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Cabinet Secretary for Social Justice
Scottish Government
St Andrew's House
Regent Road
Edinburgh
EH1 3DG

12 March 2026

Dear Cabinet Secretary,

I am writing to outline Consumer Scotland's recommendation to provide additional support with energy bills to people in Scotland with a terminal illness.

Consumer Scotland research suggests that households where a member has a disability or health condition are twice as likely to report difficulty keeping up with energy bills. This can result from having higher energy usage than other consumers, prompted by reasons including the need to keep their home warmer or to run complex medical equipment. The current energy bill support schemes available to households are largely income-based, meaning that where a household has significantly higher than usual energy demand this is not reflected in the affordability support they may receive.¹

One group for whom this is a particularly acute problem is the terminally ill.

Targeted Support for People living with Terminal Illness

According to research carried out by Marie Curie, terminally ill people's bills can rise by as much as 75% after diagnosis due to additional essential energy use, including an enhanced heating regime and the cost to run medical devices at home.² This additional cost is not specifically recognised in the energy affordability supports currently available.

Consumer Scotland has produced a short briefing paper (attached) with costed policy recommendations to improve support for terminally ill consumers. This could be delivered through the pre-existing devolved social security support mechanisms for terminally ill people. The analysis is based on up-to-date figures and Consumer Scotland's previously

¹ Consumer Scotland, [Designing energy support for disabled consumers](#), November 2024

² Marie Curie, [One Charge Too Many](#), August 2023

published report which made recommendations to enhance energy affordability support, and widen access to suitable energy efficiency measures, for terminally ill people. The key points to note include:

- There are existing mechanisms in Scotland's social security system, under the *Special Rules for Terminal Illness* (SRTI), and identification and validation of eligibility specifically through the *Benefits Assessment for Special Rules in Scotland* (BASRiS). Data indicates that in October 2025 there were 13,350 individuals in Scotland who had a terminal illness under BASRiS eligibility.
- Terminal illness support for energy bills can mirror existing energy support and social security schemes, either by extending these to terminally ill working-age households or providing similar support to households solely in receipt of disability benefits and/or meeting the BASRiS criteria.
- The options paper provides a variety of potential costings for support. We recommend a bespoke amount of £450 per SRTI-eligible individual, based on 25% of a typical dual fuel energy bill of a Scottish household under the current Ofgem energy price cap. We have also presented alternatives, including expanding the eligibility of existing winter heating benefits to include terminally ill consumers, and utilising existing social security mechanisms. The total cost range of the options presented is £58.75 to £450 per individual.

Consumer Scotland would be pleased to discuss further the options for improving energy affordability support for terminally ill people in Scotland and how this can be delivered.

I have written in similar terms to the spokespeople of the parties represented in Parliament.

Kind regards,



Sam Ghibaldan

CC:

- Party spokespeople on social security

Encl. (1): Terminal Illness Energy Support Options and Costings Paper

Terminal Illness Energy Support Options Paper

Key Summary

- People living with a terminal illness face significantly higher and unavoidable energy costs. Current energy affordability support does not adequately reflect these elevated needs, leading many terminally ill consumers at a heightened risk of fuel poverty.
- This options paper sets out proposals for targeted energy affordability support that could be delivered by Social Security Scotland, verified through its Special Rules for Terminal Illness (SRTI) processes. Terminally ill consumers would not need to apply separately as Social Security Scotland (SSS) already holds information required to automatically data match them to additional energy support at the point they apply for disability benefits through the SRTI rules.
- Two delivery options are assessed:
 1. **Creating a new bespoke payment**, designed to offset a meaningful proportion of additional essential energy costs associated with terminal illness (section 5). This Minimum Guaranteed Offset would provide £450 to each terminally ill person in Scotland at a cost of around £6 million annual cost.
 2. **Expanding eligibility for existing Scottish devolved benefits** to include SRTI-eligible individuals (section 6). Individually, extending existing benefits would provide up to £300 of support at an estimated total annual cost of £4 million.
- Ultimately, a bespoke payment, designed around a Minimum Guaranteed Offset, offers the closest alignment with actual additional energy needs. Additionally, it offers a clear, adaptable mechanism that can be readily updated to meet the needs of terminally ill people, rather than adjusting multiple existing benefits which would be complex to deliver.
- While establishing a new benefit introduces additional administrative steps, existing powers, delivery infrastructure and learnings from the creation and delivery of disability benefits will mitigate these challenges.

1. Policy Rationale, Proposal, and Strategic Fit

The Policy Rationale

For people approaching the end of life, living in poverty can significantly undermine their ability to meet essential needs, including staying warm, dry and clean. Living in poverty at the end of life can accelerate health deterioration, compounding distress at a time individuals already face profound medical, emotional and practical challenges¹.

Consumer Scotland research highlights that **‘high essential energy expenditure’ is a key driver of energy affordability challenges for disabled and terminally ill consumers**². People with terminal illnesses frequently face significantly elevated energy costs due to the need to operate essential medical and mobility equipment, such as oxygen concentrators, home dialysis machines and electric wheelchairs or hoists. They may also need to maintain higher indoor temperatures to manage pain, respiratory conditions, fatigue and other clinical symptoms. These additional and unavoidable energy needs place substantial financial pressure on individuals already experiencing severe vulnerability.

According to research by Marie Curie, **terminally ill people’s energy bills can be 75% higher than the average household’s**, depending on their condition, due to the cost of running medical equipment, and their other increased heating and power needs³. Recent research by Marie Curie and the University of Loughborough estimated that 8.1% of terminally ill, working-age people were in “deep poverty”⁴ in Scotland, compared to 5.8% of non-terminally ill, working-age people⁵.

The current landscape of energy support does not account for the impact of higher essential energy expenditure, and therefore does not effectively help terminally ill consumers to meet their essential energy needs.

Proposal

In this options paper **we propose the introduction of a new affordability support targeted at terminally ill consumers, recognising their high essential energy needs and the current gap in the support landscape.**

The current devolved disability benefit payments, and specifically the Special Rules for Terminal Illness (SRTI), provides the Scottish Government with **an existing vehicle to identify, validate and deliver energy affordability support** specifically to those who are at the end-of-life via the social security system in Scotland.

Targeted energy support can deliver significant benefits for the health and wellbeing of terminally ill consumers, along with wider societal benefits. Improved affordability and access to essential-to-life heat and power means that people are able to **better maintain**

¹ Richards, N. et al, [Dying in the Margins: Experiences of Dying at Home for People Living with Financial Hardship and Deprivation](#), June 2024

² Consumer Scotland, [Designing Energy Support for Disabled Consumers](#), December 2024

³ Marie Curie & Loughborough University, [Dying in Poverty 2024](#), 2024

⁴ “Deep Poverty” is defined by the Social Metrics Commission as being more than 50% below the poverty line. More details can be found here: Social Metrics Commission, [Measuring Poverty 2024](#), October 2024.

⁵ Marie Curie & Loughborough University, [Poverty at the End of Life in the UK in 2024](#), November 2025

their health and wellbeing. It can also **reduce the burden** on the NHS by minimising cold-related hospital admissions and cold-related mortality.

Improving the affordability of energy bills also helps to **prevent debt and arrears**, self-disconnection from energy for those on prepayment meters, and reduces debt-related mental health issues.

The options presented in this paper are broken down into two categories:

- (i) **creating a bespoke support payment** that offsets a proportion of additional essential energy expenditure for individuals that meet the SRTI criteria; and
- (ii) **expanding eligibility for existing social security support** to individuals that meet the SRTI criteria.

Both categories make use of **the existing SRTI identification and validation process** as described in section 2. After validation, the options differ in providing support either through a bespoke new payment, or alternatively providing support through existing social security payments by extending their current eligibility to include SRTI-eligible individuals. A summary of the comparison of delivery options is included in Table 1, and discussed in more detail later in this paper:

Table 1 – Comparison of Proposed Delivery Options

Option	Minimum Guaranteed Offset (New Payment)	Extend Eligibility to Existing Social Security Payments to SRTI-eligibility
Core Purpose	Tailored support specific to terminal-illness-related energy needs.	Uses existing schemes not designed around terminal illness.
Support Level	Estimated £450, linked to additional energy needs.	Individually lower (but could be combined) and varies by benefit (e.g. Warm Home Discount, Winter Heating Payments).
Timing	Can be delivered year-round on SRTI confirmation.	Mostly winter-season payments.
Administrative Feasibility	Higher setup requirements; new benefit needed.	Quicker delivery using existing systems.
Fit to Need	Closer alignment with actual additional energy use of SRTI-eligible individuals.	Limited—payments linked to energy need, but not directly to energy need of SRTI-eligible individuals.
Estimated Costing	£6,007,500	Between £784,312.50 and £4,005,000 (for individual benefit delivery, not combined)
Overall	Most targeted support but more administrative setup costs.	Easier to implement but less targeted.

How it Supports the Scottish Government's Fuel Poverty Strategy

This proposal aligns with the Scottish Government's statutory duties under the Fuel Poverty (Targets, Definition and Strategy) (Scotland) Act 2019, and directly supports the delivery of the current Fuel Poverty Strategy.

Terminally ill individuals typically require an enhanced heating regime as recognised in the existing regulations.⁶ The Scottish Government's 2021 Fuel Poverty Strategy highlights that fuel poor households are more likely to include someone with a long-term illness or disability, recognising that cold homes exacerbate ill-health and increase health risks. Committing to a person-centred approach, the Scottish Government's analysis and research recognised that fuel poverty was a threat to health and wellbeing, which if left unaddressed leads to self-rationing and an increased risk of self-disconnection.⁷

Evidence submitted in advance of the publication of the 2021-2024 Periodic Report from third sector organisations further highlights that disabled people with serious long-term conditions face high essential energy expenditure, while current cost-of-living measures were not sufficiently targeted at those with the highest energy needs.⁸

The Scottish Fuel Poverty Advisory Panel (SFPAP), in its scrutiny of the 2021 Fuel Poverty Strategy, has recommended that the Scottish Government develop a stronger focus on improving health outcomes for those suffering fuel poverty.⁹ In response to the 2021-2024 Periodic Report, SFPAP also highlights gaps in current schemes' recognition of additional energy needs for all critical medical equipment.¹⁰

This proposal directly addresses these gaps by providing targeted affordability support to terminally ill consumers, consistent with the Scottish Government's person-centred, health-focused approach to tackling fuel poverty.

2. Implementation and Administrative Considerations

Identifying and Verifying a Terminal Illness Prognosis

Verification of a terminally ill prognosis is essential to effectively target terminally ill consumers with energy support.

Social Security Scotland ('SSS') have an established Special Rules for Terminal Illness ('SRTI') process, facilitated by the "Benefits Assessment Under Special Rules in Scotland" (BASRiS) medical evidence form. A BASRiS form is a form that terminally ill patients in Scotland can use when applying for specific benefits, like disability benefits, under special rules that provide the claimant with an up-rated, expediated benefit claim. A patient's healthcare

⁶ The Fuel Poverty (Enhanced Heating) (Scotland) Regulations 2020, SSI 2020/58, ss. 3-4

⁷ Scottish Government, Tackling Fuel Poverty in Scotland: A Strategic Approach, pp. 51-52, December 2021

⁸ Scottish Government, Tackling Fuel Poverty in Scotland: Periodic Report 2021-2024, pp. 70, 74, April 2025

⁹ Scottish Fuel Poverty Advisory Panel, Annual Report 2023-2024, p. 10, June 2024

¹⁰ Scottish Fuel Poverty Advisory panel, Periodic Report Consultation Response, p. 11, November 2024

professional will complete the BASRiS form, providing clinical confirmation that the named patient meets the definition of terminal illness under Scotland's social security system.¹¹

Additionally, the BASRiS system provides an established and accurate route to identification and verification as disability benefits are not subject to income or capital thresholds like means-tested benefits are, which may otherwise exclude terminally ill consumers.

Terminally ill consumers would not need to apply separately for our proposed energy support as SSS already holds the information required to automatically data match and transfer them onto the additional energy support. Following verification, they would automatically receive the relevant energy affordability support in addition to their disability benefit. Using data-matching to identify SRTI-eligible individuals removes the need for a separate applications and reduces the administrative burden on consumers at a time of significant vulnerability.

Payment Infrastructure

SSS already facilitate devolved social security payments, including devolved energy support. Therefore, existing payment infrastructure will be in place to facilitate payments to identified terminally ill patients in a manner similar to that is already done with disability benefits.

Devolution of Disability Benefits

The process for devolving disability benefits in Scotland meant that until recently there were terminally ill benefit claimants in Scotland who continued to receive disability benefits administered by the Department for Work and Pensions ('DWP').

SSS completed the case transfer process for claimants in receipt of Personal Independence Payment (PIP) in Scotland by the end of June 2025, and aimed to complete the transfer of Attendance Allowance (AA) clients in Scotland by the end of 2025.¹²

Therefore, it is expected that any cross-border deliverability challenges should be mitigated.

Current numbers of SRTI Eligible Individuals in Scotland

Using the latest published statistics from SSS, we have estimated there are 230 child-age SRTI eligible benefit claimants,¹³ 7,730 working-age SRTI eligible benefit claimants,¹⁴ and 5,390 pension-age SRTI eligible benefit claimants¹⁵, for a total of 13,350 SRTI eligible benefit claimants across Scotland.

Consumers Already in Receipt of Enhanced Rate Disability Benefits before a Terminal Illness Diagnosis

¹¹ Social Security (Scotland) Act 2018, Schedule 5, Part 1, Chapter 1, 1(2): "it is the clinical judgement of an appropriate healthcare professional that the individual has a progressive disease that can reasonably be expected to cause the individual's death."

¹² Social Security Scotland, [Pension Age Disability Payment Statistics to 31 October 2025](#), December 2025

¹³ Social Security Scotland (2025) [Child Disability Payment: statistics to 30 September 2025](#) - Table 21: Caseload for Child Disability Payment by Special Rules for Terminal Illness status at 30 September 2025

¹⁴ Social Security Scotland (2025) [Adult Disability Payment statistics to 31 October 2025](#) – Table 23: Caseload for Adult Disability Payment by Special Rules Status at 31 October 2025

¹⁵ Social Security Scotland (2025) [Pension Age Disability Payment statistics to 31 October 2025 - Social Security Scotland](#) – Table 17: Caseload by Special Rule Status, 31 October 2025

Individuals already in receipt of the enhanced rate of disability benefits prior to a terminal illness diagnosis may not engage with the SRTI process for the purpose of future energy support. Although SRTI provides an expedited route to enhanced-rate awards, those already receiving enhanced payments may not recognise the need to reapply. This creates a risk that eligible individuals may inadvertently miss out on terminal illness-related energy support linked to SRTI-verified status.

To ensure effective delivery, consideration should be given to how terminally ill consumers already receiving the highest-rate disability benefits are identified. Targeted engagement and communications, with clear guidance to healthcare professionals, welfare advisers and other frontline staff would help mitigate this risk and ensure that eligible individuals access support in a timely manner.

3. Stakeholder Considerations

Ofgem's Consumer Vulnerability Strategy recognises the greater impact a health condition can have on what disabled consumers pay for energy.¹⁶ This strategy was refreshed in spring 2025. Additionally, Ofgem already has a statutory duty to consider the needs of disabled people, those who are chronically sick, of pensionable age, living in rural areas and on a low income.¹⁷ Ofgem's rules for the companies it regulates reflect the need for those companies to give due attention to the special needs for vulnerable consumers, for example in their customer service arrangements. **Financial redistributive measures however, such as the one proposed in this paper, are a matter for government** rather than Ofgem.

Marie Curie has called for improved energy financial support for terminally ill consumers. Research about fuel poverty at the end of life from Marie Curie and Loughborough University in *Dying in Poverty in Scotland 2024*¹⁸ found:

1. One in five terminally ill people in Scotland will die in fuel poverty at the end of life;
2. Minority ethnic groups are more likely to die in fuel poverty at the end of life (26.54%) compared to white people (19.5%);
3. Over 45% of terminally ill people living in social housing will die in fuel poverty, compared to 30% of terminally ill people living in private rented accommodation; and
4. Terminally ill people using oil heating experience almost a 30% change in household heating bill in their last year of life.

4. Analysis of Delivery Options

In this paper we have considered two main options for delivering enhanced energy bill support to terminally ill people:

¹⁶ Ofgem, [Decision on Consumer Vulnerability Strategy 2025](#), 2019

¹⁷ Ofgem, [Consumer Vulnerability Strategy Refresh](#), 2024

¹⁸ Marie Curie, [Dying in Poverty in Scotland in 2024](#), 2024

- i. creating a bespoke support payment, that provides a minimum guaranteed offset of additional essential energy expenditure, for individuals that meet the SRTI criteria (explored in section 5); and
- ii. expanding eligibility of existing social security support to individuals that meet the SRTI criteria (explored in section 6);

5. Considerations for a Minimum Offset of Energy Bills

Costing a Minimum Offset of Additional Essential Energy Expenditure

Evidence from terminal illness charities shows that energy bills for people with a terminal illness can dramatically rise after diagnosis. CHAS estimated the running costs of vital medical equipment for a terminally ill patient in NHS Grampian in 2023 to amount to an additional £274.57 per month before heating costs are taken into account¹⁹ and Marie Curie estimating energy bill increases of as much as 75%.

While not every household may experience this maximum impact, an SRTI-linked terminal illness energy support payment set at 25% of a typical dual-fuel energy bill offers a “Guaranteed Minimum Offset” of these essential additional energy costs.

The current levelised, ex VAT rates for direct debit consumers on typical dual fuel bills (e.g. not accounting for essential energy expenditure from terminal illness) in the North and South Scotland DNO regions for the current Ofgem price cap period (1 January to 31 March 2026) are listed below in Table 2:

Table 2 – Levelised, unweighted, ex. VAT rates for Direct Debit using 2,700kWh/yr for single rate electricity and 11,500 kWh/yr for gas in Ofgem Price Cap Period 1 January to 31 March 2026

Supply Type	North of Scotland DNO Region	South of Scotland DNO Region	GB Average
Electricity	£945.06	£899.26	£902.44
Gas	£767.57	£767.66	£771.83
Dual Fuel	£1712.63	£1666.92	£1674.26

Ofgem Price Cap Statistics, 2026

Using a 25% figure of the higher of the two Scottish regions, Northern Scotland, including VAT, provides a support figure of **£450 (rounded to the nearest £)**. While a more sophisticated figure could be produced based on specific DNO regions, or eventually individual consumption data, **a simple, single figure would ensure the additional support for SRTI-eligible consumers in Scotland is meaningful while being easy to deliver in practice.**

¹⁹ CHAS, [‘Help Power Precious Lives’: Supporting the Families of Seriously Ill Children with their Energy Costs](#), October 2023.

The process for terminally ill people to follow would be not dissimilar to the current process for claiming disability benefits. A terminally ill person would make a claim for a disability benefit under the current SRTI rules, with the use of a BASRiS form as described above. Valid claims would then provide claimants with both a disability payment under the SRTI, and access to the Minimum Guaranteed Offset payment of £450. The value of the benefit could be amended annually in line with changes to the energy price cap to ensure it continues to reflect actual energy costs and provides adequate support.²⁰

6. Considerations on Expanding Eligibility of Pre-existing Scottish Social Security Benefits

An alternative to creating a new payment could be to provide support to terminally ill people directly through existing Scottish social security benefits.

Current Winter Heating Benefits

SSS, and DWP (through energy suppliers in the case of the Warm Home Discount (WHD)) currently deliver a number of energy support payments, such as the Scottish Winter Fuel Payment, Scottish Winter Heating Payment, and the Scottish Child Winter Heating Payment. To acknowledge the additional heating costs of terminally ill individuals, eligibility criteria for one or more of these benefits could be extended to also include SRTI eligible claimants.

The receipt of the payment would straightforwardly follow the current benefit procedures set up by SSS. For example, a terminally ill person would need to make a claim for a disability benefit under the current SRTI rules, with the use of a BASRiS form as described above. Valid claims would then provide claimants with both a disability payment under the SRTI, and passport them on to one or more of the winter heating payments, with payment being made when the relevant triggers of the passported benefit are made.

In the case of WHD, this would require SSS to also notify DWP of the SRTI eligibility to ensure relevant energy suppliers were in turn notified to deliver automated data-matched support through the Scottish WHD Core Group.

Meeting Energy Needs through Combined Support

A range of winter heating benefits have been considered, however none of them amount to the £450 figure that would be appropriate for the energy needs of terminally ill individuals. It may be possible to provide a similar level of support by broadening eligibility of two or more benefits to SRTI eligible consumers. In practice this means an SRTI eligible consumer would receive a figure that would eventually amount to around the £450 amount through receipt of multiple winter heating benefits at different times.

Interaction with Existing Benefit Entitlement

For options delivered through existing social security benefits, we assume SRTI-eligible claimants would receive an additional entitlement equivalent to the standard payment,

²⁰ Although the energy price cap is updated quarterly, linking uprating to an annual adjustment reduces administrative complexity and volatility. Using the Q4 price cap would allow changes to be implemented in time for the April social security uprating cycle, ensuring alignment with wider social security processes.

irrespective of any award they already receive through other routes. This approach does risk greater administrative challenges with overlapping payments complicating delivery.

7. Analysis of Proposed Options for Terminal Illness Energy Support

The table in Annex 1 sets out the costings for the proposed policy options for delivering energy support to terminally ill people. The options can be broken down into broadly two categories:

- a) The creation of a new benefit in the form of the proposed Minimum Guaranteed Offset (policy option 1);
- b) Broadening the eligibility criteria of 4 existing benefits to include SRTI-eligible people (policy options 2 - 5).

The creation of a new benefit, proposed in policy option 1, would allow Scottish Government to **design a benefit that more directly meets the additional energy needs of terminally ill people**. Also, being a standalone benefit designed specifically for terminally ill recipients, it can be amended and tailored to take account for future data sets that relate to energy need and fuel poverty should they become available (e.g. more support could be provided to households with poorer energy efficiency). Finally, it can also be delivered upon receipt of the SRTI notification, recognising that additional energy costs are often a year round issue for terminally ill people and not simply a matter of providing winter heating support. However, the creation of a new benefit would come with additional administrative hurdles to set up and operationalise.

Broadening the eligibility of existing Scottish devolved benefits (policy options 2 – 5) is anticipated to have fewer administrative hurdles (e.g. existing benefit infrastructure and payment systems can be reused) and potentially therefore **be quicker to deliver in the short-term**. However, the value and delivery of support to terminally ill people will be necessarily constrained by the existing benefit system (e.g. under what conditions the payment is triggered, and the monetary value of the preexisting benefit, rather than linking it to the needs of terminally ill people). Not delivering support through a bespoke payment also limits opportunities for Government to tweak support specifically for SRTI-eligible people as the amended benefits are not solely designed for this group.

Considering the available data around the estimated additional cost of energy for terminally ill people, option 1 is closest to bridging that gap for their energy need. Also, attempting to deliver support to all SRTI groups through existing benefits may produce other administrative issues (e.g. as discussed above, should an SRTI-eligible claimant receive a “repeat” payment if they already receive an existing benefit for another reason?).

Ultimately, while there may be short-term advantages in amending existing benefits, it risks not providing sufficient support. This can only be achieved by amending multiple benefits, which in turn creates additional complications in the delivery of support, and limits the ability to straightforwardly target support that delivers for needs of terminal illness.

The option to create a new benefit of this type is within the Scottish Government's competency, and while it requires additional consultation that amending existing benefits may not, lessons can be taken from existing benefits to aid in this process. The Scotland Act 2016 (as it amends the Scotland Act 1998) and the Social Security (Scotland) Act 2018 (the "2018 Act") afford the Scottish Ministers relevant powers and competency to create a new terminal illness social security benefit. As the 2018 Act confers operational and regulatory powers on Social Security Scotland as the agency responsible for implementing devolved assistance, it is recommended that a new Terminal Illness benefit is created and delivered by this agency. The 2018 act provides regulation-making powers to establish a new "form of assistance" that is within devolved competence.

A new benefit will still require updated clinical guidance (for example, revisions to the Chief Medical Officer's guidance on terminal illness), healthcare staff guidance and payment infrastructure. However, it is anticipated that existing systems and processes for SRTI in current disability benefits provide an established route that can be reused for this new benefit.

Therefore, to provide support that more closely recognises the high essential energy usage of terminally ill consumers through a bespoke platform, the creation of a new benefit is Consumer Scotland's recommended approach.

ANNEX 1 - PROPOSED POLICY OPTIONS FOR TERMINAL ILLNESS ENERGY SUPPORT

Policy Option	Amount/Additional Amount per Claimant	Forecast Cost (based on 13,350 claimants)	Deliverability	Benefits	Challenges
1. Proposed Minimum Guaranteed Offset	Indicatively £450 per annum	£6,007,500	Automatic data matching, through the SRTI mechanism, and payment is recommended to ensure that all targeted recipients receive support.	- As purpose made support, can be tailored to SRTI claimants' needs. - More closely matched to actual impact of terminal illness options than other energy bills. - Can be tailored to individual circumstances using relevant current/future data sources (e.g. energy consumption data, medical device consumption, housing efficiency data is readily available in the future).	- No established payment infrastructure. - Most expensive intervention.
2. Extension of Warm Home Discount –	£150 per household	£2,002,500	Reuse SSS and DWP automatic data matching, and energy supplier payment infrastructure to deliver a credit directly to energy bills of claimants who are SRTI-eligible.	Established payment infrastructure through energy supplier	- Not all energy suppliers are obliged to provide the Warm Home Discount. - Terminally ill patients not named as the billpayer risk being missed.

Core Group²¹				• Support is credited directly to the energy bill • Timing of support helps with winter energy peaks	• A reserved support mechanism, not delivered by Scottish Government (though Scottish Government has input into eligibility criteria) • Funded by all consumers through social levies on energy bills (regressive funding).
3. Extension of Pension Age Winter Heating Payment	Up to £300 depending on household makeup	£4,005,000 (based on highest £300 rate)	Reuse SSS processes for payment of Winter Fuel Payment/Scottish Pension Age Winter Heating Payment for working age patients and children.	• Established payment infrastructure through Social Security Scotland • Timing of support helps with winter energy peaks	• Amount is not linked to additional need cost of terminally ill patients. • Currently differs depending on age of the recipients, not aligned with energy need associated with terminal illness.
4. Extension of Scottish Child Winter Heating Payment	£251.50 per qualifying benefit claimant	£3,357,525	Automatic payments to eligible children (with qualifying disability payment) Potential to reuse SSS systems to deliver scheme to working-age SRTI claimants.	• Established payment infrastructure through Social Security Scotland • Timing of support helps with winter energy peaks	• Single annual payment may not align with sustained year-round needs of terminally ill people. • Amount is not linked to additional need cost of terminally ill patients

²¹ Based on the proposed Warm Home Discount Scheme 2026-2031 in Scotland contained in the UK Government's Response to Consultation published in January 2026- [Continuing the Warm Home Discount Scheme: government response](#)

				• Clear precedent in policy framework to support additional essential energy usage.	
5. Extension of Scottish Winter Heating Payment	£58.75 per qualifying benefit claimant	£784,312.50	Automatic payment to qualifying patients (eligible benefit + received during qualifying week (e.g. 4-10 November))	• Established payment infrastructure through Social Security Scotland	• Single annual payment may not align with sustained year-round needs of terminally ill people. • Amount is not linked to additional need cost of terminally ill patients