the accounts direction issued by the Scottish Ministers, including the relevant accounting and disclosure requirements, and apply suitable accounting policies on a consistent basis;
- Make judgments and estimates on a reasonable basis;
- State whether applicable accounting standards as set out in the Government Financial Reporting Manual have been followed, and disclose and explain any material departures in the financial statements;
- Prepare the financial statements on a 'going concern' basis; and
- Confirm that the Annual Report and Accounts as a whole is fair, balanced and understandable and take personal responsibility for the Annual Report and Accounts and the judgements required for determining that it is fair, balanced and understandable.

The Permanent Secretary of the Scottish Government, as Principal Accountable Officer for the Scottish Administration, designated that Ian Davidson is the Accountable Officer for the Commission. The responsibilities of an Accountable Officer include responsibility for the propriety and regularity of the public finances for which the Accountable Officer is answerable, for keeping proper records and for safeguarding the Commission's assets, are set out in the Scottish Government Memorandum to Accountable Officers of Other Public Bodies and published within the Scottish Public Finance Manual.

- As Accountable Officer, I have taken all the steps that I ought to have taken to make myself aware of any relevant audit information and to establish that the Commission's auditors were aware of that information.
- So far as I am aware, there is no relevant audit information of which the auditors are unaware.
- I confirm that the annual report and accounts as a whole is fair, balanced and understandable and that I take personal responsibility for the annual report and accounts and the judgments required for determining that it is fair, balanced and understandable.

Governance Statement

As Accountable Officer, I have responsibility for maintaining a sound system of corporate governance and internal control that supports the achievement of SCoSS's policies, aims and objectives, set by Scottish Ministers, whilst safeguarding the public funds and assets for which I am personally responsible, in accordance with the responsibilities set out in the "Accountable Officer's Memorandum".

In the discharge of my personal responsibilities, I ensure organisational compliance with the Scottish Public Finance Manual (SPFM). SPFM is issued by the Scottish Ministers to provide guidance to the Scottish Government and other relevant bodies on the proper handling and reporting of public funds. It sets out the relevant statutory, parliamentary, and administrative requirements, emphasises the need for economy, efficiency, and effectiveness, and promotes good practice and high standards of propriety.

The Framework Document, drawn up by Scottish Government, sets out the broad framework within which SCoSS has agreed to operate. It does not convey any legal

powers or responsibilities. The relationship between the SCoSS Board and Scottish Ministers and the SCoSS Board and the Secretariat is outlined in Section 2.1 of this report entitled 'Purpose and Structure'.

Business at the Board and its Committees are governed through the Standing Orders which the Board approves and which are regularly reviewed. In addition, the Minutes of Board meetings are published on the SCoSS website.

In 2024-25, the SCoSS Board met a total of eleven times during the reporting period with the attendance rate of Board Members detailed below.

Member	Board Meetings attended
Ed Pybus (from 1 August 2024)	8
Adam Bennett (from 1 August 2024)	8
Dr Jackie Gulland (to 31 July 2024)	2
Dr Marilyn Howard	11
Judith Paterson	11
Dr Mark Simpson	11

In addition to the SCoSS Board, there are two sub-committees, namely the Audit Sub-Committee and the Charter Sub-Committee. The rules governing the operation of the sub-committees are set out in the Standing Orders.

The Board established an Audit Sub-Committee to support it in its responsibilities on risk, governance and assurance.

The Audit Sub-Committee advises the Board and the Accountable Officer on the effectiveness of the internal control system. This includes considering risk matters at each meeting, and scrutinising financial management and the annual report and accounts.

Membership of the Commission can be found in the Co-Chairs' and Members' Report. As of 1 April 2024, the Members of the Audit Sub-Committee were Judith Paterson and Dr Mark Simpson. The SCoSS Board agreed, on 31 October 2024, that the members of the Audit Sub-Committee are Ed Pybus (Chair), Adam Bennett and Judith Paterson.

The Audit Sub-Committee met on a quarterly basis in 2024-25. The minutes of all meetings of the Audit Sub-Committee are published on the SCoSS website.

The Charter Sub-Committee was established to manage the scrutiny work of the Commission in relation to the Social Security Charter. The rules governing the operation of the Charter Sub-Committee were agreed by the SCoSS Board in January 2024 and are set out in the SCoSS Standing Orders. As of 1 April 2024, the members of the Charter Sub-Committee were Dr Marilyn Howard and Dr Mark Simpson. The SCoSS Board agreed, on 31 October 2024, that the members of the Charter Sub-Committee are Ed Pybus, Dr Marilyn Howard and Dr Mark Simpson.

The Charter Sub-Committee met on ten occasions in 2024-25. The minutes of all meetings of the Charter Sub-Committee are published on the SCoSS website.

Since the establishment of SCoSS, no written authorities have been provided to the Accountable Officer; there have been no lapses of data security; and no significant risk-related matters have arisen.

Accountability for governance

The governance and accountability framework document, based on a Scottish Government document for use across all NDPBs, sets out the broad framework within which we operate and defines key roles and responsibilities which underpin the relationship between us and the Scottish Government. We are held accountable against this framework through regular accountability meetings with our sponsor department in the Scottish Government.

Financial management

The Scottish Government sets a budget for our administration. We allocate that budget internally based on activity required to deliver our core functions and our strategic priorities. That budget allocation is discussed with and approved by the Board. We carry out regular budget reviews of expenditure and the Board is presented with papers detailing our financial position on a quarterly cycle to enable oversight of our financial performance.

This governance statement relates to SCoSS's governance system as it applied during 2024-25 and up to the date of approval of the annual report and accounts. Scottish Government Internal Audit carry out a programme of reviews across the range of Scottish Government corporate systems which are used by SCoSS. No issues have been identified as a result of Scottish Government internal audit reviews that would affect SCoSS.

The operation of the governing Board is referred to at 'Purpose and Structure' [Section 2.1].

The main features that support regular monitoring, review and assurance are detailed in the Performance Report.

Risk management

We have a risk management framework which was subject to a major review in 2022. The framework sets out how we manage risk, and the different roles and responsibilities in the risk management cycle. The framework includes a corporate risk register which sets out our biggest and cross organisation risks. The framework includes the Board's risk appetite in a number of areas which drives our response to the risks that we face.

A detailed assessment of SCoSS's risk management arrangements is referred to at 'Risks facing SCoSS' [Section 2.2].

An assessment of corporate governance arrangements is provided in the Governance section of the Performance Report [Section 2.1].

An independent, external review of SCoSS governance was commissioned by the Scottish Government. An improvement plan implementing the recommendations of the review was progressed in 2024-25 and has now been fully implemented.

External Audit Recommendations: 2023-24

There was one recommendation from Audit Scotland in the 2023-24 audit which is noted below alongside commentary on the corresponding action taken. There were no outstanding recommendations from previous audits which required action.

2023-24 Recommendation One (Audit Sub-Committee): The audit sub-committee, with support from the secretariat, sponsor unit and SG finance, should perform a self-assessment using the checklist in the Audit Committee Handbook published by the Scottish Government.

On 14 November 2024, the Audit Sub-Committee considered and agreed an audit and assurance checklist using the checklist in the Audit Committee Handbook published by the Scottish Government.

3.2 Remuneration and Staff Report

All secretariat staff working for SCoSS are civil servants employed by the Scottish Government and bound by the Civil Service Code and other civil service requirements as to their conduct, impartiality and confidentiality. Changes to pay and conditions are made in line with wider Scottish Government arrangements. The SCoSS budget is reviewed to reflect any changes to staff remuneration.

Members of SCoSS, including the Chair, are non-executive appointments made by the Scottish Ministers in line with the Code of Practice for Ministerial Public Appointments in Scotland. The role of Members is to contribute their expertise to the development of high quality reports, provide direction, support and guidance to ensure the body delivers and is committed to delivering its functions effectively and efficiently and in accordance with the aims, policies and priorities identified within the 2018 Act.

The Chair and Members have been appointed to SCoSS through a public appointment round that is regulated and monitored by the Ethical Standards Commissioner. As such, their pay and conditions are the responsibility of the Public Appointments branch of the People Directorate within the Scottish Government.

Remuneration (daily fees), allowances and expenses paid to the Chair and Members must comply with the SG Pay Policy for Senior Appointments and any specific guidance on such matters issued by the Scottish Ministers.

SCoSS Board Member, Staff and Accountable Officer Costs

The analysis of board members costs, staff numbers and costs and accountable officer costs disclosed below, and the fair pay disclosure and exit packages, form the audited part of the remuneration and staff report.

Member	31 March 2025 £'000	31 March 2024 £'000
Ed Pybus, Chair, appointed 1 August 2024	10-15	-
Adam Bennett appointed 1 August 2024	0-5	-
Jackie Gulland – term ended 31 July 2024	0-5	0-5
Marilyn Howard	5-10	0-5
Judith Paterson – Co-Chair until 31 July 2024	5-10	10-15
Mark Simpson – Co-Chair until 31 July 2024	5-10	5-10

All full year equivalent remuneration above sits in the same bandings noted above.

Accountable Officer

Ian Davidson, Deputy Director, Social Security Policy, is the Accountable Officer for SCoSS during the reporting period. He is a full-time employee of the Scottish Government and his salary was paid directly from the Scottish Government budget. SCoSS did not contribute to his pay, benefits or pension. He also received no bonuses or benefits in kind.

Accountable Officer	31 March 2025 Basic Pay Range £'000	31 March 2025 Bonus Payments £'000	31 March 2025 Benefits in Kind £'000
Ian Davidson	90-95	0	0
Accountable Officer	31 March 2024 Basic Pay Range £'000	31 March 2024 Bonus Payments £'000	31 March 2024 Benefits in Kind £'000
Ian Davidson	85-90	0	0

Remuneration for the Accountable Officer reflects the total amount received in both his roles as Deputy Director of Social Security Policy and no apportionment has been made for his role as Accountable Officer of SCoSS.

In respect of the Accountable Officer's pension benefits, the liability sits with the Scottish Government.

Staff Report

The staff report contains information relating to staff numbers and costs. As of 31 March 2025, SCoSS did not employ any Senior Civil Servants. As noted above, the SCoSS Secretariat are all civil servants, employed by the Scottish Government and on Scottish Government Pay, Terms & Conditions.

FTE	31 March 2025	31 March 2024
Permanent staff	4	5
Temporary staff	0	0
Total	4	5

Staff costs for SCoSS, in 2024-25, are set out below.

Staff costs	2024-25 £	2023-24 £
Wages and Salaries	252,272	255,559
Social Security Costs	29,880	28,765
Other Pension Costs	72,761	70,378
SCoSS Board Members Fees	37,853	30,327
Staff Leave Adjustment	1,630	2,832
Total	394,396	387,861

Staff Composition & Sickness Absence

Due to the low number of staff working in SCoSS, this data cannot be disclosed without risk of identifying individual members of staff and breaching data security. This has therefore been omitted from the report.

Trade Union Time Disclosure

SCoSS had no employees who were relevant trade union officials during 2024-25.

Trade Union Time Regulations 2017 came into force on 1 April 2017. The regulations place a requirement on public sector employers to publish information relating to facility time taken by union representatives. There are no separate arrangements in place for us to publish information relating to facilities time and the requirements are covered within the main Scottish Government annual report and accounts. As an organisation, SCoSS is part of the Scottish Government main bargaining arrangements.

Exit Packages

There were no exit packages in 2024-25.

Fair Pay Disclosure

The FReM requires bodies to disclose the ratio of the mid-point of the highest paid director's remuneration to the median remuneration of the body's staff. The FReM also requires bodies to disclose the equivalent ratio for the staff member in the lower and upper quartile. In addition, the FReM also requires disclosure of the percentage change from the previous year for salary and allowances, performance pay and bonuses in respect of the highest paid director and the employees of the body taken as a whole.

SCoSS does not employ any staff or have any Board Members that fulfil the role of a Director or have Directorial responsibilities. In addition, the Accountable Officer does not have Directorial responsibilities and his principal role is as a Deputy Director (Social Security Policy) within the Scottish Government. The SCoSS Secretariat are all employed as Scottish Government civil servants. In addition, the staff complement within the SCoSS Secretariat is extremely small. The number of staff employed ranged from five members of staff to four members of staff towards

the end of the reporting period. On that basis, it is not considered to be appropriate or proportionate to make a fair pay disclosure given the organisational structure of SCoSS and the small number of individuals employed within SCoSS.

Equal opportunities and diversity

The Social Security Policy Division works in conjunction with SCoSS to ensure that HR policies, practices and systems comply with employment and equality legislation, and standards expected of public sector employers. All SCoSS's permanent staff, as Scottish Government employees, are covered by Scottish Government policies including its Delivering Diversity and Equality policy. Further to this, SCoSS also relies on Scottish Government disability policies, which covers areas such as how we fill posts, monitoring and discussing performance and providing reasonable adjustments.

The Scottish Government is also committed to providing all staff, including the SCoSS Secretariat, with opportunities for learning to help staff understand what valuing diversity means in practice, and how to take action to build an inclusive workplace culture.

The Chair and Board Member appointees also adhere to the Code of Practice for Ministerial Appointments to Public Bodies in Scotland in which Diversity and Equality remains a core principle and are expected to abide by the Civil Service Code.

They also have a responsibility to make sure that they are familiar with, and that their actions comply with, the provisions contained within the agreed Code of Conduct for Board Members which was approved in June 2022. The current Code of Conduct is in the process of being reviewed as part of the wider review of all corporate documentation.

3.3 Parliamentary Accountability Report

Contingent liabilities

SCoSS are required to disclose any legally enforceable undertakings given in the form of a guarantee or indemnity which would bind the body into providing the resources in the event of the guarantee or indemnity maturing; or a letter or general statement of comfort which could be considered to impose a moral financial obligation. SCoSS is also required to report any liabilities for which the likelihood of a transfer of economic benefit in settlement is too remote to meet the definition of contingent liability under IAS37.

There are no contingent liabilities, or remote contingent liabilities, to report.

Losses and special payments

In accordance with the SPFM, we are required to disclose losses and special payments above £300,000. During 2024-25, there were no losses or special payments within this criteria (2023-24: £nil).

Gifts and Charitable Donations

There were no gifts made during the year (2023-24: nil). There were no charitable donations made during the year (2023-24: nil).

Fees and Charges

The fees and charges guidance in the SPFM require charges at market rates whenever applicable. SCoSS has nothing to report for the period to 31 March 2025 relating to fees and charges.

Ian Davidson

Ian Davidson
Accountable Officer (Deputy Director, Social Security Policy)

02 September 2025

4. Independent Auditor's Report

Independent auditor's report to the members of Scottish Commission on Social Security the Auditor General for Scotland and the Scottish Parliament

Reporting on the audit of the financial statements

Opinion on financial statements

I have audited the financial statements in the annual report and accounts of Scottish Commission on Social Security for the year ended 31 March 2025 under the Public Finance and Accountability (Scotland) Act 2000. The financial statements comprise the Statement of Comprehensive Net Expenditure, the Statement of Financial Position, the Statement of Cash Flows, the Statement of Changes in Taxpayer's Equity and notes to the financial statements, including material accounting policy information. The financial reporting framework that has been applied in their preparation is applicable law and UK adopted international accounting standards, as interpreted and adapted by the 2024/25 Government Financial Reporting Manual (the 2024/25 FReM).

In my opinion the accompanying financial statements:

- give a true and fair view of the state of the body's affairs as at 31 March 2025 and of its net expenditure for the year then ended;
- have been properly prepared in accordance with UK adopted international accounting standards, as interpreted and adapted by the 2024/25 FReM; and
- have been prepared in accordance with the requirements of the Social Security (Scotland) Act 2018 and directions made thereunder by the Scottish Ministers.

Basis for opinion

I conducted my audit in accordance with applicable law and International Standards on Auditing (UK) (ISAs (UK)), as required by the [Code of Audit Practice](#) approved by the Auditor General for Scotland. My responsibilities under those standards are further described in the auditor's responsibilities for the audit of the financial statements section of my report. I was appointed by the Auditor General on 2 December 2022. My period of appointment is five years, covering 2022/23 to 2026/27. I am independent of the body in accordance with the ethical requirements that are relevant to my audit of the financial statements in the UK including the Financial Reporting Council's Ethical Standard, and I have fulfilled my other ethical responsibilities in accordance with these requirements. Non-audit services prohibited by the Ethical Standard were not provided to the body. I believe that the audit evidence I have obtained is sufficient and appropriate to provide a basis for my opinion.

Conclusions relating to going concern basis of accounting

I have concluded that the use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work I have performed, I have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the body's ability to continue to adopt the going concern basis of accounting for a period of at least twelve months from when the financial statements are authorised for issue.

These conclusions are not intended to, nor do they, provide assurance on the body's current or future financial sustainability. However, I report on the body's arrangements for financial sustainability in a separate Annual Audit Report available from the [Audit Scotland website](#).

Risks of material misstatement

I report in my separate Annual Audit Report the most significant assessed risks of material misstatement that I identified and my judgements thereon.

Responsibilities of the Accountable Officer for the financial statements

As explained more fully in the Statement of Accountable Officer's Responsibilities, the Accountable Officer is responsible for the preparation of financial statements that give a true and fair view in accordance with the financial reporting framework, and for such internal control as the Accountable Officer determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the Accountable Officer is responsible for assessing the body's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless there is an intention to discontinue the body's operations.

Auditor's responsibilities for the audit of the financial statements

My objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes my opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the decisions of users taken on the basis of these financial statements.

Irregularities, including fraud, are instances of non-compliance with laws and regulations. I design procedures in line with my responsibilities outlined above to detect material misstatements in respect of irregularities, including fraud. Procedures include:

- using my understanding of the central government sector to identify that the Social Security (Scotland) Act 2018 and directions made thereunder by the Scottish Ministers are significant in the context of the body;
- inquiring of the Accountable Officer as to other laws or regulations that may be expected to have a fundamental effect on the operations of the body;

- inquiring of the Accountable Officer concerning the body's policies and procedures regarding compliance with the applicable legal and regulatory framework;
- discussions among my audit team on the susceptibility of the financial statements to material misstatement, including how fraud might occur; and
- considering whether the audit team collectively has the appropriate competence and capabilities to identify or recognise non-compliance with laws and regulations.

The extent to which my procedures are capable of detecting irregularities, including fraud, is affected by the inherent difficulty in detecting irregularities, the effectiveness of the body's controls, and the nature, timing and extent of the audit procedures performed.

Irregularities that result from fraud are inherently more difficult to detect than irregularities that result from error as fraud may involve collusion, intentional omissions, misrepresentations, or the override of internal control. The capability of the audit to detect fraud and other irregularities depends on factors such as the skilfulness of the perpetrator, the frequency and extent of manipulation, the degree of collusion involved, the relative size of individual amounts manipulated, and the seniority of those individuals involved.

A further description of the auditor's responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website www.frc.org.uk/auditorsresponsibilities. This description forms part of my auditor's report.

Reporting on regularity of expenditure and income

Opinion on regularity

In my opinion in all material respects the expenditure and income in the financial statements were incurred or applied in accordance with any applicable enactments and guidance issued by the Scottish Ministers.

Responsibilities for regularity

The Accountable Officer is responsible for ensuring the regularity of expenditure and income. In addition to my responsibilities in respect of irregularities explained in the audit of the financial statements section of my report, I am responsible for expressing an opinion on the regularity of expenditure and income in accordance with the Public Finance and Accountability (Scotland) Act 2000.

Reporting on other requirements

Opinion prescribed by the Auditor General for Scotland on audited parts of the Remuneration and Staff Report

I have audited the parts of the Remuneration and Staff Report described as audited. In my opinion, the audited parts of the Remuneration and Staff Report have been properly prepared in accordance with the Social Security (Scotland) Act 2018 and directions made thereunder by the Scottish Ministers.

Other information

The Accountable Officer is responsible for the other information in the annual report and accounts. The other information comprises the Performance Report and the Accountability Report excluding the audited parts of the Remuneration and Staff Report.

My responsibility is to read all the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or my knowledge obtained in the course of the audit or otherwise appears to be materially misstated. If I identify such material inconsistencies or apparent material misstatements, I am required to determine whether this gives rise to a material misstatement in the financial statements themselves. If, based on the work I have performed, I conclude that there is a material misstatement of this other information, I am required to report that fact. I have nothing to report in this regard.

My opinion on the financial statements does not cover the other information and I do not express any form of assurance conclusion thereon except on the Performance Report and Governance Statement to the extent explicitly stated in the following opinions prescribed by the Auditor General for Scotland.

Opinions prescribed by the Auditor General for Scotland on Performance Report and Governance Statement

In my opinion, based on the work undertaken in the course of the audit:

- the information given in the Performance Report for the financial year for which the financial statements are prepared is consistent with the financial statements and that report has been prepared in accordance with the Social Security (Scotland) Act 2018 and directions made thereunder by the Scottish Ministers; and
- the information given in the Governance Statement for the financial year for which the financial statements are prepared is consistent with the financial statements and that report has been prepared in accordance with the Social Security (Scotland) Act 2018 and directions made thereunder by the Scottish Ministers.

Matters on which I am required to report by exception

I am required by the Auditor General for Scotland to report to you if, in my opinion:

- adequate accounting records have not been kept; or

- the financial statements and the audited parts of the Remuneration and Staff Report are not in agreement with the accounting records; or
- I have not received all the information and explanations I require for my audit. I have nothing to report in respect of these matters.

Conclusions on wider scope responsibilities

In addition to my responsibilities for the annual report and accounts, my conclusions on the wider scope responsibilities specified in the Code of Audit Practice are set out in my Annual Audit Report.

Use of my report

This report is made solely to the parties to whom it is addressed in accordance with the Public Finance and Accountability (Scotland) Act 2000 and for no other purpose. In accordance with paragraph 108 of the Code of Audit Practice, I do not undertake to have responsibilities to members or officers, in their individual capacities, or to third parties.



Lisa Duthie
Audit Director

Audit Scotland
8 Nelson Mandela Place
Glasgow
G2 1BT

02 September 2025

5. Financial Accounts

5.1 Introduction

This statement of accounts reports the results of the Scottish Commission on Social Security for the year from 1 April 2024 to 31 March 2025. It has been prepared in accordance with the Accounts Direction given by the Scottish Ministers under section 19(4) of the Public Finance and Accountability Scotland Act 2000. These financial statements were authorised for issue by Ian Davidson as the Accountable Officer, on 02 September 2025

5.2 Statement of Comprehensive Net Expenditure for the year ended 31 March 2025

	Note	2024-25 £	2023-24 £
Staff costs	2	394,396	387,861
Purchase of Goods & Services	3	34,252	25,319
Total Operating Expenditure		428,648	413,180
Net Operating Expenditure		428,648	413,180

No activities were discontinued during the year.

5.3 Statement of Financial Position as at 31 March 2025

	Notes	2024-25 £	2023-24 £
Non-Current Assets		0	0
Current Assets	4	26,433	30,034
Total Assets		26,433	30,034
Current Liabilities			
Trade & Other Payables	5	(26,433)	(30,034)
Total Current Liabilities		(26,433)	(30,034)
Total Assets less Liabilities		0	0
Taxpayers Equity and other reserves			
General Fund	SoCTE	0	0
Total Taxpayers Equity		0	0

Ian Davidson

Ian Davidson
Accountable Officer (Deputy Director, Social Security Policy)

02 September 2025

5.4 Statement of Cash flows for the year ended 31 March 2025

	Note	General Fund
		2024-25
Cash flow from Operating Activities		£
Comprehensive net expenditure for the year	SoCNE	(428,648)
Movements in working capital: Increase/(Decrease) in Payables ⁷	5	(3,601)
Net Cash flow from Operating Activities		(432,249)
Net Cashflow from Investing Activities		0
Cashflow from Financing Activities		(432,249)
Funding from Scottish Government	SoCTE	402,215
Funding from Scottish Government prior year ⁸	4	30,034
Net Cash Inflow from Financing Activities		432,249
Net Increase /(Decrease) in Cash & Cash Equivalents		0

⁷ Movements in working capital excludes movements in receivables which did not pass through the SoCNE.

⁸ This amount is funding received from the Scottish Government in relation to the prior year. The prior year funding is to cover accruals as SCoSS is funded on a cash basis.

	Note	General Fund
		2023-24
Cash flow from Operating Activities		£
Comprehensive net expenditure for the year	SoCNE	(413,180)
Movements in working capital: Increase/(Decrease) in Payables ⁹	5	6,675
Net Cash flow from Operating Activities		(406,505)
Net Cashflow from Investing Activities		0
Cashflow from Financing Activities		(406,505)
Funding from Scottish Government	SoCTE	383,146
Funding from Scottish Government prior year ¹⁰	4	23,359
Net Cash Inflow from Financing Activities		406,505
Net Increase /(Decrease) in Cash & Cash Equivalents		0

⁹ Movements in working capital excludes movements in receivables which did not pass through the SoCNE.

¹⁰ This amount is funding received from the Scottish Government in relation to the prior year. The prior year funding is to cover accruals as SCoSS is funded on a cash basis.

5.5 Statement of Changes in Taxpayer's Equity for the Year Ended 31 March 2025

	Notes	General Fund £
Balance at 31 st March 2024		0
Comprehensive net expenditure for the year	SoCNE	(428,648)
Funding Receivable ¹¹	4	26,433
Net Funding		402,215
Balance at 31st March 2025		0

	Notes	General Fund £
Balance at 31 st March 2023		0
Comprehensive net expenditure for the year	SoCNE	(413,180)
Funding Receivable	4	30,034
Net Funding		383,146
Balance at 31st March 2024		0

¹¹ Funding has been accrued in respect of the payables due. This receivable funding has been credited directly to the general fund and does not pass through the SoCNE.

5.6 Notes to the Accounts for the year ended 31 March 2025

1. Statement of accounting policies

In line with Schedule 1, Chapter 4 of the Social Security (Scotland) Act 2018, and in accordance with the accounts direction issued by the Scottish Ministers under section 19(4) of the Public Finance and Accountability (Scotland) Act 2000, these financial statements have been prepared in accordance with the Government Financial Reporting Manual (FReM) 2024-25 issued by HM Treasury.

The accounting policies contained in the FReM apply International Financial Reporting Standards (IFRSs) as adapted or interpreted for the public sector context. Where the FReM permits a choice of accounting policy, the accounting policy which is judged to be the most appropriate to the particular circumstance for the purpose of giving a true and fair view has been selected. The particular policies adopted by SCoSS are described below. They have been applied consistently in dealing with items that are considered material to the accounts.

In accordance with the FReM these accounts have been prepared on a going concern basis, which provides that the organisation will continue in operational existence for the foreseeable future.

(a) Accounting convention

The accounts are prepared under the historical cost convention modified to account for the revaluation of property, plant and equipment and intangible assets to fair value as determined by the relevant accounting standard.

(b) Value added tax

SCoSS is registered for VAT as part of the Scottish Government VAT group registration which is responsible for recovering VAT on behalf of the Commission. Irrecoverable tax is charged to the relevant expenditure category.

(c) Receivables

The accounts have been prepared on an accruals basis and all material amounts due as at 31 March 2025 have been brought into the account irrespective of when actual payments were received. These can be found below in Note 4.

(d) Payables

The accounts are prepared on an accruals basis and all material amounts outstanding as at 31 March 2025 should be brought into account irrespective of when actual payments were made. These can be found below in Note 5.

(e) Pensions

Pension benefits are provided through the Principal Civil Service Pension Scheme (PCSPS) and the Civil Service and Other Pension Scheme (CSOPS). These are unfunded multiemployer defined benefit schemes in which SCoSS is unable to identify its share of the underlying assets and liabilities of the scheme. Therefore, SCoSS has accounted for the contributions to the scheme as if it was a defined contribution scheme. This is in accordance with FReM requirements.

(f) Short Term Employee Benefits

A liability and an expense are recognised for holiday pay and other short term benefits when employees render their service thereby increasing their entitlement to these benefits. Accruals are recognised for material amounts in respect of these benefits earned but not taken or paid at the date of the Statement of Financial Position.

(g) Going concern

The accounts have been prepared on the going concern basis, which provides that the organisation will continue in operational existence for the foreseeable future. SCoSS has no reason to believe that Scottish Ministers intend to withdraw support to the organisation, and funding for 2025-26 has been confirmed in the Budget Act. It is therefore considered appropriate to prepare the accounts on a going concern basis. An operating budget will be set annually as part of the SG's normal budget process.

In addition, the provisions within the 2025 Act relating to SCoSS came into effect on 10 May 2025 and the changes made by the 2025 Act does not have any impact on the going concern assessment.

(h) Disclosure of new accounting standards

SCoSS has considered the impact of new accounting standards issued and there is no expected impact on SCoSS.

2. Staff costs

Staff costs in 2024-25 amounted to £394,396 (2023-24 - £387,861). Staff costs include directly-employed staff, interim managers & staff related expenditure. A breakdown of these costs is given in the Remuneration and Staff Report.

3. Purchase of Other Goods & Services

	2024-25 £	2023-24 £
Audit Fee	8,630	8,470
Conference / Focus Groups	7,204	0
Publications	3,165	0
Travel & Subsistence	325	573
IT	7,810	7,444
Website Costs	7,038	4,276
Other Expenditure	80	4,556
Total	34,252	25,319

4. Trade Receivables & Other Current Assets

	2024-25 £	2023-24 £
Other Receivables	26,433	30,034
Total Receivables	26,433	30,034

£26,433 (2023-24 - £30,034) other receivables is for cash from Scottish Government Funding that will be used to cover the 2024-25 accruals balance when paid next year.

5. Current Liabilities

	2024-25 £	2023-24 £
Audit Fees	3,208	5,730
Staff Flexi Leave Accrual	3,535	2,628
Staff Annual Leave Accrual	15,482	14,759
Other	4,208	6,917
Total Payables	26,433	30,034

6. Depreciation & Impairment Charges

SCoSS does not have any assets and there have been no impairments.

7. Other Operating Expenditure

SCoSS does not have any Other Operating Expenditure.

8. Property, Plant and Equipment

SCoSS did not have any assets or IFRS 16 leases, as at 31 March 2025.

9. Related Party Transactions

SCoSS is an advisory non-departmental public body and it considers that the Scottish Government is a related party within this context. During the year the Commission has had a number of material financial transactions with the Scottish Government including—

- All permanent staff are Scottish Government employees;
- SCoSS uses Scottish Government estates, HR & Financial systems and relies on a number of other Scottish Government services;
- SCoSS ledger is part of the wider SG Core accounts hierarchy;
- All financial transactions are set up, processed and paid via Scottish Government financial systems; and
- Neither the Board Members nor any key managerial staff have undertaken any material transactions with SCoSS during the year.

10. Capital Commitments and contingent liabilities

There are no capital commitments or contingent liabilities.

11. Third Party Assets

SCoSS has no third party assets to report.

12. Events after the reporting period date

There have been no further events after the end of the reporting period to report or which would have a material effect on the accounts.

6. Annex: Accounts Direction

Scottish Commission on Social Security

DIRECTION BY THE SCOTTISH MINISTERS

1. The Scottish Ministers, in accordance with Schedule 1 (Chapter 4(12)) of the Social Security (Scotland) Act 2018 hereby give the following direction.
2. The statement of accounts for the financial period ended 31 March 2021, and subsequent years shall comply with the accounting principles and disclosure requirements of the edition of the Government Financial Reporting Manual (FReM) which is in force for the year for which the statement of accounts are prepared.
3. The accounts shall be prepared so as to give a true and fair view of the income and expenditure and cashflows for the financial year, and of the state of affairs as at the end of the financial year.
4. This direction shall be reproduced as an appendix to the statement of accounts.

Signed by the authority of the Scottish Ministers.

Dated 18 May 2021

Yours sincerely,



Ian Davidson
Deputy Director
Scottish Government
Social Security Directorate