

# **Scottish Carer's Assistance: Independent Analysis of Responses to Consultation**

**November 2022**

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**Why Research  
October 2022**

## Acknowledgments

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# Executive Summary

## Background

The Social Security (Scotland) Act 2018 was a major piece of devolved legislation and laid the foundations for the delivery of a range of benefits. Twelve benefits have already been delivered in Scotland and the Carer's Allowance Supplement was the first payment introduced under the Scottish Government's new social security powers. The Scottish Government plans to begin the roll out of Scottish Carer's Assistance from the end of 2023, with full national introduction planned for spring 2024.

Scottish Carer's Assistance will replace Carer's Allowance and will support over 80,000 people who provide 35+ hours per week of care to individuals receiving certain disability benefits.

In February 2022, the Scottish Government launched a consultation seeking views on proposals ahead of the introduction of Scottish Carer's Assistance. This consultation paper outlined the Scottish Government's proposals for how Scottish Carer's Assistance will look when it first launches, for a new extra payment for those who care for more than one person and the future of Carer's Allowance Supplement and set out five priority proposals for future change.

In total, there were 192 responses to the consultation, of which 41 were designated from organisations and 151 from individuals.

## Key Themes

A number of key themes were evident across consultation questions and consultation events as well as across respondent groups.

Overall, Carer's Allowance as currently delivered by the Department for Work and Pensions was seen by many respondents to be complicated, difficult to understand in terms of entitlements, hard to navigate, lacking in transparency and administratively burdensome in terms of making applications and keeping the Department for Work and Pensions up to date with any changes in circumstances. As such, the proposals outlined in the consultation paper were welcomed and were, in the main, seen to recognise carers and their caring role, as well as going some way to help alleviate the poverty experienced by many carers. In general, the approach outlined in the consultation paper was perceived to be more sympathetic, flexible, person-centred and an acknowledgement of the difficult and challenging role faced by carers.

However, some respondents felt the proposals did not go far enough, with a few comments that all carers should be recognised for their caring role, that many existing carers will not be eligible for support under these proposals and

that the proposed changes should be extended further. For example, while respondents were positive about the Carer's Additional Person Payment, there were many comments that this should be more than the proposed £10 per week.

There were some references to the amounts of money saved by carers for the public purse and comments on the effective hourly rate paid to carers through Carer's Allowance which was perceived to be very low in comparison to the national living wage or the real living wage. There were some calls for all carers to be paid the national living wage or real living wage for their hours of caring.

Key themes emerging across the consultation included:

- The need for information to be provided in a variety of different formats and utilising a range of different channels to optimise accessibility. For example, there were some calls for easily accessible information on entitlement to other benefits.
- A number of respondents – particularly organisations – asked for more support to be available to carers. There were some specific suggestions for carers to be linked to carer centres for advice and support, for example, in providing information on benefits.
- Respondents want to see fast, straightforward and transparent processes when applying for Scottish Carer's Assistance and would like to be able to find out more about other related benefits to which they may be entitled.
- Respondents would also like to see information provided about the impact of receiving Scottish Carer's Assistance on other benefits; and to ensure there are no negative impacts on other benefits of which they are in receipt.
- Some respondents – mainly organisations – called for a co-design approach in development of Scottish Carer's Assistance and related benefits, so as to ensure processes and procedures meet the needs of carers.
- Linked to the issue of co-design, there were some requests for flexible payment procedures (weekly, monthly or bi-annual) to suit individual needs.
- Some respondents – mainly organisations – requested that the proposed future changes are introduced alongside the launch of Scottish Carer's Assistance rather than at an unspecified future date.
- Across sub-groups there were comments that eligibility for the current Carer's Allowance is too restrictive and there were requests for Scottish Carer's Assistance to be more flexible and accommodating. One example given was that payment could be made according to the number of hours spent caring, as some carers will have fluctuating caring hours.

- There were many requests for eligibility for Scottish Carer's Assistance to be extended. The most frequently cited was the inclusion of pensioners who many felt should be entitled to this benefit.
- There were also high levels of support for changes to the limitations that are currently in place as well as criticism of the current earnings threshold. Respondents would like to see carers enabled to work for a greater number of hours and for allied increases in the earnings threshold. It was suggested that this would improve household income and carer's mental wellbeing (for example, poverty and social isolation were perceived to be negative impacts of the caring role).
- Other scenarios where it was felt Scottish Carer's Assistance should offer more flexibility were where there may be more than one carer caring for a cared for person and / or a shared caring role as at present only one carer can receive the benefit.
- Across the consultation some respondents felt that all carers should qualify for the benefit, particularly as many will be caring for over 35 hours per week and making savings for the public purse.

## Summary of main findings

### Scottish Carer's Assistance from Launch

The consultation paper outlined a number of proposals in relation to Scottish Carer's Assistance and a majority of respondents agreed with each of these.

- When considering how Scottish Carer's Assistance services could be designed to suit carers' needs, respondents focused on a need for a choice of communication methods, straightforward processes and types of support needed by carers as well as concerns over the rules about the current Carer's Allowance (Q1).
- Respondents cited a wide range of organisations and forms of support that Scottish Carer's Assistance could link to. A key form of support was carers' centres that can provide information and local help in accessing and completing paperwork as well as performing an advocacy role (Q2).
- A majority of respondents (68%) agreed with the proposed residency criteria for Scottish Carer's Assistance. A large minority agreed that carers should need to live in Scotland or that residency should be the main consideration. Furthermore, a significant minority felt it is not possible to care for someone living outside the carer's area or a long way outside Scotland. However, there were some calls for flexibility in the arrangements, for example, when a carer close to the Scottish border

provides care for a Scottish resident. Views on the 'past presence test' were mixed (Qs3-5).

- Almost three quarters of respondents agreed with the proposed redetermination timescales for Scottish Carer's Assistance. These were noted as being fair and reasonable, allowing more time to collate information and gather information and obtain support and advice. There were some comments that Social Security Scotland should not need a longer period to make a decision than carers have to request a redetermination. A small minority of respondents felt the proposed timescales were too long (Qs 6-7).
- 64% of respondents agreed with the proposals on when payments of Scottish Carer's Assistance should be suspended, with comments that the reasons given for suspension were appropriate with suspension only taking place in severe or serious circumstances. Many comments focused on the negative financial impact that stopping qualifying disability benefits can have on a carer. A large minority of respondents felt Scottish Carer's Assistance payment should continue until a person's situation is resolved, particularly as the carer will still be required to provide care (Qs 8-10).
- 67% of respondents agreed with the proposals for when an award of Scottish Carer's Assistance should be set to £0. The key reasons were that this offers a more flexible approach or it will be easier as carers will not have to reapply for their benefit (Qs 11-12).
- A large majority (85%) of respondents agreed with the proposal to pay Scottish Carer's Assistance to carers when the person they are caring for is receiving short-term assistance. The key reason for this was that the carer will still have caring responsibilities and should not be penalised financially during this process (Qs 13-15).

## Extra money for carers in Scotland

- 62% of respondents agreed that Carer's Allowance Supplement should be paid alongside carers' regular payments of Scottish Carer's Assistance in future. However, a significant minority supported payment of a lump sum. There were some suggestions that carers should have a choice as to how they would like to receive this payment (Qs 16-18).
- 72% of respondents agreed with the proposed eligibility criteria for Carer's Additional Person Payment. This was felt to recognise the financial burden faced by carers and an acknowledgement of caring responsibilities. However, there was some criticism of the proposed amount of £10 per week, with suggestions that this should be increased and some disagreement with the criteria relating to a minimum of 20 hours additional care per person (Qs 19-20).



- 73% of respondents agreed with the proposed payment frequency for Carer's Additional Person Payment (Qs 21-22).
- 63% of respondents agreed with the proposal to target Carer's Additional Person Payment to carers who are getting payments of Scottish Carer's Assistance. This was seen to be fair, sensible, logical and reasonable, though there were some calls for the payment to be made to all carers with an underlying entitlement to Scottish Carer's Assistance (Qs 23-25).

## Changes to Scottish Carer's Assistance

- Almost all respondents (97%) agreed with the proposed future change to allow carers in full-time education to get Scottish Carer's Assistance. It was felt this would help to remove barriers and encourage carers to go into education. A number of benefits were highlighted including personal and professional development, career improvement, gaining of qualifications and improved mental health and wellbeing (Qs 26-27).
- A large majority (79%) of respondents agreed with the proposed future change to allow carers to add together hours spent caring for two people to reach the 35 hour caring requirement. Key was the recognition of multiple caring circumstances. A large minority felt that it is the total number of hours spent caring that is important rather than the number of people cared for. There was some concern about bureaucratic and administrative complications (Qs 28-29).
- Almost all respondents (89%) agreed with the proposed future change to continue to pay Scottish Carer's Assistance for 12 weeks after the death of a cared for person. This additional time period was perceived to allow people time to adapt to changed circumstances as well as helping to reduce financial and emotional stress (Qs 30-31).
- A similar number of respondents (87%) agreed with the proposed future change to continue to pay Scottish Carer's Assistance for 12 weeks when a cared for person goes into hospital or residential care. Respondents noted that carers will still have a caring role to fulfil and may face additional financial costs in terms of fuel, parking and other travel expenses (Qs 32-33).
- 82% of respondents agreed with the proposed future change to increase the earnings limit for Scottish Carer's Assistance. A key comment was that carers should be given the opportunity to earn more where possible as this can help to bring about financial stability and alleviate poverty as well as being beneficial to mental health and wellbeing. However, there were comments that the earnings limit should be higher than the suggested £158 per week (Qs 34-35).

- 67% of respondents agreed that the earnings threshold should be set at a level which would allow carers to work 16 hours a week alongside their caring role. While a significant minority approved of this threshold, some others commented that this limit is too low and should be increased (Qs 36-37).
- A majority (77%) of respondents agreed with the proposal to look at a 'run on' after a carer earns over the earnings limit in future. This was seen to be helpful to those with variable earnings as well as making life easier as it would help to provide some stability to carers while they adapt to changes (Qs 38-39).
- A large majority (86%) of respondents agreed that a payment for long-term carers should be considered further. This was perceived to help provide financial support and stability to carers. There were also suggestions that this payment should be available to a wider range of carers, including those in receipt of a state pension. (Qs 40-41).
- In considering what a payment should look like and who it should be for, respondents made a wide range of suggestions, although there was little consensus in what this payment should be (Q42).
- When asked to provide other views about the proposals for future changes to Scottish Carer's Assistance, most comments echoed points from earlier questions (Q43).

## Impact Assessments

- Fewer than half of the respondents chose to answer any questions on impact assessments (Qs 44-48).
- In terms of those who share protected characteristics, respondents focused on women, disabled people, those within ethnic minority groups, sexual orientation and age. While views on the proposals were largely positive, it was felt that there is a need to engage with these groups and communicate with them utilising a variety of approaches.
- The key impacts on island communities were felt to be limited services available and the cost of accessing these services.
- Respondents felt that these proposals would help to reduce socioeconomic disadvantage.
- It was felt that the proposals would lead to improvements for young carers.
- There could be economic benefits both to businesses and to carer employees.

# Introduction

## Background

Unpaid carers provide care and support to family members, friends and neighbours. The people they care for may be affected by disability, physical or mental ill health, frailty or substance misuse. A carer does not need to be living with the person they care for. Anyone can become a carer at any time in their life, and sometimes for more than one person at a time. Carers can be any age from young children to very elderly people. While caring can be a positive experience for the carer and the cared for person and carers play a crucial role in providing support, caring is also associated with a higher risk of poverty, poor mental wellbeing and physical health and can restrict social, education and employment opportunities.

Figures show an estimated total of around 685,000 carers living in Scotland, including 30,000 young carers. This means that around one in eight of the Scottish population are involved in providing care and support to a family member, friend or neighbour in order for them to continue to live within their community. It is thought that around three in five people will at some point in their lives be a carer. There are also likely to be other individuals who do not identify themselves as carers but nonetheless perform this role.

Carers UK estimate that the value of support provided by unpaid carers in Scotland is around £10.8 billion each year. In April 2022, there were over 81,000 carers in Scotland in receipt of Carer's Allowance and women make up 69% of the current Carer's Allowance caseload. The Scottish Government has provided £209 million in Carer's Allowance Supplement since its launch in September 2018.

## The Consultation

On 28 February, the Scottish Government launched a consultation seeking views on proposals ahead of the introduction of Scottish Carer's Assistance. This consultation paper outlined the Scottish Government's proposals for how Scottish Carer's Assistance will work when it is first launched, including making links to wider support in areas such as social care, employability, education and bereavement. It also set out proposals for a new extra payment for people with multiple caring roles, and for five priority changes to Scottish Carer's Assistance eligibility that could be made in future. The consultation asked respondents:

- To consider how Scottish Carer's Assistance should work from launch.
- To provide views on the proposed Carer's Additional Person Payment and how the Carer's Allowance Supplement should be paid in future.
- To consider future eligibility changes.

- Whether a new form of support should be considered for those with long-term caring roles.

The consultation ran until 23 May 2022. Findings from the analysis of consultation responses will feed into development of Scottish Carer's Assistance.

The consultation contained 48 questions, of which 17 were closed and 31 open.

## Respondent profile

In total, there were 192 responses to the consultation, of which 41 were designated as being from organisations and 151 from individuals. A list of all the organisations that submitted a response to the consultation is included in Appendix 1. Organisational responses included a joint response from the National Carer Organisations including Carers Scotland, Coalition of Carers in Scotland, Carers Trust Scotland, Shared Care Scotland and Minority Ethnic Carers of People Project (MECOPP). Organisations were assigned to respondent groupings to enable analysis of any differences or commonalities across or within the various different types of organisations that responded.

As shown, the highest number of organisation responses was from campaigning / advocacy organisations (17), followed by third sector organisations (10) and third sector (carer) organisations (5). Information on the category applied to each organisation is provided in Appendix 1.

**Table 1: Respondent profile**

	Number	% *
Campaigning / advocacy	17	9
Health organisation	3	2
Local authority	3	2
Representative Body / Association	3	2
Third sector	10	5
Third sector (Carer)	5	3
<b>Total organisations</b>	<b>41</b>	<b>21</b>

Individual	151	79
<b>Total respondents</b>	<b>192</b>	<b>100</b>

\* figures may not add to 100% due to rounding

## Methodology

The analysis and reporting of responses was carried out independently by a research team contracted by the Scottish Government.

Responses to the consultation were submitted using the Scottish Government consultation platform Citizen Space or by email. A small number of respondents submitted a response which did not answer the specific questions. These responses have been analysed and incorporated into the report at the relevant sections.

A small number of organisations also consulted their membership and their views have been included in our analysis.

The Scottish Government commissioned 4 consultation events, with the Health and Social Care Alliance Scotland (the Alliance) and Engender who conducted 2 each. A total of 25 individuals attended these events. A further 5 engagement events were undertaken with organisations and reached over 60 carers, including events seeking to take views from particular communities such as rural carers and speakers of Polish or Urdu. While the questions posed at these events did not follow the structure of the consultation, questions reflected its core themes. By and large, the same issues were raised in responses to the consultation and at consultation events. Where different issues were raised at consultation events, these are highlighted in the report.

It should be borne in mind that the number responding at each question is not always the same as the number presented in the respondent group table. This is because not all respondents addressed all questions. This report indicates the number of respondents who commented on each question. When referring to respondents who made particular comments, the terms 'a small number', 'a few' and so on have been used. While the analysis was qualitative in nature, with the consultation containing only a limited number of quantifiable questions, as a very general rule of thumb it can be assumed that:

- 'A very small number' indicates around 2-3 respondents;
- 'A small number' indicates around 4-5 respondents;
- 'A few' indicates around 6-9;
- 'A small minority' indicates around more than 9 but less than 10%;

- 'A significant minority' indicates between around 10-24% of respondents;
- 'A large minority' indicates more than a quarter of respondents but less than a half;
- 'A majority' indicates more than 50% of those who commented at any question.

Some of the consultation questions were composed of closed tick-boxes with specific options to choose from. Where respondents did not follow the questions but mentioned clearly within their text that they supported one of the options, these have been included in the relevant counts.

The researchers examined all comments made by respondents and noted the range of issues mentioned in responses, including reasons for opinions, specific examples or explanations, alternative suggestions or other comments. Grouping these issues together into similar themes allowed the researchers to identify whether any particular theme was specific to any particular respondent group or groups. Where any specific sub-group(s) held a particular viewpoint, this is commented on at each relevant question.

When considering group differences however, it must also be recognised that where a specific opinion has been identified in relation to a particular group or groups, this does not indicate that other groups did not share this opinion, but rather that they simply did not comment on that particular point.

While the consultation gave all who wished to comment an opportunity to do so, given the self-selecting nature of this type of exercise, any figures quoted here cannot be extrapolated to a wider population out with the respondent sample.

The remainder of this report presents a question-by-question analysis of responses to both closed and open questions.

# Scottish Carer's Assistance from launch

## A service that works well for carers

The consultation paper set out in its introduction that Scottish Carer's Assistance when launched will broadly mirror how Carer's Allowance works, meaning the core eligibility criteria will remain the same as Carer's Allowance initially. In the consultation the Scottish Government set out that the reason for this is to protect carers' existing support and to avoid creating a 'two tier system' where people in Scotland who are getting Carer's Allowance from the Department for Work and Pensions are treated differently from those getting Scottish Carer's Assistance. However, the consultation proposed some changes to how the current benefit works, including processes for challenging a benefit decision and clear timescales for this. Support would also be paid to carers when the person they care for is challenging a change to their disability benefits.

The consultation paper noted that when Scottish Carer's Assistance is first launched, the service provided will be designed based on user research and ongoing user engagement, so that it meets carers' needs. The paper also noted that with the development of Social Security Scotland, the Scottish Government has opportunities to link Scottish Carer's Assistance into wider carer services and support. Once launched, there will be ongoing work with carers and support organisations to understand how well the system is working and to identify any changes needed.

The first consultation question asked:

***Question 1: Please give us your views on how Scottish Carer's Assistance services could be designed to suit carers' needs (For example, in terms of how carers can apply for benefits, report changes that may affect their benefits, get payments, or get information or notifications about their benefits).***

A total of 164 respondents made comments on this question. Types of answers generally tended to fit into the following three broad categories:

- Suggestions regarding the best means of communication (e.g. online, phone) for applications, receiving information and notifications, and reporting changes.
- Recommendations about the processes involved and the types of support needed by carers when dealing with Scottish Carer's Assistance services.
- Concerns about the rules surrounding the current Carer's Allowance and suggestions for how these should be amended for Scottish Carer's Assistance.

Amongst suggestions about the best forms of contact with Scottish Carer's Assistance services, the largest numbers (a large minority comprising two in five respondents) cited an online system or platform or online accounts; these were viewed as the easiest and quickest methods of submitting and tracking applications, reporting changes and receiving notifications. Further advantages to carers of an online platform included saving time on the phone, being able to speak to staff online and being able to use online functionality at any time of day and night. An individual respondent noted that "Carer's Allowance has been great to support people with during lockdown as it can be completed and submitted online, without needing an account". Another individual mentioned that:

"Definitely being able to do more things online being dyslexic myself the form at the moment is so long and requires me to get someone else to help me with this but online I am able to spell check so makes it much quicker."

A few respondents put forward similar advantages of using email (good for information provision and time-saving for carers) or secure mobile phone applications (also known as apps).

However, significant numbers of respondents (including almost half the organisations) thought there was a need for a choice of contact methods or formats because of digital exclusion concerns (e.g. carers not being confident with computer technology).

Significant numbers of respondents were in favour of communication by phone, albeit with caveats, stating there should be no waiting, direct line availability where carers could speak to a person and phone option availability for longer hours. Slightly smaller though still significant numbers wanted a postal or paper-based option, with the suggestion that this would be desirable for older carers and those without access to the internet. A text service was deemed helpful by a few mainly individual respondents for occasions when carers cannot get to a computer.

An in-person or face-to-face option was recommended by a small minority, mainly consisting of organisations. It was reasoned this would offer help with completing forms, with recommendations for visits from benefits advisors or local community-based venues being made available for meetings.

A few respondents (almost entirely organisations) cited the importance of inclusive formats regarding information provision, with requests for BSL, Braille and multiple language versions and interpreting services to be made available. Plain English and large print were also advocated to enable ease of reading.

Regarding the processes involved in accessing Scottish Carer's Assistance services, the largest numbers of respondents (a large minority including a



majority of organisations) requested that these should be as simple and straightforward as possible. Ease of understanding, ease of making changes, ease of completion of forms, less duplication of information provision and not having to set up brand new applications for each time Scottish Carer's Assistance is applied for were all suggested. A small number of individuals thought it would be a good idea for Scottish Carer's Assistance processes to take on board the arrangements for the Universal Credit system or the Tax Credit system, commenting positively on these as demonstrated by the following:

"I feel the Journal arrangement which Universal Credit has is a very good tool indeed to report changes or simply seek advice or pass on information. It has been very efficient for me in the past. Due to caring role, I simply do not have the time to hang on, press this number, press this option then hold again etc. on telephone. I feel the new Scottish Carer's Assistance should consider this "journal" arrangement. This Journal arrangement is a good way of exchanging info from both sides in a quick and efficient way."  
(Individual)

A significant minority highlighted a need for quicker processes. Complaints were made about lengthy forms, time spent on the phone, postal evidence taking a long time to process and lengthy waits before receiving any payments. In terms of the latter, quicker payment adjustments and Scottish Carer's Assistance payments being made as soon as disability payments are granted to a cared for person were requested. A campaigning / advocacy body requested fast tracking of support specifically for carers of the terminally ill.

Provision for more support in applying for Scottish Carer's Assistance was recommended by a significant minority, including almost half of responding organisations. Help from carers charities and carers centres was suggested in order to assist with form filling and also with redeterminations and appeals. There were a small number of suggestions that promotion of such support could be publicised at GP surgeries or Citizens Advice Bureaus. A significant minority also wanted more clarity about procedures, for example eligibility criteria, information that applicants need to provide, the circumstances under which Scottish Carer's Assistance services need to be informed about changes, and letting carers know when they need to make contact. A respondent attending a consultation event noted that carers need to know who to approach to obtain advice and support, for example, to obtain clarity on qualifying benefits or how a carer can demonstrate eligibility.

A few respondents urged payment dates and procedures to offer more flexibility, including options of weekly, fortnightly or monthly payments; a local authority reasoned:

“Payments should be similar to Carer’s Allowance with an option for weekly payment. However, the other preferred payment option to be monthly rather than current 4-weekly as this allows the claimant to budget better when in receipt of UC which is monthly based.”

Regarding benefit payment procedures, there were a small number of respondents who wanted direct payments into bank accounts to continue, though one individual desired an option for collecting cash from a Post Office.

A large minority of respondents from most sub-groups thought that **eligibility for Carer’s Allowance was too restrictive and advocated for Scottish Carer’s Assistance to be more accommodating**. A wide variety of situations and areas for which it was thought the rules needed reviewing were suggested. Respondents tended to reiterate these themes throughout the consultation, and they included:

- Recognition for carers who care for more than one disabled person, so that all hours spent caring can count towards getting Scottish Carer’s Assistance.
- Increasing or removing earnings restrictions.
- Recognition of shared caring roles, so that more than one person can get Scottish Carer’s Assistance when caring for the same person.
- Payments made based on the hours spent caring (e.g. in cases where caring hours fluctuate).
- Scottish Carer’s Assistance should continue once the carer is in receipt of State Pension.
- Carers for family members without qualifying benefits should become eligible for Scottish Carer’s Assistance.
- Payments should be backdated for more than 3 months, amid concerns that there is a strict 3 month time limit for this.
- Scottish Carer’s Assistance should not be classed as income in low-income benefits.
- The ‘cliff edge’ for Scottish Carer’s Assistance should be removed when a cared for person dies or goes into a care home (without elaborating on whether this should be in the form of extending payment periods or a taper).

There were also a few requests from organisations for increases to Carer’s Allowance, Scottish Carer’s Assistance or the Carer’s Additional Person Payment, for instance to those in remote communities or to counteract the effects of rising living costs. Respondents suggested increasing the payment to the National Living Wage or the Real Living Wage.

A significant number of mainly individual respondents also had concerns about how Scottish Carer's Assistance would affect other benefits and urged for these not to be negatively impacted. It was suggested that carers should get access to advice in the form of benefit eligibility checks. There were a small number of worries in particular regarding the links between Scottish Carer's Assistance and Universal Credit. Possible deductions from Universal Credit were mentioned together with further knock-on effects of this such as being unable to access utility company discounts. There were also a very small number of queries about the impact on National Insurance payments.

In connection with the above, links to other support and awards were positively viewed by a significant minority. Automated information being provided to cared for persons when they are awarded disability payments to pass onto carers was suggested, as in the following example:

"It was easy for me to apply to the current system as it was linked to my daughter's DLA award, so it would be good if the system continues to be as 'joined up' as possible." (Individual)

Automated offsetting against Universal Credit was also suggested to avoid overpayments.

Finally, a significant minority consisting mainly of third sector and campaigning /advocacy organisations said that there was a need for a flexible, individual-centred approach due to the many differing circumstances and needs within the caring community. This would help give recognition to the huge contribution made by unpaid carers (e.g. in terms of saving the public purse a huge amount of money). There were also a couple of calls for carers to be involved in testing the design of the new Scottish Carer's Assistance.

The next consultation question asked:

***Question 2: Please give us your views on support that Scottish Carer's Assistance could link to that would be helpful for carers***

A total of 146 respondents made comments. A wide range of organisations and forms of support that Scottish Carer's Assistance could link to were recommended. The most frequently mentioned organisations (by a large minority notably including half of the responding organisations) were carer centres. These were generally perceived as being a local source of help for carers in accessing and completing paperwork, being a general source of information and also performing an advocacy role on behalf of carers.

Smaller but still significant minorities mentioned links to carers support groups or organisations (e.g. Carers UK, VOCAL). Similar numbers advocated support from either local or national charities or third sector organisations, some of which focused on help for particular health conditions such as autism

or Parkinson's disease. Specific mentions were made of Quarriers, Takeabreak Scotland, One Parent Families, Marie Curie and the Perth & Kinross Association of Voluntary Service (PKAVS).

Small minorities (around one in twelve respondents) advocated links to the following sources of support:

- Social workers / social work / social services (e.g. for social care support, or referrals for assessments: assessing needs of a child).
- Mental health services or support (e.g. for specific conditions, advice, emotional support).
- Local authorities or other specified Council services (e.g. Welfare Rights Department / Officer), with a suggestion to automatically alert the relevant local authority on a carer's status.

A few respondents recommended links to the Citizens Advice Bureau, seen as a provider of free, impartial advice to carers and advocacy and support in upholding carers' rights. Small numbers thought there should be a direct link to the NHS GP system in order to show that a carer was classified as such, for example to aid covid vaccinations and to enable direct referrals or self-referrals.

Types of support to which Scottish Carer's Assistance could link were suggested, mainly focused on getting information (by a large minority of roughly two in five respondents). The largest numbers (nearly one in three respondents including half of organisations) desired links to or information about other grants or benefits. Regarding benefits, information as to how entitlements to other benefits (e.g. cared for persons DLA/PIP, Universal Credit or Carers Credit for National Insurance) are impacted by receiving Scottish Carer's Assistance or automated checks for entitlements to other benefits upon application for Scottish Carer's Assistance were the main focus, for example:

“...there must also be links to sources that show what other support the carer can access. For example, a benefit checker like our advice.scot benefit calculator is a resource that can quickly find the full entitlement of whoever uses it. This kind of resource is important in ensuring that the carer can maximise their income and be better prepared for the time investment of providing care.” (Campaigning / Advocacy organisation)

A wide variety of links to forms of grant support (both actual and desired) were suggested. These included: help with household and fuel bills, a warm homes discount, subsidised broadband, council tax reductions, bus passes, cinema / theatre / leisure discounts, self-care grants, aid with financial stress, a Scheme of Assistance to get financial support for home adaptations, personal

mobility solutions, free dental care, free optician care, military compensation (for veterans) and support for hospital travel.

A significant minority of mainly organisations thought that having a central gateway for signposting information about all relevant services would be useful, in order to point the way to organisations able to help. There were suggestions that this should be accessible at the point of application for Scottish Carer's Assistance, with it noted that there is no such function associated with Carer's Allowance.

A few respondents each cited a need for links to support in obtaining (free or cheap) financial advice, and for aid with the application process for Scottish Carer's Assistance (e.g. information about how to apply, information provision in different languages and to reflect the often complex roles of carers), with a claim that such advice helps with award provision at the first attempt. A very small number wanted links to support, with legal advice for continuity planning, wills or powers of attorney, and to protect the cared for person's interests.

There were also a significant minority of requests for easier access to support and advice generally. It was noted that carers have little spare time and that access is particularly difficult for carers in remote and rural communities for whom there are no nearby carer centres. Aids were suggested including contacts with relevant people and organisations, more online visibility, online platforms being available, and the Social Security Scotland website providing relevant links. There were also recommendations to have a more user-friendly service and having more local links. Better phone support was also recommended by a small number of respondents.

Similar numbers urged links to respite care options in order to give carers a break from caring duties. A few recommended links to support for carers' own health.

Small numbers of respondents each advocated links to education and training opportunities and help with getting into work (e.g. provision of careers advice).

## **Scottish Carer's Assistance rules about residence**

The consultation paper explained that Scottish Carer's Assistance rules about residence will be based on where the carer lives, and not where the person they care for lives. Rules about where a carer needs to live to receive support will be different from Carer's Allowance, as Scottish Carer's Assistance will only be able to provide support to people who are living in Scotland, or have strong links to Scotland in certain circumstances. The Scottish Government is also looking at how the 'past presence test' should work. At the moment, this means people need to have been living in Scotland, England or Wales for two of the past three years. Following recent appeals against these rules, the

Scottish Government has reduced the ‘past presence test’ for Child and Adult Disability Payments. The aim is that carers and the people they care for will be treated in the same way in relation to residence requirements. If a different ‘past presence test’ is to be used, the Scottish Government would need to work with the Department for Work and Pensions to look at the impact of this. The Scottish Government noted in the consultation that they are keen to ensure that carers getting Scottish Carer’s Assistance could still receive any extra amounts in their benefits that carers getting Carer’s Allowance would get, for example, Carer Premiums paid in Income Support.

Questions three, four and five asked:

**Question 3: Do you agree or disagree with the proposed residency criteria for Scottish Carer’s Assistance?**

**Question 4: Please write the reason why you agree or disagree with the proposed residency criteria for Scottish Carer’s Assistance, or any other information you want to share on this question.**

**Question 5: Please give us your views on the ‘past presence test’ which should be used for Scottish Carer’s Assistance.**

## The proposed residency criteria

As shown in the following table, a majority of those answering question 3 (68%) agreed with the proposed residency criteria for Scottish Carer’s Assistance.

**Table 2: Level of agreement with the proposed residency criteria for Scottish Carer’s Assistance**

Q3	Number (percentage *)			
	Agree	Disagree	Unsure	Not answered
Organisations (n=41)	19	5	7	10
Individuals (n=151)	100	14	30	7
Total respondents (n=192)	119	19	37	17
<b>Total respondents answering question (n=175)</b>	<b>119 (68%)</b>	<b>19 (11%)</b>	<b>37 (21%)</b>	

\* figures may not add to 100% due to rounding

A total of 123 respondents provided comments on this question, almost all of these positive. The largest number, a large minority of mostly individuals,

agreed that the carer should need to live in Scotland or that current residency should be the main consideration, with further approval by a few of these regarding the 'ordinarily resident' and 'habitually resident' definitions. The main reason given for this point of view was that the funding is Scottish. A few respondents viewed this approach as common sense and fair. Similar numbers (almost all of whom were organisations) viewed the proposed rule changes positively, saying they would bring Scottish Carer's Assistance in line with rules for other Scottish benefits and that it makes sense to have a uniform approach. A very small number perceived the proposals as helping to widen access or ensure equality of support for carers.

A significant minority of one in five (mostly individuals) viewed it as not being possible to genuinely care full-time for someone living outside the carer's area or a long way outside Scotland, stating there was a need for the carer to live with or close to the cared for person. Respondents voiced concerns over the system being open to fraud in this respect with evidence needed of genuine caring. A few (almost all individual) respondents thought that both the cared for person and the carer should live in Scotland to access Scottish Carer's Assistance. However, a small number of individuals disagreed, maintaining that it was not possible for some carers to live close to the cared for person because of issues such as expensive housing and other family-related travel reasons.

There were a significant number of calls (in particular from one in four organisations) for flexibility in the arrangements, with concerns raised over people falling through the gaps owing to differences between devolved and reserved benefits. Examples were given of cases involving those arriving from another country, and particularly where a carer, close to the Scottish border was providing unpaid care to a Scottish resident. To resolve these issues, recommendations were made to make reciprocal arrangements and agreements with the Department for Work and Pensions and enacting the proposal to include carers with 'strong links to Scotland'.

Significant numbers of mainly organisations either voiced approval about reducing the 'past presence test' (e.g. to be consistent with Child and Adult Disability Payments) or cited concerns over its use, with a few calls to reduce the residence period further or eliminate it entirely so that the carer can receive support as soon as they move to Scotland. It was envisaged that recent arrivals could have significant challenges and hurdles to overcome in addition to caring responsibilities.

A couple of campaigning / advocacy organisations saw a need to extend Scottish Carer's Assistance to people subject to immigration controls, with one of these pointing out that there are some groups not excluded from receiving other benefits.

Very small numbers voiced the following points of view:

- Scottish Carer's Assistance should be for Scottish people (e.g. those brought up in Scotland) or carers need to have been in Scotland for a lengthy period of time to receive entitlements (e.g. more than 2 years unless returning from living abroad).
- Agreement with initially keeping the regulations as they are, to maintain continuity and to ensure recipients of Carer's Allowance are not disadvantaged.
- Concerns over the tests for 'ordinarily resident' and 'habitually resident'. For instance, a representative body stated the following: "...paragraph 2919 in the "residence requirements" of Annex B (which is intended to amplify the main consultation text) does not clarify adequately the distinction between being 'ordinary resident' in Scotland and 'habitually resident' in the 'common travel area' that is defined as "the UK, Ireland, the Isle of Man, and the Channel Islands", unless it is the intention to say that a person living in Scotland could claim Carer's Assistance, even if their 'main residence' was elsewhere in the UK. If that isn't the intention then the policy requires further clarification; if it is the intention then we disagree."

## Views on the 'past presence test'

A total of 114 respondents made comments at question 5. Many of these echoed positions stated at the previous question. The largest numbers, two in five respondents, agreed with the 'past presence test' as used with the proposed time reduction for Scottish Carer's Assistance, for largely the same reasons given at question 4. Two out of three years residence was seen as being too long and a preference was agreed for 26 of the last 52 weeks; this was viewed as still being sufficient to deter people moving to Scotland simply to receive additional benefits.

However a few, mostly individual, respondents stated a preference for the 'past presence test' under the current Carer's Allowance rules, reasoning that fewer people would 'fall through the cracks' and that this would act as a disincentive to stop people abusing the Scottish benefits system. An additional significant minority stated agreement with the 'past presence test' in general but it was unclear from their answer whether this was with reference to the current Carer's Allowance rules, or to the reduction for Scottish Carer's Assistance.

A significant minority of around one in five respondents (including most campaigning / advocacy organisations) disagreed with the use of the 'past presence test'. It was envisaged that if a carer lives in Scotland, can prove residency, and provides full time care they should be able to apply for Scottish Carer's Assistance. Other arguments given for this standpoint were that the



'past presence test' presents an unnecessary barrier to support, that it has negative impacts on the cared for person, and that its removal would help to embed a human rights approach in Scottish Carer's Assistance.

A few respondents agreed that there was a need to work with the Department for Work and Pensions and the other UK nations to examine the impact of changes to the 'past presence test' (e.g., changes to the number of applicants). There were a small number of concerns expressed over how the divergence in rules from the rest of the UK might lead to abuses of the system.

Similar numbers cited concerns over how carers moving to Scotland from the rest of the UK or abroad (including those moving back home), for example to care for a relative, will be treated. There were calls for devolved benefits to apply in these cases, amid concerns over adverse effects on those cared for if carers were disincentivized by a lack of eligibility. In a similar vein, there were a small number of concerns over how immigrants or refugees unable to meet the 'past presence test' requirements would be treated.

## When a carer is not happy with a decision

The consultation paper noted that carers will have the right to ask for decisions on their eligibility for Scottish Carer's Assistance to be reviewed, through re-determinations and appeals. As part of the re-determination process, a new team will look at the application and any other information provided by the carer and make a new decision. The carer can then appeal if they disagree with the decision made in the re-determination. Currently, if a carer disagrees with the decision made by the Department for Work and Pensions, they can ask for the decision to be looked at again as part of a 'mandatory reconsideration'. Carers need to do this within one month but there are no set timescales for how long the Department for Work and Pensions needs to do this.

The consultation paper pointed out that the Social Security (Scotland) Act 2018 already sets out the processes for appealing decisions and the timescales for appeals against decisions made by Social Security Scotland. Currently, carers have 31 days from a re-determination decision to apply for an appeal in most cases. The Scottish Government is proposing that carers should have 42 days from a decision to ask for a re-determination and that Social Security Scotland should have 56 days to carry out the re-determination following a request. Carers would still be able to submit a late request if they have good reason for this. They can also apply for an appeal if the re-determination decision is not made on time.

The next questions asked:

**Question 6: Do you agree or disagree with the proposed re-determination timescales for Scottish Carer's Assistance?**

**Question 7: Please write the reason why you agree or disagree with the proposed re-determination timescales for Scottish Carer's Assistance, or any other information you want to share on this question.**

As table 3 demonstrates, many more respondents – across all sub-groups – agreed (73%) than disagreed with the proposed re-determination timescales for Scottish Carer's Assistance. Of the organisations that answered this question, campaigning / advocacy organisations were the only sub-group where there was any disagreement with this proposal.

**Table 3: Level of agreement with the proposed re-determination timescales for Scottish Carer's Assistance**

Q6	Number (percentage *)			
	Agree	Disagree	Unsure	Not answered
Organisations (n=41)	24	4	1	12
Individuals (n=151)	94	10	28	19
Total respondents (n=192)	118	14	29	31
<b>Total respondents answering question (n=161)</b>	<b>118 (73%)</b>	<b>14 (9%)</b>	<b>29 (18%)</b>	

\* figures may not add to 100% due to rounding

A total of 113 respondents made comments at question 7. Most answers reflected the widespread agreement at question 6.

Three main themes were expressed. The largest numbers of respondents – a large minority – commented that the proposed re-determination timescales seemed fair, reasonable or an improvement on the current rules, often without expanding further. Similar numbers stated that giving more time to request a re-determination would be helpful, with comments that this would help to enable a good case to be put together, or for information to be gathered and submitted. A significant minority added that it would allow time for carers to contact and get support and advice from relevant sources such as rights officers, welfare advisors, lawyers and the Citizens Advice Bureaux. It would also give time to get information about short-term financial assistance during the interim period of possible suspension of Scottish Carer's Assistance. Slightly fewer respondents thought the longer time period would make life

easier for carers, pointing out that their priority was care, it was easy for them to forget things, and that they were generally short of time.

Smaller but still significant minorities agreed that bringing re-determination timescales into line with other Scottish benefits would be good for consistency and would help to make things simpler.

Small numbers of respondents each cited that they were in favour of the following:

- Carers either having the right to appeal if the re-determination timescale has lapsed, or having an extension of the timescale, with a need to take circumstances into account.
- Social Security Scotland having a set time limit (56 days) within which to carry out a re-determination; a campaigning / advocacy organisation pointed out that this was less than the 3-month timescale normally associated with other Department for Work and Pensions benefits.
- Having the same time periods for a re-determination request and conducting the re-determination, or for an appeal and its adjudication, to avoid confusion.
- Very small numbers thought that the appeals process should be quicker or that the timescale rules for re-determinations should be made clearer.

Amongst a significant minority of respondents who both agreed and disagreed with the proposed re-determination timescales, there was a view that decision making processes by Social Security Scotland should not need a longer period than carers have to request a re-determination. It was intimated that both the current Department for Work and Pensions open period and the 56 day proposal were unacceptable as this increases the risk of financial hardship for carers. The 42 day period as proposed for re-determination requests was supported by a couple of respondents.

Amongst the small minority of respondents who disagreed with the proposed timescales, the largest numbers - a few individuals - regarded these as being too long, citing this added to complications, administrative costs and stress for carers waiting to find out if they would be entitled to the allowance. Alternative suggestions centred on the current 31 days used for the devolved low income benefits and Young Carer Grant, as being adequate. A couple of respondents, however, thought that the proposed timescales should be longer or that the time limits should be removed entirely.

Finally, a campaigning / advocacy organisation cited the following specific point, and an issue perceived as needing rectification:

“Due to successful legal challenges to the DWP’s revision and appeals process for Carer’s Allowance, claimants have, in

practice, 13 months after the date of a decision to start the appeal process. For Scottish Carer's Assistance, this will be reduced to 42 days, with an extension to up to 12 months only if good reason can be shown for the delay. There is no reason that the Scottish system needed to replicate the two-stage approach to challenging a decision that was brought in by the DWP as part of the ... UK government welfare reforms. This change has rightly been criticised as a barrier to justice and it is disappointing that a similar system has been introduced into the Scottish system. However, as such a system has been introduced, it is vital that data is collected and analysed to see if this two-stage approach is working effectively, or if it is, indeed, acting as a barrier to justice for claimants wishing to challenge decisions. Whilst we welcome the commitment to ensure re-determinations are dealt with in a timely manner, there is a danger that if the agency's deadline for completing a re-determination is missed, claimants could find themselves having to appeal to the Tribunal, even if Social Security Scotland is able to later make a decision that is in the claimant's favour. This is because the tribunal rules for Scottish benefits, unlike those for UK wide benefits, do not allow an appeal to 'lapse' if the Agency makes a favourable decision after the appeal has been lodged. We would urge the Scottish Government to amend the tribunal rules to resolve this issue." (Campaigning / Advocacy)

## When payments need to stop temporarily to check entitlement or protect carers

The Scottish Government is proposing that Scottish Carer's Assistance should work differently from Carer's Allowance in terms of when payments of the benefit may be stopped temporarily. The Scottish Government plans to suspend payments (so that carers would not receive them for a period) in only a very small number of circumstances. For example, to prompt a carer to provide information which Social Security Scotland needs, to check they are entitled to support, or in rare circumstances where Social Security Scotland pays Scottish Carer's Assistance to a third party on behalf of a carer and suspension is necessary to protect the carers payments. Carers would be able to challenge a decision to suspend their payments if they disagree. When a suspension has ended and a carer was entitled to payments during the suspension, they would receive backdated payments for the full amount of their entitlement. Questions 8, 9 and 10 asked:

***Question 8: Do you agree or disagree with the proposals on when payments of Scottish Carer's Assistance should be suspended?***

**Question 9: Please write the reason why you agree or disagree with the proposals on when payments of Scottish Carer's Assistance should be suspended, or any other information you want to share on this question.**

**Question 10: Please give us your views on what should happen to payments of Scottish Carer's Assistance when a cared for person's qualifying benefit is suspended.**

As demonstrated in table 4, 64% of those answering question 8 agreed with these proposals.

**Table 4: Level of agreement with the proposals on when payments of Scottish Carer's Assistance should be suspended**

Q8	Number (percentage *)			
	Agree	Disagree	Unsure	Not answered
Organisations (n=41)	20	3	6	12
Individuals (n=151)	83	24	24	20
Total respondents (n=192)	103	27	30	32
<b>Total respondents answering question (n=160)</b>	<b>103 (64%)</b>	<b>27 (17%)</b>	<b>30 (19%)</b>	

\* figures may not add to 100% due to rounding

A total of 115 respondents made comments in response to question 9. The largest numbers of respondents (a large minority consisting of a mix of those who agreed and disagreed at question 8) pointed out that the stoppage of payments has a big effect and that consideration of this was welcomed. Circumstances where carers had no other form of income, where financial hardship would be caused, and where carers had to give up paid work to care were given as examples.

A significant number of respondents (all of whom agreed at question 8) were of the view that the proposals regarding the suspension of Scottish Carer's Assistance payments were fair, in terms of the circumstances mentioned, or that it was a fairer process than that of the Department for Work and Pensions. It was seen as too easy for the current Carer's Allowance payments to be suspended, increasing the stress on carers. Furthermore, similar numbers from a wide variety of sub-groups thought the reasons for suspension given in the proposals were valid, furthermore agreed suspension should only take place in severe or serious circumstances. A small number added that they approved of the approach and ethos behind it.

Approval was expressed by a significant minority with the perception that Scottish Carer's Assistance payments will not be stopped while qualifying disability payments are suspended or being updated while decisions are pending regarding appeals or re-determinations. A small number added that the proposal would not involve any unnecessary impact on carers.

A mix of respondents who agreed and disagreed at question 8 said it was reasonable to have suspensions in rare cases. Instances where fraud or financial abuse were suspected, where the carer's role is in question or where there were issues with a third party were identified in this context.

Significant numbers of respondents focused their remarks on the impact of stopping qualifying disability payments. It was pointed out by a significant minority (consisting of a mix of those who agreed and disagreed at question 8) that while qualifying disability payments may stop, the caring role does not. For instance, several respondents noted that if a cared for person was in hospital, the carer would still be visiting, liaising with the hospital and dealing with laundry, food and potentially accommodation, all of which involved costs and time.

Other points mentioned by small numbers of respondents in broad agreement with the proposals were as follows:

- It is reasonable for applicants to provide all information necessary to provide proof of entitlement.
- Ongoing payments will protect the person being cared for (e.g. care packages can collapse otherwise).
- Agreement with proposals for missed payments to be backdated or payments due during suspension being provided on resolution.

Amongst the smaller group of respondents who tended to disagree with the proposals, an overriding theme for most was that they were against suspensions of payments in any scenarios, or that payments should continue for transition periods until resolution for all cases.

A variety of reasons were given for not being in favour of suspending payments in any scenario, each given by a few or very small numbers of respondents, as follows:

- It takes time for carers to provide relevant information or paperwork, particularly if carers are having difficulties with the system for doing so, or where circumstances dictate that this is not a priority (e.g. being ill themselves).
- The extra stresses and worries incurred by carers.

- Concerns about the cared for person suffering if payments to the carer were suspended.
- There should be no reason to suspend payments if the new system was robust and the carer meets the eligibility criteria.

However, a couple of respondents cited a preference for payment suspensions in view of concerns about large overpayments or repayments being necessary at a later date due to an adverse adjudication. Single respondents were in favour of suspensions if the cared for person was in hospital or respite care, pending a re-determination decision or where the qualifying disability benefit has been stopped.

Finally, there were small numbers of calls for clear information regarding appeals and suspension timelines.

A total of 137 respondents chose to comment at question 10. A large minority (one in four respondents) said that Scottish Carer's Assistance payments should continue until a cared for person's situation is resolved, for instance on a report being concluded or until a final decision is made about a cared for persons qualifying benefit status. These respondents advocated for payments to continue as long as the cared for person is taking action to try to have their benefit reinstated or until the reconsideration, re-determination and appeal process is complete. In cases where the final decision went against the carer or cared for person (e.g. the qualifying benefit of the cared for person was terminated at the end of a suspension), a campaigning / advocacy organisation and a representative body thought overpayments of Scottish Carer's Assistance during the suspension period should not be expected to be returned. However, another campaigning / advocacy organisation and an individual thought these should be reclaimed.

Alternatively, smaller but still significant numbers of respondents advocated that payments should continue if the carer is still providing care. Slightly higher numbers of mainly individual respondents wished to emphasise that the caring role did not end when a cared for person's qualifying benefit stops, with a few adding that proof should be provided that this was the case.

A large majority, including more than one in two organisations, had concerns about leaving carers in financial trouble if the Scottish Carer's Assistance payments were cut off suddenly. Negative views were noted regarding the current Carer's Allowance approach, with points made about carers being unlikely to have much or any employment income and the knock-on negative impacts on other benefits, as detailed in the following example from an individual respondent:

“...the effect on cascade of benefits would be unthinkable and so stressful, there is only me and my adult child who I claim PIP and UC for as their

DWP appointee and I claim CA, IS, HB and CTB, I can't imagine the cascade of income loss if PIP needed to be appealed to our family, it was recently re-awarded for another 6 years but even though I've claimed it many (6) times DLA and PIP since 04' it still is very worrying time waiting to hear back every time... so knowing there wouldn't be an immediate suspension of everything while it was being reconsidered or appealed would provide some stress relief.”

To this end, these respondents were in favour of carers being supported generally to avoid a cliff edge situation for the carer and possible negative impacts on the cared for person. Support from a significant minority was noted about instigating a run on, grace or notice period before stopping or suspending payments to give carers time to adjust to the changed situation and make other arrangements. A small number of suggestions were made about the length of time this period should be, ranging from 4 weeks to 12 weeks. A very small number recommended that payment amounts should be reduced or tapered off to mitigate sudden changes.

A few respondents thought it was important to have flexibility in respect of the capacity to perform decision-making on an individual or case-by-case basis (e.g. for hospital stay situations).

Suspending Scottish Carer's Assistance payments on suspension of a cared for person's qualifying benefit was advocated by a significant minority, albeit in slightly smaller numbers than those advocating that these continue. The main reason given was that carers would be unlikely to be able to afford to pay back Scottish Carer's Assistance received in the interim period if the final resolution went against the cared for person. However, many of these respondents were in favour of backdated payments of Scottish Carer's Assistance being made if the qualifying benefits were reinstated, with one suggestion that interest should be added to these.

A few respondents thought payments of Scottish Carer's Assistance should be stopped entirely, reasoning that the cared for person's eligibility was part of the qualification requirements or simply that Social Security Scotland needs to have the powers to stop payments, without expanding on this further.

A significant number of respondents (particularly campaigning / advocacy organisations) foresaw a need to signpost or communicate sources of support and advice to carers to mitigate losses of Scottish Carer's Assistance payments.

Finally, a significant minority thought that Scottish Carer's Assistance payment suspension or stoppages should depend on the reason for suspension for the cared for person's qualifying benefit. There was general consensus amongst these respondents that Scottish Carer's Assistance payments should stop or be suspended if fraud or abuse of the system was suspected, or if the



suspension was due to reasons within the carer's control (e.g. information provision), and that they should continue in cases where a renewal was taking too long, or where there were system errors or processing mistakes involved.

## Setting the value of Scottish Carer's Assistance awards to £0 instead of suspending or ending the award

The consultation paper noted that the Scottish Government want to provide more stability for carers getting Scottish Carer's Assistance when there are periods where they are not eligible for support. The consultation proposed that setting payments to £0 rather than ending them in certain situations would improve stability. The Scottish Government proposed setting Scottish Carer's Assistance awards to £0 where carers are receiving 'overlapping benefits' to protect access to other support. Scottish Carer's Assistance awards would also be set to £0 for any week where a cared for person's qualifying benefit award is set to £0, for example, when the cared for adult is in hospital for more than 28 days. This would be an improvement to the current system, where an award would end at this point, and would allow support for carers to be resumed more quickly and easily, with no need to reapply.

Additionally, the Scottish Government is planning to set Scottish Carer's Assistance awards to £0 for any week in which a carer earns over the earnings limit. This is intended to prevent overpayments where a carer has earnings that change often, but stop an award from being ended when they are not eligible for support only temporarily. It was proposed that after a carer's award has been set to £0 for six months in a row, the award would then end. Carers would be able to request a re-determination of a decision to set their award to £0 and to appeal this decision if they do not agree with the outcome of the re-determination.

The next questions asked:

***Question 11: Do you agree or disagree with the proposals for when an award of Scottish Carer's Assistance should be set to £0?***

***Question 12: Please write the reason why you agree or disagree with the proposals for when an award of Scottish Carer's Assistance should be set to £0, or any other information to want to share on this question.***

As shown in table 5, 67% of those who answered this question, across all subgroups, agreed with the proposals for when an award of Scottish Carer's Assistance should be set to £0 (109 agreed and 23 disagreed).

**Table 5: Level of agreement with the proposals for when an award of Scottish Carer’s Assistance should be set to £0**

Q11	Number (percentage *)			
	Agree	Disagree	Unsure	Not answered
Organisations (n=41)	16	3	8	14
Individuals (n=151)	93	20	22	16
Total respondents (n=192)	109	23	30	30
<b>Total respondents answering question (n=162)</b>	<b>109 (67%)</b>	<b>23 (14%)</b>	<b>30 (19%)</b>	

\* figures may not add to 100% due to rounding

A total of 126 respondents made comments at question 12. The key theme from a significant minority of respondents was that this offers a more flexible approach or it will be easier as carers will not have to reapply for their benefit. A small number of organisations referred specifically to the flexibility that this offers in allowing for fluctuating earnings and breaks in caring. As commented on by an individual:

“This is a much better and fairer way of doing things and will minimise delay and hardship of waiting for new applications and awards to be made when there are any short-term changes in circumstances or earnings.”

Some respondents – mainly organisations – commented on specific elements of this proposal. There were references to the extension to cover periods where earnings are over the earnings threshold and to the protection this offers in terms of access to additional support and their ongoing payment.

There were a number of references across most respondent sub-groups to the logistical aspects of this proposal, with some respondents noting this will save time and paperwork for both the carer and Social Security Scotland. A number of mainly individuals also commented on this being a sensible and fair approach.

While many respondents agreed with this proposal, there were a few concerns from both individuals and organisations that this should continue to be paid when the cared for person is in hospital for more than 28 days. This was on the basis that the caring role might change but it does not stop. A third sector organisation suggested there should be exemptions in some instances where the qualifying benefit has stopped or been paused due to a prolonged hospital admission. A representative body / association noted:

“While someone is in hospital, their carer is unlikely to be relieved of all caring responsibilities. They will have a different set of responsibilities but will still be required to provide support and assistance during this time. The nature of the support will change, but nonetheless they will still be actively involved in caring for the person and meeting their needs both on a practical and emotional level. Carers are actively encouraged to support their loved one when in hospital, especially where their needs are complex or they have communication difficulties. They cannot be asked to contribute in this way and lose access to their Carer’s Allowance where it assumed they are no longer carrying out caring duties. This also assumes that, for the period a person is in hospital their carer can go and find work or will apply for other benefits thereby creating a more complex benefits system than is necessary”. A few individuals and third sector organisations who had disagreed with this proposal felt it is discriminatory against older people in receipt of State Pension who will not qualify for Scottish Carer’s Assistance, as they do not meet the eligibility criteria. A representative body / association commented: “Older people in receipt of State Pension should not lose the Scottish Carer’s Assistance payment. This payment should be paid along with the State Pension because older people are being unduly penalised when they are still undertaking caring duties and caring duties do not stop on reaching pensionable age. To do otherwise perpetuates ageism.”

Other benefits to this proposal cited by small numbers of respondents included:

- This will help to avoid overpayments as well as avoiding potential delays in receiving funds.
- This will cause less stress as carers will not have to reapply for Scottish Carer’s Assistance repeatedly.

A number of organisations across all sub-groups requested further information or clarity regarding specific elements of this proposal. These included requests for clarity in terms of:

- The circumstances when this would apply so that carers are not left without support at times when they are still playing a key role in a person’s care.
- The rationale for a blanket policy of ending an award after six months where this has been set to £0, as this conflicts with the stated intention to protect this access in cases of overlapping benefits.
- The circumstances in which an award may be set to £0.
- To understand how awards would be resumed across a range of scenarios.

- Whether all individuals entitled to £0 award would be entitled to passported assistance and why this would end after 6 months for some carers.
- How £0 entitlements and restarting entitlements would operate and triggers for this.
- If payments will stop when caring drops below 35 hours threshold.

A small number of organisations felt this proposal should be introduced when Scottish Carer's Assistance is launched.

## Short-term assistance

The consultation paper noted that short-term assistance is a new form of assistance within the Scottish benefits system which provides financial support for people while they challenge a decision to reduce or stop an ongoing payment of certain devolved benefits. The paper explained that this is intended to ensure that people are not put off from challenging decisions by having to manage with a lower income for a period of time. This is paid at a level which maintains the support the person was getting before the decision to stop or reduce their benefits. For Scottish Carer's Assistance, it would not be paid where the decision was to set an award to £0 because the carer is in receipt of an overlapping benefit, is earning over the earnings threshold for a temporary period, or where the qualifying benefit of the person they care for is set to £0.

The Scottish Government is proposing that carers would be able to receive support when the person they care for is challenging a decision to reduce or remove their benefits and is getting short-term assistance. This would be done by treating short-term assistance as a qualifying benefit for Scottish Carer's Assistance. Carers would still face some gaps in support as short-term assistance is only paid during the re-determination and appeal processes. The Scottish Government is also proposing that any Scottish Carer's Assistance paid while a cared for person is receiving short-term assistance would not need to be paid back in most cases.

The next questions asked:

***Question 13: Do you agree or disagree with the proposal to pay Scottish Carer's Assistance to carers when the person they are caring for is receiving short-term assistance?***

***Question 14: Please write the reason why you agree or disagree with the proposals to pay Scottish Carer's Assistance to carers when the person they are caring for is receiving short-term assistance or any other information you want to share on this question.***

**Question 15: Please give us any other views you want to share on the proposals for Scottish Carer's Assistance when it is first launched.**

As demonstrated in table 6, 85% of respondents answering question 13 agreed with this proposal.

**Table 6: Level of agreement with the proposal to pay Scottish Carer's Assistance to carers when the person they are caring for is receiving short-term assistance**

Q13	Number (percentage *)			
	Agree	Disagree	Unsure	Not answered
Organisations (n=41)	23	-	4	14
Individuals (n=151)	110	1	19	21
Total respondents (n=192)	133	1	23	35
<b>Total respondents answering question (n=157)</b>	<b>133 (85%)</b>	<b>1 (1%)</b>	<b>23 (15%)</b>	

\* figures may not add to 100% due to rounding

A total of 102 respondents then went onto provide comments at question 14. Overall, the comments were largely positive, and respondents welcomed this proposal. A significant minority of respondents across all sub-groups agreed, on the grounds that the carer will still have caring responsibilities and they should not be penalised financially during this process.

A slightly smaller number of respondents – mostly individuals – commented that this appears to be fair, that it is sensible, that it is a good idea or that it is logical but provided little by way of additional commentary. A few organisations welcomed this because it helps to protect income and access to other support for carers and can help to avoid the risk of financial hardship which can then have a negative knock-on impact on a cared for person.

A few organisations across all sub-groups noted that the proposal offers a progressive approach which safeguards the rights of carers, will help to maintain the financial stability of carers and offer them some dignity. A third sector organisation commented:

“The approach of maintaining payments while an appeal or challenge is in process is a better option than stopping all financial support. This is a more human rights based approach and will enable some to challenge decisions without losing

benefits. This approach shows that the carer and their caring role is valued alongside that of the cared for person, now receiving short-term assistance. Knowing that any payment incurred during this period will not need to be returned helps those who may have been prohibited from challenging decisions because of financial consequences and gives them a chance to have their say. This approach encourages dialogue and partnership working rather than a dogmatic approach that is dictatorial.”

Another benefit cited by a small minority of respondents – mainly individuals – was that this would reduce stress for carers. A few individuals also noted that this would help to prevent abrupt income loss and provide a safety net or safeguard for carers, with a positive knock-on impact for cared for individuals. There were a small number of comments that carers should not be left in financial difficulty and that many are dependent on this money.

A few respondents – all organisations – raised concerns or queries in relation to this proposal. These included a need for:

- Significant work with the Department for Work and Pensions to ensure that linkages are made. As noted by a campaigning / advocacy organisation:

“Widening entitlement to Carer’s Allowance may create issues for passporting to other supports and for evidencing an individual’s work-related requirements for UC [Universal Credit] and other reserved benefits. At present someone who satisfies the qualifying criteria for Carer’s Allowance automatically has no work-related requirements for UC. If the eligibility criteria for Scottish Carer’s Assistance are wider than for Carers’ Allowance, will the Department for Work and Pensions accept that entitlement to Scottish Carer’s Assistance is sufficient evidence of no work-related requirements for UC?”

- Alignment with other Social Security Scotland benefits to make the whole system easier to navigate and provide stability for carers; as well as consistency across all benefits that are managed by Social Security Scotland.
- Scottish Carer’s Assistance to be related to the person providing care and not the eligibility of the cared for person.
- Consideration of the knock-on effects if a negative outcome occurs e.g., if benefits are stopped for a cared for person this could create a financial shock due to other financial support being stopped.
- Consideration of the decision to exclude those with a £0 award as this could have repercussions on reserved benefits.

- Consideration as to what happens to carer's pension contributions.

A campaigning / advocacy organisation suggested an alternative approach:

“An alternative approach is to allow a run on period of disability and Scottish Carer's Assistance, once entitlement has ended, in all cases. This would both support those who are challenging decisions and provide support for all individuals who see a drop in income when their entitlements end, allowing them to adjust to a lower income.”

Question 15 then asked for any other views respondents wished to share on the proposals for Scottish Carer's Assistance when it is first launched, and 61 provided additional comments, many of which echoed points raised in response to the previous question. A few respondents simply noted their support for this proposal, although a small number of campaigning organisations and a representative body noted that the development of a devolved social security system should meet the six principles outlined by the Scottish Campaign on Rights to Social Security (SCoRSS).

Some respondents referred specifically to the case transfer from Department for Work and Pensions to Social Security Scotland, noting the importance of ensuring this is seamless and quick. A small number of organisations also noted the need for co-operation between Social Security Scotland and the Department for Work and Pensions to ensure that carers do not miss out on any other benefit entitlements and that nobody is affected negatively. There were also a small number of comments of the need for the enrolment process to be simple and easy to complete.

As in response to some previous questions, there were references to eligibility criteria from a significant minority of respondents, with some commenting that those in receipt of State Pension should be entitled to Scottish Carer's Assistance, with some others referring to the earnings threshold which they felt should not be capped at £128 per week. There were also a small number of comments that all full-time carers should receive help with council tax, dental care, etc. in the same way as an individual on income support. Linked to these points, there were also a small number of comments that Scottish Carer's Assistance should be paid to all carers and / or be set at a higher level.

The importance of communicating information about changes was highlighted by some respondents, mostly organisations. There were references to the need for information to be provided to key stakeholders, representative groups and so on, to ensure awareness of any changes and their impacts, and for an inclusive communications strategy. At one of the consultation events, respondents requested information to be provided in a range of formats

across a range of different media. Requests included documents to be provided in an easy read format. There were comments that using social media channels to provide information will miss some carers. There were also a few requests for guidance to be provided to local authorities, representative organisations and other stakeholders. A health organisation suggested that Social Security Scotland should provide an advocacy service that can guide carers through the application process.

Other comments made by single respondents – mostly organisations - included:

- References to changes in legislation that will be required.
- The Scottish Government should make it easier for carers to report income from Scottish Carer's Assistance for taxation purposes by way of a year-end P60 type statement.
- References to the need for adequate IT systems, data collection and analysis.
- A comprehensive review of all carers in Scotland.



## Extra money for carers in Scotland Carer's Allowance Supplement

The consultation paper noted that Carer's Allowance Supplement is a unique payment from the Scottish Government. It is paid to carers who are receiving Carer's Allowance and living in Scotland. Payments are made by Social Security Scotland using information from the Department for Work and Pensions. It was introduced as an interim measure before Scottish Carer's Assistance replaced Carer's Allowance. It is paid every six months, in June and December, and the payment amount this financial year (2022-23) is £245.70.

The consultation set out the Scottish Government intention to continue to pay Carer's Allowance Supplement in the same way as now until the process of transferring carer's benefits from the Department for Work and Pensions to Social Security Scotland is complete. Carer's Allowance Supplement payments will remain separate from payments of Scottish Carer's Assistance. This is because Scottish Carer's Assistance is counted as income in deciding eligibility for some benefits from the Department for Work and Pensions, but Carer's Allowance Supplement is not. Payments of benefits like Universal Credit are not reduced by Carer's Allowance Supplement payments. Once all eligible carers are getting Scottish Carer's Assistance, the Scottish Government will consider how it could be paid differently.

In the future, the consultation suggested that Carer's Allowance Supplement could be paid at the same time as a carer's regular Scottish Carer's Assistance payments. Carers would get more regular payments as most carers currently receive payments weekly or every four weeks. The consultation noted that this would allow any change in circumstances to be reflected in a carer's award more quickly, and thus make over or under payments less likely. However, it also highlighted that this could be more complex for carers who need to report their income to the Department for Work and Pensions or HM Revenue & Customs. An alternative approach could be for Carer's Allowance Supplement to be paid as it is now, with payments every six months. The consultation noted that this would mean that qualifying dates would still need to be used for payments and could mean that some carers miss out on support, and some could be overpaid.

The Scottish Government proposed in the consultation that Carer's Allowance Supplement could be paid alongside carer's regular Scottish Carer's Assistance payments in future. The next questions asked:

***Question 16: Do you agree or disagree that Carer's Allowance Supplement should be paid alongside carer's regular payments of Scottish Carer's Assistance in future?***

**Question 17: Please write the reason why you agree or disagree that Carer's Allowance Supplement should be paid alongside carer's regular payments of Scottish Carer's Assistance in future, or any other information you want to share on this question.**

**Question 18: Please give us any other views you want to share on the proposals for Carer's Allowance Supplement.**

As outlined in table 7, 62% of respondents agreed that Carer's Allowance Supplement should be paid alongside carer's regular payments of Scottish Carer's Assistance. Among third sector (carer) organisations, local authorities and representative bodies / associations, more respondents disagreed or were unsure than agreed.

**Table 7: Level of agreement that Carer's Allowance Supplement should be paid alongside carer's regular payments of Scottish Carer's Assistance in future**

Q16	Number (percentage *)			
	Agree	Disagree	Unsure	Not answered
Organisations (n=41)	19	6	7	9
Individuals (n=151)	87	21	30	13
Total respondents (n=192)	106	27	37	22
<b>Total respondents answering question (n=170)</b>	<b>106 (62%)</b>	<b>27 (16%)</b>	<b>37 (22%)</b>	

\* figures may not add to 100% due to rounding

A total of 138 respondents then provided comments in response to question 17. Of the respondents noting a preference, a significant number across all sub-groups supported a payment alongside regular payments of Scottish Carer's Assistance. Slightly fewer – although still a significant minority – noted their support for the payment of a lump sum.

Reasons for the preference for regular payments were that this is better for budgeting, that a stable income is more beneficial in the long term, or it can contribute to financial stability. Reasons for preferring a lump sum were that it is more noticeable as a sum of money when paid only twice yearly and can help with unexpected bills or can be helpful at certain times of the year such as Christmas when outgoings are higher than usual.

A few respondents – all individuals – simply noted that this supplementary payment would be very helpful.

A number of respondents who disagreed or were unsure of this proposal – mostly organisations – suggested that carers should be given the choice as to how they would like to receive this payment, with one third sector organisation noting this choice would be in line with the principles of collaboration and empowerment. Allied to this point, a few organisations commented that there is a need to consider the views of carers and utilise a co-design approach to ensure that any proposals meet the needs of recipients.

A small number of respondents – all organisations – felt that this payment should be consolidated within Scottish Carer's Assistance. A small number of respondents also felt that all carers should receive this extra payment.

Question 18 then gave respondents the opportunity to provide any other views they wanted to share on the proposals for Carer's Allowance Supplement; 82 opted to do so. Almost all the comments echoed points made at earlier questions, and these included:

- Support for this proposal.
- Positive views on this proposal demonstrating recognition of the caring role and time spent being a carer.
- This payment should be made to all carers, regardless of their earnings or being in receipt of State Pension.
- This payment should be higher.
- Preferences for payment to be made as a lump sum.
- Carers should be given the choice as to the frequency of this payment.
- This payment should be consolidated into the Scottish Carer's Assistance payment. It would help to simplify the system and administration for Social Security Scotland. However, one campaigning / advocacy organisation felt an amalgamated payment could be very confusing, given that Carer's Allowance Supplement is taxable but not taken into account when determining entitlement to benefits or tax credits.

## Carer's Additional Person Payment

The consultation paper explained that the Scottish Government is committed to creating a new payment for unpaid carers in Scotland, to provide extra support for people who are getting Scottish Carer's Assistance and caring for more than one person in receipt of a qualifying disability benefit. These extra payments would be part of Scottish Carer's Assistance.

The consultation proposed that to qualify for Carer’s Additional Person Payment, carers must be eligible for Scottish Carer’s Assistance and receiving payments. Carers will also need to be caring for at least two people who are in receipt of a Scottish Carer’s Assistance qualifying benefit. Carers would have to be providing at least 20 hours of care per week for each additional person they are applying for Carer’s Additional Person Payment for, and they would have to be providing 35 hours or more of care a week for the person the carer is receiving Scottish Carer’s Assistance for. They would not need to be providing this care separately from the care they provide for the person they get Scottish Carer’s Assistance for – for example, many people caring for two children would be looking after both children at the same time. However, only one carer could receive Carer’s Additional Person Payment for a given cared for person, as would also be the case for Scottish Carer’s Assistance. The next two questions asked:

**Question 19: Do you agree or disagree with the proposed eligibility criteria for Carer’s Additional Person Payment?**

**Question 20: Please write the reason why you agree or disagree with the proposed eligibility criteria for Carer’s Additional Person Payment, or any other information you want to share on this question.**

As demonstrated in table 8, a majority of those answering this question (72%) supported the proposed eligibility criteria for Carer’s Additional Person Payment. All health organisations and local authorities supported this proposal, although views differed across other types of organisation. None of the representative bodies / associations agreed with this proposal.

**Table 8: Level of agreement with the proposed eligibility criteria for Carer’s Additional Person Payment**

Q19	Number (percentage *)			
	Agree	Disagree	Unsure	Not answered
Organisations (n=41)	17	8	4	12
Individuals (n=151)	101	9	24	17
Total respondents (n=192)	118	17	28	29
<b>Total responding to question (n=163)</b>	<b>118 (72%)</b>	<b>17 (10%)</b>	<b>28 (17%)</b>	

\* figures may not add to 100% due to rounding

A total of 107 respondents then provided comments in response to question 20.

A number of key themes emerged from respondents who had agreed with the proposed eligibility criteria for Carer's Additional Person Payment. Some respondents – mostly individuals – noted that there is recognition of the financial burden faced by carers of having to care for more than one person. Others referred to this helping to make life easier. A similar number also noted that caring responsibilities need to be acknowledged and this additional payment goes some way to recognising this. There were a number of general comments that the proposal is fair, good or useful.

Among respondents who primarily disagreed with, or who were unsure about this proposal, two key themes emerged. First, and cited by a significant minority of respondents across all sub-groups, was that the amount of Carer's Additional Person Payment should be more than £10 per week, with some of these respondents referring to this payment as 'an insult' to carers that does not reflect the additional duties or responsibilities of caring for more than one person. A small number of these respondents calculated that Carer's Assistance equates to an hourly rate of £1.99 and that the Carer's Additional Person Payment equates to £0.50 per hour. It was suggested the latter should be in line with the former at the very least. As noted by a representative body / association:

“While any additional payment to carers is welcomed, the Carer's Additional Person Payment of £10 per week does not reflect the additional duties or responsibilities of caring for more than one person. [We] are concerned that this amount would not compensate for the loss of potential earnings of carers who need to give up employment because of their caring duties. As the majority of carers are women, they are disproportionately affected. This would not alleviate the financial burden carried by carers or lift many carers out of poverty. Where a carer is in receipt of Universal Credit the additional amount would be deducted from UC and there would be no financial gain to carers.”

A third sector organisation involved in offering care to people at end of life commented:

“The Carer's Additional Person Payment must be doubled to £20 per additional person to help support the carer with the cost of living and costs associated with caring for someone with a terminal illness, such as medicines, food, energy and home adaptations, otherwise families are at risk of poverty at the end of life.”

Secondly, and corresponding with comments that an additional payment of £10 is insufficient, a significant minority of respondents – mostly organisations who disagreed at question 19 – disagreed with the criteria relating to a minimum of 20 hours additional care per person. It was felt that this does not take into account the extent and complexity of care provision to multiple people with different needs and circumstances. A third sector organisation suggested this payment should be more flexible and responsive to individual needs and requirements. A health organisation felt the additional payment should be increased or the hours enabling eligibility should be decreased.

A few respondents – mostly organisations – felt the list of criteria was too long, with one organisation in the third sector commenting that it is unfair that those with an underlying entitlement (carers who are eligible for Scottish Carer's Assistance but who receive another benefit instead, including State Pension) will not receive this payment. A representative body / association suggested that there is a need for more evidence to justify the proposed eligibility criteria.

A small minority of respondents – who mostly disagreed or were unsure about the proposal - outlined various concerns or queries. These included:

- There is a need to consider the link between the Carer's Additional Person Payment and other benefits.
- All carers with an underlying entitlement should receive this allowance and this discriminates against people who receive certain benefits which make them ineligible.
- There is a need to consider instances where caring is split between two partners, but only one qualifies for Carer's Allowance and the associated national insurance credit.
- Tax credits should be offered to families with one earner and an unpaid carer.
- Carer's Allowance should not be classed as additional income or taxed.
- The impact of the Additional Person Payment upon Severe Disability Premium (SDP) should be considered, as currently those receiving care become ineligible for SDP where Carer's Allowance is paid.

## Carer's Additional Person Payment

### The amount and frequency of payments

The consultation paper outlined that the payment would be the equivalent of £10 per week and would be up-rated each year using the same measure of increases in costs that are used for other Scottish benefits. It proposed that

the Carer's Additional Person Payment would be paid at the same time as Scottish Carer's Assistance payments. Most carers currently get Carer's Allowance payments either weekly or every four weeks. The next two questions asked:

**Question 21: Do you agree or disagree with the proposed payment frequency for Carer's Additional Person Payment?**

**Question 22: Please write the reason why you agree or disagree with the proposed payment frequency for Carer's Additional Person Payment, or any other information you want to share on this question.**

As noted in the following table, once again, a majority of those answering this question (73%) agreed with the proposed payment frequency for Carer's Additional Person Payment. All health organisations and local authorities agreed with this proposal.

**Table 9: Level of agreement with the proposed payment frequency for Carer's Additional Person Payment**

Q21	Number (percentage *)			
	Agree	Disagree	Unsure	Not answered
Organisations (n=41)	21	3	6	11
Individuals (n=151)	96	9	26	20
Total respondents (n=192)	117	12	32	31
<b>Total responding to question (n=161)</b>	<b>117 (73%)</b>	<b>12 (7%)</b>	<b>32 (20%)</b>	

\* figures may not add to 100% due to rounding

A total of 64 respondents then provided comments in response to question 22. A number of key themes emerged, most of which were cited by less than 10 respondents and most of whom echoed points made in the consultation paper.

The key theme, noted by a significant minority, was that it should be paid alongside their regular payment, with some of these respondents noting that it would keep things simple. A small minority of respondents simply noted that this proposal makes sense. A few organisations commented that this will be good for budgeting purposes, as respondents will know the amount of money they will be receiving regularly. There were also a few comments that this

would provide financial stability for carers. Other benefits noted by small numbers of respondents were that this proposal would:

- Reduce administration costs.
- Help to avoid confusion.
- Help to avoid underpayments or overpayments.
- Avoid the need for qualifying dates that are associated with lump sum payments and clear any confusion over cut-off dates in reporting changes in circumstances.

The issue of choice for the carer was raised by a few organisations who answered 'unsure' to question 21. These felt that carers should be offered a choice as to when they would like to receive this payment, to reflect their individual circumstances. Allied to this point, a small number of organisations also commented that the approach should be co-designed with carers and their representative organisations. One local authority was concerned that this could be difficult to manage, and that the payment might be taxable.

## Targeting Carer's Additional Person Payment at carers getting Scottish Carer's Assistance

The consultation explained that Carer's Additional Person Payment will be paid to people in receipt of Scottish Carer's Assistance and caring for more than one person who is getting a disability payment. This means it would not be paid to people who have 'underlying entitlement' to Scottish Carer's Assistance, or who get the Universal Credit Carer Element instead. This is how Carer's Allowance Supplement works now. The consultation also explained that the reason that Carer's Allowance Supplement and Carer's Additional Person Payment are targeted at people getting payments of Scottish Carer's Assistance is that 'overlapping benefits' are paid at a higher rate, and people getting Universal Credit Carer Element can receive Carer's Allowance unless they are earning over the earnings limit. This means that carers receiving payments of Scottish Carer's Assistance are likely to be on lower incomes. The next three questions asked:

***Question 23: Do you agree or disagree with the proposal to target Carer's Additional Person Payment to carers who are getting payments of Scottish Carer's Assistance?***

***Question 24: Please write the reason why you agree or disagree with the proposal to target Carer's Additional Person Payment to carers who are getting payments of Scottish Carer's Assistance, or any other information you want to share on this question.***



**Question 25: Please give us any other views you want to share about the proposed Carer’s Additional Person Payment.**

As noted in the following table, once again, a majority of those answering this question (63%) agreed with the proposal to target Carer’s Additional Person Payment to carers who are getting payments of Scottish Carer’s Assistance.

**Table 10: Level of agreement with the proposal to target Carer’s Additional Person Payment to carers who are getting payments of Scottish Carer’s Assistance**

Q23	Number (percentage *)			
	Agree	Disagree	Unsure	Not answered
Organisations (n=41)	15	10	6	10
Individuals (n=151)	85	12	31	23
Total respondents (n=192)	100	22	37	33
<b>Total responding to question (n=159)</b>	<b>100 (63%)</b>	<b>22 (14%)</b>	<b>37 (23%)</b>	

\* figures may not add to 100% due to rounding

A total of 72 respondents then provided comments in response to question 24. A significant minority of these simply noted their support for the proposal without providing much by way of detail. The proposal was regarded as being fair, sensible, logical and reasonable or that people caring for more than one person should receive more support.

A key theme which emerged, primarily from those who disagreed with this proposal, and cited by respondents across most sub-groups, was that Carer’s Additional Person Payment should be paid to all carers with an underlying entitlement to Scottish Carer’s Assistance. A campaigning / advocacy organisation remarked:

“The consultation does not explain the rationale for restricting this additional payment to those eligible for a financial award for Scottish Carer’s Assistance. We believe that Scottish Government should investigate the potential for eligibility to be broadened to all with an entitlement to Scottish Carer’s Assistance, as it appears to us that it could be decoupled from the underlying entitlement issues with other DWP

benefits. It is important to recognise the complexity of some people's caring responsibilities.”

This was backed up by another campaigning / advocacy organisation, which suggested:

“A solution would be to pay Carer’s Additional Person Payment to carers who have an underlying entitlement to carers allowance as well. This would be in line with the policy intent, which is not to fully mitigate the costs of caring, nor to pay them for their carers role – its role is to provide support for carers. [We] recognise that ‘having more than one caring role can have a bigger impact on carers’ health and wellbeing’ – so carers on overlapping benefits equally need this support.”

A few organisations outlined concerns that:

- Some individuals could be financially worse off as a result of applying for new Scottish benefits.
- This should be considered for those who receive only the Carer Element of Universal Credit (UC) as UC recipients are often no better off than the Scottish Carer’s Assistance recipient.

The need for Social Security Scotland to work alongside the Department for Work and Pensions was highlighted by a small number of organisations. The benefits to this were that it would help to minimise any financial penalties for overlapping benefits. One campaigning / advocacy organisation felt there should be a data sharing agreement between Social Security Scotland and the Department for Work and Pensions to identify carers on Universal Credit who may be entitled to additional support.

A few organisations welcomed the communications strategy outlined in the consultation paper, although they felt that carers would need to be supported with appropriate independent advice. A campaigning / advocacy organisation suggested a referral protocol, and a health organisation felt that carers should be able to seek advice from an advisor within Social Security Scotland advocacy services.

A total of 57 respondents provided comments in response to question 25, many of which mirrored comments made to question 24. A number of these respondents noted their support for this proposal, although there were a few provisos around other social security benefits and a desire that this payment should not result in carers losing income from elsewhere. A few respondents were also positive that this provides recognition for carers, although a small number also commented that this was long overdue.

A large minority of respondents commented that an additional payment of £10 is too low and does not reflect the potential volume of care being provided, with a few respondents suggesting alternative payments. These included a payment at the same rate as a single person who is cared for but with a sliding scale, relating to the hours of care provided. One third sector organisation commented:

“While £10 per person is a progressive policy in comparison with decades of DWP neglect, the amount proposed is considerably lower than other policy positions that could have been taken. It would be far better if carers could be effectively paid minimum wage for the 20 hours worked, with the same paid again for every additional qualifying cared for person. The net expenditure of this as compared with the savings made against the health and social care budgets and as compared with potential reduction in other entitlements (e.g., severe disability premiums) would still represent extremely good value.”

There were also some repeated calls for this payment to be paid to all carers, including those in receipt of a state pension.

## Changes to Scottish Carer's Assistance

The consultation paper explained that when Scottish Carer's Assistance is first launched, many of the eligibility criteria will be kept the same as it is now. The Scottish Government noted, this is intended to avoid a 'two-tier system' where carers already getting Carer's Allowance are treated differently from people who have newly applied for Scottish Carer's Assistance. Longer term, it is planned that further changes may be introduced. The priority changes proposed in the consultation paper are:

- Removing the education restrictions so full time students can receive Scottish Carer's Assistance.
- Allowing carers to add together hours spent caring for more than one person.
- Increasing the time carers will receive Scottish Carer's Assistance from eight to twelve weeks after the death of a cared for person.
- Extending the period of payment when a cared for person goes into hospital or residential care from four to twelve weeks.
- Increasing the earnings limit so carers can earn more and still get financial support and addressing the cliff-edge

## Access to education and training

The Scottish Government is proposing to remove the current education restriction. The next two questions asked:

***Question 26: Do you agree or disagree with the proposed future change to allow carers in full-time education to get Scottish Carer's Assistance?***

***Question 27: Please write the reason why you agree or disagree with the proposed future change to allow carers in full-time education to get Scottish Carer's Assistance, or any other information you want to share on this question.***

As noted in table 11, almost all those answering this question (97%) agreed with the proposed future change to allow carers in full-time education to get Scottish Carer's Assistance.

**Table 11: Level of agreement with the proposed future change to allow carers in full-time education to get Scottish Carer’s Assistance**

Q26	Number (percentage *)			
	Agree	Disagree	Unsure	Not answered
Organisations (n=41)	33	1	-	7
Individuals (n=151)	125	1	3	22
Total respondents (n=192)	158	2	3	29
<b>Total answering question (n=163)</b>	<b>158 (97%)</b>	<b>2 (1%)</b>	<b>3 (2%)</b>	

\* figures may not add to 100% due to rounding

A total of 132 respondents made comments at question 27, almost all of these were positive. The largest proportion – one in two respondents – predicted that the change would help encourage more carers to go into education, saying it would reduce barriers and allow people to study while caring. Large minorities agreed the change was a fair and sensible approach, and that carers deserve extra help and recognition without being penalised for having an education. A significant minority thought that carers financial strains would be eased and that they would no longer be put off education by the thought of losing Carer’s Allowance. A third sector (carer) organisation noted that many students drop out of education due to financial issues.

Similar numbers thought the change was advantageous, making it easier to study whilst caring. Points were made about it being possible to both study and care full-time, though this would make it very difficult to take on part-time work as well. Scottish Carer’s Assistance could therefore supplement student incomes.

The benefits of education for carers were highlighted by a large minority of respondents, in terms of personal and professional development, career improvement, gaining new qualifications, helping with wellbeing and mental health and creating more opportunities. A significant minority felt education would improve future prospects for carers when they are no longer in a caring role and that they would be better prepared for employment or career changes. A significant minority specified the benefits for young carers as they would not be excluded from higher education and future opportunities would be improved.

A few respondents urged the proposed change to take place when the benefit is launch, or at least with a given timescale for implementation, rather than at an unspecified future date. Very small numbers of respondents voiced the following other thoughts:

- The change would allow students to be awarded financial support while being a recognised as a carer.
- There is a need to ensure that students getting student financial support are better off overall from being able to receive Scottish Carer's Assistance (e.g. Scottish Carer's Assistance should not be considered as income for student financial support or funding assessment calculations, and vice versa).
- Education could provide more opportunities for carers to learn or educate themselves about the conditions or disabilities they are caring for.
- The change could benefit women, reflecting that in society caring roles most typically fall to women, and unpaid care can act as a barrier to education.

The only negative note was from a health organisation which viewed it as impossible to fit in full-time study and full-time caring without having the carers health and wellbeing affected, therefore advised safeguards to be put in place. However a few respondents also noted that many courses were now very flexible, being delivered in a hybrid fashion or online, thereby affording increased opportunities for carers to fit them in with their caring duties.

## Recognising different caring situations

The consultation paper explained that Carer's Allowance is only paid where 35 hours or more of care is provided each week by one person, for one person. This means that where someone is caring 35 hours or more every week but this care is split across two or more people, they are not eligible to get the benefit. The Scottish Government is proposing to allow carers to add together hours spent caring for two people to reach the 35 hours per week caring requirement. Questions 28 and 29 asked:

***Question 28: Do you agree or disagree with the proposed future change to allow carers to add together hours spent caring for two people to reach the 35 hour caring requirement?***

***Question 29: Please write the reason why you agree or disagree with the proposed future change to allow carers to add together hours spent caring for two people to reach the 35 hour caring requirement, or any other information you want to share on this question.***

As noted in the following table, a large majority (79%) of those answering this question agreed with the proposed future change to allow carers to add together hours spent caring for two people to reach the 35 hour caring requirement (130 agreed and only six disagreed, although 28 gave an answer of 'unsure').

**Table 12: Level of agreement with the proposed future change to allow carers to add together hours spent caring for two people to reach the 35 hour caring requirement**

Q28	Number (percentage *)			
	Agree	Disagree	Unsure	Not answered
Organisations (n=41)	29	-	3	9
Individuals (n=151)	101	6	25	19
Total respondents (n=192)	130	6	28	28
<b>Total answering question (n=164)</b>	<b>130 (79%)</b>	<b>6 (4%)</b>	<b>28 (17%)</b>	

\* figures may not add to 100% due to rounding

A total of 110 respondents provided further comments. A very large majority of comments were positive about the proposed change. A large minority said it recognised multiple caring circumstances and that many carers care for more than one person. Scenarios where the change would be beneficial included care of parents, sandwich carers (i.e. carers of parents and children simultaneously) and situations where cared for people do not live in the same home. A small number of respondents foresaw that the number of people caring for more than one person was increasing or likely to increase.

A large minority reiterated that entitlement should be dependent on the total amount of caring, and that it was the total number of hours that was important rather than the number of people cared for. Similar numbers cited general agreement with the proposal, saying it seemed fair, sensible or a positive step, with a few respondents stating this would rectify a longstanding inequity in Carer's Allowance. A significant minority were in favour of having more flexibility in meeting Scottish Carer's Assistance eligibility requirements, saying that the system should be more reflective of individual needs and should incorporate more than two carers.

A few respondents (mainly campaigning / advocacy organisations) urged that consideration should be given to including all the hours of those who care for

more than two people. It was hypothesised that these carers were likely to be most vulnerable to poverty, having less time available for work and potentially higher travel costs to reach those they care for. A campaigning / advocacy organisation noted:

“We recognise that this potentially makes the claims process and change of circumstances notifications more complicated, however, we note that the process for claiming in relation to two or three people is in existence for the Young Carer’s Grant (albeit for over 16 hours per week).”

A few respondents recommended alternative payment rules, reasoning that carers for more than one person should get paid more than single person Carer’s Assistance because of greater impacts and because these carers do far more than 35 hours per week of caring. Suggestions were made for a sliding scale or payment based on each hour of care. More generally, there were a couple of suggestions from a representative body and a third sector organisation to reduce the qualifying number of hours from 35 per week.

The most frequently mentioned concerns about the proposal were bureaucratic and administrative complications. These included having to deal with potential multiple applications and whether or not several people helping with care could have several applications regarding one persons care. Also mentioned were differing numbers of hours per week of care depending on individual circumstances and caring requirements, change of circumstances notifications and difficulties combining and counting hours of care.

Small numbers of respondents voiced concerns about possible impacts on other benefits and rights (e.g. the cared for persons reserved benefits, risks to the rights of a second carer who may also be adding together hours to reach the 35 hour threshold). There were also a small number of misconceptions regarding care being classified as a job with the carer being deemed ineligible for Universal Credit benefits, when in fact Scottish Carer’s Assistance is an income replacement benefit which can bring carers into entitlement for Universal Credit. Additionally, very small numbers of respondents were worried that there could be a rise in fraudulent applications and abuse of the system.

## More stable support where life events have affected the cared for person

### When a cared for person dies

The consultation paper noted that Carer’s Allowance is paid where the person being cared for is getting certain disability benefits which means that payments will stop when the cared for persons benefits stop. The consultation



explained that when a cared for adult goes into hospital, Carer’s Allowance will stop after four weeks. When a cared for person dies, Carer’s Allowance payments stop after eight weeks. However, the Scottish Government noted in the consultation that it recognises that changes in a cared for persons disability benefits do not always match the needs of the carer and that unpaid carers need more stable incomes.

As such, the Scottish Government is planning to extend the period of Scottish Carer’s Assistance so that it is paid for twelve weeks after the death of a cared for person.

Questions 30 and 31 asked:

**Question 30: Do you agree or disagree with the proposed future change to continue to pay Scottish Carer’s Assistance for 12 weeks (rather than 8 weeks) after the death of a cared for person?**

**Question 31: Please write the reason why you agree or disagree with the proposed future change to continue to pay Scottish Carer’s Assistance for 12 weeks (rather than 8 weeks) after the death of a cared for person, or any other information you want to share on this question.**

As noted in Table 13, almost all of those answering this question (89%) agreed with this proposed future change. Only one campaigning / advocacy organisation disagreed with this proposed future change.

**Table 13: Level of agreement with the proposed future change to continue to pay Scottish Carer’s Assistance for 12 weeks (rather than 8 weeks) after the death of a cared for person**

Q30	Number (percentage *)			
	Agree	Disagree	Unsure	Not answered
Organisations (n=41)	30	1	2	8
Individuals (n=151)	112	6	9	24
Total respondents (n=192)	142	7	11	32
<b>Total responding to question (n=160)</b>	<b>142 (89%)</b>	<b>7 (4%)</b>	<b>11 (7%)</b>	

\* figures may not add to 100% due to rounding

A total of 120 respondents made comments in support of their initial response to this question. A large number of these echoed points covered in the

consultation paper. A significant minority reiterated their support for the proposal without further detail and a small minority noted this is a more empathetic and compassionate approach than at present. A campaigning / advocacy organisation acknowledged:

“Cared for people are often loved ones; spouses, children, close family or friends. The death of a loved one can be traumatic. This can be more so for the death of a cared for person. Caring for a person can change the relationship you have with this person, bringing you closer than ever. Moreover, caring can also have a significant impact on a carers life. Becoming a carer can impact employment, relationships with other people and a persons sense of self. When a cared for person dies, carers are not only faced with the death of a loved one, but a complete change in their life. The transition from being a full-time carer can have huge impacts on a person. Eight weeks is not likely to be enough time to fully cope with the death of a loved one. By extending the payments, it will allow the carer more time to come to terms with the death, the impact this will have on their life, and time to secure a stable income. Extending the time to 12 weeks is a small, but an impactful way of providing additional support to carers.”

A key theme cited by almost half of respondents was that the proposed extension period would allow people time to adapt to their changed circumstances and can be used as a buffer where carers can sort out their benefits, look for employment or have some time to grieve before there are changes to their financial circumstances. A significant minority of respondents also noted that this extended period would help to reduce financial and emotional stress at a time of significant change. A few respondents noted that while a carers grief may be similar to that of someone else who has suffered a loss, carers have less practical ability to get back into work or education or to rebuild support networks.

Accessing advice and support was seen to be important to a few respondents, mostly organisations. There were suggestions of a need for carers to be able to access help across a range of areas including financial support, legal aid, information on other benefits and access to advisors.

While respondents generally welcomed this proposal, a small minority of respondents who both agreed and disagreed felt that the Scottish Government should introduce a longer time period. There were suggestions for this to be extended from between 16 weeks to 12 months, although there was no consensus on this time period. A Third Sector (Carer) organisation quoted from an unpaid carer who noted:

“Because Carer’s Allowance doesn’t let many carers work or study while being a carer, they are often stuck in a poverty trap where they have very limited ability to earn. Then when the cared for person dies, goes into a home, etc - the carer may well be unemployable. The household income will have disappeared and there are also all the emotional consequences to consider! In many cases it’s very likely there has been a huge emotional impact from the bereavement of the stress of change of circumstances.”

Another Third Sector organisation suggested that the period of 12 weeks should be extended where there are extenuating circumstances.

A small number of individuals who disagreed with this proposal felt that 8 weeks is enough time for a carer to sort out the necessary legalities of the cared for persons estate.

Finally, in response to this question, a Third Sector organisation and a campaigning / advocacy organisation suggested the Scottish Government should introduce a “Post Caring Support Payment” at the same level as Jobseeker’s Allowance, which would be linked to the length of time of being a carer. They also felt that there should be a new fund to support the training and education of carers returning to work or seeking employment for the first time.

## When a cared for person goes into hospital or residential care

The Scottish Government is also proposing to extend the period of payment when a cared for adult goes into hospital or residential care from four to twelve weeks. Questions 32 and 33 asked:

***Question 32: Do you agree or disagree with the proposed future change to continue to pay Scottish Carer’s Assistance for 12 weeks when a cared for person goes into hospital or residential care?***

***Question 33: Please write the reason why you agree or disagree with the proposed future change to continue to pay Scottish Carer’s Assistance for 12 weeks when a cared for person goes into hospital or residential care, or any other information you want to share on this question.***

As noted in the following table, 87% of those answering this question agreed with this proposed future change. All local authorities, representative bodies / associations and health organisations agreed with this proposal. Only two third-sector organisations disagreed with this proposed future change.

**Table 14: Level of agreement with the proposed future change to continue to pay Scottish Carer’s Assistance for 12 weeks when a cared for person goes into hospital or residential care**

Q32	Number (percentage *)			
	Agree	Disagree	Unsure	Not answered
Organisations (n=41)	29	2	2	8
Individuals (n=151)	108	6	11	26
Total respondents (n=192)	137	8	13	34
<b>Total respondents answering question (n=158)</b>	<b>137 (87%)</b>	<b>8 (5%)</b>	<b>13 (8%)</b>	

\* figures may not add to 100% due to rounding

In response to Question 33, a total of 110 respondents provided comments. A number of these welcomed this proposal, with some comments that this is an emotionally challenging time for both carers and the cared for person and that this offers a more compassionate approach. A small number of organisations commented that the current limit of four weeks is unreasonable.

The key theme to emerge from a significant minority of respondents of all types was that these carers still have a caring role to fulfil. This may include sorting out paperwork, carrying out tasks relating to medication, carrying out housework, contacting other family members and providing emotional support to the cared for person while they are in hospital or residential care. One campaigning / advocacy organisation noted that the caring role can become more intense as the carer may need to advocate for the cared for person. As noted by a representative body:

"While someone is in hospital or temporary care their carer is unlikely to be relieved of all caring responsibilities. They will have a different set of responsibilities and will still require to provide support and assistance during this time. The nature of the support will change but nonetheless they will still be actively involved in caring for the person and meeting their needs both on a practical and emotional level. Carers are actively encouraged to support their loved one when in hospital or care, especially where their needs are complex or they have communication difficulties. Carers cannot be asked to contribute in this way and lose access to their Carer’s Allowance where it assumed they are no longer carrying out caring duties. This also assumes that, for the period

a person is in hospital, their carer can go and find work or will apply for other benefits thereby creating a more complex benefits system than is necessary.”

A small minority of respondents also noted that many carers will face additional financial costs when visiting the cared for person. These include the costs of parking, fuel and other travel expenses.

Small numbers of respondents also noted that carers need this payment to be continued as it is needed for living expenses and that it helps with their financial commitments, or that carers need continuity of payments to provide them with some form of financial stability when a cared for person goes into hospital or residential care.

Time to adjust to changed circumstances was outlined by a small minority of respondents across most sub-groups. It was felt that this increased time period allows longer for a carer to adjust to their changed circumstances and to sort out their (and the cared for person's) finances. Furthermore, it offers more time for carers who need to enter the employment market for the first time or to re-enter this after a period of caring. This extension also allows time for an accurate assessment of the likelihood of the cared for person remaining in hospital or residential care.

A few respondents, mainly organisations – noted that the reapplication process can be problematic and that this proposal helps to reduce paperwork for all concerned as well as removing the worry of having payments stopped and then restarting. One individual commented that the reapplication process can take up to 12 weeks.

The issue of finding temporary employment for a period of only 12 weeks was identified as problematic for carers, particularly when they still have a caring role to undertake.

While this proposed extended period was welcomed by many of these respondents, a small number felt that the 12 week period is not long enough, with some comments that this should be extended for the duration of the hospital or residential care admission. Linked to this, there were also some specific comments on issues related to hospital discharge in that this can be a lengthy process, particularly if there are changes to a care package, and this can penalise carers despite the discharge process being out-with their control. A few organisations suggested that there should be an element of discretion to allow for special circumstances, for example, so a carer would receive payment for longer if there is a delay to hospital discharge but it is not the fault of the carer.

While most respondents were positive about this proposal, a small number of individuals noted that 12 weeks is too long a time to pay this benefit. While

there was no consensus about what time period is most appropriate, there were references to four weeks and eight weeks. One respondent felt that the payment should be stopped after a shorter period for carers of those going into residential care as their chances of returning home would be minimal.

## Access to paid work

The consultation paper noted that carers earning £128 per week or more (the 2021/22 rate in place at the time of the consultation), after deductions for things like pension contributions, cannot receive Carer's Allowance. Additionally if a carer earns £1 over this limit, they lose the whole Carer's Allowance award (often referred to as the earnings 'cliff edge'). The Scottish Government is proposing increasing the earnings threshold, which would increase the amount carers could earn while receiving Scottish Carer's Assistance. The formula for this could be linked to 16 hours at a specific rate, such as the Real Living Wage<sup>1</sup>. This would equate to an earnings level of around £158 weekly. As reporting earnings is already a requirement for Carer's Allowance, the consultation noted that this change should not make the system more complicated for carers. Questions 34-37 asked:

***Question 34: Do you agree or disagree with the proposed future change to increase the earnings limit for Scottish Carer's Assistance?***

***Question 35: Please write the reason why you agree or disagree with the proposed future change to increase the earnings limit for Scottish Carer's Assistance, or any other information you want to share on this question.***

***Question 36: Do you agree or disagree that the earnings threshold should be set at a level which would allow carers to work 16 hours a week alongside their caring role?***

***Question 37: Please write the reason why you agree or disagree that the earnings threshold should be set at a level which would allow carers to work 16 hours a week alongside their caring role, or any other information you want to share on this question.***

## Proposed future change to increase the earnings limit for Scottish Carer's Assistance

A majority of respondents (82%) agreed with this proposal. Across organisation sub-groups, all local authorities and representative bodies /

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<sup>1</sup> The current rate for the National Living Wage is £9.50 per hour for those aged 23 and over. The current rate for the Real Living Wage is £9.90 per hour for all employees aged 18 and over.

associations agreed with this proposal. Only one third sector organisation disagreed.

**Table 15: Level of agreement with the proposed future change to increase the earnings limit for Scottish Carer’s Assistance**

Q34	Number (percentage *)			
	Agree	Disagree	Unsure	Not answered
Organisations (n=41)	30	1	-	10
Individuals (n=151)	107	14	15	15
Total respondents (192)	137	15	15	25
<b>Total respondents answering question (n=167)</b>	<b>137 (82%)</b>	<b>15 (9%)</b>	<b>15 (9%)</b>	

\* figures may not add to 100% due to rounding

A total of 132 respondents chose to comment at question 35. A large minority, one in three perceived that carers should not be penalised or deterred from working, and that they should be given the opportunity to earn more where possible. Points were made about it being difficult to live off Carer’s Allowance by itself and working being an aid to financial stability and alleviating poverty. A significant minority added that it was good for carers to work, giving them a life alongside caring, being beneficial for mental health and being an aid to securing employment at the end of their caring role.

A large minority from all sub-groups agreed that the current earnings limit of £128 per week was too low and were in favour of it being raised. These respondents regarded this limit as acting as a disincentive to work, not allowing for having a part time job at the living wage and making re-entry to the workplace difficult. However, a significant minority advocated raising the earnings limit further than the suggested £158 per week, regarding this amount as still too low to make a difference as it restricts carers to working in the lowest paid roles and offers limited career progression. There were also a few complaints that the amount discriminated against better-paid carers (e.g. those earning above the Real Living Wage). A typical comment was as follows:

“I agree because at present my husband is having to try and find a job that only lets him work around 8 hours a week. He wants to work part-time but because of the cap on earnings, he can’t even get a 16 hrs a week job. It’s ridiculous.” (Individual)

A few respondents each advocated for the earnings limit to increase with rising wages (either living or minimum) or for it to rise in line with increased living costs, taking into account additional expenditure incurred through caring such as special diets, equipment and heating.

A significant minority of respondents viewed a 'cliff edge' approach as being unfair, noting that being £1 over the threshold stops entitlement to Carer's Allowance. Alternative recommendations were made for a tapered approach or sliding scale for income above the earnings limit in order to reduce awards rather than stop them entirely.

Slightly higher numbers of respondents reinforced the aforementioned negative views of the earnings limit, claiming a lack of fairness in that too many carers miss out on Carer's Allowance because they earn over the current limit. Raising the limit was looked upon favourably, reasoning that this would improve recognition for carers, open up Scottish Carer's Assistance to more carers and result in fewer people leaving employment or reducing their hours, with consequential benefits for employers. A few respondents viewed the new approach as fair and sensible.

A small minority mistakenly perceived that the current Carer's Allowance system fails to take variable work patterns or variable income (e.g. through self-employment or zero hour's contracts) into account, whereas in actual fact earnings can be averaged where a clear work pattern can be identified. However, two individual respondents gave examples of Covid-related or Christmas bonuses causing problems with the cliff edge to the extent that they had asked not to receive these due to fears of losing Carer's Allowance. There were therefore requests to average out earnings in any new Scottish Carer's Assistance system.

A significant minority, including a majority of the small number who disagreed with the proposed future change to increase the earnings limit for Scottish Carer's Assistance, argued that entitlements should be based solely on the hours spent caring, and that limits on earnings or hours worked should not matter and be removed. It was reasoned that this should be deserved because carers save money on social care.

Only a small number of respondents explicitly stated that they preferred the suggestion of using a formula based on 16 times the hourly Real Living Wage (£158). Amongst these, it was foreseen that this limit would let carers know easily what they can earn up to, as well as providing more flexibility for working carers. Similar numbers however advocated against this approach, stating that it was often the case that it was necessary to work more hours than these in order to retain a job. A few respondents noted that parents with cared for children attending school find it easier to do more hours of work but



are denied entitlements. Very small numbers of respondents stated a preference for limiting hours rather than limiting the amount earned.

Concerns were raised by a few respondents about the knock-on effects of increasing the earnings limits for Scottish Carer’s Assistance on other benefit entitlements.

## Views on the earnings threshold

A majority of respondents (67%) agreed that the earnings threshold should be set at a level which would allow carers to work 16 hours a week alongside their caring role.

**Table 16: Level of agreement that the earnings threshold should be set at a level which would allow carers to work 16 hours a week alongside their caring role**

Q36	Number (percentage *)			
	Agree	Disagree	Unsure	Not answered
Organisations (n=41)	25	2	4	10
Individuals (n=151)	86	25	24	16
<b>Total respondents (n=192)</b>	<b>111</b>	<b>27</b>	<b>28</b>	<b>26</b>
<b>Total respondents answering question (n=166)</b>	<b>111 (67%)</b>	<b>27 (16%)</b>	<b>28 (17%)</b>	

\* figures may not add to 100% due to rounding

A total of 129 respondents then commented at question 37. Overall, there was a fairly even split between those respondents who thought a 16 hour limit was about the right amount and those who desired higher limits or more flexibility with Scottish Carer’s Assistance.

The highest numbers (a large minority) thought that a 16 hour limit was too low and should be increased. A variety of reasons were offered for this, including consideration of cost of living increases, a lack of feasibility in holding management or other well paid roles in a 16 hour week, a lack of jobs allowing as few as a 16 hour week, the amount being an insufficient increase to help support carers to escape the poverty trap, and an increase should be allowed if pay was at minimum wage levels, rather than living wage levels. A few respondents suggested alternative hourly limits, with 20 hours mentioned most frequently, although levels of 24, 25, and 30 hours were also recommended.

A few respondents wished to see the threshold scrapped entirely, perceiving that online workers can work while combining caring roles or that if carers were caring full-time they would be unable to work many hours anyway. A similar number reiterated that Scottish Carer's Assistance entitlements should simply depend on the number of hours of care given, regardless of hours worked or earnings, urging for carers to be recognised for their roles in enabling savings to be made in social care.

A significant minority, including one in three organisations, foresaw a need to allow or account for higher pay rates (than minimum or living wage) alongside the hourly threshold, perceiving a need for the earnings threshold to be raised. Issues were noted around carers being stopped from working a significant number of hours if they were on a high rate of pay as Scottish Carer's Assistance support would then be jeopardised, and a need to compensate carers for significant additional costs incurred in caring (e.g. heating, equipment). One suggestion was for the hourly limit to be based on average hourly wages rather than the Real Living Wage. There were a small number of calls for good information and communication to be given to carers about the impact of fiscal boundaries set by the hourly and earnings limits on eligibility for Scottish Carer's Assistance. A small number of respondents advocated for there to be no limit on earnings (i.e. an ability to work up to 16 hours per week irrespective of the hourly rate of pay).

A significant minority, however, viewed the 16 hour threshold as being the right amount, with around half of these specifically mentioning 16 hours at a living wage level of pay. Comments suggested that this proposal was realistic, fair and workable amid negative comments about the current Carer's Allowance limit (e.g. difficulties incurred in trying to work and care at the same time). While also approving of the 16 hour limit, a small minority saw this as merely a step in the right direction or a bare minimum requirement, which will need to be reviewed over time.

A significant number each noted the following positive knock-on effects:

- It would help provide carers with respite and relief from stress (e.g. advantageous for mental health, helping to sustain the caring role and helping to prepare the carer for life when a caring role ends).
- It would allow more carers to care and work (e.g. while children in education are at school).
- It would give carers extra income with subsequent fewer financial worries.

In contrast to a point made above about jobs being difficult to access at a limit of 16 hours per week, a few respondents regarded this figure as amounting to standard hours for a part time job, approving of the greater choice available

compared with the current situation. A couple of respondents noted that a 16 hour threshold aligns with the ability to receive Working Tax Credits.

A small minority cited concerns over the enabling of working 16 hours a week in addition to 35 hours (or more) caring causing burnout amongst carers amid doubts over whether carers would be able to spend such a time away from their responsibilities. A representative body noted:

“... 81% of adult carers caring for 35+ hours per week are already caring for 50+ hours a week; although these figures would need reanalysis for working age carers, they do indicate that many claimants of the Scottish Carers Assistance will not have any time for part-time work, unless the 35+ caring hour eligibility threshold is itself reduced.”

Again, there were concerns from a few respondents regarding the treatment of fluctuating earnings and/or hours worked. Very small numbers of respondents reiterated opposition to a ‘cliff edge’ situation resulting in additional hours worked failing to make up for the loss of a Scottish Carer’s Assistance award. Similar numbers had concerns about the impact of the proposal on benefits such as Tax Credits, Universal Credit and Severe Disability Premiums amid requests for advice on this issue.

## Addressing the ‘cliff edge’

The consultation paper further proposed replacing the ‘cliff edge’ with a ‘run on’ period. Payments could continue for a number of weeks after a carer earns over the earnings limit, which would provide more stability. Support could also be reduced gradually so carers would have more time to adjust before their Scottish Carer’s Assistance ends. The consultation noted this would also help carers who have fluctuating earnings. An ‘earnings taper’ option was also suggested which would mean payments of Scottish Carer’s Assistance would continue when a carer earned more than the limit but would be reduced as earnings increased. This is similar to how Universal Credit works. The Scottish Government found the run on option would be a better way to fix the cliff edge issue for a number of reasons. The consultation noted that an earnings taper could introduce more interactions with the tax system and could result in making the benefit much more complicated, particularly for carers getting other financial support. The Scottish Government also looked at an option to remove the earnings limit and replace it with a limit on the hours per week carers could work, which would allow unpaid carers to take on higher paying jobs and earn more while working part-time. However, the consultation noted that this would need a new system to be created and could make the benefit more complicated. With these issues in mind, the Scottish

Government proposed the introduction of a run on period after earnings have exceeded the earnings threshold.

Questions 38 and 39 asked:

**Question 38: Do you agree or disagree with the proposal to look at a ‘run on’ after a carer earns over the earnings limit in future?**

**Question 39: Please write the reason why you agree or disagree with the proposal to look at a ‘run on’ after a carer earns over the earnings limit in future, or any other information you want to share on this question.**

As noted in table 17, 77% of those answering this question agreed with the proposal to look at a ‘run on’ after a carer earns over the earnings limit in future

**Table 17: Level of agreement with the proposal to look at a ‘run on’ after a carer earns over the earnings limit in future**

Q38	Number (percentage *)			
	Agree	Disagree	Unsure	Not answered
Organisations (n=41)	26	-	5	10
Individuals (n=151)	98	10	23	20
Total respondents (n=192)	124	10	28	30
<b>Total respondents answering question (n=162)</b>	<b>124 (77%)</b>	<b>10 (6%)</b>	<b>28 (17%)</b>	

\* figures may not add to 100% due to rounding

A total of 106 respondents chose to answer question 39. There were two dominant themes, each noted by large minorities as outlined below.

Firstly, it was suggested that a ‘run on’ would be helpful for those with variable earnings as it was perceived that these carers would no longer have their award ended if they were temporarily over the earnings limit. Carers in situations involving zero hours contracts, overtime pay, bonuses, seasonal work and fixed term contracts were specified in this respect as beneficiaries.

Secondly, it was perceived that a ‘run on’ would make life easier for carers by way of provision of stability while they adapted to changes, particularly by way of less stress and worry over finances and mitigation of damage caused by

'cliff edge' situations. A few respondents noted this would particularly help carers receiving pay rises, which would currently take them over the earnings limit.

A significant minority of respondents made general comments in favour of the 'run on' approach, stating it seemed reasonable, pragmatic and fair compared with the current Department for Work and Pensions system. Similar numbers signalled their opposition to a 'cliff edge' approach, regarding it as unfair and nonsensical, with a small number of calls for it to be abolished. Preferences were stated for a sliding scale or tapered approach to reducing Scottish Carer's Assistance with regards to earnings. There were a similar number of calls for taking a longer-term view of earnings in Scottish Carer's Assistance entitlement awards. A campaigning / advocacy organisation pointed out that this approach would be less burdensome for the carer to report on and less of an administrative burden for Scottish Social Security.

A need for more detail about how the 'run on' approach would work was requested by a significant minority of mainly organisation respondents, particularly regarding the duration that the 'run on' should continue for after a carer reaches the earnings limit, and its interaction with other benefits and entitlements. A local authority and a campaigning / advocacy organisation thought it would be helpful if a carer can simply resume entitlement to Scottish Carer's Assistance if their earnings fall again, subsequent to breaching the limit, rather than go through the process of a completely new application.

Amongst the comments which were more negatively disposed towards the 'run on' approach, very small numbers of individuals each saw it as being complex or difficult to administer, or viewed carers who work as being paid anyway and therefore not being a priority for receiving extra financial assistance.

## Recognition or support for a wider group of unpaid carers

The consultation paper noted that there have been calls for a wider group of carers to be recognised through Scottish Carer's Assistance. This includes people who only have 'underlying entitlement' to the current benefit, i.e. those who do not receive Carer's Allowance because they get another income replacement benefit, for example, State Pension. The Scottish Government has looked at options to provide a new payment to carers with 'underlying entitlement'. A different approach could be a payment for long-term carers which would recognise the impacts on carers' finances of a long-term caring role. This approach would need to be examined to understand whether this would be feasible, its impacts and to work out more detail about who would be able to get a payment and how much it should be.

Questions 40 and 41 asked:

**Question 40: Do you agree or disagree that a payment for long-term carers should be considered further?**

**Question 41: Please write the reason why you agree or disagree that a payment for long-term carers should be considered further, or any other information you want to share on this question.**

As noted in the following table, a large majority of those answering this question (86%) agreed that a payment for long-term carers should be considered further.

**Table 18: Level of agreement that a payment for long term carers should be considered further**

Q40	Number (percentage *)			
	Agree	Disagree	Unsure	Not answered
Organisations (n=41)	28	-	3	10
Individuals (n=151)	109	3	16	23
Total respondents (n=192)	137	3	19	33
<b>Total respondents answering question (n=159)</b>	<b>137 (86%)</b>	<b>3 (2%)</b>	<b>19 (12%)</b>	

\* figures may not add to 100% due to rounding

A total of 116 respondents then commented at Question 41, some of whom referred to their personal situation as a carer. A key theme, across all subgroups, and noted by a significant minority was the importance of recognising the caring role and the impacts on carers. There were comments in support of this proposal as it would help to provide financial support and stability to unpaid carers. There were also references to the contribution made by carers and the savings made for the health and social care sector. There was a general view that anyone providing care should be appropriately supported and compensated, particularly as some carers will have foregone opportunities for education, employment, career progression and building up a private pension. It was also felt that caring can have a greater impact on a person as they get older. A small minority of respondents also commented on their personal circumstances, noting they had lost income and finances in the form of salary and pension contributions, as a direct result of caring. As one campaigning / advocacy organisation commented:

“We support an approach which looks at providing longer term financial support and stability for carers. Many carers struggle to juggle their work or caring responsibilities while trying to maintain their own physical and mental health. Quite often, their own health can suffer as a result of the strain and pressure of caring. Removing financial worry for carers has the potential to make a difference to them and their family.”

Entitlement to this payment was referenced by a number of respondents, with a significant minority suggesting that carers on a state pension should qualify for this payment. The key reason for this was that caring responsibilities continue after retirement and some caring roles become harder with age. Again, there were some references to the financial disadvantages experienced by carers and the savings made for the public purse due to their caring role. As well as individuals in receipt of a state pension, smaller numbers of respondents also felt that this payment should be available to:

- Those who care for the terminally ill.
- Single parents who work.
- Unpaid carers who do not qualify because of the earnings threshold.
- Anyone on a lower rate of income tax.
- All carers.
- Carers of those living with dementia.
- Two people caring for the same individual, so that both are in receipt of this payment.

While respondents generally welcomed this proposal, some noted that all carers should be able to access social security payments that give financial recognition which reflect the nature of the caring role. This was largely to counteract the poverty that many carers suffer. Suggestions included that all carers should receive the equivalent of the State Pension, that payments could correlate with the level of care provided, Universal Basic Income should be used as a basic income with top ups for any disabilities, or that carers should be paid a minimum of the living wage for the first 35 hours of care.

Benefits of this proposal were outlined by a few respondents. These were primarily that this helps to reduce the current strain felt by the care system, although there was also acknowledgement from a couple of respondents that this would remove some of the strain felt by carers.

A small minority of respondents, mostly individuals and campaigning / advocacy organisations, felt this is an area for further consideration and exploration, with references to the recent [Independent Review of Adult Social Care in Scotland](#).

Of the small number of respondents who disagreed with this proposal, there were comments that carers will already be receiving other benefits, that there are existing schemes to provide for such carers or that those with a State Pension should not be entitled as they are already in receipt of a State Pension which is a higher amount than Carer's Allowance.

## What a payment should look like and who it should be for

Questions 42 and 43 then asked:

***Question 42: If a payment for long-term carers was considered, what should the payment look like and who should it be for?***

***Question 43: Please give us any other views you want to share about the proposals for future changes to Scottish Carer's Assistance.***

A total of 107 respondents provided comments at Question 42. A wide range of suggestions were made although there was little consensus in responses, with most respondents unable to suggest a suitable amount for this payment.

A few respondents suggested there should be an additional payment each month. Alternatively, smaller numbers felt a one-off annual payment would be appropriate or suggested a weekly payment. Suggested amounts for a weekly payment ranged from £10 per week to £100 per week. A small number of respondents opted for a top up payment paid twice yearly.

Other suggestions made by small numbers of respondents were that this payment:

- Should not be means tested.
- Should be means tested.
- Should not be taxed.
- Should not impact on other benefits.
- Should be linked to the living wage rate or be based on a guaranteed universal income.
- Should be on a scale depending on the level and complexity of care provided and the skills needed to deliver this care.

In terms of who the payment should be for, a wide range of suggestions were made. The key suggestions were for all carers, those in receipt of State Pension, all carers with underlying entitlement and carers providing care for



someone with a lifelong condition. Other suggestions made by small numbers of respondents included carers who:

- Care for children with lifelong disabilities.
- Care for seriously disabled individuals.
- Have cared for at least five years.
- Have cared for a long time (unspecified duration).
- Provide care and are unable to work or seek employment.
- Care for more than 35 hours a week.
- Provide care and have employment.
- Look after relatives.
- Care for the terminally ill.
- Work for more than 16 hours per week and earn above the threshold.
- Are in full time education.
- Are in a household where care is delivered by more than one person (both should be eligible).
- Are young carers.

As a third sector organisation commented:

*“There needs to be recognition that long-term carers, who are providing intensive caring roles, often over many decades, need to be well supported financially and with much needed and identified care and support from health and social care. Lack of appropriate support does not assist family carers to move out of poverty but instead locks families, facing poor service provision into additional poverty.”*

## Other views about the proposals for future changes to Scottish Carer’s Assistance

A total of 70 respondents commented at Question 43, most of whom echoed points made at earlier questions; some of these welcomed the proposals for future changes, without providing much by way of additional detail. Comments included requests:

- To raise the earnings threshold, with one individual noting that work is good for the mental health of carers, albeit that some carers are unable to work due to their caring role.
- For pensioners to be awarded Scottish Carer’s Assistance.
- For carers to be recognised and rewarded fairly.

- To identify all carers across Scotland to ensure all those who qualify for Scottish Carer's Assistance are aware of this.
- For two carers in the same household to qualify for Scottish Carer's Assistance where they both provide care for an individual.
- For the 35 hours caring limit to be removed, a campaigning / advocacy organisation suggested this should be lowered to 20 hours.
- For all future changes to be introduced at the launch of Scottish Carer's Assistance.
- To raise awareness of entitlement to Scottish Carer's Assistance to ensure that all who qualify for a payment are aware of this.
- For increased benefits to be offered to carers; for example, free dental care, free eye care or free TV licences.

There were a small number of comments from organisations in relation to a minimum income guarantee, with a local authority noting:

“Understanding the inter-relationships, if any exist, between SCA and any future design of a Minimum Income Guarantee will be important. There are options to incorporate contributory and non-contributory elements into these payments to ensure all those eligible, will receive a minimum level of support and those who have contributed are able to access an additional amount. This approach provides a safety net to mitigate the impacts of income shocks and provide a regular and predictable income.”

Finally, a campaigning / advocacy organisation noted that social security policy for carers needs to be consistent and have coherence with other policy areas that can impact on carers, for example, the Scottish Government's broader commitments to tackle gender inequality.

## Impact Assessments

The consultation noted that in their work to develop policy for Scottish Carer's Assistance the Scottish Government has considered how the decisions made could affect people and groups differently. It highlighted that carer benefits will be designed and developed in a way that will help ensure that they work for all carers. The consultation also noted that the Scottish Government is seeking to avoid any negative impacts in benefit delivery to any people, groups, communities or businesses.

## Equality Impact Assessment

The consultation paper noted that the Scottish Government has looked at equality information about unpaid carers to identify where changes could affect some groups either positively or negatively, and where there are opportunities to make changes which would improve equality.

***Question 44: Please set out any information you wish to share on the impact of Scottish Carer's Assistance on groups who share protected characteristics.***

A total of 70 respondents answered this question. Some respondents provided general comments rather than referencing specific groups who share protected characteristics. A few respondents agreed generally with the proposed changes set out in the consultation paper, typically saying it is a fairer system, more empathetic, and will positively impact equality. A few respondents made general comments on the need for equality for all carers as well as access to all services. One individual suggested that those with protected characteristics should have less stringent requirements regarding eligibility for the benefit.

A small number of respondents foresaw the need for all unpaid carers to receive the same level of support.

Some respondents focused on groups of people who share protected characteristics, and these remarks are summarised in the following paragraphs. However, it should be noted that some respondents referenced multiple protected characteristics, for example, women who are disabled or women who are from an ethnic minority group.

## Women

A few respondents remarked on women who are carers, agreeing with the consultation paper which noted that caring roles fall most typically to women, with caring more likely to have a negative impact on greater numbers of women than men. A campaigning / advocacy organisation commented that single parents are predominantly women, more likely to be reliant on social

security benefits and experience poverty. There were also references to disabled migrant women, and women from south Asian communities who may be caring for multiple family members but who do not consider themselves to be carers and might not apply for the support to which they are entitled. It was also felt that language barriers might prevent some women for whom English is not always their first language from applying for support.

## Age

Of the small number of respondents who mentioned age, most focused on the elderly in that caring can be more difficult for them. Again, there were a very small number of comments that pensioners should be entitled to Scottish Carer's Assistance. A very small number of respondents focused on young carers, with one request for children under 16 who are carers to be eligible for Scottish Carer's Assistance.

## Disability

A few respondents discussed disabled people, with comments that there can be overlapping issues which impact on those with disabilities. One individual pointed out that disabled people are disadvantaged if they receive ESA (Employment and Support Allowance) as they then lose their Carer's Allowance. Another individual felt that care experienced young people are not assessed for disabilities quickly enough and that this should in itself be an additional protected characteristic. One respondent perceived that individuals with health conditions such as epilepsy may need more support and financial help and may rely more on carers. Additionally, some of these are carers themselves and there is likely to be a negative financial impact on all carers when diagnosed with epilepsy.

## Race

A few respondents remarked on individuals within ethnic minority groups. The key issue was that this group of people need to be encouraged to apply for the support to which they are entitled, as many will be either unaware of their entitlement or will not want to come forward to ask for help. Furthermore, information needs to be provided in various language formats, as not all individuals will speak fluent English.

## Sexual orientation

A very small number of remarks related to sexual orientation. A campaigning / advocacy organisation noted that there can be issues for LGBT+ individuals in receiving support for a caring role if they do not want to declare the nature of their relationship to the cared for individual.

## Other references

Other remarks were made regarding individuals living on the islands or in rural communities where it might be difficult to access help and services. There were also a few references to the need for more support for working carers or those who would like to work, with requests for the earnings threshold to be eased.

A few respondents – primarily organisations – foresaw a need for the Scottish Government to work alongside representative carer groups and those with lived experience in the development of these proposals, with one noting the need for engagement with communities using a Human Rights based approach. Concerns over eligibility criteria and carers with no recourse to public funds were raised by a small number of organisations, with a suggestion that more data is needed to ascertain the number of carers across Scotland.

One organisation advocated the need to differentiate carers who look after individuals with profound and multiple learning disabilities (PMLD) or with complex needs and their reality of caring, from that of families caring for a child with less complex needs.

## Island Communities Impact Assessment

The consultation paper outlined a number of issues which impact on island communities. It also noted that Social Security Scotland's Local Delivery function will provide support to applicants in rural areas, which will be an improvement on the support offered through the current system. The Scottish Government will also be putting in place a monitoring and evaluation plan for Scottish Carer's Assistance prior to implementation that is intended to take account of the issues identified with the completed Island Communities Impact Assessment.

***Question 45: Please set out any information you wish to share on the impact of Scottish Carer's Assistance on Island communities.***

Only 32 respondents provided commentary at this question, although some others stated they could not comment, as they do not live in an island community.

Most of the information provided by respondents echoed the issues outlined in the consultation paper. The two most cited issues by significant numbers of these respondents were the limited services available and the costs of accessing these services. In terms of the former, respondents noted a lack of health professionals, amenities and services in island communities, with fewer opportunities for carers to access the necessary services. Examples given included a lack of local providers, reduced availability of services, and a lack

of day care and respite provision. As such, a third sector carer's organisation noted that caring roles on the islands can be more intensive due to a lack of social care provision. A couple of respondents also noted that there may be increased feelings of isolation for carers in island communities, and an individual commented that a loss of interaction and support can lead to a decline in mental health for carers.

Linked to the latter issue, respondents noted that it costs more to access services and that the cost of living is higher for island communities (one representative body / association commented that the cost of living is estimated to be 15-30% higher). Fuel poverty rates are also higher on the islands. Overall, it was felt that island communities are more economically disadvantaged than their mainland counterparts. As one local authority commented:

“Residents in island communities, such as Highland, experience different complexities, costs of living, access to services, and lifestyles when compared with those living in an inner city. Many families in rural areas will run a car at the expense of other essential requirements to access further and higher education, employment, and essential services. In addition, food and fuel are often more expensive for island communities and those living in rural areas. Issues such as increased travel costs to access employment and services, low pay which is often linked to seasonal employment and the historical low take up of benefits all compound the issues of financial hardships and poverty. These factors mean residents in the Highlands and other rural areas in Scotland have different experiences when compared with inner cities. Thus, service design needs to accommodate these different needs in order to achieve the best possible outcomes.”

Digital exclusion and unreliable broadband services were cited by a few respondents as being an issue for island communities, although two third sector organisations also noted that direct face-to-face communication can be a challenge due to geographical distance. A campaigning / advocacy organisation noted:

“We have, through dialogue with our rural and island-based customers, learned about the extra challenges they face such as paying higher costs for their energy usage (due to a lack of energy options available), poor infrastructure and transport options, and poor connectivity and broadband coverage which hinders their ability to seek out support online.”

A very small number of respondents noted that it can be difficult to find part-time employment on the islands and thus obtaining additional finance for a household is more challenging.

Ways of overcoming these specific challenges were mentioned by a small number of organisations. These included suggestions for tax credits to be offered to carers in these locations to reflect the different environment in which they deliver care; to offer a rural supplement to Scottish Carer's Assistance to help address the additional costs of fuel, food and transport; and to offer free travel to those living in island communities.

While this question focused on island communities specifically, a small number of respondents also noted that these issues are not specific solely to island communities, but that mainland rural and remote communities suffer from the same issues and challenges such as limited services and access to these.

## Fairer Scotland Duty

The Scottish Government is also keen to look at how Scottish Carer's Assistance can help to reduce the challenges that people can face as a result of socio-economic disadvantage, which can include having a low income, not having access to basic goods and services, or having a background which gives them fewer advantages. In developing detailed policy for Scottish Carer's Assistance, the Scottish Government will be looking further at how it could do more to help tackle the disadvantages people face because of financial and economic inequality.

***Question 46: Please set out any information you wish to share on the impact of Scottish Carer's Assistance on reducing inequality caused by socio-economic disadvantage.***

A total of 62 respondents answered this question, many points mirroring those raised in the consultation paper. The key theme to emerge, and cited by respondents across most sub-groups, was support for the proposals in the consultation paper. It was perceived that these will help to reduce socioeconomic disadvantage, with many of the proposals positively impacting on people living in poverty.

Issues where respondents agreed with points raised in the consultation paper included agreement that women are disproportionately affected by caring and that providing care can result in significant personal and economic costs. One third sector organisation noted that it is vital that the gendered impact of providing unpaid care is addressed. Linked to this, there were also a few comments that individuals with socio-economic disadvantage are least able to advocate for themselves, that the current cost of living crisis has exacerbated

socio-economic disadvantage, and that many carers are significantly restricted in their ability to be socially and economically active and have limited life opportunities due to their caring role.

Other themes which have been cited in earlier questions included:

- The need for carers to be given recognition and support in their role.
- All carers should be able to have an equal quality of life with non-carers.
- Requests for changes to eligibility criteria: this included requests to raise the earnings threshold as this currently does not allow for stable or sustainable career options for carers; changes to the requirement for a minimum of 35 hours per week caring commitment; and revisions to the rules which tie the provision of the benefit to the cared for person's disability benefit entitlement.
- Requests for the introduction of a Minimum Income Guarantee.
- Receipt of Scottish Carer's Allowance should entitle carers to additional services that help to reduce disadvantage, such as free travel on public transport, regular health checks, and assistance in finding skilled employment.
- Provision of support services such as community hubs, which can provide information on other services, and benefits to which carers might be entitled; or education and information for carers who are disadvantaged.

A few respondents noted their agreement with these proposals but felt that they need to go further. A representative body noted that there is a need for significant changes to reduce poverty levels, and an organisation in the health sector felt that there is a need for longer term changes to relieve financial pressures (including the current cost of living crisis, the earnings cap and the inadequacy of other social security benefits).

Very small numbers of organisations noted the need to tackle the root causes of poverty, and a couple of individuals felt that socio-economic disadvantage should be prioritised over other groups with protected characteristics.

## Child Rights and Wellbeing Impact Assessment

The consultation paper noted that a Child Rights and Wellbeing Impact Assessment will be carried out for Scottish Carer's Assistance to help to ensure that this will protect and promote the wellbeing of children and young people. Scottish Carer's Assistance will be available to carers aged 16 and over so the consultation noted that it is expected the primary impacts will be on young people aged 16 and over.

**Question 47: Please set out any information you wish to share on the impact of Scottish Carer's Assistance on children's rights and wellbeing.**



A total of 53 respondents answered this question, some of whom noted the importance of children's rights and wellbeing as a consideration and felt the proposals would have a positive impact on children and their rights, improve financial stability and increase recognition of child carers. Linked to this, a few individuals saw a need to protect children and to ensure they are at the centre of any decision-making. There were a number of general remarks that the proposals in this consultation paper will lead to improvements for young carers in terms of maintaining social connections through education, supporting their wellbeing and having a positive impact on mental health.

Other views, each advocated by very small numbers of respondents included:

- Young carers are currently not recognised but should be and should get more financial assistance and more support in the future.
- All young carers need to be made aware of their entitlement to benefits.
- Changes to Scottish Carer's Assistance that remove barriers for accessing full-time education will mean more carers will be able to study and improve their life chances. Young carers will be less likely to have to make a choice between education and caring.
- The Scottish Government should work with young carer's organisations.
- There should be a consistent age definition for children across all policy areas.

## Business and Regulatory Impact Assessment

The consultation paper noted that a Business and Regulatory Impact Assessment is used to analyse the cost and benefits to businesses and the third sector of any proposed legislation or regulation, with the goal of using evidence to identify the proposal that best achieves policy objectives while minimising costs and burdens as much as possible. The Scottish Government has considered the potential business and third sector impacts of introducing Scottish Carer's Assistance, including Carer's Additional Person Payment. Question 48 asked:

***Question 48: Please set out any information you wish to share on the impact of Scottish Carer's Assistance on businesses.***

Only 30 respondents provided comments at this question, with a few noting their agreement that the impact on businesses needs to be considered.

A key view espoused by a few respondents was the need for all businesses to have a basic understanding about the caring role and the impact this can have on an individual, for example, being limited in the number of hours that can be worked. A representative body noted that businesses need to be flexible and creative in their contractual arrangements, and that the need for changes to

working practices during the pandemic has shown this is possible. Allied to this, a few respondents also noted that the consultation proposals might benefit businesses as carer employees may be able to work longer hours, with resulting benefits for the business and the carer's mental health. The proposals may also help to ease recruitment and retention problems currently being experienced by some businesses. A representative body / association noted:

“The increase in the earnings limit for carers and the increase in hours that carers are able to work could benefit employers. There have been workforce shortages, with recruitment and retention of staff remaining challenging in the public, third sector and independent sector. While not all carers will be able to work, it will depend on their individual circumstances, but those who can may help ease the workforce challenges across the sectors while improving their financial situation. The pandemic has taught that standard work patterns can change; hybrid working and working from home are attractive options and offer flexible arrangements that may suit some carers. The impact on business in each of the sectors will require them to become flexible and creative in their contractual arrangements with staff.”

A very small number of respondents, mostly organisations, suggested that there would be economic benefits from these proposals. A third sector organisation noted that carers could be more socially and economically active in their communities, and a local authority perceived that increased benefits would mean more spend in local businesses.

The need for advice and support activities was highlighted by a very small number of respondents. A health organisation suggested that guidance should be provided to businesses about the employment of carers, and an individual noted that carer organisations can advise businesses on how to support carers within their workforce. There were a small number of references to removing the earnings threshold and / or revising the number of hours a carer can work before their benefits are impacted.

## Additional comments

A few respondents provided additional comments, some of which reiterated points made at earlier questions.

Some of these respondents welcomed the opportunity to respond to the consultation and provided background information on their organisation to provide context for their response.

The issues raised included:

- There is a need to improve support for carers. This includes welfare benefits and other means of assistance such as respite breaks.
- Support for carers needs to be easier to access with Social Security Scotland staff based in carer centres to provide advice and support to carers. Reference was made to obtaining tailored peer support and mental health provision. At a consultation event, respondents noted that Social Security Scotland's staff need to be able to understand the process from a carer's perspective and to understand different disability conditions.
- Scottish Carer's Assistance should be extended to include a wider range of carers including people of pension age and full and part-time students.
- Scottish Carer's Assistance should be based on the Scottish Living Wage.
- Scottish Carer's Assistance should be provided on a sliding scale so that those in greater need can receive a higher benefit level, for example, islanders and those in rural Scotland where higher numbers of people suffer from fuel poverty.
- The names and range of different payments is confusing to carers.
- There is a need for support for carers to enable them to fulfil their caring role as well as enabling external support to be brought in where necessary, as some carers have to manage their own condition as well as look after the cared for person.
- Payments to long-term carers should be based on existing information rather than via an intrusive application process.

## **Appendix I: Organisations responding to the consultation**

### **Campaigning / advocacy organisations**

Advice Direct Scotland  
Carers Link East Dunbartonshire  
Child Poverty Action Group in Scotland  
Citizens Advice Scotland  
ENABLE Scotland  
Engender  
Epilepsy Scotland  
Low Incomes Tax Reform Group  
MND Scotland  
MS Society  
North Lanarkshire Carers Together  
One Parent Families Scotland  
Parkinson's UK Scotland  
Poverty Alliance  
Reform Scotland  
Scottish Women's Convention  
Self-Directed Support Collective

### **Health organisations**

Aberdeen City Health Social Care Partnership  
Clackmannanshire and Stirling Health & Social Care Partnership  
NHS Greater Glasgow Carer's Working Group

### **Local Authorities**

Glasgow City Council  
South Lanarkshire Council  
The Highland Council

### **Representative Body / Association**

Health and Social Care Alliance Scotland  
Scottish Association of Social Work  
Social Work Scotland

**Third Sector**

About Dementia (Age Scotland)

Age Scotland

Al Massar SCIO

Maggie's Scotland

Marie Curie

National Association of Student Money Advisers

Poppy Scotland

Promoting a More Inclusive Society

Self-Directed Support South Lanarkshire

**Third Sector (Carer)**

Angus Carers Centre

Care for Carers

Crossroads Care Harris

National Carer Organisations

Stirling Carers Centre

## Appendix 2: Detailed breakdown of closed questions

**Table 2: Level of agreement with the proposed residency criteria for Scottish Carer's Assistance**

Q3	Number (percentage *)			
	Agree	Disagree	Unsure	Not answered
Campaigning / advocacy (17)	6 (35%)	4 (24%)	4 (24%)	3 (18%)
Health organisation (3)	2 (67%)	-	1 (33%)	-
Local authority (3)	2 (67%)	1 (33%)	-	-
Representative Body / Association (3)	1 (33%)	-	2 (67%)	-
Third sector (10)	6 (60%)	-	-	4 (40%)
Third sector (Carer) (5)	2 (40%)	-	-	3 (60%)
<b>Total organisations (41)</b>	<b>19 (46%)</b>	<b>5 (12%)</b>	<b>7 (17%)</b>	<b>10 (24%)</b>
Individual (151)	100 (66%)	14 (9%)	30 (20%)	7 (5%)
<b>Total respondents (192)</b>	<b>119 (62%)</b>	<b>19 (10%)</b>	<b>37 (19%)</b>	<b>17 (9%)</b>

\* figures may not add to 100% due to rounding

**Table 3: Level of agreement with the proposed re-determination timescales for Scottish Carer's Assistance**

Q6	Number (percentage *)			
	Agree	Disagree	Unsure	Not answered
Campaigning / advocacy (17)	9 (53)	4 (24)	-	4 (24)
Health organisation (3)	3 (100)	-	-	-
Local authority (3)	3 (100)	-	-	-

Representative Body / Association (3)	3 (100)	-	-	-
Third sector (10)	5 (50)	-	-	5 (50)
Third sector (Carer) (5)	1 (20)	-	1 (20)	3 (60)
<b>Total organisations (41)</b>	<b>24 (59)</b>	<b>4 (10)</b>	<b>1 (2)</b>	<b>12 (29)</b>
Individual (151)	94 (62)	10 (7)	28 (19)	19 (13)
<b>Total respondents (192)</b>	<b>118 (61)</b>	<b>14 (7)</b>	<b>29 (15)</b>	<b>31 (16)</b>

\* figures may not add to 100% due to rounding

**Table 4: Level of agreement with the proposals on when payments of Scottish Carer's Assistance should be suspended**

Q8	Number (percentage *)			
	Agree	Disagree	Unsure	Not answered
Campaigning / advocacy (17)	8 (47)	2 (12)	3 (18)	4 (24)
Health organisation (3)	2 (67)	-	1 (33)	-
Local authority (3)	2 (67)	-	1 (33)	-
Representative Body / Association (3)	2 (67)	1 (33)	-	-
Third sector (10)	4 (40)	-	1 (10)	5 (50)
Third sector (Carer) (5)	2 (40)	-	-	3 (60)
<b>Total organisations (41)</b>	<b>20 (49)</b>	<b>3 (7)</b>	<b>6 (15)</b>	<b>12 (29)</b>
Individual (151)	83 (55)	24 (16)	24 (16)	20 (13)
<b>Total respondents (192)</b>	<b>103 (54)</b>	<b>27 (14)</b>	<b>30 (16)</b>	<b>32 (17)</b>

\* figures may not add to 100% due to rounding

**Table 5: Level of agreement with the proposals for when an award of Scottish Carer's Assistance should be set to £0**

Q11	Number (percentage *)			
	Agree	Disagree	Unsure	Not answered
Campaigning / advocacy (17)	5 (29)	-	5 (29)	7 (41)
Health organisation (3)	3 (100)	-	-	-
Local authority (3)	3 (100)	-	-	-
Representative Body / Association (3)	1 (33)	1 (33)	1 (33)	-
Third sector (10)	3 (30)	2 (20)	1 (10)	4 (40)
Third sector (Carer) (5)	1 (20)	-	1 (20)	3 (60)
<b>Total organisations (41)</b>	<b>16 (39)</b>	<b>3 (7)</b>	<b>8 (20)</b>	<b>14 (34)</b>
Individual (151)	93 (62)	20 (13)	22 (15)	16 (11)
<b>Total respondents (192)</b>	<b>109 (57)</b>	<b>23 (12)</b>	<b>30 (16)</b>	<b>30 (16)</b>

\* figures may not add to 100% due to rounding

**Table 6: Level of agreement with the proposal to pay Scottish Carer's Assistance to carers when the person they are caring for is receiving short-term assistance**

Q13	Number (percentage *)			
	Agree	Disagree	Unsure	Not answered
Campaigning / advocacy (17)	9 (53)	-	1 (6)	7 (41)
Health organisation (3)	2 (67)	-	1 (33)	-
Local authority (3)	2 (67)	-	1 (33)	-
Representative Body / Association (3)	3 (100)	-	-	-



Third sector (10)	5 (50)	-	1 (10)	4 (40)
Third sector (Carer) (5)	2 (40)	-	-	3 (60)
<b>Total organisations (41)</b>	<b>23 (56)</b>	<b>-</b>	<b>4 (10)</b>	<b>14 (34)</b>
Individual (151)	110 (73)	1 (1)	19 (13)	21 (14)
<b>Total respondents (192)</b>	<b>133 (69)</b>	<b>1 (1)</b>	<b>23 (12)</b>	<b>35 (18)</b>

\* figures may not add to 100% due to rounding

**Table 7: Level of agreement that Carer's Allowance Supplement should be paid alongside carer's regular payments of Scottish Carer's Assistance in future**

Q16	Number (percentage *)			
	Agree	Disagree	Unsure	Not answered
Campaigning / advocacy (17)	8 (47)	-	4 (24)	5 (29)
Health organisation (3)	3 (100)	-	-	-
Local authority (3)	1 (33)	2 (67)	-	-
Representative Body / Association (3)	1 (33)	-	2 (67)	-
Third sector (10)	5 (50)	1 (10)	1 (10)	3 (30)
Third sector (Carer) (5)	1 (20)	3 (60)	-	1 (20)
<b>Total organisations (41)</b>	<b>19 (46)</b>	<b>6 (15)</b>	<b>7 (17)</b>	<b>9 (22)</b>
Individual (151)	87 (58)	21 (14)	30 (20)	13 (9)
<b>Total respondents (192)</b>	<b>106 (55)</b>	<b>27 (14)</b>	<b>37 (19)</b>	<b>22 (11)</b>

\* figures may not add to 100% due to rounding

**Table 8: Level of agreement with the proposed eligibility criteria for Carer's Additional Person Payment**

Q19	Number (percentage *)			
	Agree	Disagree	Unsure	Not answered
Campaigning / advocacy (17)	7 (41)	3 (18)	2 (12)	5 (29)
Health organisation (3)	3 (100)	-	-	-
Local authority (3)	3 (100)	-	-	-
Representative Body / Association (3)	-	2 (67)	1 (33)	-
Third sector (10)	3 (30)	2 (20)	1 (10)	4 (40)
Third sector (Carer) (5)	1 (20)	1 (20)	-	3 (60)
<b>Total organisations (41)</b>	<b>17 (41)</b>	<b>8 (20)</b>	<b>4 (10)</b>	<b>12 (29)</b>
Individual (151)	101 (67)	9 (6)	24 (16)	17 (11)
<b>Total respondents (192)</b>	<b>118 (61)</b>	<b>17 (9)</b>	<b>28 (15)</b>	<b>29 (15)</b>

\* figures may not add to 100% due to rounding

**Table 9: Level of agreement with the proposed payment frequency for Carer's Additional Person Payment**

Q21	Number (percentage *)			
	Agree	Disagree	Unsure	Not answered
Campaigning / advocacy (17)	8 (47)	-	4 (24)	5 (29)
Health organisation (3)	3 (100)	-	-	-
Local authority (3)	3 (100)	-	-	-
Representative Body / Association (3)	2 (67)	-	1 (33)	-
Third sector (10)	4 (40)	2 (20)	-	4 (40)

Third sector (Carer) (5)	1 (20)	1 (20)	1 (20)	2 (40)
<b>Total organisations (41)</b>	<b>21 (51)</b>	<b>3 (7)</b>	<b>6 (15)</b>	<b>11 (27)</b>
Individual (151)	96 (64)	9 (6)	26 (17)	20 (13)
<b>Total respondents (192)</b>	<b>117 (61)</b>	<b>12 (6)</b>	<b>32 (17)</b>	<b>31 (16)</b>

\* figures may not add to 100% due to rounding

**Table 10: Level of agreement with the proposal to target Carer's Additional Person Payment to carers who are getting payments of Scottish Carer's Assistance**

Q23	Number (percentage *)			
	Agree	Disagree	Unsure	Not answered
Campaigning / advocacy (17)	5 (29)	3 (18)	4 (24)	5 (29)
Health organisation (3)	3 (100)	-	-	-
Local authority (3)	2 (67)	1 (33)	-	-
Representative Body / Association (3)	2 (67)	1 (33)	-	-
Third sector (10)	2 (20)	4 (40)	1 (10)	3 (30)
Third sector (Carer) (5)	1 (20)	1 (20)	1 (20)	2 (40)
<b>Total organisations (41)</b>	<b>15 (37)</b>	<b>10 (24)</b>	<b>6 (15)</b>	<b>10 (24)</b>
Individual (151)	85 (56)	12 (8)	31 (21)	23 (15)
<b>Total respondents (192)</b>	<b>100 (52)</b>	<b>22 (11)</b>	<b>37 (19)</b>	<b>33 (17)</b>

\* figures may not add to 100% due to rounding

**Table 11: Level of agreement with the proposed future change to allow carers in full-time education to get Scottish Carer's Assistance**

Q26	Number (percentage *)			
	Agree	Disagree	Unsure	Not answered
Campaigning / advocacy (17)	14 (82)	-	-	3 (18)
Health organisation (3)	2 (67)	1 (33)	-	-
Local authority (3)	3 (100)	-	-	-
Representative Body / Association (3)	3 (100)	-	-	-
Third sector (10)	8 (80)	-	-	2 (20)
Third sector (Carer) (5)	3 (60)	-	-	2 (40)
<b>Total organisations (41)</b>	<b>33 (80)</b>	<b>1 (2)</b>	<b>-</b>	<b>7 (17)</b>
Individual (151)	125 (83)	1 (1)	3 (2)	22 (15)
<b>Total respondents (192)</b>	<b>158 (82)</b>	<b>2 (1)</b>	<b>3 (2)</b>	<b>29 (15)</b>

\* figures may not add to 100% due to rounding

**Table 12: Level of agreement with the proposed future change to allow carers to add together hours spent caring for two people to reach the 35 hour caring requirement**

Q28	Number (percentage *)			
	Agree	Disagree	Unsure	Not answered
Campaigning / advocacy (17)	12 (71)	-	2 (12)	3 (18)
Health organisation (3)	3 (100)	-	-	-
Local authority (3)	3 (100)	-	-	-

Representative Body / Association (3)	2 (67)	-	1 (33)	-
Third sector (10)	6 (60)	-	-	4 (40)
Third sector (Carer) (5)	3 (60)	-	-	2 (40)
<b>Total organisations (41)</b>	<b>29 (71)</b>	<b>-</b>	<b>3 (7)</b>	<b>9 (22)</b>
Individual (151)	101 (67)	6 (4)	25 (17)	19 (13)
<b>Total respondents (192)</b>	<b>130 (68)</b>	<b>6 (3)</b>	<b>28 (15)</b>	<b>28 (15)</b>

\* figures may not add to 100% due to rounding

**proposed future change to**  
**Table 13: Level of agreement with the continue to pay Scottish Carer's Assistance for 12 weeks (rather than 8 weeks) after the death of a cared for person**

Q30	Number (percentage *)			
	Agree	Disagree	Unsure	Not answered
Campaigning / advocacy (17)	14 (82)	1 (6)	-	2 (12)
Health organisation (3)	3 (100)	-	-	-
Local authority (3)	2 (67)	-	1 (33)	-
Representative Body / Association (3)	3 (100)	-	-	-
Third sector (10)	5 (50)	-	1 (10)	4 (40)
Third sector (Carer) (5)	3 (60)	-	-	2 (40)
<b>Total organisations (41)</b>	<b>30 (73)</b>	<b>1 (2)</b>	<b>2 (5)</b>	<b>8 (20)</b>

	<b>proposed future change to</b>			
Individual (151)	112 (74)	6 (4)	9 (6)	24 (16)
<b>Total respondents (192)</b>	<b>142 (74)</b>	<b>7 (4)</b>	<b>11 (6)</b>	<b>32 (17)</b>

\* figures may not add to 100% due to rounding

**Table 14: Level of agreement with the continue to pay Scottish Carer's Assistance for 12 weeks when a cared for person goes into hospital or residential care**

<b>Q32</b>	<b>Number (percentage *)</b>			
	Agree	Disagree	Unsure	Not answered
Campaigning / advocacy (17)	12 (71)	-	2 (12)	3 (18)
Health organisation (3)	3 (100)	-	-	-
Local authority (3)	3 (100)	-	-	-

	<b>proposed future change to</b>			
Representative Body / Association (3)	3 (100)	-	-	-
Third sector (10)	5 (50)	2 (20)	-	3 (30)
Third sector (Carer) (5)	3 (60)	-	-	2 (40)
<b>Total organisations (41)</b>	<b>29 (71)</b>	<b>2 (5)</b>	<b>2 (5)</b>	<b>8 (20)</b>
Individual (151)	108 (72)	6 (4)	11 (7)	26 (17)
<b>Total respondents (192)</b>	<b>137 (71)</b>	<b>8 (4)</b>	<b>13 (7)</b>	<b>34 (18)</b>

\* figures may not add to 100% due to rounding

**Table 15: Level of agreement with the increase the earnings limit for Scottish Carer's Assistance**

Q34	Number (percentage *)			
	Agree	Disagree	Unsure	Not answered



	<b>proposed future change to</b>			
Campaigning / advocacy (17)	14 (82)	-	-	3 (18)
Health organisation (3)	2 (67)	-	-	1 (33)
Local authority (3)	3 (100)	-	-	-
Representative Body / Association (3)	3 (100)	-	-	-
Third sector (10)	5 (50)	1 (10%)	-	4 (40)
Third sector (Carer) (5)	3 (60)	-	-	2 (40)
<b>Total organisations (41)</b>	<b>30 (73)</b>	<b>1 (2)</b>	<b>-</b>	<b>10 (24)</b>
Individual (151)	107 (71)	14 (9)	15 (10)	15 (10)
<b>Total respondents (192)</b>	<b>137 (71)</b>	<b>15 (8)</b>	<b>15 (8)</b>	<b>25 (13)</b>

\* figures may not add to 100% due to rounding

**Table 16: Level of agreement that the earnings threshold should be set at a level which would allow carers to work 16 hours a week alongside their caring role**

Q36	Number (percentage *)			
	Agree	Disagree	Unsure	Not answered
Campaigning / advocacy (17)	10 (59)	-	3 (18)	4 (24)
Health organisation (3)	2 (67)	-	-	1 (33)
Local authority (3)	3 (100)	-	-	-
Representative Body / Association (3)	2 (67)	1 (33)	-	-
Third sector (10)	5 (50)	1 (10)	1 (10)	3 (30)
Third sector (Carer) (5)	3 (60)	-	-	2 (40)
<b>Total organisations (41)</b>	<b>25 (61)</b>	<b>2 (5)</b>	<b>4 (10)</b>	<b>10 (24)</b>

Individual (151)	86 (57)	25 (17)	24 (16)	16 (11)
<b>Total respondents (192)</b>	<b>111 (58)</b>	<b>27 (14)</b>	<b>28 (15)</b>	<b>26 (14%)</b>

\* figures may not add to 100% due to rounding

**Table 17: Level of agreement with the proposal to look at a ‘run on’ after a carer earns over the earnings limit in future**

Q38	Number (percentage *)			
	Agree	Disagree	Unsure	Not answered
Campaigning / advocacy (17)	11 (65)	-	2 (12)	4 (24)
Health organisation (3)	2 (67)	-	1 (33)	-
Local authority (3)	2 (67)	-	1 (33)	-
Representative Body / Association (3)	2 (67)	-	1 (33)	-

Third sector (10)	6 (60)	-	-	4 (40)
Third sector (Carer) (5)	3 (60)	-	-	2 (40)
<b>Total organisations (41)</b>	<b>26 (63)</b>	<b>-</b>	<b>5 (12)</b>	<b>10 (24)</b>
Individual (151)	98 (65)	10 (7)	23 (15)	20 (13)
<b>Total respondents (192)</b>	<b>124 (65)</b>	<b>10 (5)</b>	<b>28 (15)</b>	<b>30 (16)</b>

\* figures may not add to 100% due to rounding

**Table 18: Level of agreement that a payment for long term carers should be considered further**

Q40	Number (percentage *)			
	Agree	Disagree	Unsure	Not answered
Campaigning / advocacy (17)	12 (71)	-	1 (6)	4 (24)

Health organisation (3)	3 (100)	-	-	-
Local authority (3)	2 (67)	-	1 (33)	-
Representative Body / Association (3)	2 (67)	-	1 (33)	-
Third sector (10)	6 (60)	-	-	4 (40)
Third sector (Carer) (5)	3 (60)	-	-	2 (40)
<b>Total organisations (41)</b>	<b>28 (68)</b>	<b>-</b>	<b>3 (7)</b>	<b>10 (24)</b>
Individual (151)	109 (72)	3 (2)	16 (11)	23 (15)
<b>Total respondents (192)</b>	<b>137 (71)</b>	<b>3 (2)</b>	<b>19 (10)</b>	<b>33 (17)</b>

\* figures may not add to 100% due to rounding

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