Error Control Strategy

Background

Since Ministers established Social Security Scotland in 2018, our approach throughout the design of our new services has been to ensure that clients have access to clear information, advice and support before, during and after making an application for assistance.

However we acknowledge that on occasion, clients may unintentionally make an error when applying for assistance or in keeping their claim up to date, which may result in benefit awards being paid incorrectly. We describe this as *client induced error*.

Equally, on occasion we will make mistakes when administering claims for assistance, which we describe as *official error*. Some examples of reasons for this could be human error by our staff, technical issues with our IT systems, or erroneous data shared with us by another government department (such as the Department for Work and Pensions for example). We anticipate increased risk of official error when launching a new benefit or making major changes to an existing one. Through approval checking and error monitoring, we identify opportunities for improvement to guidance, processes and IT systems

Given that our key objective is to pay the right people the right money at the right time, careful consideration has been given to minimising the risk of error occurring, and to identify and resolve quickly where error does occur. The purpose of this error strategy is to provide more detail on how we intend to mitigate the error risk.

Overview

The Social Security (Scotland) Act 2018 (hereafter 'the Act') outlines the duty placed upon Scottish Ministers to ensure that individuals are given assistance they are entitled to (s.24). It places further duty on them to inform persons claiming assistance of changes in circumstances they must report; and the way in which changes should be notified (s56(2)(a)). Both of these duties relate to ensuring that assistance payments are made correctly.

In addition, the Scottish Public Finance Manual is issued by Scottish Ministers to provide guidance to the Scottish Government and other relevant bodies on the proper handling and reporting of public funds. It requires efficiency, effectiveness and good practice.

Social Security Scotland's Corporate and Business Plan also sets out how running our service in a responsible way and will help to minimise payment errors.

Social Security Scotland's error strategy aims to align with these requirements and will deliver results through effective design and delivery in four main areas – **Prevention, Identification, Resolution and Learning.**

While we have looked for opportunities to control error through preventative design features, we know that error will still occur. Therefore we have also put in place capabilities to assist in the identification of error, so that resolution action can be taken to correct the benefit award. In addition, if appropriate we will also calculate and pay any underpayments of assistance due; and calculate overpayments for consideration of debt recovery action from a client.

Where an overpayment of assistance has occurred which is due to official error, recovery of the sum overpaid will only be pursued from the client where they could reasonably expected to notice that the error had occurred. As a result, controlling official error effectively will minimise loss to the public purse.

We continually collate data on of the volumes and causes of error to identify trends, thus informing a responsive approach to error by making improvements to our processes, staff training provision and communication products. We will continue to enhance our data analysis capability to maintain a cyclical process of preventing error from occurring through a responsive continuous improvement approach.

Our objective remains to support Ministers in complying with their statutory duties under the Act and to deliver our services in accordance with the Scottish social security principles, as set out in Section 1 of the Act - notably that **social security is an investment in the people of Scotland**, and that **the system is to be efficient and deliver value for money**, by ensuring that we control error effectively and meet Social Security Charter commitments to **make decisions in a way that is consistent and accurate – and aim to get them right first time** and **pay you on time in the right amount.**

Scope

The scope of this strategy statement relates only to error impacting public funds administered by Social Security Scotland.

It does not include errors in process which have no impact in terms of underpayment or overpayment of benefit. While these errors could represent inefficiency through nugatory work or a less than optimum customer experience, our approach to complaints, quality monitoring and continuous improvement will address these additional error types.

Neither does this strategy statement include counter-fraud control mechanisms – details of how we intend to mitigate the threat of fraud are provided in the Counter Fraud Strategy.

Definitions of error types

Official Error:

Where the agency has made an error in law, or mistake as to a material fact in a determination of entitlement resulting in an incorrect payment; or

Where, as result of delay, inaction, technological or procedural error by Agency staff, the agency has made an incorrect payment; or

Where a qualifying benefit administered by another government department has been awarded due to official error, leading to an incorrect determination of entitlement being made in respect of assistance paid by us.

Client Induced Error:

Where a client (or a third party acting on their behalf) has provided incorrect or incomplete information, resulting in an error in a determination of entitlement; or

Where a client has either failed or delayed in providing information relating to a relevant change in circumstances, resulting in assistance continuing in payment at an incorrect rate.

NB: Where a client intentionally provides incorrect or incomplete information or fails to notify us of a change of circumstances to deceive in order to obtain assistance which would not otherwise be given, this would constitute an offence under Sections 71 and 72 of the Act, and would be classified as fraud rather than error.

Delivering effective prevention measures

Applying the maxim that 'prevention is better than cure', our focus is on preventing error from occurring

We will continually develop preventative controls to ensure that opportunities for error to occur are reduced wherever possible, ensuring that the benefits being devolved are secure by design, while also minimising impact on the customer journey and delivering value for money.

Principles which are carefully considered through the design and implementation of our new benefits are based on established best practice and research, and include:

Adequate pre- and post-claim support: Ministers have taken an obligation to ensure clients are supported throughout the lifetime of their claim and have a clear understanding of the types of actions they should take to keep their claim up to date.

Clarity of communications: the wording of the application form and subsequent correspondence has been carefully considered and then tested with citizens to minimise risk of dubiety or misinterpretation. Regular campaigns will raise awareness with our clients and our partner organisations of the obligation to report changes in circumstances.

Application of **behavioural insight** research findings and recommendations throughout the design of our services.

Staff and partner awareness: ensuring that our staff and partners who work with us receive adequate, ongoing training to support them in getting decisions right first time. Careful consideration is given to clarity of guidance products to ensure ease of use for staff and partners; and is subject to extensive user testing to refine these over time.

Design of **IT system** prioritises easy to navigate, intuitive interfaces for staff.

Identifying error

Where error has occurred we will proactively seek to identify this at the earliest opportunity to limit the impact.

Sufficient resource: we will invest resources to undertake proactive activities to identify errors.

Quality control and checking: a robust approach to quality checking for process compliance will support identification of error while enabling provision of tailored, targeted support to our staff.

Data matching: we are committed to the Scottish Government objective to protect the public purse and will seek opportunities to collaborate in data matching activities with other government departments to assist identification of anomalies which may indicate error.

Claim reviews: we will engage with our clients and where appropriate will review their circumstances, which will help us to identify any unreported changes and associated underpayment or overpayment.

Efficient error resolution

We have robust and effective processes in place to quickly control and resolve error when it does occur.

Empowered staff: where appropriate staff should be able to take action to correct errors as they find them, while our no-blame culture will encourage colleagues to be forthcoming about mistakes they have made to seek assistance with quick resolution. Staff feedback will be actively encouraged as a valuable source of suggestions for continuous improvements.

Effective interfaces: ensuring close working relationships between people and systems will ensure that all overpayments are referred for recovery action while underpayments are quickly paid to the client.

Learning from experience

We will identify opportunities to safeguard our service through error analysis and a commitment to continuous improvement.

Effective use of data: capturing robust, detailed management information will provide high quality continuous feedback on operational performance and client experience and supports continuous improvement

Specialist Expertise: close working with analytical, quality checking and continuous improvement colleagues will ensure we can draw maximum benefit from the management information we capture.

Feedback: quickly sharing information with stakeholders such as operational teams and learning and development colleagues will provide useful intelligence to ensure we are responsive to emerging error patterns.

Effective targeting of risk areas: understanding our risk will allow us to undertake proactive detection work against a selection of the most appropriate claims for review activity, minimising nugatory work and delivering value for money by maximising the errors identified.

Monitoring Progress

We will collate management information to allow us to benchmark our progress, and publish our results within our Annual Report and Accounts.

We will continually evaluate our results to understand the effectiveness of the responsive range of error control measures, and ultimately, this Error Control Strategy. We will publish a refreshed error strategy statement as required.

Our commitment to error control

The error control strategy will support Ministers in complying with their statutory duties under the Act and ensure that we deliver our services in accordance with the Scottish social security principles, as set out in Section 1 of the Act and the requirements of the Social Security Charter.

Specifically, it will deliver results in support of Principle (a) **social security is an investment in the people of Scotland,** and Principle (g) **the Scottish social security system is to be efficient and deliver value for money**. Social Security Scotland will administer these resources responsibly, by:

- Focussing on continual improvement of preventative measures to reduce the risk of error occurring;

- Proactively identifying instances of error, taking swift action to control and resolve;

- Continually learning from experience, informing our evolving, responsive control measures.

Social Security Scotland

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