

The Scottish Government Response to the Consultation on Pension Age Winter Heating Payment (PAWHP)

May 2024

Ministerial Foreword



As Cabinet Secretary for Social Justice, in October I was pleased to launch the consultation on our proposed Pension Age Winter Heating Payment, which will replace Winter Fuel Payments in Scotland from winter 2024.

This new benefit will continue to help those of state pension age with the costs of heating their homes in winter and provide a guaranteed annual payment of up to £300 per individual.

We will deliver the new benefit this winter, ensuring the safe and secure transfer of around one million eligible people who have reached the state pension age, the largest caseload introduced to Social Security Scotland since the agency's inception. This will be an investment of around £180 million in 2024/25 to help older people with the costs of heating their homes throughout the winter.

I am pleased that so many people took the time to respond to the consultation, with a total of over 900 responses from organisations and individuals with an interest in the future of Pension Age Winter Heating Payment.

Working with individuals and organisations with experience of the benefits system is central to our approach to developing the devolved social security system in Scotland. This document explains the considerations we have made on the policy based on the views and feedback we received during the consultation period.

As I laid out in the consultation, our focus is on a safe and secure transfer of Pension Age Winter Heating Payment for launch this winter (2024/2025). However, it is clear that further development work will be required as we continue to explore the potential longer-term development of Pension Age Winter Heating Payment. The responses to the consultation will support this work.

Shirley-Anne Somerville MSP
Cabinet Secretary for Social Justice

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Scottish Government Response to the Consultation on Pension Age Winter Heating Payment (PAWHP)

Introduction and background

In Winter 2024/2025, the new Pension Age Winter Heating Payment (PAWHP) will replace the Department for Work and Pensions (DWP) Winter Fuel Payment (WFP), providing around one million individuals who have reached state pension age with a guaranteed annual payment of up to £300. This will be the largest caseload introduced to Social Security Scotland since the agency's inception.

The consultation¹ on PAWHP explained our intention to replace the WFP safely and securely on a like-for-like basis. Under our proposals, everyone who would currently be eligible to receive WFP will continue to receive the benefit at the level they were previously entitled to due to their age and household composition. The consultation asked about the following areas:

- Whether the proposals are likely to meet the policy intent;
- Whether the eligibility criteria are clear;
- The amount, format and timing of the payment;
- Our assessment of the impact of the policy;
- Improvements that would support rural/island communities; and,
- Potential longer term development of PAWHP to provide effective support

We received over 900 responses to the consultation, 881 from individuals and 25 from organisations. Most indicated that they support the like-for-like replacement of WFP, agreeing it would be an effective way to provide financial support for older people. However, stakeholders with an interest in poverty (including fuel poverty) were more likely to disagree with this approach. The main areas of disagreement concerned the name of the benefit and redetermination timescales for Social Security Scotland.

We have fully considered the consultation responses and the impacts that the suggested changes would have on PAWHP if they were implemented. A report² summarising the independent analysis of the 906 consultation responses has been published on the Scottish Government website. Our response to the issues raised by respondents is set out in this report.

We have taken into account the extent to which any changes to the policy at this stage may present a significant financial challenge or potentially risk our ability to deliver the benefit in winter 2024/25, due to the requirement for a substantial redesign of the delivery systems of the payment. Further policy development work will continue, to consider future improvements to the delivery of Pension Age Winter Heating Payment post-launch.

¹ The Consultation document can be found here [Pension Age Winter Heating Payment \(PAWHP\): consultation - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/consultations/pawhp/consultation-2024-25/pages/consultation-2024-25.aspx)

² The Consultation analysis report can be found here [Pension Age Winter Heating Payment \(PAWHP\): Consultation Analysis](https://www.gov.scot/publications/consultations/pawhp/consultation-2024-25/pages/consultation-analysis.aspx)

Other Engagement

During the consultation period in December and January, ahead of the consultation closing, the Scottish Government met directly with some of our key stakeholders including Age Scotland, Citizens Advice Scotland, Energy Action Scotland, and Consumer Scotland to discuss the proposals and to respond to any immediate questions before they submitted their responses to the consultation.

The Scottish Government also carried out a separate research project seeking the views of Social Security Experience Panel members on this proposed new payment. We asked Experience Panel members for their thoughts on proposals for PAWHP including eligibility, timing of payment, payment rates and the potential impact of the payment on different communities and groups. In total, 164 members completed the survey out of 2,047 invited to. The full report³ details the findings and key themes that emerged from this work.

³ Experience Panel reports can be found here [Social Security Experience Panels: Pension Age Winter Heating Payment - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/social-security-experience-panels-pension-age-winter-heating-payment/pages/1-1-introduction.aspx)

Questions 1 to 3: Overview and the name of the new benefit

Section 4.1 of the consultation document provided an overview of proposals for the new PAWHP benefit, and asked respondents to comment on the proposed name of 'Pension Age Winter Heating Payment'.

Name of the new benefit

The consultation laid out our proposal to name the new benefit which will replace WFP, 'Pension Age Winter Heating Payment'.

Responses to the consultation identified mixed views in relation to the name of PAWHP. 76% of stakeholders who responded to this question agreed with the proposed name of 'Pension Age Winter Heating Payment'. However, there was less agreement from individuals (41% of individuals who responded to this question disagreed, with 43% in agreement). Many suggested that it should continue to be called 'Winter Fuel Payment'. Some of the responses suggested that a change in name could be confusing.

During the previous consultation on Low Income Winter Heating Assistance (LIWHA, now Winter Heating Payment or WHP) that concluded in early 2022, we considered the naming of the winter benefits and asked for respondent's views. In our response to the consultation analysis we committed to undertaking further testing of potential names prior to the launch. This concluded in the change in name to 'Winter Heating Payment', as people felt it was clearer what type of support was available when 'payment' was used in comparison to 'assistance'.

'Pension Age Winter Heating Payment' was chosen as the current name for the benefit based on this previous user research conducted preceding the launch of WHP and was agreed by the Minister of Social Security and Local Government at the time. The name of 'Child Winter Heating Assistance' was subsequently also changed to 'Child Winter Heating Payment' thus meaning all Winter Benefits have reference to 'Winter Heating Payment' within their name ensuring consistency for clients and stakeholders.

We are currently developing an extensive strategic communications and engagement plan to raise awareness of the changes to Winter Fuel Payment and the new benefit name 'Pension Age Winter Heating Payment'. This will include proactive communication and marketing activity around the name change, as well as information about forthcoming changes, to help make sure eligible people and stakeholders are made aware of, and reassured about, the replacement benefit.

Given the previous work undertaken when developing and launching Winter Heating Payment, and the changes already made to align the naming of Child Winter Heating Payment (previously Child Winter Heating Assistance), it is considered appropriate to name this new benefit 'Pension Age Winter Heating Payment'. Naming the new benefit PAWHP ensures it is clear what support is being provided and to whom.

Longer-term development of the new benefit

The consultation asked respondents to comment on the potential longer term development of this benefit in order to provide the most effective support.

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.

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.

Several respondents advocated for the targeting of funds used for PAWHP to particular groups, rather than a universal approach. 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. 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.

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.

Extending the benefit to other groups was advocated by several respondents, including RNIB Scotland, The ALLIANCE, Age Scotland and Citizens Advice Scotland. These organisations 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.

We are committed to delivering PAWHP on a like-for-like basis to ensure the transfer is managed safely and securely for winter 2024/2025. Policy development will continue to consider potential improvements that could be implemented in the future.

Question 4: Timing of the Payment

Section 4.2 of the consultation asked questions about the timing of payments, and when these should be made during the winter.

There was strong support for the proposal to continue making payments in November and December, with 87% of all respondents agreeing. Support was also high amongst organisations, with 73% agreeing.

Several individuals and one organisation, advocated for an earlier payment date, with October being the most common suggestion. Arguments for this approach included that the weather becomes colder in Scotland 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. Conversely, some called for the payment to be made after Christmas in January or February. Some individuals suggested to split the payment over two or more months, to assist with budgeting over the winter, to spread the cost and to ensure that the money was spent on heating bills.

Given the high levels of agreement among the majority of individuals and stakeholders who responded to this question, and the complexity and costs associated with delivering more than one payment per winter alongside the ongoing delivery of other Winter Benefits, we do not intend to make changes to the timing of the payment.

Question 5: Improving delivery for rural, island and off-grid communities

Scottish Ministers committed to considering how delivery for rural/island/off-grid communities could be improved when delivering PAWHP. In the consultation we asked how we could improve delivery for households in remote rural and island communities that are not on the gas grid. The two main suggestions highlighted in consultation responses in relation to improving delivery for these groups centred around payment timing and value of payment.

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.

Many respondents advocated for the 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.

An alternative option suggested by respondents in the consultation, was to prioritise payments to this particular group to ensure they received the payment as soon as possible in the winter period. This would allow for them to buy the relevant fuel as

early as possible in the winter period, where costs may be lower. As this group have to buy fuel in advance it would allow them to put their PAWHP towards the cost of a bulk order earlier in the winter.

Alternatively, 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.

While it is clear that there are ways in which delivery could be improved for these communities, any changes introduced at this stage would bring considerable complexity and cost and would risk the safe and secure transfer of PAWHP in Winter 2024/2025. It will therefore not be possible to make changes to the way PAWHP is delivered in the short term. Further consideration of the challenges raised will be included as part of future improvements.

Questions 6 to 9: Eligibility and the Value of Payment

Section 4.3 of the consultation asked questions on the eligibility criteria of the new payment, and the value of the payment. Many of the responses given in this section echoed the responses to question 2, in which many outlined possible changes to eligibility and payment value as part of a possible long-term development of the benefit.

Targeting or expanding eligibility

The consultation outlined the proposed eligibility criteria for PAWHP, reflecting the universal approach of identifying eligibility based on a person reaching state pension age, which is currently in place for WFP.

Whilst many stakeholders agreed with the proposed like-for-like approach for launch, many identified a need for better targeting to ensure the money is used to provide support to those who need it most. This includes targeting at those of pension age who have a low income (e.g. through Pension Credit), or those who are at higher risk of fuel poverty. There were also suggestions that PAWHP could be treated as taxable income, to reduce the payment value for those on higher incomes and to prioritise the use of those taxes for support to those who need it most.

When asked whether they agreed with a universal approach to identify eligibility based on individuals reaching state pension age, four fifths (80%) of respondents agreed, 14% disagreed, and 6% were unsure. Among organisations who answered, 81% agreed and 19% disagreed. Only one poverty/fuel poverty organisation answered, disagreeing with the approach.

However, it was frequently noted that not all older people require financial support, and suggestions included that alternative or additional income-based eligibility criteria could be used to identify and target the payment to those who need it most.

It is clear that any targeted approach or expansion of eligibility would increase annual caseload, cost and complexity. We therefore could not deliver PAWHP to a more targeted or extended group of eligible clients and still launch the new benefit by winter 2024/25 as we have committed.

Given the timescales for delivery, it would not be possible to make changes to the eligibility criteria without significant risk to the delivery. It is therefore considered that the present proposals are appropriate to ensure the safe and secure transfer of this benefit. However, we will continue to review the eligibility and scope of PAWHP moving forward.

Payment to those in residential care

The consultation outlined our proposals to reflect the current DWP policy with regards to payment value for people who are living in residential care during the qualifying week, and the period of 12 weeks immediately before the qualifying week, who do not qualify for the 'full' rate of WFP.

People in residential care who are not in receipt of specific benefits (e.g. Pension Credit) are entitled to a WFP of either £100 if they are aged 66 to 79 or £150 if they are aged 80 or over. This is because they share the accommodation with other people who are also entitled to the payment and are responsible for a share of the heating costs. This reflects the same shared-rate that someone who is not in receipt of a low income benefit who is living at home would receive.

This proposal received a low level of agreement. One third (37%) of all respondents agreed with this proposal, 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. However, respondents that disagreed did so 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.

The consultation also proposed that those who are living in residential care and receiving one of the specific benefits (e.g. Pension Credit) receive no payment. This is because historically people living in a care home and in receipt of an income-related benefit have received public funding for their care and accommodation costs including heating through funding from the local authority. As this is still the case for the vast majority of people receiving Pension Credit, the WFP is not payable.

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 second lowest level of agreement recorded by organisations across the consultation questions. Concerns were raised that those in receipt of low-income benefits were likely to be more in need of support than those not in receipt of such benefits and that this group may need help to cover case costs. 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.

It was acknowledged by some that people in residential care should not receive PAWHP as heating is already covered in their care costs and that 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.

Conversely, 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.

Given the Scottish Government's commitment to deliver a like-for-like benefit, and the understanding that those in receipt of Pension Credit are likely to have their care costs covered by public funding, we do not intend to make changes to the current rules for those in residential care.

Payment value

The consultation outlined proposals to maintain the current WFP payment values, based on the like-for-like approach to delivering PAWHP. WFP currently delivers four different payments of either £100, £150, £200 or £300 for individuals, dependent on their household makeup. Generally, a household with occupants between 66-79 will receive £200 and households with someone over the age of 80 will receive £300.

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 remaining 36% disagreed and 14% were unsure.

The most common theme in responses to this question was that the payment should increase as the cost of fuel and energy increases or that the benefit values should rise in with inflation. 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. Some also highlighted increased payment value for those on low incomes (e.g. those in receipt of Pension Credit).

PAWHP is not a means-tested benefit and therefore an increase in payment value would not necessarily be the most effective mechanism to positively impact on fuel poverty levels. Those in receipt of an income-related benefit such as Pension Credit are already entitled to receive the full rate within the relevant age bracket and additional support with heating costs is also available through our Winter Heating Payment. The impact of inflation on Social Security benefits is reviewed on an annual basis. Where up-rating of certain payments is at the discretion of Scottish Ministers, consideration is given to the associated costs of up-rating, the affordability of doing so and the impact that this will have. Any increase in value would have to be met from within the fixed Scottish Budget. We do not, therefore, intend to increase the value of PAWHP for the benefit delivery in winter 2024/2025.

We do recognise that the costs associated with heating homes has increased significantly. This policy aims to mitigate some of the impact of additional domestic

heating costs in winter by providing universal, reliable financial support to people of pension age who are more vulnerable to cold temperatures due to their age and therefore have a greater need for household heat.

Questions 10 to 12: Payment Format

Section 4.4 of the consultation asked questions on the proposed format of the payment, such as whether PAWHP should continue as a single annual payment, and the ability for clients to opt out of the payment.

Providing multiple payments to eligible clients throughout the winter

The consultation outlined our proposals for a single annual payment to be made each year to those entitled to PAWHP, reflecting the same service provided by DWP for WFP.

Among those who answered, 88% of all respondents and 87% of individuals agreed with this proposal for a single annual payment. 94% of organisations responding agreed, and no organisations disagreed, meaning this was the joint highest level of support recorded by organisations.

However, those who disagreed suggested 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. Some suggested for two payments each winter. 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.

Making more than a single payment to eligible clients each winter would inevitably increase the complexity and cost of delivering the benefit. The impact on both complexity and cost would depend on how many payment cycles were to be introduced, but it is likely that making more than one payment to eligible clients each winter would add increased risk to the delivery of the new benefit and increase agency staffing requirements.

Given the high levels of agreement among the majority of individuals and stakeholders who responded to this question, and the complexity and costs associated with delivering more than one payment per winter alongside the ongoing delivery of other Winter Benefits, we intend to continue making a single annual payment as proposed.

Providing clients with the opportunity to opt-out of PAWHP

WFP is a universal payment for older age people and we know there will be some people who may not require additional support during the winter due to their level of income. DWP currently provide an option to 'opt-out' of receiving WFP if the eligible

person does not wish to receive it or alternatively suggest people can donate it to a charity of their choice.

In the consultation we laid out our proposals to mirror that approach for PAWHP, and provide the opportunity to 'opt-out' of the payment ahead of the winter period. This approach would mean a person would continue to be 'opted out' unless they advised Social Security Scotland that they wanted their payment to resume. This means that pensioners who do not feel they require additional support, because they have a high level of income for example, can choose not to receive it.

Over three fifths (64%) of those who responded to this aspect of the consultation agreed with the proposals for opting-out of PAWHP, while 16% disagreed; agreement was higher among organisations (76%).

Clear communication about the 'opt-out' option was highlighted as necessary by some. 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.

One stakeholder, Independent Age, supported the option of having an 'opt-out' mechanism. However, noted 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 was suggested to ensure that individuals who had previously opt-ed out would not miss out on a payment because they had forgotten to opt back in.

We intend to continue to provide an option to 'opt-out' and that an individual will need to 'opt-in' at a future point in time should they wish to do so. This reflects that PAWHP is a universal benefit, which some eligible recipients will not require, and reflects our commitment to deliver a like-for-like benefit. This approach also ensures those clients who have chosen to 'opt-out' previously do not need to continue to update Social Security Scotland. Relevant communication will be provided to the client each year to notify them they remain opted out, and advising them on the steps to opt-back in should they wish to do so.

Question 13: Qualifying Week

When introducing PAWHP to Social Security Scotland, we require a point in the year to establish entitlement, to ensure we receive the relevant data from DWP and can make automatic payments to clients. We currently intend to have a single qualifying week in September (beginning on the third Monday in September).

The majority of respondents agreed with our proposal to continue having the qualifying week in September (71% overall, 71% of individuals and 82% of organisations agreed with this approach). However, those who disagreed with the proposals instead suggested multiple qualifying weeks throughout the winter or that there should be no qualifying week and that eligibility should be assessed throughout the year. These were suggested primarily to address concerns that people who turn

state pension age following the qualifying week in September but during the winter will miss out on support in that initial year.

A single qualifying week is the approach taken for both CWHP and WHP, which are similarly reliant on data sources from DWP. Similarly, a single qualifying week is already used by DWP to determine eligibility for WFP. Whilst using a qualifying week means someone may not receive support in their initial year of reaching the state pension age, there is a requirement for a qualifying week in which the entitlement of eligible recipients is identified for the winter period ahead.

Due to the reliance on DWP to provide details of eligible clients, the introduction of multiple points in time in which data would be required adds significant complexity, costs, increases the risk to delivery, and would require DWP agreement. It is likely to increase the administrative costs of delivery significantly within Social Security Scotland. We therefore do not intend to make any changes to the qualifying week for PAWHP.

Questions 14 to 16: Re-determinations and Unintended Consequences

Section 5 of the consultation asked questions about the proposed timescales for a client to request a re-determination, and the time period for Social Security Scotland to consider a re-determination for PAWHP. A re-determination can be requested by a client to Social Security Scotland where the client believes a wrong decision has been made in respect of their application and they ask for this to be looked at again.

Re-determination timescales

The consultation outlined proposals on timescales for a client to request a re-determination (31 calendar days) and timescales for Social Security Scotland making a decision on a re-determination (56 calendar days).

Following further consideration of re-determinations timescales as well as the feedback received during the consultation, we intend to increase the time limit for a client to request a re-determination from 31 calendar days to 42 calendar days. This would provide greater flexibility for clients to challenge a PAWHP determination and would address organisations' concerns that this client group may need more time to request a re-determination.

We had proposed using an upper limit of 56 calendar days for Social Security Scotland to complete a re-determination. The increase in timescales for a client to request a re-determination will mean that both timescales align with the disability benefit re-determinations timescales. Although there were some reservations from organisations about a longer timeframe, it is important to note that 56 days would be the upper limit for completing a re-determination, and that we expect most re-determinations to be completed more quickly.

The rationale for providing an enhanced deadline of 56 calendar days to complete a re-determination, rather than the 16 working days used for low income benefits, is that PAWHP is not a low income benefit. PAWHP is an age-based benefit with

variable award levels, which would impact the challenge process due to increased complexity. During a re-determination for PAWHP, household matching may be required, as well as allowing time for clients to gather further supporting information regarding the qualifying week.

PAWHP will also have the largest caseload of all Social Security Scotland benefits, with approximately 1.1 million people eligible. Considering the scale of the eligible cohort and the complexity of decision-making for PAWHP, even a small volume of re-determinations could have significant operational impacts. A longer timescale to complete re-determinations would allow Social Security Scotland to more effectively manage these requests, reducing the risk of re-determinations going out-of-time.

In summary, these enhanced timeframes for re-determinations would provide more time and flexibility for clients to challenge their PAWHP award, as well as ensuring sufficient time for Social Security Scotland to consider PAWHP award level, gather supporting information and complete household matching during the re-determination. This aligned approach would promote informed decision-making at re-determination stage and is likely to reduce the likelihood of appeals.

Questions 17 to 21: Impacts

Section 6 of the consultation asked about the possible impact of the policy on protected groups, on businesses and on island communities. The following draft impact assessments have been published, and the final versions will be published alongside the regulations when they are laid in Parliament:

- PAWHP Equality Impact Assessment
- PAWHP Business & Regulatory Impact Assessment
- PAWHP Islands Community Impact Assessment
- PAWHP Fairer Scotland Duty Impact Assessment

Implementation and monitoring

Pension Age Winter Heating Payments will launch in winter 2024/25. Following launch, we will, as with other benefits, seek to make ongoing improvements. Policy development will continue to consider the eligibility and scope of PAWHP.

We will collate management information to monitor uptake and the characteristics of recipients and will undertake qualitative research to test whether Pension Age Winter Heating Payment is meeting its policy intentions. This will inform future consideration of variations to policy or delivery arrangements.

Scottish Government
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