

## Audit and Assurance Committee

<b>Date of Meeting</b>	Tuesday 16 <sup>th</sup> May 2023
<b>Subject</b>	Register of Compliance Obligations Update
<b>Agenda No.</b>	11
<b>Prepared By</b>	Corporate Assurance Team
<b>Purpose</b>	Note

### 1. Background

- 1.1. The Corporate Assurance Team within Social Security Scotland are responsible for ensuring we meet the expectations on us as a public body and monitor the delivery of our statutory functions under the Social Security (Scotland) Act 2018.
- 1.2. This is the bi-annual report on the progress of the Register of Compliance Framework.

### 2. Public Body Duty Updates

- 2.1. We have highlighted specific areas of work we wanted to bring to the Committee's attention. We have not provided the full Register of Compliance Obligations alongside this paper, but this is available on request.

#### Website and Mobile Applications Accessibility Regulations

- 2.2. The Social Security Scotland website is compliant and holds an accessibility statement confirming it is Web Content Accessibility Guidelines (WCAG) compliant.
- 2.3. However, around 50 business application have been found not to be WCAG compliant. Of these applications, only one business application currently has a timeline and roadmap to reach compliance by the end of April. There are no roadmaps in development for the remaining business applications due to resourcing constraints within the agency.

If our systems/ software does not meet Web Content Accessibility Guidelines (WCAG) 2.1 AA compliance, then colleagues who require assistive technologies or require technical adjustments may be unable to carry out their full role in alignment with expectations. This could result in staff morale or turnover, inability to meet our commitment of employees reflecting the people of Scotland, reputational damage to Social Security Scotland, potential breach of legislation and associated Employment Tribunal claims.

- 2.4. A number of recommendations have been accepted by Agency Leadership Team to help drive improvements, including the implementation of an

Accessibility team that will have responsibility for defining and delivering the Accessibility strategy. Accessibility Programme colleagues are currently working on a reporting dashboard which will help the agency understand its current performance on accessibility. This is still in development with no confirmed timeline.

### Scottish Administrative Exercise

- 2.5. The programme team have experienced a change in leadership and are now delivering a handbook for Scottish Admin Exercises which includes the path each exercise should follow and template notifications. The delivery date for this is the 31st May.
- 2.6. Programme are looking to replicate this handbook for Legal Entitlement & Admin Practices. The Department for Work and Pensions and Social Security Scotland are currently in discussions around the design for Legal Entitlement & Admin Practices activity coming across into the agency. However, the end date for Legal Entitlement & Admin Practices is still 31st May.

### Health and Safety at Work Act 1974

- 2.7. We are committed to providing and maintaining a working environment that ensures the health, safety, and wellbeing of our colleagues; and of members of the public, contractors, and visitors when they are in our buildings.
- 2.8. Our [Health and Safety Policy](#) lays out our responsibility to our people and our arrangements in the organisation to comply with the Health and Safety at Work Act 1974.
- 2.9. This policy forms part of our organisation's health and safety strategy and plan. It has been consulted upon and agreed at the Health and Safety Committee as part of our health and safety governance. This policy will be reviewed periodically in line with good practice. The policy was updated and published internally on 29<sup>th</sup> March 2023

## 3. Statutory Functions

- 3.1. We have mapped out statutory functions under the Social Security (Scotland) Act 2018 and regularly seek evidence from business areas on compliance with the Act. Specific developments which the Committee may wish to note include our duties under the Act in relation to the delivery of new benefits.
- 3.2. The Corporate Assurance Team continue to map out obligations and gather evidence at the introduction of each new benefit to provide assurance to the Accountable Officer and Committee that each legal requirement is met. This activity follows the mapped statutory functions within the act, for example – Duty to promote Take-up, Recognition of Importance of inclusive communication and accessible communication, The evidence reviewed can

include specific operational guidance and letters which must be in place for each benefit.

- 3.3. The corporate assurance team have assigned leads to each area of the business so that there is a single point of contact for providing support and gathering updates on our statutory functions.

## 4. Conclusions

- 4.1. The Committee are asked to note the contents of the report and your attention is drawn to the specific areas of non-compliance highlighted in this report. The risk highlighted in Section 2.3 is listed within Chief Digital Office risk register, highlighting specific key controls and mitigating actions currently in place.
- 4.2. This is our seventh progress report on the Register of Compliance Obligations and as we mature our compliance function the team would welcome any comments the Committee has on format, frequency and content of this report.
- 4.3. A copy of this paper will be shared with the Executive Advisory Body.

## 5. GOVERNANCE CHECKLIST

Please ensure that you detail which Corporate Plan Strategic Objective the paper contributes to. These strategic considerations should be used to assist you with the content of your paper.

Strategic Objective	Contribution
<p><b>Dignity, fairness and respect</b></p> <p>Delivering a service with dignity, fairness and respect at its core.</p>	<p>This paper has an impact to some extent on all the strategic objectives. Our compliance obligations cover a wide range of areas, and specifically target and help us achieve all of them.</p>
<p><b>Equality and tackling poverty</b></p> <p>Promoting equality and tackling poverty.</p>	<p>This paper has an impact to some extent on all the strategic objectives. Our compliance obligations cover a wide range of areas and specifically target and help us achieve all of them.</p>
<p><b>Efficiency and alignment</b></p> <p>Ensuring efficiency and aligning our activities with wider public sector for the benefit of the people we serve.</p>	<p>This paper has an impact to some extent on all the strategic objectives. Our compliance obligations cover a wide range of areas and specifically target and help us achieve all of them.</p>
<p><b>Economy, society and environment</b></p> <p>Contributing to our economy, society and protection of our environment.</p>	<p>This paper has an impact to some extent on all the strategic objectives. Our compliance obligations cover a wide range of areas and specifically target and help us achieve all of them.</p>

Strategic consideration	Impact
Environment	There are a number of public body obligations that consider the environment and we are using these to inform our wider environmental strategic approach.

Strategic consideration	Impact
Governance	The Compliance Framework is a tool for good governance enabling us to keep track and report effectively on our compliance obligations.
Data	Data will be collated as the Compliance Framework embeds and this will be fed into a number of wider reporting mechanisms.
Finance	There are a number of public obligations that consider Finance, which our Finance Unit are leading on.
Staff	Not applicable
Equalities	There are a number of public body obligations that consider equality and we are using these to inform our wider environmental strategic approach.
Estates	Environmental obligations should be considered as part of the decisions in this area. See above note on Environment.
Communications and Presentation	Not Applicable

Impact Assessment
Non applicable