



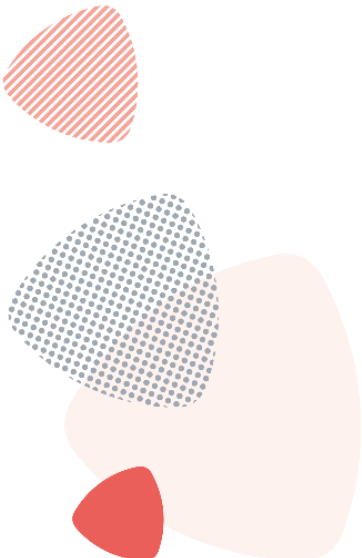
SCVO response to the Digital Inclusion Alliance's Investment Challenge

Start with what works

An evidence-led approach to sustainably resourcing digital inclusion in Scotland

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Executive summary

We agree on the problem

Scotland needs a different approach to resourcing digital inclusion.

Short-term projects, fragmented provision and insecure funding have failed to create sustainable capacity. Annual budget cycles reward counting devices distributed and training hours delivered rather than the slower work of building trust and local capability. Meanwhile public services continue to redesign around digital channels, and the organisations doing so need to take greater responsibility for ensuring people can participate.

The Digital Inclusion Alliance is right about all of this. It is also right that Scotland needs to treat the things that make sustained digital participation possible as enduring infrastructure, that outcomes matter more than outputs, and that place shapes both need and cost.

SCVO has been making these arguments since our [2023 Digital Inclusion Roadmap](#), and [Audit Scotland](#) reinforced them in 2024.

Where we differ

Our concern is that the current debate begins too far downstream.

The question should not initially be how digital inclusion can be made investable. It should be what causes digital exclusion, what works in tackling it, what needs to be sustainably resourced, and where responsibility for those costs should lie.

Only after answering those questions can Scotland determine which funding mechanisms are appropriate.

This is not an argument against innovation in funding. Nothing in this report rules out blended finance, pooled budgets or social investment. It is an argument about sequence:

Funding mechanisms are tools, not a theory of how to tackle digital exclusion.

The difference matters when the funding mechanism does not fit the provision the evidence says is needed. Beginning with the mechanism means interventions that do not fit are not funded, and people whose outcomes cannot be attributed are not prioritised. Beginning with the evidence means the requirement is funded either way, by whichever mechanism suits it.

The immediate context

There is a further problem with the way this debate is framed. It proceeds as though Scotland were designing a system from a standing start, at a moment when the provision that already exists is closing.

Digital inclusion projects across Scotland are ending as short-term funding runs out. Trusted staff are being lost, and the relationships they held are going with them. Very little of the activity this report describes is currently funded at all, and the practical question facing most organisations is not how their work might be made investable but whether it will exist next year.

Designing a coherent, investable, future-ready model is an interesting exercise. It is not the most urgent one. There is a real risk of spending several years building an architecture to fund provision that has been dismantled in the meantime.

Six findings

1. Digital exclusion is rooted in poverty, inequality and exclusionary systems, as well as in skills, connectivity and access. Six in ten Scottish households with children fall below the [Minimum Digital Living Standard](#). Home internet access ranges from 77% of households on the lowest incomes to 100% of the highest ([Scottish Household Survey 2023](#)). Someone who cannot afford a connection because their income does not cover the cost of essentials does not principally have a digital skills problem, and does not have an investment architecture problem.

2. Scotland has a strong and convergent evidence base on the characteristics of effective provision. Two independently evaluated national programmes, Connecting Scotland, the [Roadmap](#), the Minimum Digital Living Standard and Audit Scotland all point the same way. What is well established is the characteristics of effective provision, and Scotland does not need another exercise to rediscover those. What remains genuinely unknown is how much need there is and which funding mechanisms work in meeting those differing needs. Those are tractable evidence questions, and neither requires financial engineering to answer.

3. Exclusion is dynamic, so Scotland needs standing capacity rather than a succession of projects. People move in and out of exclusion at identifiable moments: leaving prison or hospital, becoming homeless, bereavement, relapse, a device lost, a contract ending, a service changing its login. Provision has to exist before the need arises. A three-year project cannot be there when someone leaves hospital in year five.

4. Organisations creating greater dependency on digital services are responsible for ensuring people are not excluded by that change. The more useful question is not who benefits financially from digital inclusion, but who creates the conditions that make digital participation necessary. Transformation business cases commonly capture the expected benefits of channel shift and technology investment, but can fail to capture the costs of supporting people who cannot use the resulting service. Those costs do not disappear. They are displaced onto

voluntary organisations, libraries, advice services and frontline staff across housing, health and care, often without corresponding resource.

5. Much effective digital inclusion is recurring, human and relational. It creates substantial social and economic value. It rarely generates a revenue stream capable of repaying investment finance. A service costing £50,000 a year does not become investable because it produces £150,000 of social value, because social value is not a revenue stream. Where the activity itself does not generate income, investment requires a third party, often the public sector, to commit future revenue to service the capital. The question then becomes whether that is better than funding the activity directly. Underneath this sits a principle: equitable access to an essential public service does not become worthwhile only when it saves the state money. Efficiency should inform how inclusive services are delivered, not whether inclusion is provided at all.

6. Different needs require different provision, and different funding mechanisms. Not everyone needs every element: some can afford a device but lack the skills to use it for what would help them, others have skills and no way to pay for connectivity. Provision should therefore be embedded and differentiated rather than delivered as a standard package, which is why this report does not attempt to price digital inclusion. Public expenditure, commissioning, grants, procurement, corporate contribution and investment finance may all have a role. The mechanism should fit the requirement rather than the requirement being reshaped to fit the mechanism.

What this means in practice

Applying that sequence to the components of effective digital inclusion produces an answer that looks nothing like a single funding solution.

What Scotland needs is existing budgets accounting properly for the costs their own decisions create, alongside stable multi-year revenue for the trusted community support, access and connectivity that cannot simply be absorbed within existing services.

That second element is real and continuing expenditure. This report should not be read as suggesting that digital inclusion can be delivered without money. The distinction we draw is between the need for sustained expenditure, which is genuine, and the need for a new financial architecture through which to deliver it, which we do not think has been established.

That is a less exciting answer than a new financial instrument, but it is what the evidence supports.

Recommendations

Six recommendations follow from the evidence. Two are the substantive policy asks and are listed first.

	Recommendation	Principal audience	Primary resource implication
1	Require digital transformation programmes to assess, cost and mitigate the exclusion associated with them	Public bodies, Audit Scotland	Expenditure within transformation budgets
2	Fund trusted community capacity on a sustained basis	Commissioners, Scottish Government	Sustained revenue
3	Publish a digital inclusion delivery plan, built on the evidence Scotland already has	Scottish Government, COSLA	Political and policy leadership
4	Set clear expectations of responsibility across sectors, starting with connectivity affordability	Scottish Government, Ofcom	Regulatory and practice change
5	Measure exclusionary systems as well as excluded people	Public bodies, DIA	Modest resource
6	Test financial innovation selectively, and require evidence of additionality	DIA panel, funders	A decision on process

The first two are the substantive asks. The remaining four are enabling actions and tests. None depends on first making digital inclusion investable.

They correspond to two duties, which are the clearest synthesis of this report's argument.

Prevent avoidable exclusion at source, and sustainably fund the support that remains necessary.

There is no evidence that the absence of an investment mechanism is the principal barrier to progress. The barriers the evidence does point to are the absence of a plan, weak accountability

for exclusion associated with digital transformation, and insecure funding for the trusted support people need.

None of those three problems is solved by making digital inclusion more investable.

In one paragraph

Scotland does not need to make digital exclusion investable before it can act. There is already a strong and convergent evidence base on what causes exclusion and on the characteristics of provision that works. The priority should be to sustainably resource the devices, connectivity, trusted human support, skills, inclusive services and community capacity that the evidence tells us people need. Responsibility should sit partly with government and partly with the organisations whose digitisation creates the need for that support. Once we understand those responsibilities and what the provision actually requires, we can choose the right funding mechanism for each. Sometimes that may involve innovative finance. Sometimes it will require mainstream public investment. The mechanism should follow the evidence, not determine the intervention.

About this report

This report builds on SCVO's [2023 Digital Inclusion Roadmap](#) rather than replacing it. The Roadmap established what effective digital inclusion requires: motivation, device, connectivity, skills and confidence and inclusive design, supported by policy, partnership and resources. It did not attempt to answer in detail how those requirements should be sustainably resourced. This report takes up that unfinished question.

It was prompted by the Digital Inclusion Alliance's [Investment Challenge](#), and it responds substantively to it, but it is not structured as a consultation response and does not answer the consultation questions in turn. It is intended to stand alone as SCVO's position on resourcing digital inclusion in Scotland.

One point of scope. This report engages with the Investment Challenge, and it does so constructively, acknowledging common ground. That should not be read as resolving SCVO's wider concerns about the Digital Inclusion Alliance itself, which we set out publicly in [Error 404: digital inclusion still not found](#) and which relate to national leadership, accountability and the risk that new structures substitute for the delivery framework Audit Scotland called for. Those concerns remain. This report is deliberately narrower: it addresses the resourcing question the Investment Challenge asks.

Part one: Understand the problem

1. Digital exclusion in Scotland

Scotland is digitising public services faster than it is including people in them.

The direction of travel is set, and much of it is welcome. The [digital strategy published with COSLA in November 2025](#) commits to a digital-first public sector, a personalised services app and wider use of data across services. The [Public Service Reform Strategy](#) points the same way, supported by the [sustainable digital public services delivery plan 2025 to 2028](#). Health and care is building a [Digital Front Door](#). [ScotAccount](#) is becoming the route into government services.

Two things follow. First, the ability to participate is not evenly distributed. Digital inclusion is not a minority interest at the edge of transformation: it determines whether reform delivers for everyone or shifts cost and disadvantage onto the people least able to absorb them.

Second, this is happening in an exceptionally constrained fiscal environment, under a government committed to fiscal sustainability and public service reform. That makes it more important, not less, that digital inclusion is built into mainstream investment and service design rather than treated as an unfunded consequence afterwards. Recognising those costs within the programmes that create them is a more accountable route than building new financial machinery to fund the consequences of exclusion after it has arisen.

Six measures worth holding in mind

Measure	Measure	Source
Adults in Scotland lacking foundation digital skills	15%	Audit Scotland, 2024 , using Lloyds Essential Digital Skills data
Scottish households with no internet access at home	9%	Scottish Household Survey 2023
Home internet access by income: households on £6,001 to £10,000 net, compared with households over £60,000	77% against 100%	Scottish Household Survey 2023
Internet use among disabled adults aged 60 and over, compared with non-disabled adults of the same age	69% against 83%	Scottish Household Survey 2023
Scottish households with children below the Minimum Digital Living Standard (MDLS)	6 in 10 <i>around 354,300 households</i>	MDLS Scotland, 2025
Adults in Scotland and Wales experiencing data poverty	1 in 7	Nesta, 2021 . The most recent Scotland-specific estimate available, and now dated

Three points matter more than the numbers themselves.

These measures are not interchangeable. Someone can have home broadband and still lack the skills to use a health portal, or be a confident smartphone user and unable to complete a form that assumes a laptop. The MDLS figure is the most useful because it is holistic, measuring whether a household has the combination of connection, equipment, skills and knowledge needed to participate.

The dial has largely stopped moving. Household internet access has sat at 91% for two successive years. [Audit Scotland](#) found that while more people are online, the proportion without the skills to use the internet has stayed the same, while the tasks people must complete online have become harder. Progress on access is not progress on inclusion.

What needs testing. There is no survey establishing what proportion of all Scottish households meet the MDLS, only households with children. Scotland is setting policy without knowing the size of the population it is setting policy for.

Why it matters

Digital participation is now a condition of ordinary life rather than an enhancement to it. It determines access to health (appointment booking, repeat prescriptions, Near Me, the NHS app and the emerging Digital Front Door), to money (Universal Credit journals, bank branch closures, online-only tariffs), to employment, education and public services, and increasingly to a single digital identity. It also shapes contact with family, peer support and recovery networks, and the ability to take part in civic life.

The argument is not that digital is bad for people. Our own programme evidence shows the opposite, strongly. It is that digital participation has become necessary for full participation in society while access to it remains unequal.

The essential message

Digital exclusion cannot be understood independently of poverty and inequality.

This was the central insight of our [2023 Roadmap](#) and nothing since has weakened it. Digital exclusion is both a cause and a consequence of poverty, tracking income, lone parenthood, household size, deprivation, disability and age. In the [UK MDLS survey](#), households below the standard were distinguished by precisely the factors associated with child poverty. Someone who cannot afford broadband because their income does not cover the cost of essentials does not principally have a digital skills problem.

There is a sharper version of this. For a household rationing a data allowance, using a public service online carries a cost. Essential public services are not free at the point of access for everyone, and as services move online some people are being asked to pay for access out of an income that already does not stretch.

Three kinds of cause, three kinds of response

Conflating these causes risks ending up funding the wrong things.

Type of cause	Examples	What resourcing can achieve
Directly addressable by digital inclusion work	No suitable device, no connection, low confidence or skills, no trusted person to ask, no awareness of what is possible	Interventions can substantially resolve these where they are sustained rather than temporary
Created by the design of systems and services	Authentication requirements, app-only access, poor accessibility, removal of phone and counter alternatives, digital-by-default processes, jargon	Should be removed at source by the organisation that created them, not compensated for indefinitely by intermediaries
Arising from poverty and wider inequality	Income below the cost of essentials, insecure housing, ill health, caring responsibilities, low literacy, insecure immigration status	Digital inclusion can mitigate the digital consequences but cannot resolve the underlying cause

These categories are not mutually exclusive descriptions of individuals. Disability, ill health, low literacy and poverty sit in more than one column at once, and usually do. Their purpose is to distinguish causes, because different causes imply different responsibilities and resource responses.

The first needs sustained provision. The second is a cost belonging to the organisation digitising the service, and in a tight settlement it is where most progress is achievable, because it concerns how transformation expenditure is allocated. The third means digital inclusion policy should be honest about its limits. It is not a poverty strategy, and should not be asked to produce returns only a poverty strategy could deliver.

2. Digital exclusion is dynamic

The most common mental model of digital inclusion is a one-way journey. Someone is excluded, an intervention happens, and they are then included.

That model is wrong, and it produces the wrong funding decisions.

People move in and out of exclusion

Our programme evidence is unusually strong here, because [Digital Lifelines Scotland](#) and the [Digital Inclusion in Health & Care Programme](#) worked with people whose circumstances change often and sharply. The moments that produced or renewed exclusion included release from prison, discharge from hospital, becoming homeless or moving into a first tenancy, bereavement, relapse, lost income, deteriorating health, sight, dexterity or memory, a device lost,

stolen, broken or sold, a contract ending or data running out, the loss of the family member or worker who did it for them, and a service changing its login, moving to an app or closing its phone line.

Some of this is measurable. In one [Digital Lifelines](#) project supporting people experiencing homelessness, 58 devices were lost or stolen and 63 were replaced within the funding period. That is not project failure. It is the normal operating condition of this work. Although it was a small minority of the overall devices that were distributed, it tells us something that matters for funding: access is not a one-off transaction.

Affordability behaves the same way. In the [Jangala Get Box pilot](#), where users began a month with a 25GB allowance, 43% ran out before the month ended, on average after 13 days.

Connectivity provided once, or capped, is not connectivity sustained.

Evaluation evidence also records people dropping out of contact and returning, for reasons including relapse, relocation and no longer needing help. A system that counts people once, at the point of intervention, cannot see any of this.

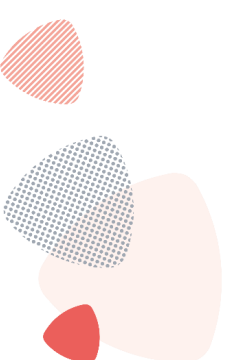
Capability is contextual, not general

Someone can be fluent on a smartphone and defeated by a form that assumes a keyboard, or manage social media confidently and be locked out by two-factor authentication on a bank account.

What the evidence demonstrates: capability is specific to task, device, service design and circumstance. It is not a fixed attribute of a person that a training course permanently raises.

The objective should be sustainable digital participation, agency and choice, not universal digital independence.

We would use the language of “sustained digital independence” with caution. Some people will become fully independent users, others will need occasional help when something changes, and some will need continuing support. Some will be entirely capable and still prefer to phone or attend in person, which is a legitimate choice rather than a policy failure. Continuing to need human support is not evidence that an intervention failed. Human support is part of digital inclusion infrastructure.



Case study: exclusion at a transition point

A woman leaving prison in the Highlands received a smartphone and connectivity at the point of release, with help to set it up. She used it to manage her benefits claim and her housing, and to stay in daily contact with her support worker and her family. Her support organisation credited that continuity of contact with helping her avoid relapse and move towards stability. Nothing here suggests a skills deficit. She was excluded because she left an institution with no device, no connection and no account access, at exactly the moment when benefits, housing and support contact all required them. The intervention worked because something existed at that moment, locally, with a trusted worker attached to it.

Source: *Digital Lifelines Scotland small grants fund final impact report*, Red Chair Highland, 2025.

What this means for resourcing

If exclusion is dynamic, Scotland does not need a series of interventions. It needs a standing capacity that can respond when someone's circumstances change. Provision has to exist before the need arises, in the places and services where people already are. Funding has to be recurring, because the need is recurring: a three-year project cannot be there when someone leaves hospital in year five. And success measures built around one-off transitions from excluded to included will undercount the value of the capacity that matters most.

Part two: Start with what works

3. What the evidence tells us

Scotland has a strong and convergent evidence base on the characteristics of effective digital inclusion provision.

Over the past five years Scotland has run two independently evaluated digital inclusion programmes in health and social care, distributed devices and connectivity at scale through [Connecting Scotland](#), published a [Roadmap](#) drawing on more than a decade of delivery, developed a [Minimum Digital Living Standard](#) with the Scottish Government, and been audited by [Audit Scotland](#). Alongside that sits a consistent body of UK research. That evidence converges, and has done for some time.

We set it out organised by what works rather than by which programme produced it, because the resourcing question in part four depends on knowing what has to exist, not which fund paid for it.

Appropriate access

People need a device suited to their circumstances and to what they are trying to do.

What the evidence demonstrates: device choice matters, and getting it wrong wastes money. A smartphone was the right answer for someone leaving prison who needed to be contactable immediately, and the wrong answer for someone joining a support group by video call or completing a college course. Evaluations repeatedly note people whose only access was an outdated handset that could not run the software their support depended on. Where people were given a choice, engagement and dignity both improved.

Devices are also a consumable rather than a one-off capital purchase. They are lost, stolen, broken, sold and outgrown. Provision that assumes otherwise will have quietly stopped working within two years.

Affordable connectivity

Access has to be affordable and sustainable rather than provided temporarily.

What the evidence demonstrates: temporary or capped connectivity produces temporary inclusion. Six months of free data solves a six-month problem. Capped allowances run out, on the [Jangala evidence](#) typically halfway through the month, and unpredictably, so people ration their use of the very services the connection was provided for.

What the evidence also demonstrates: the social tariff market is not delivering at the scale required. Take-up stood at under 9% of eligible households in June 2025, and 70% of eligible households were unaware that social tariffs existed in October 2025 ([Ofcom](#)). Multiple studies

conclude current tariffs remain unaffordable for households in deep poverty. Eligibility and credit checks deter people, and fixed-line tariffs are of no use to someone without a fixed address.

This is a clear example of a barrier that the organisations creating it are best placed to reduce, and of a problem where the useful national action is largely about practice rather than expenditure. Part three returns to where that responsibility sits, and part seven sets out what should change.

Skills and confidence

Support has to respond to what someone actually wants to do.

What the evidence demonstrates: effective support starts from the person's own purpose, not from a curriculum. The [Digital Inclusion Programme evaluation](#) found that successful projects supported real-life uses, such as attending a video GP appointment, contacting family or managing energy bills, and encouraged self-directed exploration rather than concentrating on functional skills in the abstract. Projects that worked operated with no fixed learning agenda.

What the evidence suggests: completion of a generic digital skills course is a weak proxy for inclusion. Skills are also lost. They get outdated as devices, interfaces and authentication requirements change. Treating skills as a one-time acquisition misunderstands what is being funded.

Trusted human support

This is the most consistent finding in the Scottish evidence base, and the most important for the resourcing argument.

What the evidence demonstrates: digital inclusion is rarely achieved through transactional or one-off intervention. The Digital Inclusion Programme evaluation identified trust as the single most consistent success factor across all projects, and found engagement often followed weeks or months of relationship-building. Support worked when it came from someone the person already knew or came to trust, was delivered where people already were, and could be paused when life intervened and picked up later. The Digital Champion model worked for the same reason: champions were effective not because of technical skill but because they were embedded, trusted and able to create an environment where someone could fail, try again and ask an obvious question without embarrassment.

This establishes something that matters directly for part five:

Some of the most effective digital inclusion interventions are inherently human, relational and recurrent.

A community worker spending 45 minutes helping someone regain access to an email account

does not naturally generate a repayment stream. It may nevertheless be the difference between that person accessing their housing account, their medical record or their benefits.

Inclusive design

Responsibility cannot rest with the excluded individual.

What the evidence demonstrates: mandatory digital-only services create barriers for people accessing support and for the staff supporting them. Where accessibility and inclusive design are inadequate, cognitive, motor, literacy and language barriers combine with unfamiliar systems to exclude people who would otherwise participate. Within learning disability services in particular, the evidence points to adapting digital approaches to different communication and processing needs rather than expecting people to conform to standardised systems.

The practical question this raises is one Scotland is not currently asking:

Are we investing more effort in identifying digitally excluded people than in identifying digitally exclusionary systems?

Every avoidable barrier a service leaves in place converts into a recurring cost borne by someone else. Often that is a voluntary organisation, but it is also libraries, advice services, welfare rights teams and frontline staff in housing, health and care, few of whom are funded to do it.

Two points need to be held together here, and the argument fails if either is dropped.

Avoidable exclusion created by design should be reduced at source. This is not a one-off fix. Accessibility, usability testing, assisted digital channels and the retention of non-digital routes are continuing responsibilities with continuing costs, and they belong to the organisation delivering the service.

Support needs remain even when services are well designed. A perfectly designed NHS service will not remove dementia, low literacy, poverty or the absence of a connection. Good design reduces the volume and difficulty of the support required. It does not eliminate the need for it.

Scotland needs both. Arguing only for better design leaves people unsupported. Arguing only for more support funds intermediaries indefinitely to navigate problems that need not exist.

Embedded support

Digital inclusion works best inside other provision, not alongside it.

What the evidence demonstrates: evaluations of numerous programmes in Scotland and across the UK have found digital inclusion most sustainable and effective when integrated into core service delivery rather than run as a separate project. In the Digital Inclusion in Health & Care Programme, where digital need was raised during assessment, recorded and acted on

alongside other health and care needs, digital became a normal conversation for the whole team rather than the specialist's job, need was actually identified, and exclusion stopped being framed as an individual deficit.

Embedding is largely a change to practice, assessment, care planning and workforce development within services that already exist. It is not free, but it is not a new programme either.

Long-term capacity

Short-term projects can test new approaches. An established and permanent social need requires sustained provision.

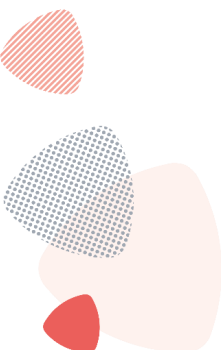
What the evidence demonstrates: short-term funding disrupts continuity. The Digital Inclusion Programme evaluation found projects unable to maintain momentum because staff contracts were tied to fixed-term funding, and unable to embed learning within the funding window. Digital Lifelines projects reported demand remaining high as funding ended.

Leaders across health and social care were blunt about the implication, telling researchers that digital inclusion cannot become self-sustaining and will always require a budget and people. Our own conclusion is narrower but firm: a sustainable digital inclusion system will continue to require budget and human capacity, even as better service design reduces how much support is needed.

This is the point at which the funding debate usually begins, and it is worth being precise about the problem. It is not simply that projects are too short. It is that Scotland keeps funding digital inclusion as a temporary intervention while digital participation has become a permanent condition of accessing public services.

Longer grants would help. They would not resolve the underlying category error.

If digital inclusion is treated as innovation, we pilot it. If it is treated as charitable activity, we grant-fund it. If it is treated as essential to equitable access to public services, we design it into those services and resource it accordingly.



Case study: embedded, relational, and cheaper than the alternative

A woman in her late seventies with a long history of complex mental health needs had received intensive support for most of her life, requiring weekly input from NHS Fife's community mental health team. Her clinical psychologist referred her to Link Living's peer digital inclusion service. With one-to-one support from a peer digital coach she built confidence using a device and began accessing therapeutic and community resources online. She went on to found a holistic therapies group for older people, which she now coordinates herself, and is no longer reliant on weekly mental health appointments.

Using [NHS cost collection figures](#), the evaluators estimated that around £14,500 a year of service cost had been avoided in this single case, and noted that if five other people achieved similar results the savings would exceed the project's entire funding.

Three features matter more than the number. It was **embedded**: the referral came from inside the NHS into a service run by a housing and social care organisation. It was **relational**: a peer coach, over multiple sessions, at her pace. And the outcome was not the digital skill. It was a woman running a community group.

Source: [Digital Inclusion Programme evaluation](#), Blake Stevenson, 2025.

What the evidence does not tell us

We should be equally clear about the limits, because the resourcing argument is weaker if it overclaims.

What the evidence suggests, rather than demonstrates: digital inclusion can reduce service demand and cost in some circumstances. The costed case studies are genuinely encouraging and estimated savings ranging from several hundred pounds to over £14,000 per person per year. But they are individual cases, costed retrospectively, using national unit costs applied to estimated changes in service use. The evaluators themselves recommended that future projects build cost tracking in from the start, which is a fair acknowledgement that this was not designed as economic evaluation.

What needs testing: there is no Scottish evidence base capable of supporting a claim that digital inclusion delivers a reliable, attributable, cashable return at population scale. Anyone building a financial instrument on that assumption is building on a handful of well-documented individual cases.

That is not an argument against acting. It is an argument for being careful about which claims the resourcing model has to carry. We return to it in part five.

The distinction between what Scotland knows and does not know matters for what comes later. The characteristics of effective provision are well established. What remains genuinely unknown is how much need there is, what outcomes provision achieves at population level, and which funding mechanisms work. Those are tractable evidence questions, not problems requiring financial engineering, and they are different from the question of what good provision looks like.

What the evidence establishes

Effective digital inclusion needs to be:

- **appropriate** to the person and to the task they are trying to complete
- **affordable** over time, not provided once
- **supported by trusted people**, repeatedly and at the person's pace
- **embedded** in existing services and relationships rather than run alongside them
- **designed** to remove avoidable barriers at source
- **available** when circumstances change, not only at the point of first contact
- **sustained** rather than delivered as a succession of projects.

These seven characteristics determine both who has responsibility for digital inclusion and what kind of resource it requires. Part three turns to the first of those questions.

Part three: Responsibility before finance

4. Who is responsible for digital inclusion?

The [Investment Challenge](#) asks who benefits financially from digital inclusion, on the reasonable assumption that those who benefit might be persuaded to pay.

We think there is a prior question, and a more important one:

Who creates the conditions that make digital participation necessary, and who therefore has a responsibility to ensure people are not excluded by them?

This is not a claim that public services cause poverty, disability or low literacy. What a transformed service creates is a new dependency on digital participation. The proposition that follows is narrower and more defensible:

If the design of a transformed service makes digital capability necessary for access, the programme should bear the cost of making that access equitable.

[Audit Scotland](#) supports this framing directly, concluding that public service reform will only achieve its aims if everyone is included, and that all public bodies undertaking digital transformation need to enable digital inclusion.

The difference matters. A question about who benefits produces a search for willing contributors. A question about who creates the need produces an allocation of responsibility. Only the second gives Scotland something it can hold to account.

We say in our [2023 Roadmap](#) that digital inclusion is everyone's responsibility. We still believe that. But "everyone's responsibility" is only useful if it is specific about whose responsibility is what.

Scottish Government

Government's responsibility is national leadership, policy coherence and creating the conditions in which sustainable provision is possible. That is not the same as funding everything. It is the responsibility to set direction, allocate accountability, and ensure that its own digital transformation does not generate exclusion.

Audit Scotland set out what this requires in August 2024: clear ambitions, an action plan, defined responsibilities and governance arrangements developed with COSLA, with funding requirements considered through medium-term financial planning, by March 2025. At the time of writing there is a digital strategy vision statement published with COSLA in November 2025 and a ministerial commitment that an action plan will follow. A draft plan has been shared with partners in early September 2026, but at the time of writing there is still no published plan

setting out agreed responsibilities, timescales or resource requirements.

The resourcing question cannot be answered without it. You cannot decide what funding mechanism suits a delivery model that has not been defined, or allocate costs across sectors without a statement of who is responsible for what. The absence of a plan is why the investment conversation is being held in a vacuum.

Government also carries the responsibilities upstream of digital exclusion entirely: poverty, income adequacy, equality and infrastructure. Digital inclusion policy cannot substitute for those.

Local government and public services

This is where we would ask for the biggest change in thinking.

If access to healthcare, housing, social security or council services is digitised, supporting equitable access to that service is part of the cost of delivering it. At present it too often is not. Transformation business cases commonly capture the expected benefits of channel shift and technology investment, but can fail to capture the costs of supporting people who cannot use the resulting service. Audit Scotland found this pattern directly: government aims to save money through digital services while the burden of supporting people to use them falls to local community organisations and charities, without resource or recognition.

Those costs are displaced rather than removed, and not only onto the voluntary sector. Libraries absorb a great deal of it, as do advice services, welfare rights teams, and frontline staff in housing, health and social care who help people through processes that were not designed with them in mind. Few of them are funded or recognised for doing so, and none of them appear in the business case that created the need.

The principle we would propose is straightforward, and it applies in a tight settlement precisely because it is about how existing money is spent:

Digital inclusion should be treated as a necessary component of digital transformation, not as a separate programme that mitigates its consequences.

In practice this means assessing and costing, within a programme's own business case, who is likely to be excluded, how that will be mitigated, what support is required and for how long, and what non-digital provision remains necessary. Recommendation 1 in part seven sets out the requirement in full.

The argument is not that inclusion is free. Some costs will be met by reprioritising within a programme, and others, including assisted digital capacity, accessibility testing, staff training and the retention of alternative channels, will require genuine additional expenditure. The point is that these are delivery costs of the transformation rather than a separate problem to be solved elsewhere, later, by someone else.

Private sector

Telecommunications, banking, technology and utility companies have a legitimate role as contributors. But responsibility comes before philanthropy.

The Investment Challenge asks how these companies might move from one-off sponsorship to longer-term investment. That is a fair question, but it treats their contribution as discretionary generosity rather than as connected to their own conduct.

The questions we would ask instead: why should a telecommunications company be commended for contributing to a digital inclusion fund while offering products that remain unaffordable to people on the lowest incomes, and while most eligible households do not know its social tariff exists? Why should a bank sponsor digital skills programmes after closing the branches people were using? Why should a technology company fund inclusion work without addressing accessibility, device longevity and affordability in its products?

The principle:

Corporate contribution should complement, not substitute for, action to remove exclusion created by products, pricing and service design.

Or, as it is more often put to us by the organisations doing the work: **don't pay us to help people overcome barriers you could remove yourselves.**

This is not an argument against corporate contribution. It is an argument about sequence. Reduce the avoidable barrier first, because that is cheaper for everyone, then contribute to the support that remains necessary. And support will remain necessary, because affordability, disability, literacy and life circumstances are not design faults that a better interface resolves.

We should also be realistic about the scale of what corporate contribution has historically delivered in Scotland, because the Investment Challenge places significant weight on it. The following reflects SCVO's own experience of seeking corporate support over the past decade rather than a systematic market analysis. Larger national and multinational companies have tended to direct contributions towards England, and contributions made in Scotland have tended to cluster around corporate offices or areas of commercial interest. National cash contributions have been modest relative to the scale of need, and much corporate support has been offered in kind, often as volunteering days, which is well intentioned but rarely sustainable and frequently generates work for the voluntary organisation hosting it.

That is our experience rather than evidence, which is why we would put it as a test rather than a conclusion. Before a funding model is designed around private capital, the DIA should be able to demonstrate:

- **appetite:** which investors have expressed concrete interest in Scottish digital inclusion, as opposed to interest in the concept

- **quantum:** how much capital is realistically available, over what period
- **expected returns:** what rate of return investors require, and from which revenue stream
- **timescales:** the investment horizon, and whether it matches the outcome horizon
- **public exposure:** what guarantees, first-loss provisions or outcome payments would be required from public bodies
- **transaction costs:** the cost of structuring, verifying and administering the arrangement, and what proportion of the total that represents.

Those are answerable questions. They should be answered before a model is built on the assumption that the capital exists.

Voluntary sector

The sector's contribution is trusted relationships, community reach, specialist expertise and the ability to work with people that statutory services struggle to reach. The evidence in part two shows how central that is.

But the sector's role should be to provide support, not to absorb the cost of other organisations' decisions.

The voluntary sector should not be expected to absorb unfunded costs created by the digitisation of public services.

The next section shows that this is not a rhetorical complaint. It is measurable.

Individuals

People's own aspirations, agency and choices should drive the support they receive. That is a consistent finding in our programme evidence: support works when it starts from what the person wants to do.

Responsibility for overcoming structural exclusion should not be transferred to individuals. Someone who cannot afford a connection has not made a poor choice. Someone who cannot navigate an authentication process designed without them in mind has not failed a test. And people are entitled to decline. Someone who is perfectly capable of using a service online and prefers to phone or attend in person is exercising a choice, not creating a problem to be solved.

Case study: the contribution the sector already makes

Connecting Scotland is usually described as a device and connectivity programme. Across its first three phases it distributed more than 60,000 devices, backed by £48.1 million of Scottish Government funding to SCVO. The human support element was not in that figure.

Digital skills support was delivered by digital champions: frontline staff in the more than 1,000 partner organisations that supported the programme, working on top of their existing jobs. SCVO provided training and materials. The staff time itself was absorbed by the organisations.

SCVO's own illustrative analysis of the digital champion survey and the phase 1 evaluation suggests that the staff time contributed in kind across the programme amounted to something in the order of £1.3 million, at the living wage rate applicable at the time. It is an estimate of contributed staff time, not a price for digital champion support, and it should not be used to cost future provision.

Two things about it matter.

First, it is an underestimate. It counts direct contact time only, at the minimum defensible hourly rate of the day, and excludes employer on-costs, overheads, administration, device distribution, travel and monitoring. At current wage rates the same contact time would cost substantially more.

Second, it was invisible in the programme's reported cost. A national programme reported its cost without the component the evidence in part two identifies as most important, because somebody else was paying for it.

SCVO's own conclusion at the time was a question rather than a claim: as costs rise, can organisations continue to afford to provide this support in kind?

Subsequent experience across the sector suggests that this model is increasingly difficult to sustain. That, rather than an absence of investment instruments, is what the current funding debate is really about.

Source: SCVO analysis of Connecting Scotland digital champion survey data and phase 1 evaluation. This is an illustrative estimate based on self-reported survey averages, not a formal costing.

What this section establishes

Responsibility can be allocated before any decision about funding mechanisms is taken, and doing so changes what the funding question is.

Who	Responsibility	Nature of the obligation
Scottish Government	Leadership, plan, accountability, poverty and equality policy, conditions for sustainable provision	Continuing public policy duty
Public bodies digitising services	Assess, cost and mitigate exclusion caused by their own transformation; retain necessary non-digital routes	Cost of delivering the service
Telecoms, technology, banking, utilities	Remove exclusion created by their products, pricing and service decisions; contribute to remaining need	Conduct first, contribution second
Voluntary sector	Trusted support, reach, expertise, delivery	Should be funded, not absorbed
Individuals	Choice, aspiration, direction of their own support	Agency and choice, not responsibility for structural exclusion

Allocating responsibility this way changes the funding question. Several of the requirements identified in part two turn out to belong logically within budgets and services that already exist. Others will require resource that does not currently exist anywhere. Part four separates the two.

Part four: What actually needs to be resourced?

5. Sustainable digital inclusion infrastructure

Part two set out what the evidence says works. Part three allocated responsibility. This part translates both into a resource requirement.

Our [2023 Roadmap](#) described effective digital inclusion as requiring five interconnected elements: motivation, device, connectivity, skills and confidence, and inclusive design, supported by policy, partnership and resources.

The Roadmap established what effective digital inclusion requires. It did not attempt to answer in detail how those requirements should be sustainably resourced. This report takes up that unfinished question.

Scotland needs a sustainable digital inclusion infrastructure capable of supporting people at the point when their circumstances put them at risk of exclusion.

Infrastructure is a word that can be used to avoid specifics. So here is what we mean by it, concretely.

Component	What it actually is
Devices	Suitable devices, matched to purpose, replaced when lost, broken or outgrown
Connectivity	Affordable, adequate, continuing access, not a time-limited allowance
Trusted human support	Time from a person the individual trusts, available when needed and repeatedly
Skills and confidence	Support built around what the person wants to do, refreshed as technology changes
Inclusive service design	Services that do not create avoidable barriers, with non-digital routes retained
Community capacity	Local organisations with the stability to hold relationships over years
Workforce capability	Frontline staff across health, care, housing and advice who can identify and respond to digital exclusion as part of their job
Leadership and coordination	National leadership and accountability, and local capacity to match provision to need and know whether it is working

Three observations follow, and they shape everything in chapter 6.

Only two of the eight are primarily physical assets. Most are people, practice and organisational capacity. That has direct consequences for what kind of money is appropriate.

Several belong within existing service and transformation budgets: inclusive service design, workforce capability, the embedding of support within existing provision and, arguably, local coordination. In some cases that will require reprioritisation. In others it will require additional resource, because services under pressure may have neither the capacity nor the funding envelope to absorb new inclusion work. The important point is that these are core delivery costs rather than things to be displaced into separate short-term inclusion projects.

This is a description of a system, not a package. That distinction matters enough to state separately.

Not everyone needs everything

Digital inclusion should be embedded within services. What that means in practice is that the intervention looks different depending on the need, and not all exclusion requires all elements to be addressed.

Some people can afford a device but lack the skills or the motivation to use it for what would help them. Some have the skills and no way to pay for regular connectivity. Some have both and are defeated by an authentication process. Some need nothing more than for a service to stop being unnecessarily difficult. Some, particularly people at the transition points described in part one, need the full combination, and need it repeatedly.

Scotland has run programmes that provide the full combination. Connecting Scotland did, and [Digital Lifelines](#) does. Both demonstrate that comprehensive provision works and that it can be mobilised quickly. But Connecting Scotland was designed as an emergency response to a pandemic, and in the current fiscal environment an approach that offers everyone the full package is unlikely to be sustainable at national scale. There is a place for comprehensive device and connectivity support. It should not be treated as the template for how all digital inclusion is delivered.

This has a direct consequence for the resourcing question, and it is why this report does not attempt to price provision.

There is no single unit cost for digital inclusion, because there is no single intervention. A figure derived from a full-package programme would describe one delivery model rather than the requirement.

That is not an evasion of the question. It is an argument about where the question should be answered.

Where the resource requirement should be established

The sequence in part six asks what needs to be resourced before selecting a mechanism. That

does not mean a single national costing exercise, and we would caution against one built on a package model.

It means the requirement is established at the point of responsibility.

- A transformation programme costs the inclusion that its own change makes necessary, for the people its own service reaches. That is recommendation 1 in part seven, and it is the most important costing any public body in Scotland could do.
- A commissioner costs the support the service it commissions actually needs, differentiated by the people that service works with.
- An employer costs the workforce capability its own staff require.

Aggregated, those answers give Scotland a resource requirement grounded in real provision for real need. Built the other way round, from a national average multiplied by a population, it would give a number that describes nobody.

6. Different things require different kinds of money

Once you look at the eight components, it becomes clear that they are not the same kind of expenditure, and that treating them as a single funding problem is the source of much of the confusion.

Requirement	Nature of expenditure	Appropriate mechanism
Trusted community digital support	Recurring revenue	Core funding, commissioning, public funding
Connectivity support	Recurring	Public support, regulated or improved social tariffs, corporate contribution
Devices	Capital, but consumable in practice	Public funding, grants, corporate donation of hardware, refurbishment
Inclusive public service redesign	Transformation expenditure	Mainstream digital programme budgets
Workforce capability	Recurring revenue	Existing workforce development budgets
Community capacity and coordination	Recurring revenue	Core or commissioned funding

Testing a genuinely novel intervention	Time-limited, risk-bearing	Innovation grant
Infrastructure generating a sustainable income stream	Capital, potentially investable	Social or private investment, where a repayment mechanism genuinely exists

The central financing mismatch

Before considering any particular mechanism, one proposition should be stated plainly, because it explains most of the disagreement in this report:

Much of what effective digital inclusion requires is recurrent revenue expenditure: people, relationships, connectivity, coordination and continuing support. Investment finance is most naturally suited to assets or activities with a credible repayment stream. The first question is therefore not how to turn recurrent provision into an investment product, but whether capital is what that provision actually needs.

There is a related structural mismatch. Capital tends to favour interventions that are predictable, measurable, standardised and scalable. The evidence in part two describes work that is relational, local, adaptive, slow and dependent on skilled human judgement. That is not an argument that such work cannot be financed. It is an argument that financing it well is harder than financing a capital asset, and that the difficulty should be acknowledged before a mechanism is chosen rather than after.

The purpose of the table above is not to prescribe the answer for every intervention. It is to establish a principle:

Funding mechanisms should match the economics of the intervention.

Note what the table shows. Several of these activities could in principle sit within an investment structure, through outcomes contracts, working capital facilities or similar instruments. But most of them do not themselves generate the reliable revenue stream required to repay investment. Investment would therefore usually depend on a third party, often the public sector, committing future revenue to service the capital.

That is the question worth putting directly: if the public sector must commit future revenue either way, is routing it through an investment structure better than funding the activity directly? Sometimes it may be, where the timing of capital matters or where risk is genuinely better held elsewhere. Often it will not be. The answer depends on the intervention, which is precisely the argument of this report.

Why social value does not make something investable

This is the point at which the investment logic and the delivery evidence come apart, so it is

worth being precise.

A community digital support service costing £50,000 a year does not become investable because it produces £150,000 of estimated social value. Investment finance requires a revenue stream capable of repaying capital with a return. Social value is not a revenue stream. It does not arrive as cash in an account belonging to anyone who could repay an investor.

In the types of provision considered in this report, the plausible routes are essentially three. Someone pays for the outcome, which means a public body is funding it and the investment is a cashflow arrangement rather than a new source of money. The service generates income from users, which is not viable for people who cannot afford connectivity. Or the savings are cashable, attributable and accrue to a body willing to pay for them, which part five examines and finds to be true far less often than the model requires.

Where none of those applies, introducing investment finance adds transaction costs, contracting complexity, verification requirements and a return to capital, all of which are money not reaching frontline support. The service still needs £50,000 a year, and now also needs the mechanism that delivers it.

Underlying this is a set of distinctions that are routinely collapsed in investment discussions and that part five examines in detail:

social value → economic benefit → fiscal saving → cashable saving → investor return

Each step in that sequence is a narrower category than the one before it, and each requires evidence the previous one does not. Digital inclusion produces a great deal of the first. It produces the last only rarely.

The simpler route, which should be exhausted first

Before creating blended finance vehicles, outcome payments or private investment models, there is a more obvious option that Scotland has not tried extensively.

Move digital inclusion into core funding, commissioning, workforce development and service design.

That is not a radical proposition. For many analogous requirements, including accessibility, interpretation and assisted access, we normally recognise provision as a delivery cost rather than first asking how it can be made investable. Some digital inclusion provision belongs in that category. Other parts of it, particularly trusted community capacity, need to be sustained separately, which is why this report treats the two differently.

If digital participation is genuinely infrastructure, as the Investment Challenge argues, then substantial parts of it may simply need to be publicly funded infrastructure.

Part five: Testing the Investment Challenge

Parts one to four set out an evidence-led account of what causes digital exclusion, what works in tackling it, who is responsible and what kind of expenditure it represents.

This part applies that account to the propositions in the [DIA Investment Challenge](#). For each, the test is the same: does it follow from the evidence?

For several, the answer is yes. For others it is “possibly, but unproven”. For the proposition that social value can, in itself, create an investable return, the answer is no: a repayment mechanism is still required.

7. Where SCVO agrees with the DIA

There is common ground, and the disagreement that follows is about method rather than intent. We agree that:

- short-term, fragmented funding is a real and serious problem, and that annual cycles pull delivery towards counting devices and training hours
- Scotland should treat the things that make sustained digital participation possible as enduring infrastructure
- the full stack matters, and the Investment Challenge is right to include ongoing human support within its definition
- fragmentation across departmental budgets is real, as is the risk that increasingly digital services amplify inequality
- understanding what existing public expenditure achieves is worth doing
- outcomes matter more than outputs
- place shapes need, cost and the availability of trusted organisations. SCVO has been developing place-based approaches since 2021, and the lesson from that work is that capital alone is insufficient
- testing different funding mechanisms is legitimate. We are not arguing that grants are sacred.

We also agree that lived experience should shape this work, and would add one point about timing. The question is not whether lived experience is represented in the governance of a solution once designed. It is whether people have influence over what problem is prioritised, what outcomes matter and how success is defined. Part six develops that.

Finally, we would recognise something about the process. Alongside the Investment Challenge, the DIA published a discussion paper by Professor Michael Roy of Stirling University, *Digital participation as infrastructure: are there lessons from social investment?*, which examines the international evidence on social investment and outcomes-based finance. It is not an endorsement of the Investment Challenge's direction. It sets out where the evidence for these instruments is weak, where they have failed, and what that implies for applying them to digital participation. Publishing a paper that tests your own emerging proposition, rather than one that supports it, is a genuinely open thing to have done and deserves recognition. We engage with it in detail in section 8.7.

8. Where we believe the evidence points in a different direction

8.1 What can the satellite account actually tell us?

The Investment Challenge rests significantly on the satellite account for Scotland on digital public sector spend, which is described as revealing a system investing significant resources in digital participation without coordination or strategic alignment. We have not seen the underlying analysis, so what follows concerns the inference rather than the arithmetic.

The critical distinction is between **public sector expenditure on digital** and **public sector expenditure on digital inclusion**.

Software licensing, cloud infrastructure, cyber security, network costs and employee devices are essential digital expenditure, and very little of it is substitutable for community digital inclusion support. A local authority cannot redirect its cyber security budget to fund a digital champion post, and would be criticised if it tried. A large headline number invites the inference that the money is already there and needs only realigning, but even where expenditure could theoretically be redirected it sits in budgets belonging to organisations with their own statutory obligations and pressures. Identifying money in aggregate is not the same as being able to move it.

The analysis is genuinely useful for a narrower and more consequential question:

When Scotland invests in digitising a public service, what proportion of that investment is dedicated to ensuring everyone can access and benefit from the resulting service?

That question is answerable from the same data. The answer would tell Scotland something it does not currently know, and it points directly at the recommendation in part three. Our suggestion is not that the satellite account work should be abandoned, but that it should be pointed at that question instead.

8.2 Prevention and invest-to-save

There is a real case here and we do not want to weaken it.

What the evidence suggests: digital inclusion can reduce avoidable service contacts, support self-management of health conditions, improve access to entitlements, support employment and reduce crisis intervention. The costed case studies in the [Digital Inclusion Programme evaluation](#) estimated avoided costs ranging from several hundred pounds to over £14,000 per person per year.

The limitations are equally real, and they are structural rather than evidential gaps that better measurement will close.

Benefits accrue to a different organisation from the one that invested. A housing association funding digital support may generate savings in primary care. Neither has a mechanism to transfer value to the other. Scotland's wider experience of preventative spending has run into this wrong-pocket problem repeatedly.

Benefits arrive later than investment horizons. Prevention compounds over years. Investment contracts, as Roy notes, typically run three to five years.

Attribution is genuinely difficult. Someone whose health improves after digital support may also have changed medication, moved house or reconnected with family. Converting that into a single payable metric requires interpretive decisions that are rarely as objective as the resulting number appears.

Capacity released is not the same as cash saved. If digital inclusion reduces missed appointments, the clinic does not bank the money. It sees other patients. That is a genuine public good and a real efficiency. It is not a cashable saving available to repay an investor.

Success can legitimately increase expenditure. We return to this below.

The conclusion:

The economic and social case for digital inclusion does not depend on every intervention producing a directly cashable fiscal return.

We should demonstrate economic value where it exists. We should not allow economic value to become the definition of success.

8.3 ROI, outcomes and what we are actually measuring

Successful digital inclusion can increase public expenditure.

Someone who becomes able to claim benefits they are entitled to increases government expenditure. Someone who starts engaging appropriately with healthcare increases demand on the NHS. Someone helped to speak to their family every week produces no identifiable fiscal saving at all.

All three are successful outcomes. Two of them would appear as costs in an ROI model.

This is why the following distinctions need to be held apart rather than collapsed, as they frequently are in investment discussions:

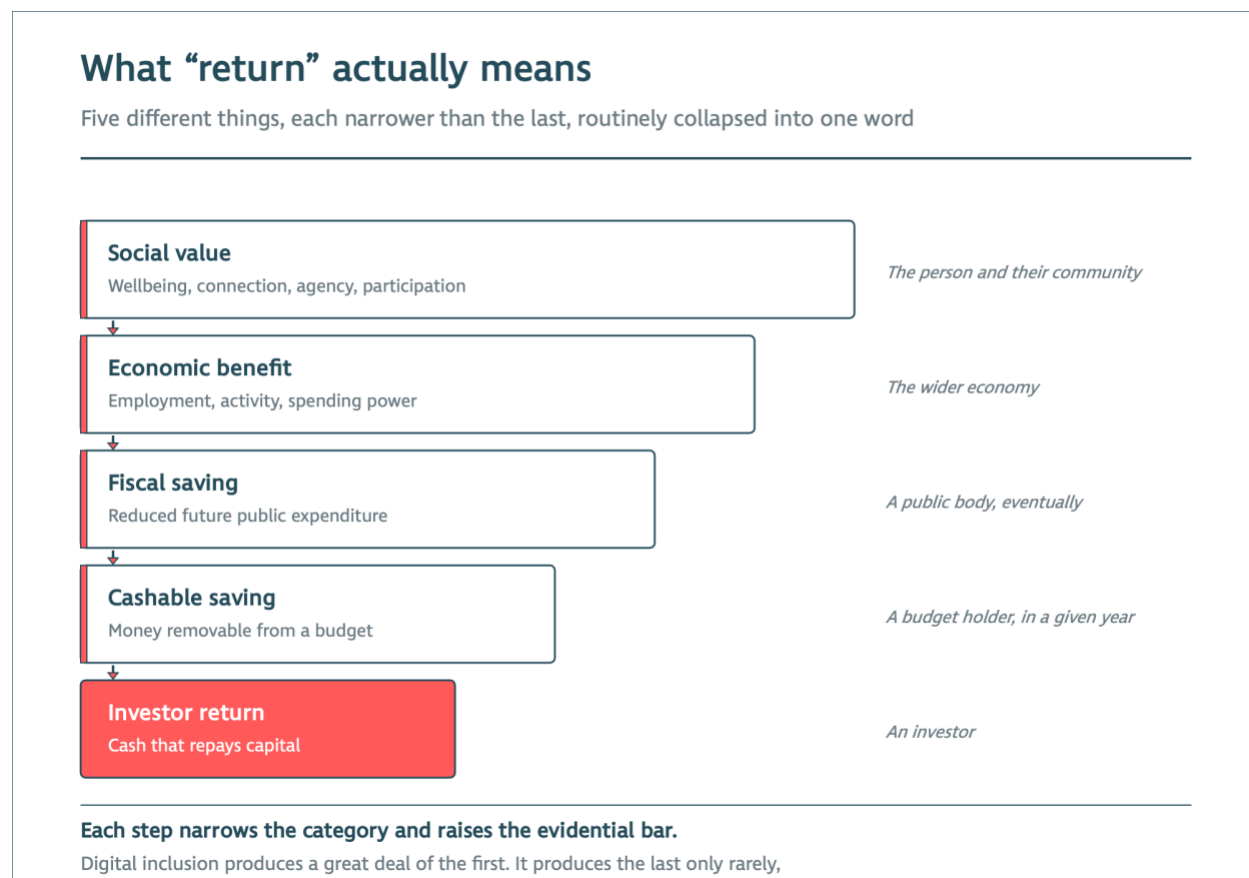


Figure 1: What “return” actually means. Five different things, each narrower than the last.

Each step narrows the category and raises the evidential bar. Digital inclusion produces a great deal of the first. It produces the last only rarely, and only where a third party has committed to pay.

There is a further consequence, and it is the one we would most want the DIA to consider.

Once ROI becomes the organising principle, funding gravitates towards interventions where outcomes are easiest to measure and returns easiest to demonstrate.

That favours people who are cheaper and quicker to help over those facing complex or entrenched barriers. The social investment literature has a name for this pattern: creaming the easier cases and parking the harder ones. It is not a hypothetical risk. It is documented across fifteen years of outcomes-based contracting in other fields, such as employability.

Applied here, the implication is uncomfortable:

The people most likely to require sustained digital inclusion support may also be the least financially investable.

Our own delivery evidence illustrates the point. In Digital Lifelines, devices were lost and replaced, people dropped out of contact and returned, a substantial minority did not re-engage within the funding period, and support was frequently paused while more urgent needs were addressed. Every one of those features is a problem for an outcomes contract. None means the work was ineffective. They are what working with people in crisis looks like. Any investment model that systematically rewards measurability risks reinforcing rather than reducing inequality.

There is a principle underneath this, and it is where SCVO differs most fundamentally from an ROI-led model.

Equitable access to an essential public service does not become worthwhile only when it saves the state money. Efficiency should inform how inclusive services are delivered. It should not determine whether inclusion is provided at all.

We do not normally ask for the financial return on enabling a disabled person to enter a public building, or on providing an interpreter. We ask whether the service is accessible. Economics are not irrelevant: public money should be spent well, and demonstrating value matters. But efficiency is a question about how an obligation is met, not about whether the obligation exists.

That is also why the least-investable-person problem matters. It is not only a technical concern about incentives. It is that an ROI test applied to inclusion will tend to exclude the people inclusion exists for.

8.4 Blended and private finance

We do not oppose these categorically. Under some conditions, pooled and outcomes-oriented finance can genuinely challenge short-termism and siloed spending.

What we would propose instead of a position is a test.

What does private or blended investment enable that stable public investment cannot?

Answering it requires evidence on additionality, whether a genuine repayment stream exists or a public body ultimately services the capital, transaction costs, the cost of capital compared with public borrowing, who bears the loss if outcomes are not achieved, whether the investment horizon matches the outcome horizon, what the contract rewards and therefore what providers will do, whether outcomes can be attributed, and who defines the outcome and to whom the mechanism is accountable.

Where a proposal passes that test, it should be explored. Where conventional funding is simpler and more appropriate, it should be used.

We would add the threshold question from part four: does the private investment generated

exceed the public and charitable resource required to create and operate the mechanism that generates it? That is answerable in advance, and it should be answered in advance.

There is also a legitimate question about whether the proposed architecture, which introduces investors, vehicles, outcome contracts, risk allocation, first-loss arrangements, repayment triggers, verification pipelines, intermediaries and additional governance, risks reproducing the complexity and transaction costs it is intended to resolve. The Investment Challenge's own fourth design principle is proportionality and minimising transaction costs. We would simply hold the proposals to it.

8.5 Coordination, and whether it requires a new organisation

The Investment Challenge raises the possibility of delegating stewardship of Scotland's digital inclusion investment to an independent backbone entity, or operational hub.

We would separate two propositions that the framing tends to merge.

Coordination and leadership are necessary functions. But they should be described accurately. The Investment Challenge's diagnosis of fragmentation implies an abundance of activity that is poorly organised. That is not what the evidence describes. Scotland has very little direct digital inclusion funding, and much of the provision that exists is small, short-term and currently contracting. What is fragmented is the funding, not a large ecosystem of delivery.

That distinction matters, because the two diagnoses lead to different responses. Poorly organised abundance calls for coordination. A thin and shrinking base of provision calls for funding. Coordinating scarcity does not create capacity.

There is a real role for leadership at national level and coordination at local level, close to the services and relationships that already exist. Neither requires a new national bureaucracy.

A new independent organisation is a solution, not the function. It is one way of performing coordination, and it carries costs: establishment, governance, staffing, premises and the continuing effort of maintaining legitimacy with the bodies it does not control.

Three questions should be answered before that route is chosen.

- **Which functions are genuinely missing?** Not which are performed imperfectly, but which nobody currently holds.
- **Can existing bodies perform them?** Scottish Government holds policy leadership and Audit Scotland has already defined the accountability gap. COSLA, integration authorities, local authorities and intermediary bodies including SCVO already hold relationships, delivery evidence and sector reach.
- **What additional value justifies a separate structure,** net of the resource required to create and sustain it, and where would its authority come from?

Our concern is specific. A body without authority over the budgets that create exclusion cannot compel the change that recommendation 1 in part seven requires, and a coordinating entity that cannot compel that change risks becoming the place responsibility is referred to rather than exercised. Roy's finding about pooled cross-sector funds dissolving once political attention moves elsewhere is directly relevant to any new structure dependent on sustained goodwill.

This is not an argument against coordination. It is an argument that coordination should be located where the authority already sits, unless a clear case is made that it cannot be. In practice that authority is held in two places: Scottish Government, for national leadership and for the accountability Audit Scotland has already defined, and local Community Planning mechanisms, for matching provision to need in their own areas. The voluntary sector holds its own convening role, which SCVO already exercises. The DIA holds none of that authority, and a body without it cannot compel the change recommendation 1 requires.

8.6 Data, measurement and the universal customer record

The motivation is understandable. Demonstrating outcomes across services requires better linked evidence, and commissioners reasonably want it.

We would raise proportionate concerns about privacy, consent, data minimisation, administrative burden and the cost of building and running such a system. These sharpen when combined with outcomes-based investment, because investors need evidence of returns, commissioners need evidence of savings and providers need evidence of outcomes.

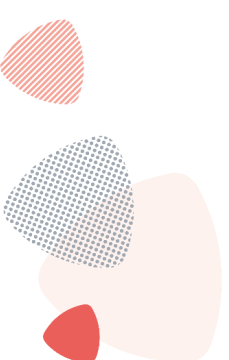
There is a real risk that the people experiencing the greatest disadvantage become subject to the most intensive data collection, because their lives have become the evidence base for an investment product. Data minimisation should be a design principle from the outset, not a compliance exercise afterwards.

But our more fundamental challenge is about the unit of analysis.

Are we investing more effort in identifying digitally excluded people than in identifying digitally exclusionary systems?

Scotland has, or is building, mechanisms to count people who struggle. Where is the equivalent dataset showing which services create the struggle?

If the ambition is system change, the system is what should be measured. We would propose that both are measured, in parallel:



Measure the person	Measure the system
How many people struggle to use this service?	What characteristics of this service create that difficulty?
How many need assisted support?	How many non-digital routes have been closed, and what replaced them?
What are their outcomes?	Has this service been tested with people at risk of exclusion?
Are they still participating a year later?	What proportion of the transformation budget was allocated to inclusion?

The right-hand column is largely within the control of public bodies and is directly actionable. It is also almost entirely absent from current proposals.

8.7 What we can learn from social investment

[Michael Roy's paper](#) is a very useful contribution to this debate, and we would encourage the DIA investment panel to take it as seriously as we have.

Drawing on fifteen years of Social Impact Bonds across more than thirty countries, he identifies results that are mixed and evidence weaker than enthusiasm implies: some good project-level outcomes, little robust or generalisable evidence of superior effectiveness or value for money compared with conventional commissioning, and recurring governance problems around measurement, gaming and accountability.

Four observations bear directly on digital participation.

Attribution. The benefits of digital participation ripple across health, employment, education and civic life over years, which is precisely the pattern that resists conversion into a single payable metric.

The short-termism paradox. Instruments designed to reward patience have repeatedly struggled to be patient. The first SIB, at Peterborough, was terminated early when national policy changed.

Outcomes collapse back into outputs. Contracts reward what is countable. A fund rewarded for devices distributed or training hours logged will produce devices and hours, reproducing the fragmented, pilot-shaped delivery that better financing is supposed to escape. This is the sharpest warning in the paper for the DIA.

Governance. Where an investor's return is what the contractual architecture exists to protect, the principal client of a service shifts from the beneficiary towards the financier.

Sustaining the coalition. Swedish pooled cross-sector social investment funds were adopted enthusiastically and largely dissolved within a few years, because the people, resources and legitimacy needed to sustain them could not be maintained once political attention moved on. For a body still constituting itself, this may be the most important lesson, and it applies regardless of which mechanisms the DIA recommends.

The conclusion is not that social investment does not work.

It is that the evidence gives us good reason not to assume financial innovation is inherently superior to stable conventional funding.

What Roy proposes instead

It would be selective to cite the critique without engaging with the alternative. Roy frames the task as institutional rather than financial, and suggests three routes: treating digital connectivity and capability as social infrastructure with the protected status proposed for libraries and community halls; routing new capital, where it is needed, through patient and publicly accountable vehicles such as the Scottish National Investment Bank, Social Investment Scotland and community share and bond models; and using the [Community Wealth Building \(Scotland\) Act 2026](#), whose action plans are due within three years of commencement, to embed digital participation within procurement conditions, asset transfer decisions and local financial powers.

The first of those is close to the argument of parts three and four, arrived at from a different direction. The third is a promising policy avenue that costs little beyond the decision to include it. We would apply the same standard to it as to everything else in this part: community wealth building provides relevant institutional mechanisms and a democratic mandate, but has not been shown to sustain the recurring revenue provision this report identifies as the core requirement. It is a route worth testing, not a solution already validated.

Roy also notes that the measurement groundwork already exists, citing SCVO's [Roadmap](#) and the [Minimum Digital Living Standard](#). That reinforces part two: the gap is not in knowing what good digital inclusion looks like.

8.8 The opportunity cost of this debate

Every proposition in this part is worth examining. But they share a characteristic: each requires substantial time, analytical effort and institutional attention before any additional support reaches a single person.

Meanwhile, provision is being lost. That is the pragmatic test we would apply to the whole exercise: does it make a difference to people within the current spending review period, or does it require a new architecture to be built first?

We are not arguing that strategy is unnecessary. We are arguing about sequence, as this report has throughout. Stabilise what exists, embed inclusion in the transformation programmes creating the need, and then design whatever additional mechanisms the evidence justifies. Doing it in the other order risks producing an elegant model with nothing left to fund.

What this part establishes

Proposition	Does it follow from the evidence?
Short-term fragmented funding is inadequate	Yes
The things enabling sustained participation are infrastructure	Yes
Outcomes should be measured over sustained periods	Yes
Place-based allocation is necessary	Yes
Public digital expenditure should account for inclusion	Yes, and this is the priority
Aggregate digital expenditure is substitutable for inclusion spending	No, and the wrong-pocket problem is structural
Digital inclusion generates reliable cashable savings at scale	Not demonstrated in Scotland
Social value can in itself create an investable return	No. A repayment mechanism is still required
Corporate partners will bring significant new capital to Scotland	Unproven
Blended finance is superior to conventional funding	Not supported by evidence from comparable fields
Better individual-level data will resolve the measurement problem	Partly, but on its own it measures the wrong unit
An independent backbone entity is needed to steward investment	Leadership and local coordination are needed. That a new national organisation is required is not established.

Community wealth building offers a viable route	Provides relevant mechanisms, but its ability to sustain recurring provision needs testing
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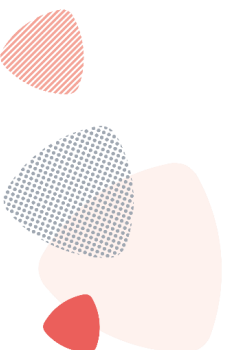
Part six: An alternative framework

9. Start with what works

The disagreement in this report is not really about blended finance, pooled budgets or social investment. It is about sequence.

The risk we see in the Investment Challenge is a sequence that begins with the funding architecture: architecture, then mechanisms, then measurable returns, then fundable interventions, then people. Each step constrains the next. Once the mechanism is chosen, only interventions that fit it can be funded. Once returns must be measurable, only measurable outcomes count. By the time the sequence reaches people, the answer has largely been determined by the instrument.

We propose the reverse.



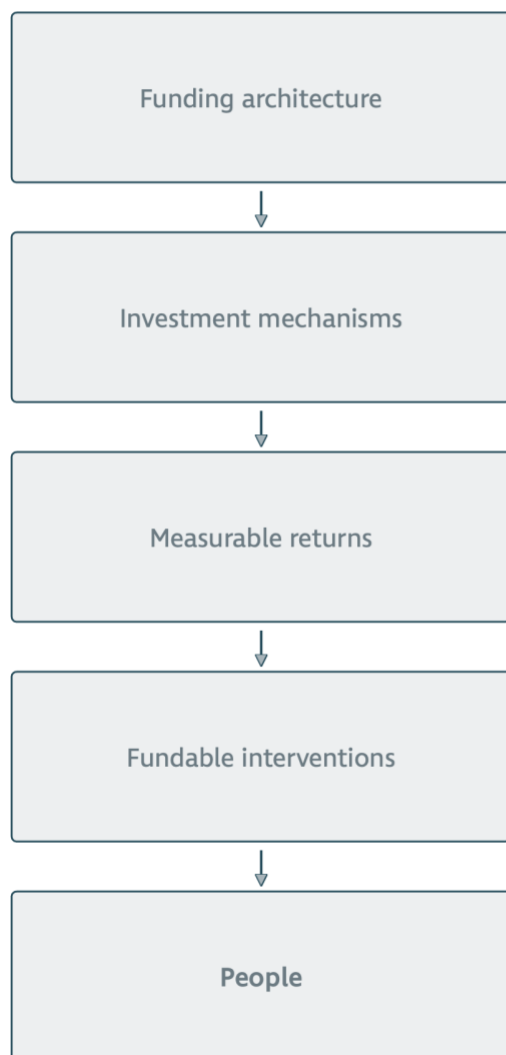
Two sequences

The order in which the questions are asked determines the answer

THE RISK

Starting with the mechanism

Where the Investment Challenge begins



Each step constrains the next. Once the mechanism is chosen, only interventions that fit it can be funded. People arrive last.

SCVO'S PROPOSITION

Starting with what works

Where the evidence begins



The mechanism follows the evidence rather than determining the intervention. Where investment finance fits, it gets used.

Figure 2: Two sequences. The order in which the questions are asked determines the answer.

Step 1: Start with people's lives and experiences

Who experiences exclusion, and when? Part one established that exclusion is dynamic and that the moments of risk are identifiable: leaving prison or hospital, becoming homeless, bereavement, relapse, losing income, declining health, a device lost, a contract ending, a service changing its login.

This step is also where power sits, and it is easy to get wrong.

Lived experience should enter before the funding model is designed, not be used afterwards to validate it. Co-production means having influence over the question being asked, not simply representation within the governance of the answer.

There is a substantial difference between asking people what they think of a solution already designed and asking what digital participation looks like in their lives and what the system should do to enable it. The first is consultation. The second changes what gets prioritised, funded and counted as success. A sequence that begins with people has to mean the second.

Steps 2 to 6

Understand the causes. Distinguish exclusion that digital inclusion work can address directly, exclusion created by the design of services, and exclusion arising from poverty that digital work can mitigate but not solve. They overlap in any individual life, and they imply different responsibilities.

Identify what works. Support that is appropriate to the person and task, affordable over time, delivered by trusted people, embedded in existing services, designed to remove avoidable barriers, available when circumstances change and sustained rather than project-based.

Determine what must exist. The eight components set out in part four: devices, connectivity, trusted human support, skills and confidence, inclusive service design, community capacity, workforce capability, and coordination and evidence.

Establish responsibility. Allocated in part three, between government, public bodies digitising services, private companies, the voluntary sector and individuals.

Establish the resource requirement, at the point of responsibility. This does not mean a single national costing built on a package model. Not everyone needs every element, so the intervention differs with the need. Each transformation programme should cost the inclusion its own change makes necessary, and each commissioner the support its service actually needs. Aggregated, those answers give a requirement grounded in real provision.

Step 7: Select the mechanism

Only now consider grants, commissioning, mainstream budgets, procurement conditions,

corporate contribution, pooled budgets, community wealth building, social investment or blended finance.

Both sequences can arrive at the same place, and nothing here rules out blended finance. The difference matters when the funding mechanism does not fit the provision the evidence says is needed. Beginning with the mechanism means interventions that do not fit are not funded and people whose outcomes cannot be attributed are not prioritised. Beginning with the evidence means the requirement is funded either way, by whichever mechanism suits it.

The suitability of any mechanism can only be determined after establishing the nature of the thing we are trying to fund.

What this produces

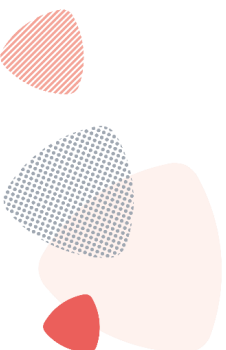
Applied to the eight components, the sequence produces a set of answers that looks nothing like a single funding solution.

Component	Whose responsibility, primarily	What kind of money
Inclusive service design	The body digitising the service	Transformation budget
Workforce capability	Employers across health, care, housing, advice	Existing workforce development budgets
Embedded support in existing services	Public bodies and commissioners	Core service and commissioning budgets
Trusted community support	Government, commissioners	Recurring revenue, multi-year
Community capacity and coordination	Government, local government	Core or commissioned funding
Devices	Public funding, corporate donation, refurbishment	Capital, but treated as consumable
Connectivity	Providers through improved tariffs, plus public support	Recurring, with corporate contribution
Testing genuinely novel approaches	Funders, innovation programmes	Time-limited, risk-bearing grant

On this evidence, the case for a new funding vehicle has not been demonstrated. What the components require is existing budgets accounting properly for the costs their own decisions create, alongside stable multi-year revenue for the trusted community support, access and connectivity that cannot simply be absorbed within existing services.

That second element is real and continuing expenditure. The distinction we draw is between the need for sustained expenditure, which is genuine, and the need for a new financial architecture through which to deliver it, which has not been established.

This framework is not a claim that money is unnecessary, a defence of the status quo, or opposition to innovation. Nor is it something SCVO invented in response to the Investment Challenge. Steps one to four restate the [2023 Roadmap](#). Steps five to seven are the resourcing question the Roadmap left open.



Part seven: Recommendations

10. What should happen next?

Two of these recommendations are the substantive policy asks, and they come first. The remaining four are enabling actions and tests that make the first two work.

The two asks correspond to two duties.

Prevent avoidable exclusion at source, and sustainably fund the support that remains necessary.

1. Require digital transformation programmes to assess, cost and mitigate the exclusion associated with them

Who we are asking: Scottish Government, COSLA, NHS Scotland, local authorities and public bodies, supported by Audit Scotland scrutiny.

Any significant public sector digital transformation should set out, within its own business case and implementation budget, who is likely to be excluded by the change, how that will be mitigated, what support is required and for how long, what non-digital provision remains necessary, and what all of it will cost.

The underlying proposition is narrow and defensible:

If the design of a transformed service makes digital capability necessary for access, the programme should bear the cost of making that access equitable.

[Audit Scotland's conclusion](#) that all public bodies undertaking digital transformation need to enable digital inclusion supports exactly this.

This is also where the resource requirement should be established. Part four explains why this report does not attempt to price digital inclusion: the intervention differs with the need, and a figure derived from a full-package programme would describe one delivery model rather than the requirement. Costing at the point of responsibility avoids that problem. Each programme costs the inclusion its own change makes necessary, for the people its own service reaches.

This is the most consequential recommendation in this report. It is the mechanism by which Scotland stops generating new exclusion faster than it can respond to it, and it is specific, implementable and capable of being audited.

Primary resource implication: genuine expenditure within transformation budgets rather than a separate inclusion programme. Some can be met by reprioritising. Assisted digital capacity, accessibility testing, staff training and retained alternative channels will require real resource.

2. Fund trusted community capacity on a sustained basis

Who we are asking: Scottish Government, integration authorities, local authorities, independent funders and commissioners.

The most consistent finding in Scotland's delivery evidence is that digital inclusion depends on trusted relationships held over time by people embedded in the services and communities where people already are. That capacity is currently funded by short-term projects and by unfunded staff time that organisations can no longer afford to absorb.

Start by stopping the loss. The immediate priority is not new provision but retaining what exists. Organisations currently delivering effective, evidenced digital inclusion support are closing projects and losing staff as short-term funding ends. Bridging that provision costs less than rebuilding it, and considerably less than designing a mechanism to fund its eventual replacement.

Two routes then matter most. **Commissioning:** include digital inclusion within the specifications of health, social care, housing, employability and advice services rather than funding it separately. **Multi-year revenue funding:** where separate funding is needed, fund on a multi-year basis with core costs included, because a twelve-month project cannot hold a relationship that takes months to build.

Primary resource implication: sustained revenue. This is the recommendation that most clearly requires real and continuing money, and the report should not be read as implying otherwise.

Enabling actions and tests

The following four recommendations do not deliver provision themselves. They create the conditions in which the first two can be met, and they test propositions that should be settled before Scotland commits to a funding architecture.

3. Publish a digital inclusion delivery plan, built from the evidence Scotland already has

Who we are asking: Scottish Government and COSLA.

Audit Scotland asked for clear ambitions, an action plan, defined responsibilities and governance arrangements by March 2025. The [digital strategy vision statement published in November 2025](#) was a step, and ministers have committed to an action plan with measurable outcomes. A draft has now been shared with partners, but at the time of writing there is still no published action plan setting out agreed responsibilities, timescales and resource requirements.

Every other question depends on it. Funding mechanisms cannot be selected for a delivery model that has not been defined, and costs cannot be allocated without a statement of who is

responsible for what.

The final plan also needs to move beyond coordination, evidence gathering and further exploration to specify funded delivery: what provision will exist, who will provide it and how it will be sustained.

The plan does not require another exercise to rediscover the characteristics of effective provision. Audit Scotland pointed to SCVO's [Roadmap](#) as a foundation Government could build on, and part two sets out what the delivery evidence establishes. The gaps that remain, on prevalence and on outcomes at population level, are tractable evidence questions and should not delay the plan.

Primary resource implication: political and policy leadership. The plan should then state what resource it requires.

4. Establish clear expectations of responsibility across sectors

Who we are asking: Scottish Government, with Ofcom and UK Government where regulatory levers are reserved.

For public bodies, that responsibility is recommendation 1. For private companies, contribution should complement rather than substitute for action to remove exclusion created by their own products, pricing and service design.

The clearest immediate example is connectivity affordability: social tariff take-up remained under 9% of eligible households in June 2025, and 70% of eligible households were unaware they existed in October 2025 ([Ofcom](#)), while multiple studies conclude current pricing remains unaffordable for households in deep poverty. Practical actions include providers routinely offering social tariffs at sign-up and in billing conversations and listing them alongside standard packages, surfacing affordable tariffs at public sector touchpoints including Universal Credit journals and Jobcentres, and Ofcom asking providers to report on awareness and uptake.

Primary resource implication: regulatory and practice change rather than Scottish expenditure.

5. Measure exclusionary systems as well as excluded people

Who we are asking: Scottish Government, public bodies, and the DIA in designing its measurement approach.

Scotland has, or is building, mechanisms to count people who struggle. It has no equivalent record of which services create the struggle. Measure both in parallel, as set out in part five.

Two specific gaps are worth closing. There is no survey establishing what proportion of all Scottish households meet the [Minimum Digital Living Standard](#), only households with children, which means Scotland is setting policy without knowing the size of the population it is setting policy for. And the satellite account analysis should be redirected towards the question it can

answer: when Scotland invests in digitising a service, what proportion of that investment is dedicated to ensuring everyone can access the result?

Where individual-level data is collected, data minimisation should be a design principle from the outset rather than a compliance exercise afterwards. And measure sustainable participation, agency and choice rather than universal digital independence: continuing to need support is not a failed outcome.

Primary resource implication: modest resource. The system-side measures are largely within the control of public bodies and are directly actionable.

6. Test financial innovation selectively, and require evidence of additionality

Who we are asking: the DIA Investment Panel, Scottish Government and funders.

Explore blended finance, pooled budgets and social or private investment where there is a demonstrable problem they are particularly suited to solving. Before proceeding with any instrument, require evidence on additionality, repayment mechanisms, transaction costs, cost of capital, risk transfer, timescale, effects on provider behaviour, attribution and accountability. Apply the threshold test: does the private investment generated exceed the public and charitable resource required to create and operate the mechanism that generates it?

Require evidence of additionality over simpler funding mechanisms.

Primary resource implication: a decision. Applying the test may reduce expenditure on mechanism design.

Other mechanisms worth testing

Two routes fall outside the main recommendations but are worth examining, on the same evidential terms as any other mechanism.

Community wealth building. The [Community Wealth Building \(Scotland\) Act 2026](#) requires action plans within three years of commencement. Embedding digital participation within procurement conditions and asset transfer decisions would cost little beyond the decision to include it. Its capacity to sustain recurring provision has not been demonstrated, so it should be treated as a route worth testing rather than a solution.

Patient, publicly accountable capital. Where new capital is genuinely needed, vehicles already aligned with Scottish policy, including the Scottish National Investment Bank, Social Investment Scotland and community share and bond models, should be examined before instruments designed elsewhere are imported.

Summary

Recommendation	Principal audience	Primary resource implication
1. Assess, cost and mitigate exclusion within digital transformation	Public bodies, Audit Scotland	Expenditure within transformation budgets
2. Fund trusted community capacity sustainably	Commissioners, Scottish Government	Sustained revenue
3. Publish a delivery plan, built on existing evidence	Scottish Government, COSLA	Political and policy leadership
4. Set expectations of responsibility across sectors	Scottish Government, Ofcom	Regulatory and practice change
5. Measure exclusionary systems as well as people	Public bodies, DIA	Modest resource
6. Test financial innovation selectively	DIA panel, funders	A decision

Recommendation 1 requires transformation programmes to carry the cost of the exclusion their own change makes necessary. Recommendation 2 requires real and sustained revenue for the trusted support that everything else depends on. Neither depends on first making digital inclusion investable.

That distinction is the central practical point of this report. Scotland does need to spend money sustainably on digital inclusion. What it does not first need is a new financial architecture through which to do so.

There is no evidence that the absence of an investment mechanism is the principal barrier to progress. The barriers the evidence does point to are the absence of a plan, weak accountability for exclusion associated with digital transformation, and insecure funding for the trusted support people need.

Which returns to the two duties. Scotland should stop creating avoidable exclusion through the way it designs and digitises public services, and should sustainably fund the support that people will continue to need even when services are designed well. Everything else in this report is subordinate to those two obligations.

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A note on sources cited via Roy

Part five draws on evidence assembled in Michael Roy's paper, including the international Social Impact Bond literature, the Peterborough Social Impact Bond, research on Swedish pooled social investment funds, and the roles of the Scottish National Investment Bank, Social Investment Scotland and Democratic Finance Scotland. Those are referenced through his paper rather than individually.