

Equalities, Human Rights and Civil Justice Committee
Tuesday 29 April 2025, 10th Meeting, 2025 (Session 6)
Scrutiny of International Recommendations: UN Committee on Economic, Social and Cultural Rights (CESCR) Concluding Observations (2025)

Marie McNair: CESCR urged a review of the digital-only system for social security. In Scotland, we have a choice of online and paper applications for social security. What is your experience of the main barriers that those systems present to rights realisation? Scotland's system is fairer, but we could still make a lot of improvements to make it even fairer.

SCLD supplementary response:

Research by SCLD¹ highlighted the increase in technology use for people with learning disabilities, particularly in the use of communication platforms, brought about by the Covid-19 pandemic; the positive impact that digital technology can have on quality of life, confidence, and choice for people with learning disabilities; and the critical role of supporters, both family and staff, in assisting individuals to navigate digital spaces effectively.

However, a number of barriers and challenges emerged. Participants faced difficulties with app complexity, security measures, connectivity, and affordability. Frustrations arose when technology malfunctioned, and concerns about online safety, cyberbullying, and potential scams were widespread. And the financial implications of technology, including costs of internet access and devices, posed barriers for many.

Indeed, a lack of access to the internet, and digital technologies generally, is an important way in which people with learning disabilities are excluded from society. The internet and digital technology are often not designed with accessibility in mind and are not accessible for people who may need support to read and write or follow complex processes. Further barriers include financial barriers, societal attitudes, lack of policy or governmental support, lack of education and training and lack of consideration of individual support needs when designing ways to interact online.²

Official statistics show that disabled people are more than four times as likely to have never used the internet than non-disabled people (14.9% and 3.4% respectively) (Office for National Statistics 2021). A qualitative evaluation of the UK Government's Digital Lifeline programme suggests that as many as 35% of people with learning disabilities do not have digital skills for life, compared to 21% of the general population (Good Things Foundation 2022). An Ofcom report suggested the least

¹ [Our right to be techy! Making digital transformation transformative for people with learning disabilities in Scotland, \(SCLD, 2023\)](#)

² [Our right to be techy! Making digital transformation transformative for people with learning disabilities in Scotland, \(SCLD, 2023\)](#)

common reason for people with learning disabilities using the internet was access to public services, at only 32% (Ofcom 2019).

A recent report by the Scottish Commission on Social Security³ highlighted accessibility concerns and challenges around online platforms, particularly for individuals with specific needs. These included general usability concerns and difficulties in adapting digital services to cater to a diverse range of requirements.

With specific reference to social security applications, most participants agreed that online applications and portals can be extremely challenging and frustrating for people with learning disabilities. The length and complexity of the online application form was regarded as challenging for some. Participants found it unclear that the form had to be saved manually, and the requirement to fill in mandatory fields could be confusing. Inserting placeholder information and returning later was noted as potentially difficult for individuals with specific communication needs. And the overall size and scope of the application form in particular was noted as lengthy and complex for those with communication barriers. Participants emphasised the importance of investing in Easy Read resources to explain benefits and application processes in a clear and accessible way.

There are a number of recommendations⁴ that could help bolster digital inclusion and promote digital solutions for people with learning disabilities:

- funding for learning disability digital inclusion coordinators across Scotland
- funding for a learning disability lived experience board focused on digital health and social care services and technologies
- a co-produced learning disability pathfinder project utilising personal data stores to empower people to interact with health and social care services
- a joint approach by the Scottish Government, Public Health Scotland and NHS Boards to learning disability data improvement.

SCLD believes these measures can lead to improved digital inclusion and digital solutions for people with learning disabilities. However, at this time, we have concerns that any move towards a digital-only system presents barriers and challenges to people with learning disabilities accessing their right to social security.

For further information please contact:

Lorne Berkley
Strategic Lead: Policy and Rights
Scottish Commission for People with Learning Disabilities
lorne.b@sclld.co.uk

³ [Scottish Commission on Social Security, People with communication needs and the Scottish social security system \(2025\)](#)

⁴ [Our right to be techy! Making digital transformation transformative for people with learning disabilities in Scotland, \(SCLD, 2023\)](#)