



Social Security
Scotland

Tèarainteachd Shòisealta Alba

Writing for Publication

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Dignity,
fairness,
respect.

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Introduction

This guidance is for all Social Security Scotland staff. We are committed to being an open and transparent organisation. This guidance has been produced to assist with that aim by setting out our approach to the preparation, protection and publication of key information.

This will contribute to our charter principle of a Scottish social security system that is efficient and delivers value for money by reducing the need for individuals to request key information.

All written papers, reports and other documents should follow the corporate content, language and format standards as this will increase inclusion and accessibility.

Key information, such as the information considered by the Executive Advisory Body and other decision-making groups, is likely to be of public interest. These documents should be written with publication in mind. We want documents written to reduce the need to remove specific text (redaction).

This approach will improve transparency and provide confidence to those who want information on the work we do and how we make decisions. It also contributes to excellent customer service by making key information easily available. A customer-focused, open and proactive approach helps individuals to understand the way we work.

Use of Names

Individuals' names, including the author, should not be used in corporate documents. Job titles or roles should be used instead. This will protect the personal data of the individuals.

The exception to this is those who are the most senior and accountable for the way we work. Their names are to be written with their job title or role:

- the Chief Executive
- the Executive Team and the
- Executive Advisory Body member

Style and Tone

Papers, reports, minutes and other documents should follow the organisation's content, language and format standards:

Social Security Scotland **Style and Writing guide**

Documents should:

- be written in a formal, business-like tone and style.
- be written in plain English.
- avoid the use of acronyms and abbreviations.
- be factual in nature.
- give recommendations where required or appropriate.
- exclude personal opinion, information which is not meant to be publicly heard or information which is not needed.

The information presented to groups who make important decisions may need to argue a recommended position or express a considered view. However, it should remain impartial and balanced in the way it is presented. As an example, instead of writing:

'...which increased substantially during the period from 500 to 600 per month'.

A more balanced expression of the change might be:

'...which increased during the period from 500 to 600 per month, a 20% increase.'

The author might view the increase of 100 as substantial, however the audience may or may not share that view and will reach its own views.

Sensitive Information

Papers, reports, minutes and other documents will sometimes deal with sensitive issues or need to include sensitive information. It will be rare that a whole document cannot be published.

When writing the document, you should place sensitive information together in its own paragraphs. It will help the author to focus on the sensitivity in deciding whether information should be withheld when published, making it easier to remove it and reduce mistakes. It will also help the reader to understand the amount of sensitive information that is being withheld.

Protecting Sensitive Information

An exemption from The Freedom of Information (Scotland) Act 2002 will need to be identified to protect sensitive information. The exemption will be recorded on the document at Annex 1, with an explanation given as to why the information is sensitive and the harm that release would cause. The document must accompany each paper to the decision making group. More information on the common exemptions used can be found in Annex 3.

Where no sensitive information is being released the author must also complete the document at Annex 1 to show that the information has been considered. Where the subject of a document is a sensitive issue, or where the majority of the content is sensitive, the chair of the group can decide that:

- the information will not be published or
- publication will be delayed.

This should be noted in the minutes of the meeting. This is likely to be exceptional.

A standing agenda item to consider sensitive information should be set at the beginning of each meeting. This provides the chair of the group with an opportunity to inform the group of any items which are likely to be so sensitive.

The agenda could therefore show the title of that item. The minutes can contain a brief summary (such as 'The Executive Advisory Board had a discussion about XXX'), but no detail of the sensitive information should be recorded.

Information Description

The author must produce a brief description of the information published. This is to assist understanding and the relevance of the information to the individual accessing it. This will be recorded in Annex 1 and published with the information. Descriptions should be no longer than 100 words, written in plain English and the use of acronyms and abbreviations is not allowed.

A completed Annex 1 should accompany any papers to the:

- Executive Advisory Board
- Audit and Assurance Committee

Time

In most cases the sensitivity of the information falls over time. The older the information is the less sensitive it will be. Where a date for the future publication is set within 12 weeks, an exemption may be applied. The date must not be more than 12 weeks from the date of the consideration of the papers.

Records Management

The author of a paper will be the owner until publication. This means that until the document is published they will be responsible for holding all of the information relating to that paper. Those who have contributed or commented on the paper should not keep any e-mails, drafts, or other documents.

The author should delete all e-mails, draft documents, or other correspondence once the meeting has concluded and the minutes agreed. The published documents should also be stored in the relevant file-plan as it is a record of considerations or decisions and therefore has value.

The published minutes and papers will become the corporate record for the governance group. Social Security Scotland Business Support Offices will be responsible for holding all of the information relating to the compilation of the minutes until they are agreed. Once agreed, all drafts and correspondence relating to the minutes will be deleted.

Template for Governance Group Papers

To ensure a consistent approach to papers submitted to our governance groups a template for use can be found in Annex 2. The document should be no more than two pages long. Additional information can be included in annexes to the paper, but this should be focused and concise providing the required information to assist the governance group to reach a view.

Making Social Security Scotland's Service Inclusive

We are designing our services so that as many people as possible understand what we do and can communicate with us and access our service in the way they want to.

Our clients, staff and other people we work with understand information and express themselves in many different ways. We will remember this every time we communicate verbally, in writing or face-to-face.

We will ask people where, when and how they want to receive information and to communicate with us. We will offer the support they need to do this.

Social Security Scotland aims to be a leader in inclusive communication. We will ask people about their experience of dealing with us and we will make changes when needed.

This guidance is more inclusive because where possible:

- It uses paragraphs of no more than three sentences
- It uses bullet points
- It does not use acronyms or abbreviations
- It uses words of three syllables or less
- It uses the active voice
- It uses Arial 12 point text
- No block capitals are used
- All text is justified left including graphics
- It uses paragraph spacing at least 1.5 times larger than line spacing.

(Annex 1)

Executive Advisory Body Paper/Executive Team etc.

The author must complete this page before submitting the paper to the Business Support Office.

Publication

To demonstrate openness and transparency, all governance group papers will now be published on the website of Social Security Scotland. All governance group papers should be written in line with the Writing for Publication Guidance.

Papers which contain sensitive information which should not be published must set out the reasons why. The author must identify the relevant exemption which should apply. The exemption should be stated in the section below, with the reasoning for this decision. Please speak to the Data Protection and Information Governance team before submitting your paper if you are unsure which exemption may apply.

1. I am aware that this paper may be published in the public domain and I am content for the information to be published.

2. I believe information in this paper should be withheld from publication and that an exemption applies.

2.1. Please state the exemption and explain your reasoning:

I consider that some information is exempt under section (**insert section**) of the Act. The information is exempt because (**set out the harm/effect of release and why it is important to protect it at this time**).

Paper Summary for Website Publication (max 100 words)

A large, empty rectangular box with a thin black border, intended for authors to write a short paragraph summarizing the content of their paper.

Paper authors should write a short paragraph here to summarise the content of the paper.

(Annex 2)

Executive Advisory Body Paper/Executive Team etc.

Date of Meeting

Subject

Agenda No.

Paper No.

Prepared By

Purpose

1. Background

This section should:

- contain enough information on the purpose and context of the paper
- help to understand key steps or considerations taken to this point
- take account of how much the governance group already knows including a summary of developments since the topic was last considered
- a reference should also be included as to who has been consulted on the paper and if they have any views as to the option/outcome recommended
- This section should also list what additional information is being provided in the rest of the paper, including its annexes

2. Key Points

This is the main body of the paper and should:

- provide the required detail for the governance group to understand the proposal/recommendation being made, without using jargon or too much technical language
- contain essential information and arguments that support the recommendation and facilitate good decision making. Lengthy, complex and detailed arguments may not be read or understood
- this section should also state the need for the change or decision proposed in the paper and, as appropriate, set out alternatives and arguments for and against. In some cases this may need to be set out more fully in annexes.
- it is this section which is most likely to include sensitive information

The following headers might need to be included in your paper: political, policy and stakeholder impact, finance and resourcing, legal, or options appraisal.

3. Conclusions

Where no recommendations are being put to the group at section one the conclusion section should provide a clear, succinct distillation of the key facts and conclusions and invite the group to note the information provided.

Alt 3 Conclusions

Where the paper recommends a specific course of action this section should:

- include a precise statement of all the recommendations that the governance group are being invited to agree
- be written so that they can be converted into a minute Board decisions. They must stand-alone and their meaning and be clear to those who have not read the paper.

(Annex 3)

Examples of Types of Potentially Sensitive Information

The type of information which might be sensitive, and therefore exempt includes:

- Commercial sensitivity – product development, procurement negotiations, funding issues, finance, wider economic interests, competitive advantage, trade secrets, intellectual property
- Political sensitivity – formulation of government policy, ministerial correspondence, negotiations, relationships between government bodies, international relations
- Public affairs – prejudice to the free and frank exchange of views, decision making or deliberation
- Security – national security and defence, technical and physical security or risk
- Investigations – by public bodies, regulators, authorities or other bodies exercising investigatory powers
- Law enforcement and the Courts – policing, actual or alleged criminal or civil offences, actual or potential litigation, investigation or prevention of crime, prosecution, immigration, prisons, justice, tax collection
- Personal information – which might identify an individual, even in the absence of their name or unique identifier
- Health, safety or the environment – information which would endanger individuals, environmental information

Common Exemptions

Section 25: Information Otherwise Available

Section 25 of the Freedom of Information (Scotland) Act 2002 (“the Act”) exempts information from disclosure where the requester can reasonably obtain the information without asking for it under the Act. It has a different focus from most other exemptions. It is not about withholding information from the public; it recognises that where information is already available, there is no need to provide an alternative right of access to it through the

Act. Information might be exempt under section 25 even if a payment has to be made for it.

Section 27. Information Intended for Future Publication

Section 27 of the Freedom of Information (Scotland) Act 2002 (“the Act”) contains two distinct exemptions. The more relevant is Section 27(1). The exemption in section 27(1) allows public authorities to refuse to disclose information if they already plan to publish it within the next 12 weeks – provided it is reasonable to delay disclosing the information until the planned date of publication.

Section 30. Prejudice to Effective Conduct of Public Affairs

Section 30 of the Freedom of Information (Scotland) Act 2002 (“the Act”) exempts information from disclosure where disclosure would, or would be likely to: (i) prejudice substantially the maintenance of the convention of the collective responsibility of the Scottish Ministers (ii) inhibit substantially the free and frank provision of advice (iii) inhibit substantially the free and frank exchange of views for the purposes of deliberation (iv) prejudice substantially the effective conduct of public affairs. It is less likely that we would seek to rely on section 30(i). This exemption is commonly used to protect information whilst a decision on a matter is under consideration.

Section 33. Commercial Interests and the Economy

Section 33 of the Freedom of Information (Scotland) Act 2002 (“the Act”) contains four distinct exemptions. The more relevant is 33 (1) (b) where information is exempt if disclosure would (or would be likely to) prejudice substantially the commercial interests of any person or organisation (section 33(1) (b)). This exemption is commonly used to protect sensitive contractual information immediately following a procurement exercise.

Section 38. Personal Information

Section 38 of the Freedom of Information (Scotland) Act 2002 (“the Act”) contains four distinct exemptions. The more relevant is 38(1) (b) which exempts information from disclosure if it is the personal data of a third party. There are three situations where third party personal data is exempt under section 38(1) (b). The most common situation is

where disclosing the personal data would contravene any of the data protection principles in Article 5(1) of the UK General Data Protection Regulation (“the first condition”).



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