Data Protection Impact Assessment (DPIA) – Social Security Experience Panels

Prepared by:		Susan Carsley	January 2017
Reviewed by:		Helen Findlay	February 2017
Authorised by:		Information Asset Owner (IAO)	February 2017

Status Control

Version	Date	Status	Prepared by	Reason for Amendment
0.1	Jan 2017	Draft	Susan Carsley	
0.2	Feb 2017	Draft	Susan Carsley	Incorporating comments from DPA team
0.3	September	Draft	Trish Brady-Campbell	Updating information
0.4	April 2018	Draft	Carole Edwards	Updating and reviewing for GDPR

1. Introduction

This paper outlines the rationale and methodology for the collection of personal identifiable data for voluntary participants of the Scottish Social Security Experience Panels. The paper also explores the implications around confidentiality and what processes will be in place to ensure that this is protected as far as possible. The document will also report on and assess against any potential Privacy Impacts as a result of the implementation Scottish Social Security Experience Panels.

2. Document metadata

Name of Project

Social Security Experience Panels

Date of report

April 2018

Author of report

Communities Analysis Division and Social Security Directorate, Scottish Government

Information Asset Owner (IAO) of relevant business unit

Audrey MacDougall, Head of Communities Analysis, Communities Analysis Division and Chief Social Researcher, Scottish Government

Date for review of Privacy Impact Assessment (PIA)

February 2019

3. Description of the project

Project Background

The Scottish Government is committed to gathering views from people who currently receive benefits to help design the Scottish social security system. As part of this journey, the Scottish Government have consulted with people across Scotland on their views.

The Scottish Government have built on this by recruiting current benefit recipients if to Experience Panels. By joining the Experience Panels, the volunteers have the opportunity to contribute their views on the future of social security in Scotland and help shape a Scottish social security system that puts people first and makes a lasting difference to the lives of people across the country.

The Experience Panels are being run by researchers at the Scottish Government. Those who volunteer to participate in the Experience Panels will be invited to take

part in a range of activities that will provide an opportunity for them to tell us about their experiences and opinions, and to work with us to design important parts of the new system.

Panel Recruitment Methodology

There were two routes for recruitment of experience panels members:

1. Random Sample Design

The Social Security Experience Panels include people who have recently received benefits from DWP that are to be devolved to the Scottish Government.

A sampling strategy was developed with the Office of the Chief Statistician and Performance and is being undertaken by the Research Sampling Team at DWP. DWP are the Data Controllers of the recent benefit recipient data and there is currently no legal basis for the Scottish Government to receive this data. Therefore, there was an agreement in place with DWP that they will draw the sample and their third party mailing supplier will mail out the invitations.

Around 20,000 recent benefit recipients were contacted, asking them to take part in the Experience Panels. This assumed a 10% response rate to achieve the desired sample.

The sampling strategy developed covered the following benefits:
- Disability and ill-health (Disability Living Allowance, Personal Independence Payment, Severe Disablement Allowance & Attendance Allowance).
- Universal Credit Flexibilities
- Industrial Injuries (IIB)
- Carers Allowance
- Maternity Grant
- Funeral Grant
- Winter Fuel and Cold Weather

The sample was drawn by DWP on Scottish Government's behalf and the mail out of these was undertaken by DWP as they are the data custodians.

2. Open Recruitment

As well as recruitment via DWP, an open recruitment route was undertaken to ensure that those who want to take part in the Experience Panels are able to.

Publicising the Experience Panels Open Recruitment

An open invitation to join Experience Panels was made in the press and on a dedicated webpage. Key organisations in Scotland were asked to publicise the panels.

A communications strategy to launch and publicise the Experience Panels Open recruitment was developed by social security communications colleagues. This ensured that the Experience Panels are publicised widely, and offer recent benefits recipients the opportunity to get involved.

Relevant organisations were sent information about the Experience Panels to advertise to those who may want to join.

Recruitment will be reopened annually, beginning in Summer 2018. This further recruitment activity will follow the open recruitment method. Following a survey of existing Experience Panel members, if specific groups are underrepresented these will be targeted in the further recruitment.

Experience Panels Governance

The Experience Panels fall under the portfolio of the Cabinet Secretary for Social Security and Older People.

The Experience Panels have a Steering Group which has overall responsibility for the work. The Steering Group consists of senior representatives (Social Security policy, programme and analytical Deputy Directors). The Steering Group will approximately 2-3 times per annum, in addition to electronic communication, and will take major decisions on the progress of the Panels. The Steering Group will sign-off the research programme for the panels.

The programme of research for the Experience Panels is designed collaboratively with the Experience Panels Working Group. The Working Group brings together colleagues from across the Social Security directorate.

Where required, advice will be sought from external contacts. For example to inform methodologies for research with particular groups. For example, advice was sought from Inclusion Scotland, NHS Scotland and the Scottish Council on Deafness around the recruitment.

In line with the principles of co-design and co-production, the research programme will be informed by asking those on the panels what they think we should focus on. The first element of 'About You' research gathered information on this, and the findings of the consultation on social security also inform the research programme.

To be considered for inclusion in the Experience Panels research programme, a strong business case is required. This will set out the requirement for the data, and demonstrate that evidence is not available from other sources. The bid process will ensure that using the panels is the best route to carrying out research.

Experience Panels Activities

The programme of research for the Experience Panels will be designed collaboratively with a Working Group that brings together colleagues from across social security policy and delivery and with the Experience Panels, reflecting what they tell us is important them.

The Experience Panels involves a range of activities. This includes surveys, phone and face-to-face interviews, focus groups and co-production sessions. Activities can be carried out face-to-face, on the phone and online.

Care is be taken to ensure that Experience Panel members are not overburdened by taking part. A strong business case is required to undertake research with Experience Panel members. It is made clear to panel members that they will not be expected to take part in all of the planned research activities, and there will be no obligation to take part. This is made clear on the recruitment materials, as well as in correspondence about taking part in specific research projects.

Personal data to be processed

Those who register as a Social Security Experience Panel member are asked to provide some information about themselves.

The following data items will be collected as part of the registration process:

- Title
- First name
- Surname
- House/flat number
- Street
- Town/City
- Postcode
- Email address
- Mobile Number
- Home Number

Details about benefits received

Panel members have provided the following data in a follow up survey:

- Experience of current benefit system (themselves or on behalf or someone else)
- Views and opinions of the current and future social security systems
- Age
- Gender
- Disability
- Information about household
- Caring status

In May 2018 we asked panel members for further personal information to allow targeting of future recruitment and disaggregation of findings to identify any variation in views and experiences. As well as re-asking the above, we will ask for:
- Ethnicity
- Religion
- Sexual orientation
- Transgender status

Throughout our research with them, participants also provide data on their views on new developments in social security and their accessibility needs, to allow us to put measures in place to support panel members to participate.

Data Collection

Registration information was and will be gathered from volunteers via a form sent to a FREEPOST address or online at www.gov.scot if preferred. A Freephone call-centre that can support people to register is also be available. Call centre operatives collect volunteer information over the phone and input this into the online form.

The follow up data (on demographics and experiences of the current system) has been collected via a survey that can be completed online, by post or by phone.

Ongoing research with panel members takes place across Scotland in focus group sessions, face to face and telephone interviews, and surveys made available online, by post and over the phone. Groups and interviews are recorded with participants consent where practical, or notes are taken by note takers who have signed a confidentiality form and have been briefed by researchers. Explicit consent is sought from every participant at the outset of every survey, interview and group.

Data Access

The Experience Panels are being run by researchers at the Scottish Government and as such they will have access to the personal information provided. As personnel within the team change over time, the names in this list may need to be adjusted although the job functions will remain the same. A complete list of current personnel with authority to access the data will be held and updated by the Information Asset Owner.

Names and job titles of those authorised to access the data;

Imelda Giarchi – Senior Principal Research Officer, Social Security
Carole Edwards – Principal Research Officer, Social Security
Catherine Henry – Senior Research Officer, Social Security
James Miller – Research Officer (faststream) Social Security
Grant McPhillips – experience panels intern, Social Security
Eleanor Macleod – experience panels intern, Social Security
Kayleigh Ellis - Operational Research Officer, Social Security
Donna Hosie – Statistician, Social Security
Amelia Brereton – Statistician, Social Security
Leila Akhoundova – Economist, Social Security
Vana Anastasiadou – Economist, Social Security
Ross Johnston - Administrative Officer, Social Security
Craig Watson – Call centre manager, Social Security
Billy Horn – Senior Customer Service Advisor, Social Security
Anne Baxter - Senior Customer Service Advisor, Social Security
Mhairi Kinnear – Customer Service Advisor – Social Security
Lizan Chambers – Customer Service Advisor – Social Security

User researchers work with the Experience Panel team to undertake research with experience panel members. While user researchers will not have access to the full experience panel dataset of personal information, they require access to select personal information to undertake research, including but not always limited to, names and contact phone numbers of panel members who have opted in to being research participants. They will also access and process resulting research data, which may contain personal information.

Names and job titles of those authorised to access data for fieldwork purposes:
Trish Brady-Campbell – user research lead
Anna Dickenson - User researcher
Mark Hartswood - User researcher
Kate Donaldson - User research lead
Philip Kirk- User researcher

Management of Data

Data will be managed by the Communities Analysis Division.

Storing Data

Data submitted electronically and scanned copies of hard copy submissions are stored in a secure file on the datashare server (\\S0429a\datashare). Separate folders with different access rights are kept according to who requires access from the above list. . The hard copy submissions will be stored in a fire safe located in 1-F North, Victoria Quay.

A fire safe is located in the Social Security Call Centre, if for any reason hard copies of either personal data or call back data must be noted down in hard copy, these will be stored in the fire safe.

Panel member contact details will be held separately from survey, interview and focus group responses in all of the above locations.

Kantar TNS stored the branding session audio recordings for the duration of the branding research project. They have now been destroyed. Qual recordings are classified as Restricted information (within our Quality & information Security Management System) as they are survey information which can be used to identify an individual by their voice, image, opinion or otherwise. Kantar TNS's Information Handling policy is available at http://konnect.grpitsrv.com/interact/Pages/Section/SubFullOne.aspx?subsection=5653.

Retention and Destruction of Data

The data will be retained for no longer than is required to meet the purpose(s) for which it was originally obtained. This is likely to be for five years, however this will be reviewed on a regular basis.

The data will be deleted/destroyed securely once it is no longer required. Further guidance is contained in the Scottish Government's policies on the secure erasure and disposal of computer media and the destruction of classified material.

Loss of Scottish Government data

Loss or theft of any Scottish Government information must be reported to the Office of Protective Security (OPS) as soon as possible. The OPS will take details of the incident, and notify the Police and obtain a crime reference number if appropriate.

The Information Asset Owner will also be informed of the incident and any developments.

Legal basis

The legal basis is consent. Experience Panel volunteers are asked to tick a consent statement indicating whether they are willing for their name, address, contact details and relevant survey question answers to be passed on to the Scottish Government for the purpose of follow-up research. Therefore, under Article 6 of the GDPR the legal basis for processing the personal data is consent. In regards to the special category data being collected and processed (ethnicity, sexual orientation and health), Article 9(2a) of the GDPR applies, and again the lawful basis is consent.

Before participating in individual research projects participants will also be asked to read and sign a further consent form.

The table below considers the checklist from the ICO website on use of consent as the legal basis under GDPR.

Asking for consent	
We have checked that consent is the most appropriate lawful basis for processing.	Yes
We have made the request for consent prominent and separate from our terms and conditions.	Yes – there are no other terms and conditions
We ask people to positively opt in.	Yes – both on registration and for each research activity
We don't use pre-ticked boxes or any other type of default consent.	Yes – consent is explicit on each occasion.
We use clear, plain language that is easy to understand.	Yes
We specify why we want the data and what we're going to do with it.	Yes
We give separate distinct ('granular') options to consent separately to different purposes and types of processing.	n/a – always processing for research purposes
We name our organisation and any third party controllers who will be relying on the consent.	Yes
We tell individuals they can withdraw their consent.	Yes
We ensure that individuals can refuse to consent without detriment.	Yes – participation si not linked to the provision of any services.
We avoid making consent a precondition of a service.	Yes
If we offer online services directly to children, we only seek consent if we have age-verification measures (and parental-consent measures for younger children) in place.	n/a
Recording consent	
We keep a record of when and how we got consent from the individual.	Yes – we have a tracker document covering both registration and consent for each interview/focus group/survey
We keep a record of exactly what they were told at the time.	Links to text used included in the tracker
Managing consent	
☐ We regularly review consents to check that the relationship, the processing and the purposes have not changed.	Yes – reconsider for every project and when reopening recruitment
We have processes in place to refresh consent at appropriate intervals, including any parental consents.	Yes – at every research activity.
We consider using privacy dashboards or other preference-management tools as a matter of good practice.	n/a – consent managed in person.
We make it easy for individuals to withdraw their consent at any time, and publicise how	Yes

to do so.	
We act on withdrawals of consent as soon as we can.	Yes
We don't penalise individuals who wish to withdraw consent.	Yes

4. Stakeholder analysis and consultation

4.1 Groups/organisations involved in project:
List all the groups involved in the project, and state their interest.

- Scottish Government: Social Researchers, Statisticians, Economists, User Researchers, Communications

    Roles:
    1. Design of letter to be sent to potential volunteers
    2. Sample design
    3. Design and preparation of publicity materials
    4. Collation & management of personal data of volunteers
    5. Organisation of experience panels
    6. Analysis of output from experience panels
    7. Answering any queries regarding experience panels

- Department of Work and Pensions: Research Sampling Team (RST), Central Analysis Division

    Roles:
    1. Draw sample of recipients which letters sent out to

- Scottish Government: Social Security Call Centre

    Roles:
    1. Answering any queries regarding experience panels
    2. Collecting contact details/personal information of volunteers who call in

5. Questions to identify privacy issues

Will the initiative involve multiple organisations, whether they are public service partners, voluntary sector organisations or private sector companies?

Yes, Department of Work and Pensions and Scottish Government. All the organisations involved have procedures for handling sensitive personal data.

Will it be possible to identify an individual?

Yes, personal data will be collected for the purposes of contacting the volunteers. There are strict procedures in place for sharing, storage and accessing (sensitive) personal data (see section 3). Access to any personal data is on a strict need-to-know basis.

In any outputs, individuals will be anonymised; no comments or quotes will be attributed to individuals, instead they will be referred to via generic descriptions. All outputs will have a strong quality assurance process built in. Reports will be checked by colleagues at the draft and final stages to ensure that no individuals could be identified.

Will there be new or additional information technologies that have substantial potential for privacy intrusion?
No.

What type of unique identifiers will be used in the project?
The following personal data will be collected:

- Title
- First name
- Surname
- House/flat number
- Street
- Town/City
- Postcode
- Email address
- Mobile Number
- Home Number

Participants have provided the following data in follow up surveys:

- Experience of current benefit system (themselves or on behalf or someone else)
- Views and opinions of the current and future social security systems
- Age
- Gender
- Disability
- Information about household
- Caring status
- Ethnicity
- Sexuality
- Gender identity

The personal data collected is used to identify which volunteers are best suited to attend which experience panel and to contact them in order to invite them to attend said experience panel, as well as for analysis purposes.

Will there be new or significant changes to the handling of types of personal data that may be of particular concern to individuals? This could

include information about racial and ethnic origin, political opinions, health, sexual life, offences and court proceedings, finances and information that could enable identity theft.

No. All data is collected on a voluntary basis, information about benefits volunteers currently receive will be collected.

Will the personal details about each individual in an existing database be subject to new or changed handling?

Current benefit recipients whose data is currently held by DWP, voluntarily sent personal information to the Scottish Government.

Will there be new or significant changes to the handling of personal data about a large number of individuals?

No.

Will the project involve the linkage of personal data with data in other collections, or any significant change to existing data links or holdings?

No.

Will there be changes to data quality assurance or processes and standards that may be unclear or unsatisfactory?

No.

Will there be new or changed data security access or disclosure arrangements that may be unclear or extensive?

Scottish Government data security procedures are followed for the data held by the Scottish Government.

Will there be new or changed data retention arrangements that may be unclear or extensive?

No.

Will there be changes to the medium of disclosure for publicly available information in such a way that the data becomes more readily accessible than before?

No.

Will the data processing be exempt in any way from the Data Protection Act or other legislative privacy protections?

Yes, the GDPR/ DPA2018 Section 11 exemption applies.

The data is being collected and processed for research purposes only.

Part IV, Section 11 (Exemptions) of the Data Protection Act 2018 covers statistics and research. Where the processing of personal data (including sensitive personal data) is carried out for research or statistical purposes, section 11 makes special provision relaxing, or exempting, certain DPA requirements, provided the following conditions are met:

a) the personal data is processed subject to appropriate safeguards for the rights and freedoms of data subjects, and

(b) the results of the research or any resulting statistics are not made available in a form which identifies a data subject

Both of these conditions will be met.

Does the project involve systematic disclosure of personal data to, or access by, third parties that are not subject to comparable privacy regulation?
No.

Does the project's justification include significant contributions to public security measures?
No.

Is there to be public consultation?

There will not be a public consultation of this project.

The project itself is in fact part of the public consultation to help design the new Scottish social security system.

Is the justification for the new data handling unclear or unpublished?
No.

General Data Protection Regulation (GDPR) Principles

Principle	Compliant – Yes/No	Description of how you have complied
6.1 Principle 1 – fair and lawful, and meeting the conditions for processing	Yes	The purpose of the project The purpose of the project is clearly described in the documentation that the selected sample will receive inviting them to participate in the Experience Panels. Telling individuals about the use of their personal data Individuals have volunteered their personal data for the purposes of being contacted to participate in experience panels and have therefore given consent for their data to be processed in this way. As standard, all research that involves Experience Panel members will be fed back to participants. This will be done primarily using newsletters (e.g. Fife People Panel newsletter) sent to participants via a dedicated mailing list function.

		As panel members will have complex needs with regards to access, care will be taken to ensure that materials developed to give members feedback are as accessible as possible. We will collect information from panel members on the registration form about preferred contact methods and additional support needs. This will help to ensure that the format of outputs and feedback can be tailored to best meet the needs of participants.
		Participants signing up for the Experience Panels via the Call Centre may have their call recorded for training purposes. A message explaining this will be played before the recording takes place.
		Conditions for which processing apply
		The individual whom the personal data, including sensitive personal data is about has given explicit consent to the processing.
		Informed consent for the panels will be obtained via an invitation and registration form, which will be completed by participants and returned online or by post. A Freephone number has also been set up to collect the registration information of those who are unable to complete the form out online or in writing.
		The Experience Panels invitation clearly states that 'taking part is completely voluntary and you can leave at any time'. Furthermore, the invitation sets out that individuals are not obliged to take part in any future panel research by registering to take part in the panels. The invitation states, 'you do not have to take part in everything. It will be entirely up to you how much time you want to spend'.
		Processes are also in place for each individual Experience Panels project to ensure that participants are informed about the project, the purpose, the client, topics and assuring them that their participation is voluntary. Explicit consent is sought from each participant for each individual survey, interview and group session.
		Human Rights Act
		As participation in the Social Security Experience Panels is voluntary, with the option to opt out at any point, this does not interfere with the right to privacy under Article 8 of the Human Rights Act.
Principle	**Compliant – Yes/No**	**Description of how you have complied**

Principle	Compliant – Yes/No	Description of how you have complied
6.2 Principle 2 – purpose limitation	Yes	Data will only be used for the purpose of contacting volunteers to participate in experience panels. The data shall not be used for any other purpose.
Principle	**Compliant – Yes/No**	**Description of how you have complied**
6.3 Principle 3 – adequacy, relevance and data minimisation	Yes	All data requested is required for the purpose of the project. Three fields; • Email address • Mobile Number • Home Number Are not compulsory, however may be required depending how the respondent wants to be contacted.
Principle	**Compliant – Yes/No**	**Description of how you have complied**
6.4 Principle 4 – accurate, kept up to date, deletion	Yes	Each time an experience panel member is asked to participate in a specific research project they will also be given the opportunity to opt out of the Experience Panels, or update their details. A clear procedure is in place for Panel members to remove themselves from the panel or correct outdated or incorrect details. This will include via the phone, via the post or via the panels email address. Panel members will also regularly be contacted explicitly to update our records.
Principle	**Compliant – Yes/No**	**Description of how you have complied**
6.5 Principle 5 – kept for no longer than necessary, anonymization	Yes	The data collected shall be kept until the completion of the Experience Panels, it is envisaged that they will run for 4 years. Data no longer needed for the purpose of the project will be securely deleted. Response data is kept separate from personal data. All responses are aggregated in reporting, and reports are anonymised to ensure no panel member is identifiable.
Principle	**Compliant – Yes/No**	**Description of how you have complied**
6.6 GDPR Articles 12-22 – data subject rights		Data will be used for the purpose of this project only and will not be used for marketing purposes. We have a process in place to edit and correct inaccurate data. We are able to provide people with copies of their data on request. We include privacy notice on registration, and

Principle	Compliant – Yes/No	Description of how you have complied
		are providing an updated one for information in the cover email of a survey of all panel members on May 2018.
6.7 Principle 6 - security	Yes	All staff with access to personal data will undertake and complete the mandatory Data Protection eLearning package every year. Key members of the Social Security analysis team will also complete the MRC Research Data and Confidentiality e-learning course http://byglearning.co.uk/mrcrsc-lms/course/category.php?id=1. Call centre operatives and researchers will also be asked to sign a confidentiality undertaking form. All personal data is stored on the secure SAS server, with access restricted to those who require to process it (see above)
Principle	Compliant – Yes/No	Description of how you have complied
6.8 GDPR Article 24 - Personal data shall not be transferred to a country or territory outside the European Economic Area.	Yes	Personal data will not be transferred to a country or territory outside the European Economic Area.

7. Risks identified and appropriate solutions or mitigation actions proposed

Is the risk eliminated, reduced or accepted?

Risk	Ref	Solution or mitigation	Result
Physical security of new data, in particular against fire, flood, power, temperature fluctuation risks, theft, unauthorised access and accidental or deliberate damage/disclosure	SSEP01	The database of experience panel member details will be managed by analysts in the Social Security team. The database will be stored in a password protected file in a restricted folder, accessible only to named researchers who have a business need to access the data. All team members with access to personal data will complete the MRC Research Data and Confidentiality e-learning course http://byglearning.co.uk/mrcrsc-lms/course/category.php?id=1 Call centre operatives will be asked to sign a confidentiality protocol	Reduce
Participants are not fully aware of how their data will be used.	SSEP02	A Privacy Policy is included in the information pack provided to all invited participants, it is also part of the online survey form. As far as possible all participants will be made aware of this.	Reduce
Data processing not compliant with the GDPR	SSEP03	On registration and in advance of individual research activities, information about experience	Eliminate

| | | panels and/or the specific project is provided in written and/or verbal format as appropriate to underpin informed consent.

Explicit consent is obtained through an opt in tick box, or verbally in the case of telephone interviews.

The registration form includes a tick box consent Signed consent to participate in further individual research projects is also be collected. | |

8. Incorporating Privacy Risks into planning

Explain how the risks and solutions or mitigation actions will be incorporated into the project/business plan, and how they will be monitored. There must be a named official responsible for addressing and monitoring each risk.

Risk	Ref	How risk will be incorporated into planning	Owner
Social Security Research team do not store and handle personal data correctly	SSEP01	All Social Security Research team members with access to personal data will complete the MRC Research Data and confidentiality e-learning course http://byglearning.co.uk/mrcrsc-lms/course/category.php?id=1 As well as having completed the compulsory Scottish Governement Data Protection Act e-learning modules.	Carole Edwards
Call Centre Staff do not handle personal data correctly	SSEP01	As part of their training, the sensitivities of collecting personal data will be highlighted and all call centre operatives will be asked to sign a confidentiality declaration Data handling procedures will be monitored for the duration of the operation of the call centre.	Craig Watson

9. Authorisation and publication

The DPIA report should be signed by your Information Asset Owner (IAO). The IAO will be the Deputy Director or Head of Division.

Before signing the DPIA report, an IAO should ensure that she/he is satisfied that the impact assessment is robust, has addressed all the relevant issues and that appropriate actions have been taken.

By signing the DPIA report, the IAO is confirming that the impact of applying the policy has been sufficiently assessed against the individuals' right to privacy.

The results of the impact assessment must be published in the eRDM with the phrase "Data Privacy Impact Assessment (DPIA) report" and the name of the project or initiative in the title.

Details of any relevant information asset must be added to the Information Asset Register, with a note that a DPIA has been conducted.

I confirm that the impact of undertaking the project has been sufficiently assessed against the needs of the privacy duty:

Name and job title of a Deputy Director or equivalent	Date each version authorised
Audrey MacDougall, Deputy Director: Communities Analysis Division and Chief Social Researcher	Version 0.4 approved 26/07/18

10. Further information

Further information about the project is available from the following website www.gov.scot/socialsecurity or by emailing socialsecurityexperience@gov.scot