

Consultation on Pension Age Winter Heating Payment (PAWHP)

Analysis of Consultation Responses

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Executive Summary

Background

The Scottish Government has committed to introducing the Pension Age Winter Heating Payment (PAWHP) in winter 2024/25. This will be a like-for-like replacement for the UK Government's Winter Fuel Payment (WFP). A [public consultation](#) on PAWHP ran between 23 October 2023 and 15 January 2024 to gather views on the proposals for a like-for-like transfer of the benefit, the eligibility criteria, and the value, form and timing of the payment. In total, 906 consultation responses were received from 881 individuals and 25 organisations.

Overall views on PAWHP

Over half (55%) of respondents who answered agreed with the proposal for a like-for-like replacement; 28% disagreed, and 17% were unsure. Four fifths (79%) of organisations that answered supported the proposal. The most prevalent theme in open responses was agreement with a like-for-like replacement. The second most common theme, among respondents who disagreed or were unsure at the closed question, was a view that the current system for WFP works well and should not be changed, particularly if the replacement is intended to be the same. Many individuals raised concerns about the competence or trustworthiness of the Scottish Government to manage the payment, while several questioned whether the replacement would be truly like-for-like.

Almost three fifths (59%) of those who answered agreed that the proposed approach is effective, though a quarter (25%) disagreed. Very high levels of support were recorded among organisations who answered, with 89% agreeing. Many felt the proposed approach effectively addressed fuel poverty among older people or reiterated the difficulties older people face paying energy bills. Several respondents described the approach as fair, helpful, smooth, efficient, and sensible.

Views on the proposed name for the payment were mixed. Overall, 44% of those who answered agreed with Pension Age Winter Heating Payment, and 40% disagreed. The most prevalent theme in open comments was that many respondents felt the name was clear, straightforward, easily understood, and accurately described the benefit and the target audience. Conversely, many individuals felt the benefit's name did not matter, and many suggested the name was too long or confusing.

Timing of the payment

There was strong support for payments in November and December; 87% of those who answered agreed. The most prevalent theme in open comments was agreement that this is the most appropriate time to make the payment. Respondents highlighted that this is when the weather becomes colder, more heating is required, and energy bills increase. Conversely, several advocated an earlier payment date; October was the most frequently mentioned month. Arguments for this approach included that the weather becomes colder in Scotland earlier than elsewhere in the UK and that an earlier payment would allow people to budget and buy solid or liquid fuel in advance when they are often cheaper. Some individuals suggested making the payment after New Year or splitting the payment over two or more months.

Eligibility criteria

Four fifths (80%) of all who answered, including 81% of organisations, agreed with the universal approach to eligibility. Respondents commented that the state pension age is when people need additional support or that the criteria seemed fair and sensible. Many argued a universal approach is fairer, avoids discrimination, promotes uptake and meets everyone's basic need to stay warm. Many argued that eligibility based on state pension age is easy to understand, avoids complicated form-filling for clients, or is cost-effective and efficient. However, many highlighted other people under the state pension age who could benefit from additional support with heating costs, including veterans, those with disabilities or health conditions, unpaid carers, and people living in poverty.

Three fifths (61%) of those who answered agreed that the eligibility criteria are clear, including 94% of organisations. Many described the criteria as clear, straightforward, or easy to understand. Several argued that this was the case because they are the same as the WFP eligibility criteria. The second most common theme was that the eligibility criteria are unclear or need to be made clearer. Several respondents stated they were confused about the criteria, or highlighted groups that might find the criteria too complicated.

When responding to questions about eligibility, the potential of means testing PAWHP was raised by respondents, who expressed a range of views. Several argued against means testing PAWHP. Reasons included that it was unfair to those who had made provision for their older age, that it was costly and complex to administer, and could cause some people to miss out on a payment. However, several other individuals, including a mix of those who agreed or disagreed with the closed question, advocated for some form of means testing of PAWHP to be introduced instead of or in addition to age-based criteria. It was frequently argued that not all older people need financial support.

Value of the payment

Varied views were expressed on the payment value, with just over half (56%) of those answering agreeing with retaining the current value; 28% disagreed and 16% were unsure. While a majority of respondents agreed with retaining the current value at the closed question, the most common theme in open comments was that the payment should increase as the cost of fuel and energy increases. Many others argued that the payment value should increase with inflation or the cost of living. In contrast, many agreed with retaining the present value of the payment, describing it as fair, sufficient, and helpful.

One third (37%) of those who answered agreed that people in residential care who do not receive one of the listed income-related benefits should receive half the 'full' rate of PAWHP; 31% disagreed and 32% were unsure. A slightly higher proportion (42%) agreed that people in residential care who do receive one of the income-related benefits listed should not receive PAWHP; 25% disagreed and 33% were unsure. Most commonly, respondents expressed a view that people in residential care should not receive PAWHP as heating is already covered in their care costs. Similarly, several agreed that care home residents should not receive PAWHP if they already claim other income-related benefits. Conversely, several argued that those in residential care should receive some of or the full rate of PAWHP to help cover their care costs.

Many respondents felt that receipt of PAWHP, or the amount awarded, should depend on individual circumstances of those in residential care. Several suggested it should depend on how the costs of residential care are being met, advocating that self-funding residents should receive the full payment. The importance of keeping the benefit universal was highlighted by several.

Receiving the payment

Almost three quarters (74%) of those who answered agreed with a cash payment, rising to 94% of organisations. While many individuals disagreed with a cash payment in the closed question, their comments suggest they did support the proposal. Those who elaborated suggested that a cash payment was simple and efficient, reducing confusion and bureaucracy. However, payments directly into clients' energy accounts were suggested by many individuals. Some suggested that the client should decide the payment method.

The proposal to pay PAWHP as an annual one-off payment recorded the highest level of agreement in the consultation. Among those who answered, 88% were in favour. In their open comments, many respondents focused on the timing of the payment, rather than whether it should be a one-off payment, noting that winter is when a payment is needed most due to colder temperatures, greater demand for heating and higher bills. Many others agreed because they felt a one-off payment is the most efficient way to administer PAWHP and because this is how the WFP payment is currently made. Several agreed with a one-off payment as they felt it provided a predictable source of income.

Over three fifths (64%) of those who answered agreed with the proposals for opting-out of PAWHP, while 16% disagreed; agreement was higher among organisations (76%). The most prevalent theme in comments was support for an opt-out option. Many combined the question about an opt-out option with whether PAWHP should be universal or means-tested, and expressed views for and against both an opt-out and means testing.

Qualifying week

Overall, 71% of those who answered, including 82% of organisations, supported having a qualifying week in September. While open comments most frequently repeated support, several highlighted that people with birthdays after September would not be eligible for the payment that year, regardless of the fact that they would be of state pension age during the winter. The most prevalent theme among those who disagreed was that there should be no qualifying week and that eligibility should be assessed throughout the year. However, several acknowledged that a qualifying week was necessary.

Re-determination timescales

Over half (58%) of those who answered agreed with the proposal that clients should have 31 days to request a re-determination. Fewer than one in ten (9%) disagreed, though one third (34%) were unsure. Suggestions for longer re-determination periods of varying lengths, ranging from 31 days to 6 months, were proposed by some. Mixed views were evident on the proposal that Social Security Scotland should have a period of 56 working days to consider a re-determination. Overall, 40% of those who answered agreed with this approach. One quarter (27%) disagreed, and one third (34%) were unsure. Many expressed a view that the proposed 56 days for Social Security Scotland to respond to a re-determination was too long.

Remote rural and island communities

When considering what support in addition to PAWHP could be provided to remote rural and island communities, many respondents offered a range of suggestions for promoting alternative fuels or approaches to alleviate fuel poverty in these communities. Calls for a higher value, earlier or more flexible payment was also a common theme. However, another prevalent theme, raised by many, was that the value and delivery of PAWHP should be no different in these areas than in the rest of Scotland.

Future developments

The consultation also gave stakeholders an opportunity to express their views on how PAWHP could be made more effective in the future. The most prevalent theme was to keep the benefit universal. Fears were expressed that, over time, means testing could be introduced. Several called for the payment value to rise in line with inflation or rising fuel costs. Others called for targeting funds used for PAWHP to particular groups, rather than a universal approach, or to extend the benefit to other groups.

Impact Assessments and other impacts

When considering the impact of PAWHP on groups who share protected characteristics, those who commented typically felt there would be no impact, stated that all should be eligible for PAWHP, or highlighted groups with specific characteristics. Most frequent were comments suggesting people with disabilities or health conditions, particularly those made worse by cold temperatures, could benefit from PAWHP or should be given additional support to reflect their higher energy costs.

It was felt there would be little impact on businesses, with a few stating that as PAWHP was for individuals, it should not affect businesses. Potential impacts on care homes were mentioned by some, while some others noted impacts on energy companies, for example, that they could benefit as PAWHP would help customers pay their bills promptly.

Several respondents stated there would be no impact on reducing inequality of outcome caused by socio-economic disadvantage. Conversely, the next most prevalent theme was that PAWHP could positively impact disadvantaged or low-income groups. However, some acknowledged the payment's impact on tackling poverty or fuel poverty could be small.

Other concerns raised by some respondents included that there could be a greater cost associated with administering a devolved payment, that people could lose money or poverty could increase if changes are introduced in the future, and that replacing the payment, in particular changing its name, could lead to confusion, stress and anxiety.

Conclusions

Many individuals and organisations with detailed knowledge took part in the consultation, sharing their views on the proposals for introducing PAWHP as a like-for-like replacement for the WFP. Overall, the key message was that while there is support for a like-for-like replacement, there are potential improvements which respondents would like the Scottish Government to consider when developing PAWHP further. The findings from this analysis will be used by the Scottish Government to support ongoing policy development and inform the drafting of PAWHP regulations.

1. Introduction

Background

The Scottish Government has committed to introducing the Pension Age Winter Heating Payment (PAWHP) in winter 2024/25. This will be a like-for-like replacement of the UK Government's Winter Fuel Payment (WFP) which is administered by the Department for Work and Pensions (DWP).

PAWHP will form part of a suite of winter heating benefits delivered by Social Security Scotland, using provisions under Section 30 of the Social Security (Scotland) Act 2018 that authorise the Scottish Ministers to assist in helping an individual towards meet their heating costs during the winter months.

To ensure PAWHP is delivered safely and securely to over a million pension-age clients each winter, there has been a commitment that:

- No one will lose out when the Scottish Government takes responsibility for PAWHP.
- There are no plans to change the current eligibility criteria.
- There are no plans to change the amount paid.
- The payment will not be means tested or taxed.

The Scottish Government is also considering improvements that could be implemented before or after PAWHP launches and how it could be developed in the longer term.

A [public consultation](#) on PAWHP ran between 23 October 2023 and 15 January 2024. Containing 21 questions, the consultation aimed to gather views on the proposals for a like-for-like transfer of the benefit, the eligibility criteria, and the value, form and timing of the payment. The questions also explore whether the proposed approach meets the needs of those it is intended to help and the impact the policy might have on various groups, including those not on the gas grid.

The findings from the analysis will be used by the Scottish Government to:

- Inform the drafting of PAWHP regulations, which will be scrutinised by the Scottish Commission on Social Security (SCoSS) before being laid in parliament.
- Highlight and overcome any issues which need to be considered as part of the transfer to PAWHP.
- Understand how PAWHP could be developed in the long term.

Respondent profile

In total, 906 consultation responses were received¹. Almost all were submitted via the online consultation platform, Citizen Space. Those received in an alternative format, for example, an email or PDF document, were reviewed separately by the research team. Individuals provided 881 responses to the consultation, representing 97% of the total

¹ A further 20 duplicate responses were identified during standard data checks and removed from the sample.

sample; the remaining 25 responses (3%) were from organisations. To aid analysis, organisations were grouped on the nature of their work, as shown below.

Sectoral Classification

	Number of respondents	% of total sample
Individuals	881	97
Organisations	25	3
Health / disability / age organisations	8	1
Poverty / fuel poverty organisations	5	1
Local authorities	3	<0.5
Miscellaneous organisations	9	1

Analysis approach

The Lines Between was commissioned to provide a robust, independent analysis of the responses to the public consultation. The main purpose of consultation analysis is to understand the full range of views expressed, and where possible using closed questions to quantify how many people held particular views. This report provides a thematic analysis of responses based on the analysis approach outlined below.

Quantitative analysis

The analysis of responses to each question begins with a summary of the closed question data illustrating the range of opinions held by respondents. As not all respondents answered each question, each table in this report shows the number and percentage of responses **among those answering each question** and broken down by individual and organisation responses and by organisation type. Please note that figures in the tables may not add to 100% due to rounding. A full breakdown of the number and percentage of responses to each question can be found in Appendix A.

Qualitative analysis

Qualitative analysis identifies the key themes across responses to each question. The research team developed a draft coding framework based on a review of the consultation questions and a sample of responses. During the coding process, new codes were created if additional themes emerged.

In a small number of instances where alternative format responses contained information that did not align with specific questions, analysts exercised judgment about the most relevant place to include this material for analysis purposes.

Where appropriate, quotes from a range of participants are included to illustrate key points and provide useful examples, insights and contextual information.

Reflecting the large number of people who took part, it is impossible to detail every response in this report; a few organisations shared lengthy submissions reflecting their specific subject matter expertise. These responses are referenced where possible. Full responses to the consultation, where permission for publication was granted, can be found on the [Scottish Government's consultation website](#).

When reviewing the analysis in this report, we would ask the reader to consider:

- Public consultations invite everyone to express their views; individuals and organisations interested in the topic are more likely to respond than those without a direct or known interest. **This self-selection means the views of respondents do not necessarily represent the views of the entire population.**
- Where differences between the views of individuals and organisations were evident in qualitative responses, these have been noted. If no specific differences are highlighted then a theme was raised by a mix of respondents, though the composition of the sample means the vast majority were typically individuals.
- Some respondents have possibly not fully read or engaged with the consultation paper, leading to answers which do not directly address the questions, or comments which suggest respondents have misinterpreted the question or misunderstood the nature of the proposed changes. While all comments have been included in the analysis and all themes presented in this report, we focus on those directly answering each question.
- Similarly, many respondents repeatedly raised the same issues or suggestions at multiple questions, regardless of the specific focus of the question. These views are all included in this report, but analysts exercised judgment about the most relevant place to include each theme to avoid repetition.
- In a few instances, highlighted in the report, qualitative comments from individuals do not align with their response to the quantitative questions. For example, a respondent may agree in principle but use their open comment to caveat their agreement or suggest an alternative approach. Similarly, in Q9b, some respondents agreed with the proposed approach but left comments implying they disagreed.

Weight of opinion

This report presents the themes identified in responses from most to least commonly mentioned. All themes, including views shared by small numbers of respondents, are covered; an insightful view expressed by a very small number of participants is not given less weight than more general comments shared by a majority. Similarly, all responses have an equal weighting. We recognise this means a response from an individual has the same weight as the response from an organisation which may represent many members, but this approach ensures all views are presented.

Qualitative analysis of open-ended questions does not permit the quantification of results. However, to assist the reader in interpreting the findings, a framework is used to convey the most to least commonly identified themes in responses to each question:

- The most common / second most common theme; the most frequently identified.
- Many respondents; more than 50, another prevalent theme.
- Several respondents; 30-49, a recurring theme.
- Some respondents; 10-19, another theme.
- A few / a small number of respondents; <10, a less commonly mentioned theme.
- Two/one respondents; a singular comment or a view identified in two responses.

2. Overall views on PAWHP

The first questions in the consultation paper focused on overall views about the transfer of the Winter Fuel Payment (WFP), on a like-for-like basis, from Westminster to the Scottish Government. Respondents were asked if the payment is an effective way for the Scottish Government to provide financial support for older people, and to comment on the proposed name of Pension Age Winter Heating Payment.

Q1a. Do you agree or disagree with the proposal to replace Winter Fuel Payment with a 'like-for-like' replacement? Please provide further information on why you agree or disagree.

	n=	Agree	Disagree	Unsure	No answer
No. of all respondents	906	489	251	156	10
% of all respondents	906	54	28	17	1
% of all answering	896	55	28	17	-
% of individuals answering	877	54	28	18	-
% of organisations answering	19	79	21	0	-
- Miscellaneous	5	80	20	0	-
- Health / disability / age	8	100	0	0	-
- Poverty / fuel poverty	3	33	67	0	-
- Local Authority	3	67	33	0	-

Over half of respondents who answered Q1a (55%) agreed with the proposal for a like-for-like replacement; 28% disagreed, and 17% were unsure. Four fifths (79%) of organisations that answered supported the proposal. While all health/disability/age organisations that answered were in favour, only one of the three poverty/fuel poverty organisations that answered supported the proposal.

Three quarters of respondents provided qualitative comments in Q1; the highest level of response to any of the consultation's open questions. Many respondents used the first question to comment on issues which were the focus of other later questions. To avoid repetition, these comments have been included in the analysis of the most relevant question, which is noted below.

Agree with a like-for-like replacement

The most prevalent theme in responses to Q1 was agreement with a like-for-like replacement. These respondents, almost all of whom agreed with the closed question and a few who were unsure, supported the transfer on the basis that it will be truly a like-for-like replacement, i.e. everything stays the same as the WFP and no one loses out as a result. Many respondents commented that the WFP currently works well and agreed with using the same approach.

Organisations who agreed with a like-for-like replacement included Inclusion Scotland, Independent Age, Age Scotland, Health and Social Care Alliance Scotland (The ALLIANCE), Public Health Scotland, Citizens Advice Bureau, Energy Saving Trust, National Carer Organisations, South Lanarkshire Council and Shetland Islands Council.

“It’s a status quo situation. I like the present set up and so like the replacement.” – Individual

“I agree so long as no pensioner in Scotland would be disadvantaged by the change from the current DWP Payment to the proposed Scottish Government payment.” – Individual

“As the current Winter Fuel Payment takes a universal approach, in principle we agree with introducing the Pension Age Winter Heating Payment on a like-for-like basis. Unlike other social security payments that have been devolved to the Scottish Parliament, there is no need to revisit often restrictive eligibility criteria, either in the short or long term.” – The ALLIANCE

Some other individuals who agreed at the closed question did so on the basis that PAWHP continues to be a universal benefit paid to all people over state pension age.

General comments in agreement were left by some individuals, describing a like-for-like replacement as a sensible and fair approach.

Disagree because the current system works well

The second most prevalent theme in Q1 was respondents who disagreed or were unsure because of the effectiveness of the current WFP. Many respondents left short comments stating that the current system works well and should not be changed, particularly if the replacement is intended to be the same.

“It works fine as it is, so why mess with it.” – Individual

“If it is like-for-like, why is it being done?” – Individual

“I cannot see why you are trying to fix a system that is not broken.” – Individual

Many others provided more detail, elaborating that creating a like-for-like replacement for a working system is an unnecessary waste of time and money. Several argued strongly that the current process should be left alone and repeated this view at multiple questions. Others argued that it was going to cost a lot of money when the only change they could see was to the name of the payment..

“If it costs a lot of money to administer and we are all going to get the same then what is the point of changing?” – Individual

Financial support helps older people

The next most prevalent theme was general comments highlighting the importance of a payment to help older people to heat their homes. Most respondents agreed with a like-

for-like replacement at the closed question, though their comments focused more on the need for a payment rather than the nature of the proposed payment.

“Continuation of funds to allow older people to help to afford to heat their home” – Individual

“It certainly is a big help in allowing particularly elderly and infirm to use extra heat.” – Individual

“This payment is an important part of the social security package for older people in Scotland. It provides a valuable cash boost moving into the colder months, and critically, the universality of the payment ensures that the vast majority of Scotland’s older adults – including those who are the most vulnerable and least financially secure – also benefit. This is in the context of 150,000 Scottish pensioners living in poverty, and an estimated 34% of those entitled to Pension Credit failing to claim support worth at least £332 million every year.” – Age Scotland

Scottish Government management of PAWHP

Many individuals raised concerns about the competence or trustworthiness of the Scottish Government or the SNP to manage the payment; this was also the second most prevalent theme in responses to Q2. It should be noted that this theme was evident across multiple consultation questions, but has been noted here to avoid repetition.

Views included a lack of confidence that the budget for, or administration of, the payment would be handled effectively and concern that the payment would be reduced in future (see below). Several respondents noted their perceptions of the Scottish Government’s poor management of public services and not keeping commitments, expressing a worry that this would also be the case with PAWHP. Some expressed the view that the change was only being proposed to differentiate Scotland from the rest of the UK. A few disliked the changes the Scottish Government had made when transferring the Cold Weather Payment to the Winter Heating Payment.

“The scheme seems to work; if the Scottish Government changes the way it runs at present, they will turn it into a disaster.” – Individual

Conversely, several respondents in Q1 and some in Q2 argued it was better for the Scottish Government and Social Security Scotland to manage the benefit. It was felt that their approach to social security was preferable to Westminster’s, that Scotland should run its own affairs, or that devolving the benefit offered flexibility to make changes later.

“I am currently in receipt of this payment. As a general rule, I think as many functions as possible should be transferred to Scottish governance/oversight. A like-for-like replacement seems fairest; I assume you would have the ability to adapt it in future if desired.” – Individual

Uncertainty about whether it will be a like-for-like replacement

Several respondents, including some who disagreed or were unsure at the closed question and a few who agreed, questioned whether the replacement would be truly like-for-like. Concern was expressed that changes could be introduced in the future, such as means testing or only providing the payment to those on Pension Credit, a lower value payment, or a different approach for people who are yet to reach state pension age.

“I don't believe that this will be like-for-like; as time goes on the goalposts are sure to be moved so that a lot of people who are just above a threshold will no longer qualify.” - Individual

More effective targeting

Some respondents, most of whom disagreed or were unsure in Q1, argued the payment should be better targeted. Individuals often focussed their comments on suggesting that means testing would ensure the payment goes to households that need it most rather than those who are more financially secure. A few organisations, including Energy Action Scotland, the Poverty and Inequality Commission, The Scottish Fuel Poverty Advisory Panel, and RNIB Scotland, called more broadly for the Scottish Government to use the benefit transfer as an opportunity to target the payment to tackle fuel poverty more effectively. This is covered more in Chapter 9.

“This payment should be targeted at those most vulnerable - for example, with a low income or disability benefit in place. This payment is for all people of State Pension Age and there will be a proportion of recipients who do not require this assistance. Given financial pressures currently it may be useful to apply a 'test' to this payment.” – Stirling Council

“The transfer of the WFP to Scotland provides an opportunity to use existing funding in a more efficient, targeted, and outcomes-focused way. The Panel believe that the Scottish Government would be remiss to pass up on this opportunity.” - The Scottish Fuel Poverty Advisory Panel

Other themes

There were calls for more information from some respondents who wanted to know more about the changes or what like-for-like means in practice before being able to comment.

A range of other points were raised in Q1 by individuals and organisations that are addressed later in this report. Some commented on the value of the payment (see Chapter 4), the needs of remote rural, island and off-gas grid households (see Chapter 8), and some shared views on the qualifying week (see Chapter 6). A few commented on the name of the payment (see Q3 below) and on the eligibility criteria, including extending eligibility (see Chapters 4 and 9).

Q2. Do you agree or disagree that this approach is an effective way for the Scottish Government to provide financial support for older people? Please provide further information on why you agree or disagree.

	n=	Agree	Disagree	Unsure	No answer
No. of all respondents	906	523	225	146	12
% of all respondents	906	58	25	16	1
% of all answering	894	59	25	16	-
% of individuals answering	876	58	25	17	-
% of organisations answering	18	89	11	0	-
- Miscellaneous	5	100	0	0	-
- Health / disability / age	8	88	13	0	-
- Poverty / fuel poverty	2	50	50	0	-
- Local Authority	3	100	0	0	-

Almost three fifths (59%) of those who answered agreed that the proposed approach is effective, while one quarter (25%) disagreed, and 16% were unsure. Very high levels of support were recorded among organisations who answered, with 89% agreeing.

Two thirds of respondents answered the qualitative element of Q2. However, many did not directly answer the question, with the most prevalent theme being calls to keep the existing WFP and not make any changes, as outlined in Q1. While various other comments were made, many aligned with the focus of other consultation questions and have been addressed elsewhere in this report.

Positive impact on older people

Many respondents felt the proposed approach effectively addressed fuel poverty among older people. Many reiterated the difficulties older people face paying energy bills and emphasised the necessity of the benefit, with a few organisations stressing that even greater support was necessary. RNIB Scotland noted that their recent survey had identified that 62% of older people had cut back on heating to make ends meet. Age Scotland reported that their research estimated that 43% of people over 50 live in fuel poverty, and their 2023 National Housing Survey indicated that rates of fuel poverty amongst those of pensionable age had doubled to 39% since 2021.

“Additionally, in our most recent Big Survey in 2023, 41% of respondents felt financially squeezed, with a further 35% feeling they would be within the next year. Most of these respondents (68%) already received support in the form of energy bill support and 43% also received the Pensioner Cost of Living Payment, yet still felt financially squeezed and worried about bills. This highlights the importance of this payment remaining universal, and perhaps the need for additional or increased financial support, particularly for older people on state pensions and for those living in the coldest areas and/or who have higher energy needs (such as health conditions or medical equipment).” – Age Scotland

“It is effective because heating costs rise at this time of year, so an additional payment is very helpful, particularly for those who have limited income.” - Individual

Some individuals felt the approach effectively helped older people stay warm as it enabled confidence in using heating, knowing that bills could be paid. It was noted that older people are more likely to stay indoors during winter, so heating was needed. Some felt the payment would effectively address health issues caused by low temperatures.

“Older people are more vulnerable than other adults to cold without realising that they have become cold. If payments were to cease or reduce, older people would be more careful with heating bills and are more likely to stress their bodies and die prematurely as a result.” – Individual

General agreement

Several individuals provided brief comments agreeing with the proposal for PAWHP, describing it as fair, helpful, smooth, efficient and sensible.

Suggestions for distributing the payment

Ways to allocate the funding, such as directly to older people, or comments on administering the benefit, were made by several. A few organisations referenced the 96% uptake of the existing WFP, and it was felt that automatic payments were more efficient than means testing, which could require application processing and work to encourage take-up. However, some, including Energy Action Scotland, argued that a universal payment is not the most effective way to target support; this is addressed more in Chapters 4 and 9.

“As reflected in the consultation paper, the universal entitlement to and automatic payment of the existing Winter Fuel Payment has led to an extremely high take-up rate. This suggests current delivery mechanisms are highly effective and should continue to be so after the introduction of the new payment. Where appropriate, as in this case, universal payments are generally an effective means of delivering support to a target group. Reducing the need to understand and assess entitlement against often complex eligibility criteria ensures that as many people as possible can access the payment, whilst minimising the administrative resource necessary for delivery.” – The ALLIANCE

Other themes

Some respondents appeared to suggest they thought PAWHP would be means tested or only available to people receiving Pension Credit, or requested more information or reassurance that this would not be the case. A small number felt the payment could help address poor housing conditions.

Q3. Do you agree or disagree with the proposal to name the replacement for Winter Fuel Payment in Scotland 'Pension Age Winter Heating Payment' (PAWHP)? Please provide further information on why you agree or disagree.

	n=	Agree	Disagree	Unsure	No answer
No. of all respondents	906	386	357	141	22
% of all respondents	906	43	39	16	2
% of all answering	884	44	40	16	-
% of individuals answering	867	43	41	16	-
% of organisations answering	17	76	24	0	-
- Miscellaneous	5	60	40	0	-
- Health / disability / age	7	86	14	0	-
- Poverty / fuel poverty	2	100	0	0	-
- Local Authority	3	67	33	0	-

Views on the proposed name for the payment were mixed among those who answered Q3. Overall, 44% agreed with Pension Age Winter Heating Payment, 40% disagreed, and 16% were unsure. There was, however, higher support among organisations who answered (76%).

The new name is clear and accurate

Two thirds of respondents left an open comment in Q3. The most prevalent theme was that the proposed name was clear and accurate. Many respondents, including Citizens Advice Bureau, RNIB Scotland, The ALLIANCE, Age Scotland, Independent Age and Energy Action Scotland, stated they felt the name was clear, straightforward, easily understood, and accurately described the benefit and the target audience.

“We agree with the suggestion to change the name of this benefit, which aligns with Scottish Government benefits and clearly states criteria within the name.” – Age Scotland

“Energy Action Scotland agrees that the renaming of the payment makes it clear who is eligible for the payment and its general purpose to support the need to heat homes during the coldest part of the year.” – Energy Action Scotland

The name does not matter

Many individuals left brief comments suggesting the benefit's name was irrelevant. Instead, it was argued that maintaining a universal benefit or delivering an effective support system is more important for the intended audience.

The new name is too long or confusing

South Lanarkshire Council and many individuals felt the name was too long or convoluted, expressing a preference for the existing name. Comments included that it was too clumsy, a mouthful, unwieldy and should be shorter to be memorable.

Many individuals disagreed with changing the name of the payment, arguing that people were already familiar with WFP. While most organisations agreed with the proposed name, one disagreed because of the potential for confusion, and a few others stressed the need to communicate the change clearly to avoid any confusion.

“Social Security Scotland should communicate the change in name and why this has changed, reassuring older people that they have not lost eligibility to the Winter Fuel Payment.” – Independent Age

Remove reference to ‘Pension Age’

Some individuals suggested removing Pension Age. Comments included that highlighting age could be discriminatory, could attract negative attitudes from those not of pensionable age who are not receiving support, or did not reflect ineligibility amongst those retiring earlier than the state pension age. National Carer Organisations disagreed with the name, noting that including Pension Age could limit changes to the benefits they called for.

“We disagree with the proposal to name the replacement payment ‘Pension Age Winter Heating Payment’. We would argue that the payment should be extended to include unpaid carers of any age who struggle to pay their heating bills. The current recommendation for the name, therefore, does not factor in for future improvements to the payment to include unpaid carers.” – National Carer Organisations

Include reference to Scotland

It was suggested by some individuals that the word Scotland or Scottish could be included. Most commonly, using the existing title with Scotland added was preferred, though the Scottish Winter Heating Payment was also suggested.

3. Timing of the payment

This chapter presents an analysis of Q4, which explored the timing of the payment.

Q4. Do you agree or disagree with the proposal to continue making payments to clients in November or December each year? Please provide further information on why you agree or disagree.

	n=	Agree	Disagree	Unsure	No answer
No. of all respondents	906	771	75	38	22
% of all respondents	906	85	8	4	2
% of all answering	884	87	8	4	-
% of individuals answering	869	87	8	4	-
% of organisations answering	15	73	20	7	-
- Miscellaneous	5	100	0	0	-
- Health / disability / age	7	71	29	0	-
- Poverty / fuel poverty	0	-	-	-	-
- Local Authority	3	33	33	33	-

There was strong support for payments in November and December among those who answered; 87% overall and 87% of individuals agreed with this proposal, the highest level of agreement recorded by individuals across the consultation questions. Support was again high among organisations who answered, with three quarters (73%) agreeing.

Appropriate timing before the coldest weather

Just under two thirds left a comment in Q4. Reflecting the strong support in the closed question, by far the most prevalent theme was agreement that this is the most appropriate time to make the payment. Both individuals and organisations highlighted that when the weather becomes colder, more heating is required and energy bills increase; therefore, additional support is required. It was also highlighted that payment in November or December enables the upfront payment of solid or liquid fuels. As noted in Q2b, some respondents highlighted that payment at this time would stop people worrying about paying their heating bills, or encourage people to use their heating sufficiently. Several respondents reiterated the more general point about the need to support older people with their heating bills over the winter, as outlined in Q1.

“A great time to pay as most have already had their heating on since October so it’s vital they have enough money to meet their bills at end of December.” – Individual

“We agree that this is a sensible time of year to issue these payments, towards the start of winter and as the weather becomes colder. And is consistent with the current arrangement for WFP.” – Age Scotland

Some individuals and a few organisations, including those who agreed and a small number who disagreed at the closed question, expressed a view that all payments should be made in November or as early as possible within the feasible timeframe, rather than continuing into December. For example, Independent Age, who disagreed at the closed question, argued that a November payment would “improve the timeliness of support”.

Earlier payment required

The next most prevalent theme was that an earlier payment date would be better. Several individuals and one organisation - Stirling Council - advocated this. October was the most frequently mentioned month. Arguments for this approach included that Scotland becomes colder earlier than other parts of the UK, and that it would allow people to budget and to buy solid or liquid fuel in advance when they are often cheaper. A few called for earlier payment for rural or island households, which is covered in Chapter 8.

Comments about Christmas

Some respondents expressed various views about the payment being made before Christmas. Some held a negative view, expressing concern that receiving a lump sum may lead to the money being spent on other items, including Christmas presents. Conversely, others felt Christmas costs meant the payment helped address financial challenges or that the payment allowed homes to be heated for guests visiting.

“Because even if pensioners are paying their fuel bills by direct debit (and thus spreading the cost throughout the year) they will still tend to have increased costs over the festive period. Thus the payment will assist them in being able to celebrate Christmas and New Year.” – Inclusion Scotland

January or February payment

Making the payment after the New Year was suggested by some individuals. This was felt to be a way to avoid the money being used for Christmas, though others argued payments in the New Year would be beneficial as it is the time of coldest weather and highest bills.

Spread the payment over the winter months

A variety of suggestions were made by some individuals to split the payment over two or more months. Reasons included assisting with budgeting, spreading the cost and ensuring the money was spent on heating bills. The number of payments is covered in detail in Q11.

Other suggestions

A few organisations and some individuals offered alternative suggestions. These included making the payment on a definite date to provide certainty and providing choice to clients.

“We agree with the reservation that [payment timing] should be the subject of intelligence-led research in that it should be reviewed in terms of the coldest months of the year, taking into account any climate change impacts.” - Scottish Community Safety Network

“Recipients should be able to choose when they would like to receive the payment which best reflects their needs and allows for greater financial planning over the winter months.”
– National Carer Organisations

4. Eligibility and value of payment

Chapter four presents the analysis of questions that asked respondents to consider the nature and clarity of the proposed eligibility criteria for PAWHP, the criteria for people in residential care who receive specific income-related benefits and the value of the payment.

Q6. Do you agree or disagree that our universal approach to identifying eligibility should be based on reaching state pension age? Please provide further information on why you agree or disagree.

	n=	Agree	Disagree	Unsure	No answer
No. of all respondents	906	711	122	56	17
% of all respondents	906	78	13	6	2
% of all answering	889	80	14	6	-
% of individuals answering	873	80	14	6	-
% of organisations answering	16	81	19	0	-
- Miscellaneous	5	100	0	0	-
- Health / disability / age	7	86	14	0	-
- Poverty / fuel poverty	1	0	100	0	-
- Local Authority	3	67	33	0	-

Four fifths (80%) of all respondents and all individuals who answered Q6 agreed with the universal approach to eligibility, with 14% disagreeing and 6% unsure. Among organisations who answered, 81% agreed and 19% disagreed. Only one poverty/fuel poverty organisation answered, disagreeing with the approach.

Stage pension age is appropriate

Three fifths of respondents provided open comments. Most commonly, respondents agreed that the state pension age is an appropriate basis for eligibility because this is the age when people need additional support. Multiple reasons for this included:

- This is when people typically stop working and face a drop in their income or move onto a fixed income. This can mean many older people, especially those who receive only state pension, are not well off and need financial support.
- People at this age have paid taxes and contributed throughout their working lives.
- Older people are more likely to be at home and will incur higher energy bills.
- Older people are more likely to be vulnerable to cold weather and suffer poor health due to cold temperatures. Warmer homes are crucial to health and wellbeing and prevent injuries, trips and falls amongst older people, so ensuring people can afford energy bills will reduce pressure on health and social care services.
- Working-age people are eligible for other benefits or can earn, so they do not need, or should not be entitled to, the payment.

“We strongly believe that warmer homes for the elderly will prevent unintentional injuries from slips, trips and falls within their homes.” - Scottish Community Safety Network

In addition, many respondents left brief comments expressing their general agreement with eligibility at state pension age or stating that the criteria seemed fair and sensible.

Many said eligibility should be based on state pension age because the current criteria work well and should be maintained on a like-for-like basis, or reiterated calls not to change the WFP system at all.

Agree with a universal approach

Agreement with maintaining a universal approach, regardless of personal circumstances, was expressed by many. Reasons given included that this is fairer, avoids discrimination, increases public support for the payment, promotes uptake, protects those on low and modest incomes, and meets everyone’s basic need to stay warm in winter and cope with increased financial costs.

Several argued against means testing PAWHP for similar reasons. These included that is unfair to those who made provision for their older age, is a stressful process for claimants, is costly and complex to administer, and can cause some people to miss out on a payment. Some specifically did not want eligibility to be based on receipt of pension credit only, expressing concern that many on low incomes are just above the cut off for this, meaning they miss out on vital support or end up worse off than those who receive pension credit. Others highlighted that pension credit is not taken up by many who are entitled to it. Age Scotland noted there can be negative impacts on individuals’ health and, in turn, NHS and social care services, due to lower uptake of non-universal benefits.

“Many miss out on social security benefits because they have a small private pension or small savings that put them over the threshold... even though people are sometimes only a few pounds over a limit and/or are still on low incomes, they... miss out on other support (like the Winter Heating Payment, energy efficiency grant funding, and Warm Home Discounts from their energy supplier).” – Age Scotland

“2.1 million (18%) of pensioners in the UK live in relative poverty with some groups such as 29% of Asian/Asian British pensioners; 25% of Black/Black British and 26% of single older women being in poverty... this lump sum payment is helpful in meeting the additional costs associated with higher fuel bills... without going through a means testing process which would reduce take-up. For example, if the payment was linked to receipt of Pension Credits, only 60% of those entitled to that benefit would receive it.” - Inclusion Scotland

It is a simple, efficient and cost-effective approach

Many respondents argued that eligibility based on state pension age is easy to understand, avoids complicated form-filling for clients, or is a cost-effective and efficient way to identify clients and administer the payment. Similarly, alternative criteria, such as means testing, were felt to be too confusing for clients, or too complex to administer. This could lead to people missing out on support, increased administration costs, or people trying to take advantage of the system.

“Using state pension age as the core criteria... is clear, consistent and simple... it eases delivery by maintaining a link with another universal payment that the DWP already collect the data necessary to deliver.” - The ALLIANCE

Extending eligibility

Situations where people under state pension age should qualify were outlined by many individuals and two organisations, including those who agreed and disagreed with the closed question. Most commonly, groups likely to need additional support with heating costs were identified, including: veterans, those with disabilities or health conditions, widowed people, those living off-grid or in rural or island areas, unemployed people, unpaid carers, and people living in poverty. It was highlighted that these groups are more likely to live on low incomes, be at home more, require warmer homes, or have higher energy costs.

“Disabled people need to have funds to heat their homes for longer as their needs are just as important as the elderly... My health is greatly affected if I can't afford to keep myself warm, I get depressed with everything I need to contend with on a daily basis and to add a cold house on top of this makes me dread winter.” - Individual

Several respondents also mentioned the rising state pension age. A few emphasised that the rising pension age had particularly disadvantaged women. There were calls to fix the PAWHP eligibility age to stop people from missing out on the payment in the future should the pension age rise again. A small number also called for the eligibility criteria to be extended to those below state pension age, e.g. aged 60 and over.

“The pension age keeps moving (higher); elderly people don't stop being old and cold because the pension age rises. It should be like the bus pass; once you're passed 60, you should get it.” – Individual

Arguments for better targeted eligibility criteria

Several individuals, including those who agreed and disagreed with the closed question, advocated for some form of means testing of PAWHP to be introduced instead of or in addition to age-based criteria. It was frequently argued that not all older people need financial support. Conversely, it was suggested that alternative or additional income-based eligibility criteria could be used to identify and target the payment to those who need it most. A small number felt that the payment should only be awarded to those of state pension age who were no longer working.

“As more and more people are remaining in employment the government's costs could be shaved a bit by giving this benefit to individuals who are actually retired and not working.” - Individual

Less commonly mentioned themes

A few respondents each argued for eligibility criteria to ensure that only those who had worked and paid taxes should receive the payment, or that those who live abroad should not be eligible.

Q7. Do you agree or disagree that the eligibility criteria for the PAWHP are clear? Please provide further information on why you agree or disagree.

	n=	Agree	Disagree	Unsure	No answer
No. of all respondents	906	544	125	217	20
% of all respondents	906	60	14	24	2
% of all answering	886	61	14	24	-
% of individuals answering	870	61	14	25	-
% of organisations answering	16	94	6	0	-
- Miscellaneous	5	100	0	0	-
- Health / disability / age	7	100	0	0	-
- Poverty / fuel poverty	1	0	100	0	-
- Local Authority	3	100	0	0	-

Three fifths (61%) of all individuals who answered agreed that the eligibility criteria for PAWHP are clear; 14% disagreed and 25% unsure. Among organisations who answered, 94% support was the joint highest level of agreement recorded by organisations across the consultation questions.

Clear criteria

Two fifths of respondents commented in Q7 and in line with the closed question results the most prevalent theme was that PAWHP eligibility criteria are clear, straightforward, or easy to understand. While some explained what they understood the criteria to be, many others gave reasons for why the criteria are clear. These included that: they only require people to know the state pension age; the payment is universal; the criteria are indicated in the name of the payment; or the criteria are the same as the existing WFP. A small number also mentioned that information in the media or communications about the WFP helped them understand the eligibility criteria.

“It is published in the news, and also you get a letter to tell you when you are eligible.” - Individual

Despite agreeing that the eligibility criteria are clear, several respondents reiterated their disagreement with the criteria or stressed that they are only easily understood if there are no future changes. A few emphasised that the current criteria will likely be clearer than those that apply under an alternative system such as means testing.

Unclear or need to be clearer

The second most common theme was that the eligibility criteria are unclear or need to be made clearer. Some respondents made brief comments to this effect, or felt the criteria were unclear due to the confusing nature of the benefits system or regular changes to the benefits criteria or state pension age.

Some others criticised the consultation paper's lack of clarity, detail and language. Respondents expressed a view that some of the information in the paper was unclear, lacked sufficient detail, or was deliberately misleading, in particular about the qualifying week or who will be eligible for PAWHP in the future.

“Not clear from guidance if proposal is to continue on same basis for future recipients, or if "same basis" approach only refers to current recipients.” - Individual

“Not sure what "and their circumstances during the qualifying week" means. No mention of what can change entitlement.” - Individual

Several respondents stated they were confused about the criteria. For example, they are unsure of the state pension age, the age at which PAWHP will be paid, or what the criteria mean for those who reach state pension age in 2024. Other comments suggested that respondents were unaware of or had misunderstood the criteria. These comments indicated that respondents: believed the current eligibility criteria used by the DWP might change; thought the payment would be for those receiving pension credit or income support only; assumed that they would begin to receive the payment at aged 65; or had not realised that those cohabiting would receive a smaller value payment.

Groups for whom the criteria might be more complicated were highlighted by some. These included those who live outside Scotland, retire before state pension age, or for whom the qualifying week will be relevant because of their birthday.

“The basic eligibility criteria of being of State Pension age should be widely understood (notwithstanding the confusion sometimes experienced by those who reach State Pension age after the qualifying week and therefore currently do not receive the payment, but still experience the Winter as a pensioner).” - Independent Age

“People who retire before state pension age could be confused by calling it a pension payment.” - Individual

Some called for more information about, or explanation of, the criteria or made suggestions for how to make the criteria more accessible. These included: providing more explanation about qualifying dates and rationale for these; running advertising campaigns; distributing information leaflets; creating audio-visual resources; and contacting people to let them know they are entitled to the payment. It was suggested that this could be particularly relevant for people with visual impairments or who do not have digital access or skills. However, one individual cautioned against providing too much information, which could be overwhelming.

“We have heard from older people that often understanding the value of what they or their household would receive can be confusing. It would be an opportunity in taking over the payment to create easy to understand, fully accessible guidance and awareness campaigns on the payments.” - Age Scotland

Criteria clear under the DWP system

Several individuals acknowledged the criteria are clear because they are the same as the WFP eligibility criteria. Some of these respondents, however, disagreed with the closed question element of Q7, arguing that because the existing criteria are clear there is no need to change, or expressing concern that devolving the payment to the Scottish Government could lead to unnecessary or confusing changes to the criteria.

Q8. Do you agree or disagree with the proposal to retaining the current value of payments? Please provide further information on why you agree or disagree.

	n=	Agree	Disagree	Unsure	No answer
No. of all respondents	906	489	248	137	32
% of all respondents	906	54	27	15	4
% of all answering	874	56	28	16	-
% of individuals answering	860	56	28	16	-
% of organisations answering	14	50	36	14	-
- Miscellaneous	5	60	40	0	-
- Health / disability / age	6	50	17	33	-
- Poverty / fuel poverty	0	-	-	-	-
- Local Authority	3	33	67	0	-

Varied views were expressed on the payment value. While 56% of individuals who answered agreed with retaining the current value, 28% disagreed and 16% were unsure. Half (50%) of organisations who answered agreed, the joint second lowest level of agreement among this group across all consultation questions; the remaining 36% disagreed and 14% were unsure.

Should be higher to reflect energy costs

While a majority of respondents agreed with retaining the current value at the closed question, the most common theme in responses to Q8 was that the payment should increase as the cost of fuel and energy increases. Most disagreed with the current value for this reason; however, a few respondents agreed with the current value but still called for future payments to match any changes in fuel costs.

“Energy bills will therefore now account for a larger proportion of household expenditure than previously, and so replicating existing values of payment that may have risen only with the general rate of inflation will mean households are receiving less support in real terms than previously... In principle, we would therefore argue that consideration should be given to increasing the value of the payments proportionate with inflation or with the increase in energy bills, whichever is higher. This would reduce levels of financial hardship and fuel poverty amongst pension aged households, whilst also ensuring the payment continues to fulfil its intended purpose to the greatest extent possible.” – The ALLIANCE

“We disagree with the proposal to retain the current value of payments and believe that payments should be increased in line with inflation and to reflect the dramatic increase in energy bills over the past few years.” - National Carer Organisations

Should be higher or rise in line with inflation

The second most common theme, mentioned by many, was opposition to retaining the current value because it was felt it should increase with inflation or the cost of living. Again, a few respondents agreed with the current rate, but suggested it rise in future years.

“With inflation and war and other uncertainty in our world, I believe this payment should be more flexible and the ceiling raised to more than it is as and when necessary. Your figures fall short of what is currently happening, so I am confused and concerned.” – Individual

“Agree that they should be retained on transfer but uprated annually in line with wage or price inflation - whichever is the higher.” – Inclusion Scotland

Retain the current value

In contrast, many respondents agreed with retaining the current value of the payments. Most did not explain why they agreed, but those who did described the current value as fair, sufficient, and helpful. Some stated that the current payment is sufficient, but they would not want it to be any less. Many, including Age Scotland, suggested that while they were content with the current payment, they hoped there would be a policy in place to set a review for the future.

“The current payments are generous, and I do not think there is any argument for changing them.” – Individual

“Agree, however, a watchful eye needs to be on the cost of electricity, gas and heating oil and any adjustments made to ensure the benefit keeps the same value to the recipient.” – Individual

“I think you should do that for the first year, but you should decide NOW how the benefit will be raised annually to maintain its impact.” – Individual

Some agreed with the current payment as they believed increases would put further pressure on an already strained benefits system or the Scottish Government budget.

Less commonly mentioned themes

Other points each mentioned by a few respondents, from most to least prevalent, included the following. While these were typically reasons for disagreeing with the proposal, they were occasionally cited as caveats to agreement.

- A general view that those in receipt of state pensions deserve more money.
- Pensioners in Scotland should receive a higher payment due to experiencing colder weather and less well-insulated homes.
- Disagreement that there should be a higher rate for those aged 80 or over.

- Concerns that pensioners who live alone may be worse off than a household with two eligible adults, despite using similar amounts of energy to heat their home.
- For PAWHP to be at the same level as any comparable payments made to people elsewhere in the UK.
- People living in rural areas deserve a higher value payment.

Q9a. Do you agree or disagree that people in residential care who do not receive the income-related benefits listed should receive half of the 'full' rate of PAWHP?

	n=	Agree	Disagree	Unsure	No answer
No. of all respondents	906	325	272	281	28
% of all respondents	906	36	30	31	3
% of all answering	878	37	31	32	-
% of individuals answering	865	37	31	32	-
% of organisations answering	13	62	8	31	-
- Miscellaneous	4	50	0	50	-
- Health / disability / age	6	50	17	33	-
- Poverty / fuel poverty	0	-	-	-	-
- Local Authority	3	100	0	0	-

One third (37%) of all respondents and individuals who answered agreed with this proposal, the lowest level of agreement recorded both overall and by individuals across the consultation questions. Three in ten (31%) disagreed and a further three in ten (32%) were unsure. Three fifths (62%) of organisations that answered agreed, 8% disagreed and 31% were unsure.

It should be noted, however, that the qualitative analysis below suggests respondents disagreed for different reasons; they either felt a higher or full rate of payment was appropriate, or called for a lower or no payment to be made. There is evidence of respondents contradicting themselves within their responses. For example, some respondents agreed at both Q9a and Q9b, i.e. they agreed with a lower rate for those in residential care, but then used their open comment to call for everyone to be treated equally.

Question 9b. Do you agree or disagree that people in residential care who receive one of the income-related benefits listed should not receive PAWHP?

	n=	Agree	Disagree	Unsure	No answer
No. of all respondents	906	367	215	291	33
% of all respondents	906	41	24	32	4
% of all answering	873	42	25	33	-
% of individuals answering	859	42	25	33	-
% of organisations answering	14	50	21	29	-
- Miscellaneous	5	40	20	40	-
- Health / disability / age	6	50	17	33	-
- Poverty / fuel poverty	0	-	-	-	-
- Local Authority	3	67	33	0	-

While there was slightly higher agreement among those who answered that people in residential care who receive one of the income-related benefits listed should not receive PAWHP, overall only 42% agreed, with one quarter (25%) disagreeing and one third (33%) unsure. Agreement was slightly higher among organisations who answered with half (50%) agreeing. This was the joint second lowest level of agreement recorded by organisations across the consultation questions.

Q9c. Please provide further information on why you agree or disagree.

Open comments were provided by two fifths of respondents at Q9c. However, because Q9c covered both closed questions, it was often unclear which question respondents were referring to in their comments. Many also did not specify if they were referring solely to people in residential care who receive income-related benefits, or to all people in residential care. Where it was possible to make a distinction, this has been noted below. The analysis should also be interpreted with caution given that some respondents appeared to contradict themselves across Q9, as noted above.

Several respondents stated they were unsure or could not give an opinion about the PAWHP for those in residential care. Reasons given included the complexity of the arguments or because they did not have enough information about residential care payment systems, individuals' circumstances and how residential care placements are funded, or whether PAWHP would be paid directly to residents or care homes.

PAWHP is not needed in residential care

While there was not a majority view in Q9c and Q9b, the most prevalent theme was that people in residential care should not receive PAWHP as heating is already covered in their care costs. Respondents argued that: care homes, not residents, are responsible for energy bills; the price of care should include heating; support is not needed as residents are already warm or do not face increased fees during the winter; and funding should be targeted to people in their own homes.

“Support should be targeted at those who are most in need. People in residential care are not at risk of disconnection and do not shoulder the same financial burden as those remaining in their own homes.”- Citizens Advice Bureau

Similarly, several respondents agreed that care home residents should not receive PAWHP if they already claim other income-related benefits. Some emphasised this was unnecessary for this group, on the assumption that if they were claiming income-related benefits, then their care costs were also likely to be paid by public funding. Others expressed concerns about a lack of fairness, arguing, for instance, that this group are already getting sufficient support or are already better supported than those who have to self-fund their residential care.

“For those in residential care and receiving relevant income-related benefits, as they would generally not be contributing to the costs of residential care, it is reasonable to exclude them from the payment entirely as they will not have even indirect responsibility for paying for energy.” – The ALLIANCE

However, Inclusion Scotland and one individual argued it would be illogical or unreasonable for those receiving income-related benefits, who are presumably less affluent, to be awarded less than those who do not receive benefits.

Should receive PAWHP to help cover care costs

The need for help to cover care costs was referred to by several to justify why those in residential care should receive some of or the full rate of PAWHP. Some highlighted the very high costs of care, that residents pay for their heating through their care fees, or that rising energy bills are passed onto residents through higher care fees.

“Residential fees are extortionate; people have to heat their rooms, and they should receive the same as anyone else. Some people have to sell their house to pay the fees.” – Individual

Several others highlighted the negative impacts on care service providers of rising energy costs, including struggling to remain open. They called for PAWHP to be paid directly to providers to cover rising energy bills and keep costs down for residents. Two individuals, however, expressed concern about residents being denied agency if they were not paid PAWHP directly. Some other respondents warned against profiteering by, or government subsidy of, care home businesses. There were comments that care homes may put their fees up or take recipients’ PAWHP without any additional benefit to residents.

Depends on individual circumstances

Many respondents felt that receipt of PAWHP, or the amount awarded, should depend on individual circumstances. Several suggested it should depend on how the costs of residential care are being met, in particular, advocating that those self-funding their care should receive the full payment. Respondents expressed a view that self-funding residents subsidise the cost of local authority places or pay a disproportionate amount more for their care. It was also suggested that halving the payment for those in residential care who do not receive income-related benefits would penalise those who had worked all their lives or

saved for the future and now had to pay for their care. Age Scotland also cautioned that some residents who receive income-related benefits may still be self-funding part of their care and urged that this group also receive the full rate of PAWHP.

“Those living within residential care are often spending all of their pension or other savings to pay for this care... With the mix of local authority funded and privately funded places in residential care, those paying privately are often paying a disproportionate amount more, with recent research suggesting they pay, on average, 40% more than those publicly funded. With a third of all residents in residential care self-funding, this a significant proportion of older people paying more towards heating than others in the same setting, even though they are more often than not on the same income.” – Age Scotland

Some felt that only residents required to contribute towards energy costs in their establishment should receive any PAWHP. A few others argued that those on short-stay residential places or who will return to their own homes should still receive the payment.

A universal approach

The importance of keeping the benefit universal, regardless of people’s circumstances, was highlighted by several. They advocated for the payment to be made based on age, not circumstances, and called for the full payment to be made to all.

Helps support other heating and living costs

Some expressed support for care home residents receiving PAWHP, arguing they would still benefit from heating support, or highlighted other costs linked to the winter months. These included the need to: buy warm clothing or heated blankets; heat their rooms or their unoccupied houses to ensure they do not fall into disrepair; help their spouse at home; or buy Christmas presents and cards. A small number emphasised residents may need the payment to contribute to essentials or general living costs.

“People in care still have to pay for warm clothing and other items to keep warm” - Individual

Comments on shared residencies

A small number expressed mixed views about whether people in shared residencies should be paid a lower rate of PAWHP, or a rate in line with people co-habiting at home. These respondents felt individual heating costs would be reduced by pooling resources and splitting the bill with other residents, justifying a lower rate. However, Age Scotland disagreed that proportional sharing reduced costs, arguing that overall heating bills in residential care are higher due to larger building sizes and the need for warmer temperatures to care for people with health conditions, for example.

5. Receiving the payment

This chapter covers different aspects of how people will receive PAWHP. Respondents were asked whether a cash payment, paid through the system that processes other benefits and the state pension, is the best option, and whether an annual one-off payment is most convenient. The consultation also considered clients' ability to opt-out of receiving PAWHP, which is an option for the existing DWP-administered WFP.

Q10. Do you agree or disagree with the proposal for PAWHP to be given to clients in the form of a cash payment and not another form? Please provide further information on why you agree or disagree.

	n=	Agree	Disagree	Unsure	No answer
No. of all respondents	906	658	137	92	19
% of all respondents	906	73	15	10	2
% of all answering	887	74	15	10	-
% of individuals answering	870	74	16	10	-
% of organisations answering	17	94	0	6	-
- Miscellaneous	5	80	0	20	-
- Health / disability / age	7	100	0	0	-
- Poverty / fuel poverty	2	100	0	0	-
- Local Authority	3	100	0	0	-

There was broad support for a cash payment. Almost three quarters (74%) of those who answered agreed, as did 74% of individuals. All but one organisation who answered agreed (94%); this was the joint highest level of support recorded by organisations across the consultation.

While many individuals disagreed with a cash payment in the closed question, their open comments suggest they did support the proposal. Having interpreted the question literally, these respondents assumed that clients would be given cash directly and noted their preference for payment by a bank transfer or alongside the state pension.

Agree with cash payment

Just over half of respondents provided an open answer in Q10. The most common theme, mentioned by nearly two fifths, was agreement with a cash payment. This includes those who disagreed at the closed question but supported a cash payment in their comment. Those who elaborated suggested that a cash payment made alongside other benefit or state pension payments was simple and efficient, reducing confusion and bureaucracy.

Many respondents supported a cash payment as they felt it provided clients freedom to spend it as they wished. Some noted that clients may use it to buy warm jumpers, electric blankets or alternative fuels not offered by energy suppliers. Similarly, some others noted that cash payment provided clients with dignity.

“Cash has the greatest benefit for individuals, allows choice, reduces any risk of stigma and is the approach most aligned with the Scottish social security principles of treating individuals with dignity and respect.” - Child Poverty Action Group in Scotland

Some respondents expressed concerns that another form of payment, e.g. directly to energy suppliers, may be less cost-effective for the Scottish Government to administer or negatively impact Social Security Scotland's workload.

A small number of respondents cited other reasons for agreeing, including a general distrust of energy suppliers, a belief that cash payments are best for remote rural and island households using alternative heating sources, and concerns that other types of payment would require new forms or applications.

Direct payments to energy suppliers

Payments directly into eligible clients' energy accounts were suggested by many individuals. Different reasons were given for taking this approach. Some supported both cash payments or payments directly to energy suppliers but did not highlight why or which was preferred. Those who solely supported payments to energy suppliers expressed a concern that PAWHP may not be used to pay for heating costs, and this was a way to ensure the money was spent as intended. A few others suggested that payments directly to energy suppliers may have a greater impact on those in fuel poverty.

Although all organisations who left an open comment agreed with a cash payment, two suggested that there could still be benefits from other approaches, for example, that payments directly to energy suppliers may have a greater impact on those in fuel poverty.

“Energy Action Scotland notes that had the payment been made directly to nominated energy suppliers, due to the nature of the calculation of fuel poverty as defined in the Fuel Poverty Act 2019, this would have a bigger fuel poverty-reducing factor than when a cash payment is provided. The government may believe that it is cost-prohibitive to make payments directly with suppliers in this way, but nonetheless, this is a feature of cash payment to beneficiaries over direct energy payments to suppliers.” – Energy Action Scotland

“This seems a reasonable approach to offer financial support to those who require help with heating costs. However, in the long-term other measures such as money off or reductions in energy bills may provide welcome relief for some as a direct benefit, particularly for households with disabled people.” - RNIB

While not answering the question directly, several individuals expressed concern that payments may not go toward heating. However, they did not say if they preferred payment by cash or in another way.

Personal Preference

Some respondents suggested that the payment method should be left to the client to decide. Respondents noted that some people may not have a bank account or understand online banking platforms.

“We agree with support through cash payments, although we would hope that consideration be given to those who do not utilise traditional banking. For instance, a study in 2015 from interviewing people from the Gypsy/Traveller community in 2015 showed 20% of those interviewed did not have bank accounts. This demonstrates the importance of having flexible payment arrangements to ensure that nobody is unfairly disadvantaged.”
 - National Carer Organisations

Q11. Do you agree or disagree with the proposal to pay PAWHP as an annual one-off payment each winter? Please provide further information on why you agree or disagree.

	n=	Agree	Disagree	Unsure	No answer
No. of all respondents	906	778	55	56	17
% of all respondents	906	86	6	6	2
% of all answering	889	88	6	6	-
% of individuals answering	873	87	6	6	-
% of organisations answering	16	94	0	6	-
- Miscellaneous	5	80	0	20	-
- Health / disability / age	7	100	0	0	-
- Poverty / fuel poverty	1	100	0	0	-
- Local Authority	3	100	0	0	-

This proposal recorded the highest level of agreement in the consultation. Among those who answered, 88% of all respondents and 87% of individuals agreed. Almost all organisations who answered agreed (94%), while 6% were unsure and none disagreed, meaning this was the joint highest level of support recorded by organisations.

Winter is the most appropriate time

Over two fifths left a comment in Q11. The most prevalent theme was agreement that a payment each winter is most appropriate. Many respondents focused on the timing of the payment, rather than whether it should be a one-off payment, noting that winter is when a payment is needed most due to colder temperatures, greater demand for heating and higher bills. In addition to this theme, several respondents repeated the recurring theme of the overall need for a payment which supports older people to heat their homes.

“Ensures the benefit is available at the most appropriate time of year.” – Individual

“It should be paid just in advance of the likely need to use it for warmth.” - Individual

Efficient administration

The second most prevalent theme was agreement with a one-off payment because it is the most efficient way to administer it. The approach was described as simple, easy, cost-effective, straightforward and sensible, with a few noting that this would minimise

administrative costs and bank charges. Similarly, others argued that split payments would add to administration costs.

“Agree as this would be more effective to administer and would be more effective for the client to get a lump sum around the time that energy prices increase.” – Stirling Council

Keep the current process

Many respondents agreed with the proposal for a one-off payment as this is the way the payment is currently made. They reflected that this process works well and is familiar to clients and therefore argued that there is no need to change from the existing approach.

Provides a predictable source of income

Several respondents, including Independent Age, agreed with a one-off payment at the start of winter as they felt it provided reassurance to clients. They suggested that one upfront payment means clients know they have support to cover their heating costs and allows them to plan ahead in terms of both how they will heat their home and budget to pay their bills. A few argued that this was the least confusing approach and reduced any worries about budgets. A few individuals and The ALLIANCE stressed that payment should be made as early as possible in the winter

Similarly, a small number agreed because they felt a one-off payment empowers individuals with autonomy and flexibility over how they use the payment.

“As someone having two pain conditions, having such an additional payment at this time of year, gives me the flexibility, and confidence, to use a bit more energy, for my benefit. There really is only so much that extra layers can do.” - Individual

Regular or monthly payments

Some respondents advocated for more regular payments instead of a one-off payment. Suggestions included monthly payments, multiple payments at the start, during and end of winter, or at times when temperatures are lowest. Those who explained their reasoning suggested that more regular payments would be better for budgeting.

Two payments

A call for two payments was made by some respondents. Most suggested that one payment should be made at the usual time, with a second payment either in January/February or at the end of winter, to cover bills received later in the winter.

“I would prefer it was in two payments (November and January), but I'm sure this would be more expensive to administer. The coldest weather is in January and February, and the money could have run out by then.” - Individual

Ensuring the payment is used for heating

Mixed views were expressed by some respondents about whether a one-off or split payment is most effective in ensuring the money is used on heating and not for other purposes. Some argued that one payment at the start of winter makes the purpose of the

payment clear, whereas multiple payments could be absorbed into general finances and spent on other things. Conversely, others argued that there could be a temptation to spend a one-off payment straight away, or it could be more challenging to manage, whereas a split payment could ensure regular support.

“Although a little more complex to set up; it would probably be better paid out in instalments. Better for budgeting, and takes away the temptation to spend it all at once for some people - who may then suffer as a result.” - Individual

Less commonly mentioned themes

Other points each raised by a small number of respondents included:

- If the payment was split, the separate payments would be too small to benefit clients or may not be enough to pay a bill.
- A call for greater consideration of extreme cold weather, which could increase the need for a second or supplementary payment.
- The best option would depend on people’s circumstances. National Carer Organisations suggested that people could be able to choose between one or multiple payments to best meet their needs.
- One individual suggested that eligible clients should be advised of the payment in November or December, but paid towards the end of the winter.

Q12. Do you agree or disagree with the proposals for providing a way for people to opt-out of receiving PAWHP? Please provide further information on why you agree or disagree.

	n=	Agree	Disagree	Unsure	No answer
No. of all respondents	906	570	143	174	19
% of all respondents	906	63	16	19	2
% of all answering	887	64	16	20	-
% of individuals answering	870	64	16	20	-
% of organisations answering	17	76	18	6	-
- Miscellaneous	5	80	20	0	-
- Health / disability / age	7	71	14	14	-
- Poverty / fuel poverty	2	50	50	0	-
- Local Authority	3	100	0	0	-

Over three fifths (64%) of all respondents and individuals who answered agreed with the proposals for opting-out of PAWHP, while 16% disagreed and 20% were unsure. While agreement was higher among organisations who answered (76%), 18% disagreed and 6% were unsure.

Agree with the opt-out option

Half of respondents provided an open comment in Q12. The most prevalent theme, raised by over half of those who answered, was support for an option to opt-out of receiving PAWHP. Many did not expand on their reasons for support, but others agreed and suggested how the opt-out system could be improved.

Some suggested that the funds left after clients opt-out of PAWHP should be ringfenced for other related purposes. Suggestions included donating the funds to charities, donating to food banks, adding the funds to the benefits system to increase the amounts received by clients on lower incomes, redirecting the money to the NHS, and funding programmes that improve home energy efficiency. Age Scotland recommended that the funds be directed toward dedicated services for older people.

“If people don’t need it, there should be an option to donate it to a fuel poverty initiative, energy efficiency programs or similar.” - Individual

There was a recommendation that when people opt-out, they should be offered an option to donate the money directly to a charity or cause of their choice. One respondent emphasised that they did not believe the funds should return to the government budget.

Clear communication about the opt-out option was highlighted as necessary by some. A few individuals acknowledged having never known about the existing opt-out from WFP. The ALLIANCE suggested that there should be a reminder of eligibility annually or every other year for those who have opted-out to allow them to opt back in if their circumstances change. In contrast, a few respondents suggested that clients should only be able to opt-out for one year and be re-enrolled automatically for future years.

“Independent Age support the option of having an ‘opt-out’ mechanism. However, we believe those who ‘opt-out’ should not have to ‘opt-in’ to receive the payment again but rather should be required to opt-out each year. This is important in ensuring that people receive the payment because they failed to opt-out rather than someone who is in desperate need of the payment missing out because they forgot to opt back in.” – Independent Age

Opting-out vs. a means-tested benefit

Many respondents combined the question about an opt-out option with whether PAWHP should be a universal benefit or means tested. Many who disagreed at Q12 stated they believed that PAWHP is an earned benefit that all people of state pension age should receive. They expressed a view that there should not be an opt-out option as the payment should be given to everyone and it should be up to clients to decide what to do with the money once they have it. Some noted that those who do not need the payment could donate it, with a few specifically highlighting the tax benefit in doing so.

“Everyone eligible should receive the payment; it is then up to them how it is spent. They can use it to help pay for their heating or perhaps give that amount to a charity of their choice.” – Individual

A few individuals disagreed with an opt-out option, noting a concern that vulnerable people who need the payment may opt-out due to pride or a belief they were not deserving, thus defeating the point of the universal benefit. This was echoed by Energy Action Scotland.

“I am aware of some people who do not keep their current payment but donate it to charity. There are some people who would benefit from the payment but due to pride and a reluctance to receive benefits may opt out. It would likely be administratively cheaper and easier to pay it to everyone.” - Individual

A small number of respondents who disagreed were concerned that the opt-out option could lead to a means-tested benefit in the future. Some others agreed with the opt-out option, emphasising the importance of keeping the opt-out voluntary, i.e. not moving toward means testing.

A few respondents expressed support for means-testing; this includes a mix of those who agreed, disagreed, and were unsure about the opt-out. They expressed a view that testing would ensure that people who do not need PAWHP do not receive it, or as Energy Action Scotland argued, that using means testing would ensure the funds reach the households most in need.

“Energy Action Scotland is concerned that the opt-out retains the potential for well-meaning lower-income households to relinquish important financial support. Should the payment be more closely linked to income or additional need then it would increase the likelihood that those that need support get it... It would appear that it is more tax efficient for wealthier households to donate an equivalent level payment to a charity that is registered for Gift Aid as any funds donated would increase by 25%. However, relying on the largesse of wealthier households to pass through an equivalent payment is not in any way a substitute for a well-designed and targeted support through the benefits system.” – Energy Action Scotland

Administrative costs

The administrative costs of allowing an opt-out option were raised by some respondents who both agreed, disagreed or were unsure of the proposal. Some thought that allowing clients to opt-out may incur a greater cost to the government than the benefit was worth.

“If someone really doesn't want it, the equivalent money can be donated to an appropriate charity. The administration involved in allowing someone to opt out would cost more money.” - Individual

6. Qualifying week

The Qualifying week is currently in September, and people who meet the eligibility criteria during the qualifying week are then paid automatically in November or December. This process allows the DWP to provide Social Security Scotland with data about eligibility in enough time for payments to be processed in advance of winter.

Q13a. Do you agree or disagree with the proposal to continue having the 'qualifying week' in September to identify eligible clients?

Q13b. Please provide further information on why you agree or disagree.

Q13c. If you disagreed, please provide a preference for when you think the qualifying week for PAWHP should be.

	n=	Agree	Disagree	Unsure	No answer
No. of all respondents	906	629	124	136	17
% of all respondents	906	69	14	15	2
% of all answering	889	71	14	15	-
% of individuals answering	872	71	14	16	-
% of organisations answering	17	82	18	0	-
- Miscellaneous	5	100	0	0	-
- Health / disability / age	7	71	29	0	-
- Poverty / fuel poverty	2	100	0	0	-
- Local Authority	3	67	33	0	-

Respondents who answered Q13 were supportive of continuing to have the qualifying week in September; 71% overall, 71% of individuals and 82% of organisations agreed with this approach.

Just under two fifths of respondents provided an answer to Q13b, and just under one in six answered Q13c. However, as respondents frequently suggested when qualifying week should be at Q13b, or gave reasons for their agreement or disagreement at Q13c, we have presented the themes evident at both questions below.

Agreement with the proposed qualifying week

By far the most prevalent theme in responses to Q13b was agreement with the proposed qualifying week in September. Respondents highlighted that because this is the same process as the WFP, it would be easy for clients to understand, simple to administer and cost-effective. Some specifically noted that it would allow enough time for payments to reach clients before winter.

“Earlier would mean less people qualify, later would result in more payments being paid in January and later causing worry for people concerned about affordability of heating bills. Historically people expect payment before Christmas and will make contact if this expectation is not met.” – Individual

Those who reach state pension age after qualifying week miss out

Many respondents disagreed with the qualifying week in September, for varied reasons. Some disagreed because of the timing; this is addressed below. Most frequently, however, several highlighted that the process means that people with birthdays after September would not be eligible for the payment that year, regardless of the fact that they would be of state pension age during the winter.

The most prevalent theme at Q13c, mentioned by some, was that there should be no qualifying week and that eligibility should be assessed throughout the year. This would mean that eligibility is based on a person’s birthday or the year that they reach state pension age, rather than also factoring in the time of year. One individual called for pro-rata payments to be made over winter depending on when people reach pension age.

“The September cut-off date negatively impacts many people who have to wait another full year for payment. It’s difficult enough for those also impacted by the rise in state pension age and having to wait 6 or 7 years longer to get such without a large number also being forced to wait even longer for winter fuel payment.” - Individual

Necessity of a qualifying week

Several respondents acknowledged that a qualifying week was necessary. Some agreed that September was a suitable time, while others were unsure of the best timing.

“Obviously a lot of people will 'miss out', but I do understand the need to get all the admin prepared for those eligible for payments and as I have no current alternative, I remain 'unsure', but not against it.” - Individual

A few organisations partially agreed, again acknowledging the need for a qualifying week, but suggesting changes to the timing would improve the service, as noted below.

Alternative timeframes

While some respondents at Q13c reiterated their disagreement with the qualifying week without providing alternative suggestions, several highlighted specific changes to the timing of the qualifying week. Beyond assessing eligibility throughout the year, other suggestions from most to least prevalent included:

- Pushing the qualifying week back to December to include people who reach pension age in the calendar year. Others recommended January or the first of January specifically for the same reason.
- Bringing forward qualifying week to summer, as September can feel cold for some.
- October was suggested, though respondents did not provide further detail.
- Spring was mentioned as it is the start of the tax year.

RNIB agreed with a qualifying week but recommended moving it closer to the payment date to close the gap between those who reach pension age after the current qualifying week and before payment. The ALLIANCE advocated that the qualifying week be the same as the qualifying week for Child Winter Heating Payment to “ensure consistency of approach across payments”.

Other reasons for disagreeing with the timing of the qualifying week, rather than the process per se, included suggestions for a longer qualifying period. For example, South Lanarkshire Council proposed a September-long period “is more appropriate to cover those of mixed age in receipt of Universal Credit”. Inclusion Scotland suggested a qualifying week be as late as possible, which in their view should be feasible given that most of the administration is now online.

Other considerations

Some comments combined consideration of the qualifying week with the wider eligibility criteria. There were calls for greater flexibility to allow consideration of people who may be on holiday during the qualifying week and those who are temporarily in care homes. A small number of respondents noted that they believed those who live abroad for most of the year should no longer be eligible to receive the payment, regardless of their status during the qualifying week.

Child Poverty Action Group and Independent Age agreed with the proposal, but suggested clients would benefit if there were a mechanism for payment for those who reach state pension age after the qualifying week but before the end of the application window. Age Scotland recommended an application process for those clients who may not have been identified automatically, e.g. if they recently moved to Scotland.

7. Re-determination timescales

This section considers the timescales for the re-determination process by Social Security Scotland. The Social Security Act (Scotland) 2018 gives individuals the right to challenge a decision made by Social Security Scotland if they believe it is incorrect. Unlike the DWP's Mandatory Reconsideration, Social Security Scotland puts aside the original determination to allow for a different, independent officer to process a new determination. Applicants are not required to provide any further information as a part of this process.

Q14. Do you agree or disagree with the proposal that clients have 31 days to request a re-determination? Please provide further information on why you agree or disagree.

	n=	Agree	Disagree	Unsure	No answer
No. of all respondents	906	512	76	298	20
% of all respondents	906	57	8	33	2
% of all answering	886	58	9	34	-
% of individuals answering	870	58	8	34	-
% of organisations answering	16	56	31	13	-
- Miscellaneous	5	80	0	20	-
- Health / disability / age	7	43	43	14	-
- Poverty / fuel poverty	1	100	0	0	-
- Local Authority	3	33	67	0	-

Over half (58%) of all respondents who answered Q14 agreed with the proposal that clients have 31 days to request a re-determination. Fewer than one in ten (9%) disagreed, though one-third (34%) were unsure. Organisations held more mixed views. While 56% of those that answered agreed, 31% disagreed and 13% were unsure.

Agreement with 31 days

Just over a quarter of respondents commented in Q14. The most prevalent theme was general agreement with the proposal. While many did not provide additional detail, reasons for agreeing included comments that the process was reasonable, fair and a sufficient timeframe to ensure a response before the winter.

“[We] supports the right of individuals to challenge the determination of Social Security Scotland and that to do this within 31 days seems fair and reasonable also noting that under some circumstances that can extend out to 12 months.” – Energy Action Scotland

Confusion

Several respondents stated they did not understand the question and were unsure how to respond. Those who elaborated typically suggested that the word ‘re-determination’ was confusing, while some expressed confusion that a re-determination period was necessary as the payment is not means tested and should be given to anyone of state pension age.

Request for a longer re-determination period

Suggestions for longer re-determination periods of varying lengths were proposed by some. Suggestions ranged from 31 days to 6 months. Two respondents requested that people have until the end of December to submit a redetermination. Respondents noted a number of reasons why people may need longer, including being in hospital, having unpaid caring duties, or timescales that account for a slower postal service.

A few organisations proposed longer timeframes. Stirling Council, The ALLIANCE and Independent Age recommended 56 days to match Social Security Scotland's timeframes to respond to a re-determination. Age Scotland suggested 42 days as it provides consistency with many other benefits administered by Social Security Scotland and would reduce confusion. National Carer Organisation also recommended 42 days to allow longer for those with commitments to their time, such as unpaid caring roles. Alternatively, they noted that if the period remains 31 days, a published list of circumstances permitting a late application should be made available.

Q15. We have proposed that Social Security Scotland have a period of 56 working days to consider a re-determination of PAWHP. Do you agree or disagree with this proposal? Please provide further information on why you agree or disagree.

It should be noted that the consultation paper contained contradictory information which impacts the analysis of Q15. While the explanation of the re-determination process proposes Social Security Scotland have 56 calendar days (approximately two months) to make the fresh re-determination, respondents were asked if they agreed with a period of 56 working days (approximately 11 weeks). While some respondents clarified whether they answered with calendar or working days in mind, it was not clear in all instances.

“It is notable that the individual has only 31 calendar days whilst Social Security Scotland has a much longer period of 56 working days. To avoid misunderstanding it would be best if ‘days’ were calculated on the same basis either calendar or working.” – Energy Action Scotland

	n=	Agree	Disagree	Unsure	No answer
No. of all respondents	906	348	235	295	28
% of all respondents	906	38	26	33	3
% of all answering	878	40	27	34	-
% of individuals answering	864	40	27	34	-
% of organisations answering	14	43	43	14	-
- Miscellaneous	5	60	20	20	-
- Health / disability / age	6	17	67	17	-
- Poverty / fuel poverty	0	-	-	-	-
- Local Authority	3	67	33	0	-

Mixed views were also evident on the proposal that Social Security Scotland have a period of 56 working days to consider a re-determination. Overall 40% of those who answered agreed with this approach, the second lowest level of agreement across the consultation, both overall and among individuals. One quarter (27%) disagreed and one third (34%) were unsure. Among organisations that answered, 43% agreed, which was the lowest level of agreement recorded by organisations across the consultation.

56 days is too long

Just over one third provided a comment in Q15. Many expressed a view that the proposed 56 days for Social Security Scotland to respond to a re-determination was too long. Many did not elaborate further, but those who provided reasons, including Age Scotland, suggested that:

- The long period may leave people without funds for heating at the start of winter.
- Re-determination should match the 31 days for individuals to make a request.
- Information about applicant ages and eligibility should be readily available and assessable and should take less time to re-determine.

“We believe there needs to be a quicker turnaround for this. If the period is September then 56 days later will take it into middle of November / start of December in the middle of Winter. There needs to be a quicker turnaround than this.” - Scottish Community Safety Network

Agreement with the proposed timeframe

Several respondents agreed with the proposal of 56 days for the review. Reasons provided in support included that it is a fair, sensible, and sufficient time to undertake the review. Others supported having consistency with other devolved payments. Some who agreed caveated their agreement with a desire for the re-determination to be made as quickly as possible as it could impact those needing funds before the cold weather starts.

“The ALLIANCE have previously suggested in responses to earlier social security related consultations that there should be equality of timescale for requesting and considering re-determinations. However, we understand that timescales are now broadly standardised across devolved payments. We are therefore generally content for those standard timescales to be applied to PAWHP to ensure consistency across the system.” – The ALLIANCE

“[Agree] As long as the re-determination can be delivered ASAP within this timescale.” - Individual

Other themes

In addition to further uncertainty over the meaning and need for re-determination, a few respondents misread the question and responded as if the proposal was asking for opinions about a 56 day option for individuals to make a re-determination request compared to 31 days at Q14. A small number of respondents expressed concerns about the cost of re-determination to Social Security Scotland.

8. Remote rural and island communities

Q5 and Q19 addressed the needs of remote rural and island communities. Despite having slightly different focuses, the same themes were evident across both questions. To avoid repetition, we have presented the analysis of responses to both questions below, based on the prevalence of themes in Q5.

Q5. How could we improve delivery for households in remote rural and island communities that are not on the gas grid?

Q19. Please set out any information you wish to share on the impact of PAWHP on Island communities.

Two thirds of respondents answered Q5; the second highest level of response in the consultation. However, one third of those answering did not leave a substantive comment. Many stated they did not know, which was the most prevalent theme at this question. In addition, several acknowledged they did not live in remote rural or island communities and so could not comment, with several others suggesting that the Scottish Government should ask people in those communities directly. Just under one quarter answered Q19. Similarly, three in ten of these respondents stated they did not know or did not have the experience to answer, making this the second most prevalent theme at this question.

Consider alternative fuels or approaches

The most prevalent theme, raised by many of those who provided a substantive comment in Q5, was a range of suggestions for promoting alternative fuels or approaches to alleviate fuel poverty in these communities. There were frequent suggestions to use oil or bottled gas, and a few suggested that the Scottish Government should supply or stockpile alternative fuels. Others commented on Scotland's potential to generate renewable energy and suggested greater investment in, or subsidising the use of, wind and solar energy and heat pumps. Improving the insulation, energy efficiency and heating systems of rural housing stock was also suggested.

“The Scottish Government should consider further support beyond the confines of PAWHP to specifically address the additional costs and challenges associated with being off grid, for example subsidising fuel costs and funding energy efficiency and retrofitting measures.” – The ALLIANCE

Higher value payment

Calls for a larger payment to remote rural and island households was the second most common theme in Q5 and also raised by some in Q19. Many respondents argued that there should be a higher, additional or supplementary payment made to these households, given the higher cost of gas alternatives and higher levels of fuel poverty. Organisations, including the Scottish Federation of Housing Associations (SFHA), Energy Action Scotland and Age Scotland, suggested a 'rural uplift' or premium. Some suggested ways in which the additional payment could be calculated or weighted, such as looking at the price difference between gas central heating compared to coal, oil or peat, comparing temperature differences or wind chill factors, or considering the higher cost-of-living.

“Look at actual costs incurred in heating by both cohorts and weight on the basis of those using gas to be the benchmark cost and where off-grid costs are different/greater, the payment should be increased accordingly.” – Individual

“This is tricky, but I can see no problem with enhanced payments to defined postcodes based on remoteness and possible climatic factors.” – Individual

“Rural and island communities often have higher energy prices, combined with older housing that is inefficient and colder temperatures. Many are also off-grid and must rely on more expensive heating sources. The PAWHP is even more vital to older people in these communities because of this, and as we have noted throughout, a ‘rural’ or ‘cold weather’ increase to the payment for those most affected by cold weather and inefficient housing which cannot be retrofitted should be considered.” – Age Scotland

Remote rural and island communities should not be treated differently

The aim of Q5 was to establish what else could be done when administering and delivering PAWHP to better support remote rural and island communities. However, many respondents interpreted the question as asking whether households in these communities should receive PAWHP, or not. Because of this, another prevalent theme was that the value and delivery of PAWHP should be no different in these areas than in the rest of Scotland. Respondents typically argued that because PAWHP is a universal cash payment it can be used by households for whatever fuel they need, including oil or bottled gas, and should not depend on location or type of fuel used.

This was the third most prevalent theme in Q19, which focused on island communities specifically to gather evidence for the Island Communities Impact Assessment. While some made the same argument, some others answered Q19 from a different perspective, arguing that island communities were equally as entitled to the payment as people living elsewhere in Scotland.

“Can't see the relevance of this question. If homes don't have gas they'll use another form of energy to heat their homes so the fuel payment going into their bank accounts works just fine.” - Individual

“Island Communities should not be differentiated from rural dwellers not on the Gas Grid. Both require significant additional support.” - Individual

Earlier or more flexible payment

Many respondents advocated for payment to be made earlier, or for greater flexibility around when the payment is made. Most commonly, respondents highlighted that households in these areas may need or prefer to bulk buy fuel in the summer or autumn when prices are cheaper. There were calls for payment in October or early November, rather than late November or December. A few called for information about the value and timing of payment to be communicated as soon as possible to allow households to budget, even if the payment is then made later.

“Making the payment as early as possible in November and December would probably assist those in remote communities. This is the best compromise that we can think of given the difficulties in making separate payments to those who are off grid etc.” – Inclusion Scotland

Delivery of the payment

Some respondents interpreted the question as the delivery of the payment. There were two strands to these comments. Most respondents either stated there should be no issues in rural areas as the payment is made directly into bank account, or called for the payment to be made direct to households, as is proposed.

Less commonly mentioned themes

Some respondents each raised the following themes:

- The greater need for support in these communities due to issues such as colder or more inclement weather and poorer quality housing stock. General comments reiterating why island communities need and would benefit from additional support was the most prevalent theme in Q19, raised by several respondents. SFHA cited Changeworks’ 2023 report [‘A Perfect Storm: Fuel Poverty in Rural Scotland’](#) as evidence of the need to support these households with their energy bills.
- Ways to identify or contact people who are not on the gas grid to ensure they receive sufficient support. Identifying off-gas grid households by postcode was frequently suggested, followed by getting the information from local authorities. A few argued that these households should be easily identifiable from existing data.
- Calls for the gas grid to be extended to areas that cannot currently access it, that there should be improvements to Scotland’s capacity to generate and distribute electricity, or that the costs of electricity should be subsidised.
- A view that there is no need for an earlier payment to these communities.
- The use or lack of gas is irrelevant, given the Scottish Government’s aim to end the use of gas boilers and decarbonise heating.

A few respondents each:

- Called for consideration to be given to other areas which are not on the gas grid but are also not remote rural or island locations, or noted that there are many electricity-only households in urban areas that are disadvantaged because of the higher price of electricity compared to gas.
- Suggested alternative approaches to providing support, including creating a separate support fund which could be applied for, reflecting fuel type used in the value of payment, or eligible households being given a council tax rebate.
- Stated in Q19 that they believed PAWHP would have no specific impact on island communities.
- Expressed a view in Q5 and Q19 that individuals had made a choice to live in remote or island communities and should be responsible for their own situations.

9. Future developments

While most of the consultation questions asked respondents to consider PAWHP as a like-for-like replacement to the existing benefit, Q2c was also included to allow stakeholders to express their views on how PAWHP could be made more effective in the future.

Q2c. Do you have any further comment on the potential longer term development of this benefit in order to provide the most effective support?

Half of respondents provided a substantive comment in response to Q2c; several other respondents stated they had nothing further to add. A range of issues were raised by those who commented, covering both suggestions for improvements to PAWHP and other themes related to support for older people and tackling fuel poverty. Many also reiterated their calls not to change the existing WFP.

Keep the benefit universal

The most prevalent theme raised by many individuals was to keep the benefit universal. Fears were expressed that, over time, means testing could be introduced. Reasons cited for not wanting the benefit to be means tested were that many people of pension age were only just above the threshold for benefits and were struggling to pay their bills, that people who had worked hard throughout their lives were disadvantaged by means testing, and that it would be costly for the government to apply means testing in practice.

“It should not be limited to those on pension credit as the threshold to receive that benefit is so low and non-tapered, leaving those with a few pounds over the qualifying threshold thousands of pounds poorer than those that receive all the pension credit benefits.” - Individual

Link to inflation or fuel costs

Several individuals and South Lanarkshire Council called for the payment value to rise in line with inflation or rising fuel costs. Comments were generally brief, but the main reason was to ensure the payment kept its value over time. Comments were made that the value of the payment has been eroded over time as it has not been linked to increasing prices.

More effective targeting

Targeting funds used for PAWHP to particular groups, rather than a universal approach, was advocated by several respondents. This included five organisations that called for the benefit to be targeted more effectively at those in fuel poverty: Energy Saving Trust, Energy Action Scotland, Inclusion Scotland, Consumer Scotland and Shetland Islands Council. For example, Consumer Scotland recommended that “the Scottish Government should undertake feasibility and scoping work during 2024 to identify options for how a more targeted approach could work in practice”. However, Inclusion Scotland noted that the rising energy costs had exacerbated the cost-of-living crisis, and therefore, now is not the right time to make such changes.

“Energy Action Scotland believes that this payment should provide better targeted support to older households, supporting people to achieve higher levels of warmth for longer hours. This is consistent with the heating regimes identified in the Fuel Poverty (Definition, Targets and Strategy) (Scotland) Act 2019. Whilst the consultation implies that the funding is not solely a fuel poverty measure it is only true because of the poor targeting of the current payment. The Pension Age Winter Heating Payment has huge potential to be an effective fuel poverty-reducing measure... This could take the form of means testing or consideration of payments in relation to the Scottish Income Tax Bands. As it stands, the payment rationale based on the conditions that existed when introduced in 1997 has changed significantly, yet there was a reconsideration of the payment and its outcomes by the UK Government. If the PAWHP is introduced to replace the Winter Fuel Payment without any changes, this would be a considerably missed opportunity.” – Energy Action Scotland

The Scottish Fuel Poverty Advisory Panel submitted a detailed response outlining why there is a need for an alternative approach, and how this could be introduced in the short- and long-term. They expressed a view that a replacement benefit should be targeted, not universal, and underpinned by data analysis to determine where the payment would have the most impact. They also suggested that the three existing winter weather payments - Winter Heating Payment, WFP (to become PAWHP), and the Warm Homes’ Discount - should be consolidated. Both these suggestions were supported by the Poverty and Inequality Commission in their response.

“This approach is regressive and poorly targeted and will have little impact on meeting the statutory targets for reducing fuel poverty, which is the main objective of then PAWHP as stated by the Scottish Government. In order to meet this objective, the Scottish Government should replace the WFP with a progressive benefit aimed at all households experiencing fuel poverty. However, if this is not currently possible due to restrictions imposed by the Social Security Scotland Act, then the Scottish Government should consider doing the following: 1) PAWHP should be targeted at those on Pension Credit, 2) PAWHP should be aligned with the Winter Heating Payment, 3) PAWHP should be treated as taxable income. The Scottish Government has presented an argument to the UK Government to provide energy support through a windfall tax on excess profits in the energy sector. An equivalent consideration should be given to using tax revenues from PAWHP to increase levels of energy support funding in Scotland” - Scottish Fuel Poverty Advisory Panel

“While there may be other legitimate policy objectives furthered by the planned PAWHP, the Commission is clear that this cannot be considered a progressive policy instrument from an anti-poverty perspective. While non-means tested benefits can play an important role in poverty reduction efforts, this particular instrument is extraordinarily poorly targeted as regards to addressing poverty.” - Poverty and Inequality Commission

Individuals raising this issue mostly felt the benefit should be targeted at those in financial need, for instance, by means testing. Singular suggestions for how the benefit could be better targeted included: implementing a cap similar to that used for child benefit; considering savings, remote locations, single-person households, health conditions and

variations in heating systems; using tiered funding levels; or supporting only those whose income is below the higher tax bracket.

“There could be a basic payment to all who qualify and an additional payment for those on the lowest income. Many benefits, like Pension Credit, give assistance to those who have the lowest income, but many have income just above the thresholds and get no further help. Extend the additional WFP to those in this category.” - Individual

Extend support to other groups

Extending the benefit to other groups was advocated by several respondents, including RNIB Scotland, The ALLIANCE, Age Scotland and Citizens Advice Scotland. All called for additional support for those with disabilities or long-term conditions, whilst the ALLIANCE also felt unpaid carers should receive support towards utility costs. Public Health Scotland suggested that consideration could be given to extending PAWHP to adults aged between 60 and state pension age. Individuals also suggested that disabled people should benefit from heating support payments, as well as those with terminal illnesses or families in need.

Citizens Advice Scotland noted that heating assistance could be accessed if a child under 19 received a qualifying benefit. However, this stopped when moving to Adult Disability Payment despite their needs not changing. They cited research findings from the Joseph Rowntree Foundation that working-age disabled people are almost twice as likely to live in poverty than those who are not (35% and 18%, respectively²).

Increase state pension payments

Calls for the value of the state pension to be increased were made by some respondents. It was suggested that PAWHP could be incorporated into the pension payment, while one suggested that if pensions were not taxed, there would be no need for PAWHP and would reduce the need for benefits or subsidies. A few commented that the pension rate is lower than in comparable countries and should be increased in line with elsewhere.

Greater assistance for remote, rural or off-grid locations

Some, including four organisations, specifically highlighted that those living in remote, rural, or off-grid locations are more in need of energy support. Age Scotland highlighted that in such areas, some houses were not suitable for energy efficiency measures or needed more appropriately accredited installers. The Energy Saving Trust noted that a methodology for calculating the uplift required to achieve a minimum income standard in such areas had already been set out in Scottish Government research³ and suggested a similar uplift could be applied to a targeted winter heating payment. Individuals similarly highlighted that the more inclement weather, dependence on solid fuels, or housing conditions in such areas meant that fuel bills were likely to be higher for some. The issue of off-grid locations is explored in more detail under the analysis of Q5 and Q19.

² <https://www.jrf.org.uk/work/uk-poverty-2023-the-essential-guide-to-understanding-poverty-in-the-uk> p66

³ <https://www.gov.scot/publications/poverty-rural-scotland-review-evidence>

“With the ever-increasing costs for fuel, this should be the subject of regular review in terms of inflation cost increases, especially for those living in more remote locations who are more likely to be affected by fluctuating fuel costs. We did consider the removal of the universalness of the scheme; however, it is recognised that some people are likely to be affected by fuel poverty in more affluent areas because of the cost of living crisis.” – Scottish Community Safety Network

Other potential developments

Some individuals called for greater controls on energy companies, generally either advocating for curbing excessive profits or calling for energy companies to be nationalised.

A number of other suggestions, each made by a few respondents, included the following, in order of prevalence:

- Take colder weather in Scotland into account i.e. provide additional assistance to those living in colder parts of Scotland
- Discount energy tariffs for older people or other potential future eligible adults.
- Keep the payment under regular review, or undertake a review with clients to check if this is the best option.
- Use the list of PAWHP clients to identify needs and communicate entitlements to other benefits.
- Make payments directly to energy companies rather than clients.
- Make the payment taxable so those on lower incomes benefit most.

“Consideration should be given to how to maximise this annual communication opportunity to older people to highlight other support available. The annual, universal communication should inform older people of income maximisation and advice services, other social security support (such as Pension Credit, Housing benefit and the Scottish Welfare Fund) as well as the energy efficiency support schemes.” – Independent Age

Other points or concerns for the future

Several individuals answered Q2c with a range of comments that focused on other concerns about the future of PAWHP rather than how it could be developed. These included concerns about the long-term ability of the Scottish Government to fund and administer the benefit, that the value of the payment could be eroded over time, and that the UK government could reduce the value of the corresponding payment, which the Scottish Government might need to replicate.

Other more general points raised by small numbers included issues around eligibility and the ability to allow people to opt-out, an explicit preference for DWP to retain control of the payment, a few expressing support for the Scottish Government and Social Security Scotland administering the benefit, a call to improve the energy efficiency of Scotland’s housing stock, and the need to provide further assistance to all older people or to specific older people, such as the very old.

10. Impact Assessments and other impacts

The consultation paper included draft Impact Assessments and asked respondents for their views on these and about any other impacts which could arise from introducing PAWHP. This chapter presents the analysis of responses about the Equality Impact Assessment, Business and Regulatory Impact Assessment and Fairer Scotland Duty. Q19 about the Island Community Impact Assessment has been included in Chapter 8.

Q16 and Q21 respectively asked respondents about potential unintended consequences from introducing PAWHP, and for any other information respondents wished to share about the proposals. Analysis of responses to these questions is also presented below.

Impact Assessments

Q17. Please set out any information you wish to share on the impact of PAWHP on groups who share protected characteristics.

Just under one fifth of respondents answered Q17. Most prevalent in comments were respondents who stated they did not know what the impact would be, or were unsure what the question or protected characteristics meant. The second most prevalent theme was several respondents who stated that there would be no impact, or that they were not aware of any potential impacts.

While not addressing the impact of PAWHP directly, the next most common theme was some respondents stating that protected characteristics should have no impact on who receives PAWHP, i.e. the system should treat all eligible older people equally.

Some respondents, including Age Scotland and Inclusion Scotland, commented on specific protected characteristics. Most frequent were comments suggesting people with disabilities or health conditions, particularly those made worse by cold temperatures, could benefit from PAWHP, or should be given additional support to reflect their higher energy costs. The intersectionality between age and disability was also noted.

“The ALLIANCE agree with the conclusions of the equality impact assessment with regards to the protected characteristics of age and disability. As noted in the assessment, older people are more likely to be disabled and so there is some degree of interrelation between these two characteristics, and PAWHP by design is intended to have a positive impact on older people.” – The ALLIANCE

“Energy Action Scotland does not believe that the assessment presented in the consultation provides an objective or fair assessment of the impact on all protected characteristics... Whilst the provision of a payment is not considered to be negative the payment does no more for disabled pension age households than it does for non-disabled pension age households. This fails to recognise that other payments provided do not support disabled pension age households adequately with the increased power and heat demands of those with essential medical equipment and enhanced need to be warmer for longer hours at home.” – Energy Action Scotland

A few raised points about other protected characteristics. These included that ethnic minority women in Scotland may not be eligible because of pension rules, and that Asian British and Black British households are more likely to experience poverty in old age and therefore benefit from PAWHP. National Carer Organisations advocated for accessible resources to be produced to benefit ethnic minority groups, recommending the MECOPP briefing on Producing Accessible Information for BME Communities as a useful tool for this. One individual called for gypsy travellers to have all the information they need to access their entitlement, while National Carer Organisations raised concerns about the higher proportion of gypsy travellers who do not have a bank account and that the flat rates of PAWHP could entrench inequality due to the higher heating costs of this group. Two respondents noted that women might be positively impacted as they are more likely to have lower incomes and live alone in later life. South Lanarkshire Council noted that people with no recourse to public funds “will also be facing extreme fuel poverty and should not be excluded”.

Q18. Please set out any information you wish to share on the impact of PAWHP on businesses.

Around one in six respondents left an open comment at Q18. The most common theme was that there would not be an impact on businesses, with a few stating that as PAWHP was for individuals it should not affect businesses. Several respondents stated they were unsure, or unclear about the meaning of the question

Some individuals commented on potential impacts on energy companies. A few recognised that energy companies could benefit as PAWHP would help customers pay their bills promptly; otherwise, companies could lose out if they have to deal with non-payment. Conversely a few raised concerns that energy companies could benefit if the payment is made directly to them in the future, with potential for profiteering. A small number who held negative views about energy companies argued it was unnecessary to consider the impact on those businesses.

Potential impacts on care homes were mentioned by some, though varied comments were made. A few suggested care homes would benefit from the payment, especially if it is paid to them directly; others argued that care homes should not be able to benefit financially. One argued that removing the payment from people in residential care could negatively impact social care costs. Others made more general comments about the role of care homes which have been covered in Q9.

A few suggested that other businesses might benefit if older people had more money to spend on other things. One individual felt the NHS would benefit due to less demand on hospitals and GPs. Another noted that businesses which need to provide new or additional information could incur costs, but did not specify which businesses this referred to.

“If individuals who receive payments are physically and mentally healthy by being kept warm, they are likely to be more social and outgoing and this would impact on businesses.” – Individual

Q20. Please set out any information you wish to share on the impact of PAWHP on reducing inequality of outcome caused by socio-economic disadvantage.

One quarter of respondents left an open comment at Q20; however, as with the other impact assessment questions some stated that they were unclear about the question or did not know whether there would be any impact.

The most common theme was several respondents who stated there would be no impact on reducing inequality of outcome caused by socio-economic disadvantage. There were two strands to these comments. Some respondents argued there would be no or negligible impact from PAWHP or that reducing disadvantage was not the policy's aim. Some other respondents highlighted that there would be no further impact because of the like-for-like replacement of the existing benefit.

“It will do nothing to reduce the inequality of outcome caused by socio-economic disadvantage. The amounts which people are to receive is a drop in an ocean of inequality and disadvantage faced by lower socio-economic groups.” Individual

Conversely, the next most prevalent theme was that PAWHP could positively impact disadvantaged or low-income groups. However, some acknowledged that the impact on tackling poverty or fuel poverty could be small. Aligned with this theme, some others made general comments reiterating the need for PAWHP because older people are more likely to be in fuel poverty or have lower incomes than other population groups.

“Will be very beneficial as it will help to bring people a better standard of health and wellbeing when they can heat their home without fear of not affording the heating bill” – Individual

“Although PAWHP is a universal payment, it will provide the greatest benefit to households with lower incomes, and should be considered part of the Scottish Government’s wider attempts to reduce poverty, including fuel poverty.” – The ALLIANCE

“Many older people are on low, modest, or fixed incomes, and are more financially squeezed than ever before. 15% of pensioners in Scotland are living in poverty, with 10% living in absolute poverty. The PAWHP is vital in addressing this issue and helping the most disadvantaged older people through the winter months.” – Age Scotland

Some respondents highlighted the need for everyone to be treated equally, or for PAWHP to remain a universal benefit.

“Although targeted payments might seem like a good use of the devolved funding, we believe that many lower-income households containing disabled pensioners, women pensioners and BME pensioners who are not on Pension Credits would then miss out. As would those just over the Pension Credit line but who are nevertheless, because of high energy prices, still in fuel poverty. Therefore we continue to support this benefit being paid to all households containing older people unless they themselves choose to opt-out.” – Inclusion Scotland

Other themes, each raised by small numbers, included:

- A view that PAWHP, as a universal benefit, unfairly supports people on higher incomes who do not need the payment.
- General comments about the need to tackle poverty and inequality in Scotland.
- Comments expressing frustration that older people who have worked and ‘contributed to society’ either do or could lose out on support, while other low-income groups continue to receive benefits.
- Suggestions that energy companies should do more to alleviate fuel poverty.
- Calls to extend the payment to disabled people to reduce their disadvantage.
- Public Health Scotland noted that PAWHP may reinforce inequalities within the pension-age population.

“More disadvantaged groups have lower life expectancy, so they are less likely to receive the PAWHP for long periods of time or the higher rate paid to those aged 85+.” – Public Health Scotland

Other consequences or considerations

Q16. Can you identify any potential unintended consequences which we have not considered in these proposals?

The most common theme raised by the two fifths of respondents who answered Q16 was that there should be no unintended consequences arising from the proposals. Many simply stated there would be none, but some elaborated that the like-for-like nature of the replacement meant there should be no impact.

The next most prevalent theme was that some felt a greater cost would be associated with administering a devolved payment. It was suggested that costs would include new systems and administration and the payment itself, which could be detrimental to Scotland’s budget and lead to higher taxation or more government debt. A few individuals called for the budget for PAWHP to be ring-fenced for the payments.

A concern that people could lose money or poverty could increase was expressed by some. Respondents envisaged future changes being made to the payment or means testing being introduced, resulting in smaller or no payments to those on Pension Credit or with a private pension. A few expressed a concern that older people in Scotland could receive less than in other parts of the UK, or that people could lose out if data is not transferred from DWP promptly, or if data used to determine eligibility is out of date.

Some respondents highlighted that replacing the payment, in particular changing its name, could lead to confusion, stress and anxiety. This could apply to older people generally, but especially to those with disabilities or mental health conditions. Respondents suggested ensuring the change is clearly communicated, or clients could end up wondering where their previous payment has gone, or thinking they are getting both the old and new payment. More specifically, two individuals argued that extending re-determination to 56 days could cause unnecessary worry or hardship, and Energy Action Scotland noted that

more clarity is needed about the timescales of the First-tier tribunal if Social Security Scotland has not reconsidered a redetermination after 56 days.

“At present, the UK DWP letters are headed "Your 2023 Winter Fuel Payment will be £500". In the middle of the letter it points out that this includes the "Pensioner Cost of Living Payment". Most people won't really notice that, hence a new Scottish winter heating payment will look like we are being "cheated" out of something. How are you going to explain this in very simple terms?" - Individual

Other potential unintended consequences mentioned included:

- Other vulnerable groups could be at risk if the eligibility continues to be people over the state pension age. Some respondents referred to disabled people as well as those with health conditions, mental health conditions and homeless people.
- An increase in ill health and deaths if some cannot afford their energy bills, putting additional pressure on the NHS.
- The need to consider whether any changes to the eligibility or value of PAWHP negatively impact the receipt of other benefits or payments.
- The cash payment being used for other purposes, particularly at Christmas.
- Considering how the payment can be made to those without a bank account.
- One individual each argued that the payment could act as a disincentive to people making their homes more energy efficient, or to energy companies reducing prices.

Q21. If there is anything else you would like to tell us about the described policy intention, impact assessments or PAWHP in general, please do so here.

One fifth of respondents left a comment at Q21. Most comments reiterated points related to specific consultation questions covered elsewhere in this report. Most common was a call for no changes to the WFP, concerns about the Scottish Government's ability to manage PAWHP, and various comments about eligibility.

Other points each raised by a small number of respondents included:

- Calls to ensure that the transfer of the benefit goes smoothly and that there are no interruptions to the payment being made.
- Requests from Public Health Scotland and a few individuals to monitor and review the impact of any changes on an ongoing basis.
- Calls for more information; though a few requested details available in the consultation paper, others noted that the consultation required people to access online links and could disenfranchise older people without digital access.

“Cannot think of any unintended consequences arising from these proposals. A good monitoring policy put in place at the start to deal with any unintended consequences that become apparent in future would be recommended so that any issues could be dealt with in a timely fashion.” - Individual

11. Conclusions

Many individuals and organisations with detailed knowledge took part in the consultation, sharing their views on the proposals for introducing PAWHP as a like-for-like replacement for the WFP. Reflecting on their experience and perspectives, this report provides a high-level summary of the consultation responses. For more detail, readers are encouraged to look to individual responses where permission was given for publication⁴.

A majority of individuals who responded to the consultation supported most of the proposals presented for PAWHP. In particular, there was strong agreement with continuing to make a one-off payment in November or December, maintaining a universal approach to eligibility based on state pension age, and using a cash payment. While a majority of respondents agreed with retaining the current payment value, many qualitative comments called for a higher payment, potentially linked to fuel prices or inflation. Mixed views were evident about the name of the payment; many felt PAWHP is clear, but many others expressed a concern that a name change could be confusing. There were also mixed views about the eligibility of people in residential care who receive income-related benefits.

While there was broad support for most proposals, a minority of individual respondents repeatedly stated there should be no change to the existing WFP, or raised concerns about whether the Scottish Government would manage PAWHP effectively or amend the eligibility criteria in the future. Other concerns about the current approach were noted, such as people with birthdays at the end of the year missing out due to a September qualifying week and whether financially secure households should receive the payment.

In general, organisations who responded agreed that the proposed like-for-like replacement, with clear eligibility criteria and a cash payment, is an effective way to offer financial support to older people. Some organisations supported keeping the payment universal to all those over state pension age; however, some others recommended expanding the eligibility criteria to groups under state pension age who would benefit from financial support, such as people with disabilities or health conditions or unpaid carers. A few organisations and some individuals called on the Scottish Government to use the benefit transfer as an opportunity to take a more targeted approach, focusing payments towards reducing fuel poverty among those in most need. These varied perspectives were also evident when respondents were asked how PAWHP could be delivered in the future.

Many respondents acknowledged the additional challenges households face in remote rural, island, or off-gas grid communities, including the higher cost of alternative fuels, colder temperatures and poorer housing stock. Suggestions for how PAWHP could be delivered more effectively to those communities included a higher or supplementary payment and an earlier payment to allow alternative fuels to be bought before winter.

Overall, the key message was that while there is support for a like-for-like replacement, respondents highlighted potential improvements for the Scottish Government to consider when developing PAWHP further. The findings from this analysis will be used to continue discussions with key stakeholders and inform the drafting of PAWHP regulations.

⁴ Responses are published on the [Scottish Government's consultation website](#)

Appendix A: Quantitative Analysis

This appendix provides more detailed breakdowns of the 15 quantitative closed questions included in the consultation.

The tables for each question show:

- The number of respondents from the total sample of 906 respondents who selected each response, and the corresponding percentage.
- The number and percentage response among those who answered each question, broken down by Individual and organisation responses and by type of organisation.

Please note that the row percentages may not add to 100% due to rounding.

Sectoral Classification

	Number of respondents	% of total sample
Individuals	881	97
Organisations	25	3
Health / disability / age organisations	8	1
Poverty / fuel poverty organisations	5	1
Local authorities	3	<0.5
Miscellaneous organisations	9	1

As individuals make up the vast majority of consultation responses, there is little difference in the quantitative results between the overall sample and individuals.

Q1a. Do you agree or disagree with the proposal to replace Winter Fuel Payment with a 'like-for-like' replacement?

	Agree	Disagree	Unsure	No answer
No. of all respondents (906)	489	251	156	10
% of all respondents (906)	54	28	17	1
% of individuals (881)	54	28	18	0
% of organisations (25)	60	16	0	24
- Miscellaneous (9)	44	11	0	44
- Health / disability / age (8)	100	0	0	0
- Poverty / fuel poverty (5)	20	40	0	40
- Local Authority (3)	67	33	0	0

Q2a. Do you agree or disagree that this approach is an effective way for the Scottish Government to provide financial support for older people?

	Agree	Disagree	Unsure	No answer
No. of all respondents (906)	523	225	146	12
% of all respondents (906)	58	25	16	1
% of individuals (881)	58	25	17	1
% of organisations (25)	64	8	0	28
- Miscellaneous (9)	56	0	0	44
- Health / disability / age (8)	88	13	0	0
- Poverty / fuel poverty (5)	20	20	0	60
- Local Authority (3)	100	0	0	0

Q3a. Do you agree or disagree with the proposal to name the replacement for Winter Fuel Payment in Scotland 'Pension Age Winter Heating Payment' (PAWHP)?

	Agree	Disagree	Unsure	No answer
No. of all respondents (906)	386	357	141	22
% of all respondents (906)	43	39	16	2
% of individuals (881)	42	40	16	2
% of organisations (25)	52	16	0	32
- Miscellaneous (9)	33	22	0	44
- Health / disability / age (8)	75	13	0	13
- Poverty / fuel poverty (5)	40	0	0	60
- Local Authority (3)	67	33	0	0

Q4a. Do you agree or disagree with the proposal to continue making payments to clients in November or December each year?

	Agree	Disagree	Unsure	No answer
No. of all respondents (906)	771	75	38	22
% of all respondents (906)	85	8	4	2
% of individuals (881)	86	8	4	1
% of organisations (25)	44	12	4	40
- Miscellaneous (9)	56	0	0	44
- Health / disability / age (8)	63	25	0	13
- Poverty / fuel poverty (5)	0	0	0	100
- Local Authority (3)	33	33	33	0

Q6a. Do you agree or disagree that our universal approach to identifying eligibility should be based on reaching state pension age?

	Agree	Disagree	Unsure	No answer
No. of all respondents (906)	711	122	56	17
% of all respondents (906)	78	13	6	2
% of individuals (881)	79	14	6	1
% of organisations (25)	52	12	0	36
- Miscellaneous (9)	56	0	0	44
- Health / disability / age (8)	75	13	0	13
- Poverty / fuel poverty (5)	0	20	0	80
- Local Authority (3)	67	33	0	0

Q7a. Do you agree or disagree that the eligibility criteria for the PAWHP are clear?

	Agree	Disagree	Unsure	No answer
No. of all respondents (906)	544	125	217	20
% of all respondents (906)	60	14	24	2
% of individuals (881)	60	14	25	1
% of organisations (25)	60	4	0	36
- Miscellaneous (9)	56	0	0	44
- Health / disability / age (8)	88	0	0	13
- Poverty / fuel poverty (5)	0	20	0	80
- Local Authority (3)	100	0	0	0

Q8a. Do you agree or disagree with the proposal to retaining the current value of payments?

	Agree	Disagree	Unsure	No answer
No. of all respondents (906)	489	248	137	32
% of all respondents (906)	54	27	15	4
% of individuals (881)	55	28	15	2
% of organisations (25)	28	20	8	44
- Miscellaneous (9)	33	22	0	44
- Health / disability / age (8)	38	13	25	25
- Poverty / fuel poverty (5)	0	0	0	100
- Local Authority (3)	33	67	0	0

Q9a. Do you agree or disagree that people in residential care who do not receive the income-related benefits listed should receive half of the 'full' rate of PAWHP?

	Agree	Disagree	Unsure	No answer
No. of all respondents (906)	325	272	281	28
% of all respondents (906)	36	30	31	3
% of individuals (881)	36	31	31	2
% of organisations (25)	32	4	16	48
- Miscellaneous (9)	22	0	22	56
- Health / disability / age (8)	38	13	25	25
- Poverty / fuel poverty (5)	0	0	0	100
- Local Authority (3)	100	0	0	0

Q9b. Do you agree or disagree that people in residential care who receive one of the income-related benefits listed should not receive PAWHP?

	Agree	Disagree	Unsure	No answer
No. of all respondents (906)	367	215	291	33
% of all respondents (906)	41	24	32	4
% of individuals (881)	41	24	33	2
% of organisations (25)	28	12	16	44
- Miscellaneous (9)	22	11	22	44
- Health / disability / age (8)	38	13	25	25
- Poverty / fuel poverty (5)	0	0	0	100
- Local Authority (3)	67	33	0	0

Q10a. Do you agree or disagree with the proposal for PAWHP to be given to clients in the form of a cash payment and not another form?

	Agree	Disagree	Unsure	No answer
No. of all respondents (906)	658	137	92	19
% of all respondents (906)	73	15	10	2
% of individuals (881)	73	16	10	1
% of organisations (25)	64	0	4	32
- Miscellaneous (9)	44	0	11	44
- Health / disability / age (8)	88	0	0	13
- Poverty / fuel poverty (5)	40	0	0	60
- Local Authority (3)	100	0	0	0

Q11a. Do you agree or disagree with the proposal to pay PAWHP as an annual one-off payment each winter?

	Agree	Disagree	Unsure	No answer
No. of all respondents (906)	778	55	56	17
% of all respondents (906)	86	6	6	2
% of individuals (881)	87	6	6	1
% of organisations (25)	60	0	4	36
- Miscellaneous (9)	44	0	11	44
- Health / disability / age (8)	88	0	0	13
- Poverty / fuel poverty (5)	20	0	0	80
- Local Authority (3)	100	0	0	0

Q12a. Do you agree or disagree with the proposals for providing a way for people to opt-out of receiving PAWHP?

	Agree	Disagree	Unsure	No answer
No. of all respondents (906)	570	143	174	19
% of all respondents (906)	63	16	19	2
% of individuals (881)	63	16	20	1
% of organisations (25)	52	12	4	32
- Miscellaneous (9)	44	11	0	44
- Health / disability / age (8)	63	13	13	13
- Poverty / fuel poverty (5)	20	20	0	60
- Local Authority (3)	100	0	0	0

Q13a. Do you agree or disagree with the proposal to continue having the ‘qualifying week’ in September to identify eligible clients?

	Agree	Disagree	Unsure	No answer
No. of all respondents (906)	629	124	136	17
% of all respondents (906)	69	14	15	2
% of individuals (881)	70	14	15	1
% of organisations (25)	56	12	0	32
- Miscellaneous (9)	56	0	0	44
- Health / disability / age (8)	63	25	0	13
- Poverty / fuel poverty (5)	40	0	0	60
- Local Authority (3)	67	33	0	0

Q14a. Do you agree or disagree with the proposal that clients have 31 days to request a re-determination?

	Agree	Disagree	Unsure	No answer
No. of all respondents (906)	512	76	298	20
% of all respondents (906)	57	8	33	2
% of individuals (881)	57	8	34	1
% of organisations (25)	36	20	8	36
- Miscellaneous (9)	44	0	11	44
- Health / disability / age (8)	38	38	13	13
- Poverty / fuel poverty (5)	20	0	0	80
- Local Authority (3)	33	67	0	0

Q15a. We have proposed that Social Security Scotland have a period of 56 working days to consider a re-determination. Do you agree or disagree with this proposal?

	Agree	Disagree	Unsure	No answer
No. of all respondents (906)	348	235	295	28
% of all respondents (906)	38	26	33	3
% of individuals (881)	39	26	33	2
% of organisations (25)	24	24	8	44
- Miscellaneous (9)	33	11	11	44
- Health / disability / age (8)	13	50	13	25
- Poverty / fuel poverty (5)	0	0	0	100
- Local Authority (3)	67	33	0	0

Appendix B: Consultation Questions

Q1a. Do you agree or disagree with the proposal to replace Winter Fuel Payment with a 'like-for-like' replacement?

Q1b. Please provide further information on why you agree or disagree.

Q2a. Do you agree or disagree that this approach is an effective way for the Scottish Government to provide financial support for older people?

Q2b. Please provide further information on why you agree or disagree.

Q2c. Do you have any further comment on the potential longer term development of this benefit in order to provide the most effective support?

Q3a. Do you agree or disagree with the proposal to name the replacement for Winter Fuel Payment in Scotland 'Pension Age Winter Heating Payment' (PAWHP)?

Q3b. Please provide further information on why you agree or disagree.

Q4a. Do you agree or disagree with the proposal to continue making payments to clients in November or December each year?

Q4b. Please provide further information on why you agree or disagree.

Q5. How could we improve delivery for households in remote rural and island communities that are not on the gas grid?

Q6a. Do you agree or disagree that our universal approach to identifying eligibility should be based on reaching state pension age?

Q6b. Please provide further information on why you agree or disagree.

Q7a. Do you agree or disagree that the eligibility criteria for the PAWHP are clear?

Q7b. Please provide further information on why you agree or disagree.

Q8a. Do you agree or disagree with the proposal to retaining the current value of payments?

Q8b. Please provide further information on why you agree or disagree.

Q9a. Do you agree or disagree that people in residential care who do not receive the income-related benefits listed should receive half of the 'full' rate of PAWHP?

Q9b. Do you agree or disagree that people in residential care who receive one of the income-related benefits listed should not receive PAWHP?

Q9c. Please provide further information on why you agree or disagree.

Q10a. Do you agree or disagree with the proposal for PAWHP to be given to clients in the form of a cash payment and not another form?

Q10b. Please provide further information on why you agree or disagree.

Q11a. Do you agree or disagree with the proposal to pay PAWHP as an annual one-off payment each winter?

Q11b. Please provide further information on why you agree or disagree.

Q12a. Do you agree or disagree with the proposals for providing a way for people to opt-out of receiving PAWHP?

Q12b. Please provide further information on why you agree or disagree.

Q13a. Do you agree or disagree with the proposal to continue having the 'qualifying week' in September to identify eligible clients?

Q13b. Please provide further information on why you agree or disagree.

Q13c. If you disagreed, please provide a preference for when you think the qualifying week for PAWHP should be.

Q14a. Do you agree or disagree with the proposal that clients have 31 days to request a re-determination?

Q14b. Please provide further information on why you agree or disagree.

Q15a. We have proposed that Social Security Scotland have a period of 56 working days to consider a re-determination of PAWHP. Do you agree or disagree with this proposal?

Q15b. Please provide further information on why you agree or disagree.

Q16. Can you identify any potential unintended consequences which we have not considered in these proposals?

Q17. Please set out any information you wish to share on the impact of PAWHP on groups who share protected characteristics.

Q18. Please set out any information you wish to share on the impact of PAWHP on businesses.

Q19. Please set out any information you wish to share on the impact of PAWHP on Island communities.

Q20. Please set out any information you wish to share on the impact of PAWHP on reducing inequality of outcome caused by socio-economic disadvantage.

Q21. If there is anything else you would like to tell us about the described policy intention, impact assessments or PAWHP in general, please do so here.



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