

# **Scottish Government Response to Consultation on the draft regulations of the Young Carer Grant**

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**Scottish Government**  
Riaghaltas na h-Alba  
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## Ministerial Foreword



I am delighted as Cabinet Secretary for Social Security and Older People to lay the regulations for the Young Carer Grant (YCG). This marks the introduction of a completely new benefit to support young carers in Scotland.

Young carers make an invaluable contribution to society. At a time when young people might be finishing school and undertaking new opportunities through work, study and travel, opportunities for young carers can be limited by their caring responsibilities. YCG, alongside a range of other measures contained within the Carers Act, will help improve the quality of life of young carers and will promote a wider range of life opportunities to ensure that this group is treated with dignity and respect.

I would like to thank the Scottish Commission on Social Security (SCoSS) and the Disability and Carer Benefit Expert Advisory Group (DACBEAG) for their reports and recommendations on YCG draft regulations. I welcome the opportunity to respond to the points raised and to explain the changes that have been made to the policy as a result.

The consultation on the draft regulations for YCG, which ran from 17 September to 10 December 2018, built on significant engagement with stakeholders. I welcome the opportunity to respond to the points raised in the consultation. Ensuring that we design YCG with and for young carers, we have worked closely with organisations and individuals and in keeping with the principles of the Social Security (Scotland) Act.

YCG is a new benefit for young carers in Scotland. We are investing in young people at a critical point in their lives through the grant and with a range of additional entitlements such as a free bus travel. Social security is a human right and YCG has been designed to be accessible both in terms of eligibility and the systems which will support it. It has been designed to respect the dignity of the individuals by reducing the intrusive questioning where possible while still maintaining a consistent decision making system. The Scottish social security system is to contribute to reducing poverty in Scotland and YCG eligibility has been designed to reach young carers in poverty and at risk of falling into poverty. Extensive modelling, desk research and user testing has provided us with a good evidence base for our policy decisions to ensure they have been designed with the people of Scotland.

The consultation responses and the recommendations of SCoSS and DACBEAG have helped us make final policy decisions and guide the development of IT systems and processes which are needed to make YCG a reality.

We are committed to providing carers with the right support at the right time. YCG will support around 2,400 young carers annually to ensure they do not miss out on opportunities available to other young people in Scotland.

I would like to thank everyone who has taken the time to submit their views.

**Shirley-Anne Somerville MSP**, Cabinet Secretary for Social Security and Older People

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## INTRODUCTION

1. Ministers have made a commitment to introduce Young Carer Grant (YCG) from Autumn 2019. It is intended that the YCG will help deliver the social security outcomes that carers:
  - are supported to look after their own health and wellbeing, improve their quality of life and reduce any negative impact of caring.
  - participate fully in society and, if they choose, engage in training, education and employment opportunities, as well as social and leisure activities.
  - have an increased sense of control and empowerment over their lives.
2. The Young Carer Grant Working Group was established in October 2017. It consists of young carer representatives, young carer services, local and national carer organisations, national youth organisations and CoSLA. The group helped to gather evidence, bring a variety of informed perspectives and provide feedback on proposals.
3. A Young Carer Panel was set up in early 2018. The Young Carer Panel was made up of young carers and young adult carers aged 16 to 25 years old. Panel members had the opportunity to take part in research and participation exercises such as focus groups and surveys. Initial findings from 15 focus groups, carried out across the country in 2018, were published on the Scottish Government website.<sup>1</sup>
4. A consultation on YCG regulations was launched<sup>2</sup> on 17 September 2018 and closed on 10 December 2018.
5. We received 75 responses to the consultation. During this period we engaged with 107 stakeholders through 11 consultation events across Scotland.
6. In addition to the formal consultation, we received over 60 responses to the YCG survey. The survey was designed to be user friendly and written in plain English. People could take part online, over the phone or using a paper form. An analysis of the consultation responses has been published.<sup>3</sup>

## IMPLEMENTATION OF YCG

7. YCG will be delivered by Social Security Scotland, an executive agency of the Scottish Government. Social Security Scotland is headquartered in Dundee with a second base in Glasgow and, once fully operational, will also have at least 400 local delivery posts in place across Scotland. Social Security Scotland currently delivers Carer's Allowance Supplement and Best Start Grant Pregnancy, Baby Payment and Best Start Early Learning Payment and by the end of 2019 a total of seven benefits will have been introduced.

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<sup>1</sup> Social Security Experience Panels: Initial Findings of the Development of the Young Carer Grant - <https://www.gov.scot/publications/social-security-experience-panels-initial-findings-development-young-carer-grant/>

<sup>2</sup> Consultation on Young Carer Grant Regulations - <https://www.gov.scot/govscot/publications/consultation-paper/2018/09>

<sup>3</sup> Analysis of YCG Consultation Responses -

8. We are using an 'Agile' approach to service design, which means that we will continually test evolving designs to make the application process as user-friendly as possible. Insights gained from this research will include how we can make the language used in the application form easy to understand and how we can format the application form so that it meets the needs of young carers. Once YCG payments are being made, we will continue to make improvements based on feedback from people who use the service.
9. We are also looking at how we can make the application process for YCG as streamlined as possible. The principle is that we should place the minimum evidence requirements on young carers to reduce any barriers to application. We recognise that young carers lead busy and sometimes chaotic lives and we therefore want to make the application process as simple as possible.

## **COMMUNICATION AND ADVICE**

10. The need for clear guidance for both decision makers and applicants, and for effective promotion of the YCG at all stages to maximise uptake has been highlighted during consultation and at meetings with stakeholders. Widespread training and awareness raising of YCG will also be required among partner agencies and advice and advocacy services. This will help to ensure that appropriate signposting is provided, and that applicants can access the necessary information and be suitably supported throughout the process. Ensuring that potential recipients clearly understand the application and appeals process is key.
11. An integrated communications plan for YCG is currently being developed and will be tested with users and stakeholders before being implemented across a range of targeted channels.
12. Social Security Scotland will actively engage with the advice sector to understand the impacts of YCG and identify how we can work in partnership to support clients. It will be possible for recipients of YCG to see someone face-to-face. Social Security Scotland, once fully operational, will provide a local presence where people can get one-to-one support if required.
13. Young carers will be given the option of how they want to engage with Social Security Scotland including online and by phone. As set out in the Scottish Government's consultation on Disability Assistance<sup>4</sup>, inclusive communication will be considered in all that we do.
14. The Scottish Government adheres to Digital First Service Standards. To progress to each new stage of development, the system must pass a Digital First Assessment. These assessments ensure that the system will meet accessibility standards for people who need extra support to use our service. Accessible formats, adaptations and support will be available to ensure all eligible young

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<sup>4</sup> [Disability assistance in Scotland: consultation](#), 2019

carers have the opportunity to apply for the grant and the process is underpinned by dignity, fairness and respect.

## **RESPONSE TO CONSULTATION –RESPONSES TO SELECTED QUESTIONS**

15. This section gives information on the Scottish Government response to questions that generated diverse views. Our full response to the consultation questions is set out at Page 9.

### **Q1. Do you think the draft regulations are likely to meet the policy aims set out in this document**

16. The majority (73%) of respondents felt that the draft regulations would be likely to meet the policy aims. Respondents' concerns centred on potential exclusion as the result of the eligibility criteria. This was particularly based on the requirements on 18 year olds to be in education.

17. YCG is one of a number of initiatives designed to provide further and more comprehensive support to carers in Scotland. The Scotland Act 2016 gives the Scottish Government legislative competence over eleven benefits including Carer's Assistance. The overarching framework for the new social security system is set out in the Social Security (Scotland) Act 2018.

18. The YCG is part of achieving the Scottish Government's National Outcomes and will specifically contribute towards the following:

- We tackle poverty by sharing opportunities, wealth and power more equally and;
- We respect, protect and fulfil human rights and live free from discrimination.

19. In response to the consultation and feedback from advisory groups and young carers, the Scottish Government has expanded the eligibility for YCG to all 16-18 year olds, where as previously an 18 year old was required to be in education.

20. We recognise that this restriction could have had a disproportionately negative impact on young carers in rural or island communities where young people more commonly leave school at 16 or 17 to continue their education at college.

21. We estimate that extending YCG to all 18 year olds could bring around an additional 700 young carers into eligibility each year at a cost of around an additional £200,000.

22. Young people aged 16-18 are often at a transition point in their lives. For many young adults with significant caring responsibilities, their opportunities may be limited by their caring role. The aim of the YCG is to help young people

improve their quality of life and help them improve their health and education outcomes.

**Q2. Can you identify any potential unidentified consequences of the regulations?**

23. Many respondents identified the challenges of exclusions based on the age criteria and the need to be in school. We have addressed these concerns by widening the eligibility criteria to all 18 year olds who provide care for at least 16 hours per week.
24. The cared for person is required to be normally paid one of the following:
- Personal Independence Payment - daily living component
  - Disability Living Allowance - the middle or highest care rate
  - Disability Living Allowance for Children
  - Attendance Allowance
  - Constant Attendance Allowance at or above the normal maximum rate with an Industrial Injuries Disablement Benefit
  - Constant Attendance Allowance at the basic (full day) rate with a War Disablement Pension
  - Armed Forces Independence Payment.
25. The Scottish Government will include hours spent providing emotional and psychological support in the definition of care for YCG.
26. The Scottish Commission on Social Security (SCoSS) and the Scottish Government's Disability and Carers Benefits Expert Advisory Group (DACBEAG) recommended against specifying the kind of care provided to avoid unnecessary complexity and favoured a flexible definition of care or no definition of care.
27. We understand that a flexible definition allows for a range of circumstances which is necessary considering the variety of young carers' responsibilities. However clarity may be required through wider Scottish Government communications in defining what constitutes care in order to facilitate the self-identification of carers and to allow a straightforward decision process.
28. As widening and shortening the definition to allow greater flexibility moves away from the definition of care set out in the Carers Act, we will consider how to support the process of self-identification for young carers through application guidance and supporting communications targeted at young carers.
29. We would not intend that subsidiary caring responsibilities are covered, such as looking after a pet for the cared for person, or time spent travelling in order to care.



**Q4. Should applicants be able to combine hours caring for more than one person to meet the required 16 hours average each week?**

30. Respondents felt strongly that young carers should be able to combine hours spent caring to meet the required 16 hour average each week. Therefore we have decided that young carers can combine hours spent caring for up to 3 cared-for people.
31. The aim of aim YCG is not intended to be a payment for care. It provides some financial support and recognition for young carers who have opportunities because of their caring responsibilities. As we are seeking to mitigate adverse impacts of caring; we intend to allow young carers to combine hours.
32. We will ask the client to sign a declaration which will confirm they have informed their cared-for person they are applying for the grant.
33. We will not ask for the number of hours spent caring to be recorded on a timesheet or other reference material. We will verify that the cared-for person is normally paid a qualifying disability benefit by checking the DWP systems.
34. Once the application has been processed, we will send a notification to both the client and the cared-for person
35. The Scottish Government is committed to building a system of benefits that is based on trust. In keeping with this principle, we will not ask the cared-for person or any other 3<sup>rd</sup> party to verify the care is taken place. As the consultation recognised, it may be necessary for further verification to be carried out in some cases. This may involve asking for confirmation that care is taking place.

**Q5. Should young carers be eligible for the YCG when another carer is in receipt of Carer's Allowance for providing care for the same person?**

36. Respondents felt that young carers should receive YCG if another carer is in receipt of Carer's Allowance and providing care for the same person. Taking this into account, we will award YCG in this circumstance.
37. Eligibility is based on the day the application is received by Social Security Scotland. If the caring relationship changes after the application has been made, this will have no impact, as long as the client met all of the eligibility conditions of the award on the date of application.
38. If we receive an application for the grant when the young carer has also applied for Carer's Allowance, we will not award the grant. We will invite the young carer to re-apply should their Carer's Allowance application be refused. The number of young carers within this age group who receive Carer's Allowance is very low. We would wish to avoid awarding the grant and then have a Carer's Allowance award being made which covers the same period, which would mean the young carer has received a Social Security payment for caring twice.

**Q7. Do you have any comments on the proposed approach to residency?**

39. The majority of respondents indicated that they were happy with the approach to residency. Some suggested that YCG should be available to all young carers living in Scotland, regardless of their immigration status.
40. To qualify for YCG, the applicant must be:
- i. habitually resident in the United Kingdom, the Channel Islands, the Isle of Man, the European Economic Area or Switzerland, and
  - ii. ordinarily resident in Scotland.
41. Our approach to residence with regards to YCG reflects the approach the Scottish Government has taken to other benefits.
42. Despite the success of our conversations with the Home Office in relation to Best Start Grant, YCG is of a different scale and our expectation had been that the Home Office would seek to add it to the list of controlled funds.

## SUMMARY OF CONSULTATION AND SG RESPONSE

Consultation Question	Response Numbers	Summary Analysis from Consultation Report	YCG Policy Response
Q1. Do you think the draft regulations are likely to meet the policy aims set out in this document?	Yes – 55 No – 17 Not Answered – 3	Most (73%) respondents felt that the draft regulations would be likely to meet the policy aims. Concerns reported were regarding apparent exclusions based on the eligibility criteria, that may limit the positive impact of YCG.	<p>The policy has been updated in response to the consultation to widen eligibility to include all young carers between the ages of 16-18. There is no stipulation that they have to be in education to receive the grant.</p> <p>The Scottish Parliament can only create carer benefits where there is “regular and substantial” provision of care to a “person to whom a disability benefit is normally payable”. This mirrors the existing criteria for Carer’s Allowance. To expand this definition, we would require primary legislation.</p>
Q2. Can you identify any potential unintended consequences of the regulations?	Yes – 49 No – 23 Not Answered – 3	<ol style="list-style-type: none"> <li>1. Many respondents identified challenges and exclusions created by the age criteria and the need to be attending a school. They felt that the grant should be provided on a more inclusive basis for all young carers aged 16-18.</li> <li>2. The definition of caring as provided in the draft regulations was considered too restrictive and may unintentionally result in the exclusion of those providing emotional (rather than practical) support.</li> </ol>	<ol style="list-style-type: none"> <li>1. We have removed the requirement for the recipient to be at school.</li> <li>2. The definition of care will include examples emotional as well as practical support to recognise the range of activities that amount to care. This reflects our intent that the grant should be available for carers whose lives are significantly affected by their caring role.</li> </ol>

		<p>3. Several respondents felt that the need for the cared-for person to be in receipt of specific benefits was restrictive and would exclude certain groups of young carers, particularly those supporting people with mental health issues and addictions.</p> <p>4. Excluding young carers from eligibility where YCG is already being paid to another person (when sharing the care of the same person) was highlighted. This was considered problematic both in terms of excluding young carers from the support, and in creating potential conflict between carers/young carers regarding who would apply for/ receive the grant, as well as perpetuating the risk that 'hidden' young carers remain unidentified. Rather, respondents felt that all young carers who provide the required hours of care should be eligible for support, regardless of other carers also claiming support.</p> <p>5. Some respondents highlighted a risk that the YCG could result in young people continuing in caring roles rather than maximising their life opportunities,</p>	<p>3. We have widened the definition of care to include examples of emotional and psychological aspects of care in response to feedback from the consultation. The requirement for the cared-for person to be normally paid specific benefits is necessary for identifying young carers, and to be within our legal competence.</p> <p>4. A young person will be eligible to receive YCG where they care for someone who is also being cared for by someone in receipt of Carer's Allowance. As a Day 1 approach, one young carer will be allowed to claim YCG for each cared for person in line with the recommendations from DACBEAG. Allowing multiple young carers to receive YCG for the same cared for person would require additional verification checks. However we commit to monitor any consequences of this decision. Young carers will be able to combine hours spent caring for up to three cared for persons in order to meet the 16 hour eligibility threshold. This is something the Scottish Government will continue to monitor.</p> <p>5. The YCG is intended to recognise the role and contribution of young carers and encourage them to have a life alongside caring. Alongside a range of non-cash</p>
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		<p>and could increase 'carer identity' which may have a negative impact on the young person's sense of agency. It was also suggested that the YCG may be seen as a 'gateway' to Carer's Allowance. Therefore, there could be a perception that the young carer should continue in their caring role when it is not in their best interests to do so.</p> <p>6. Some respondents commented that there may be issues for young carers that do not have bank accounts, while others suggested that some young carers will require help to complete the application process/form and that the process needs to be simple.</p>	<p>benefits delivered through Young Scot, the YCG intends to break down barriers to opportunities for young carers to education, leisure, travel and work. The Scottish Government is clear that it is up to the young carer how they wish to spend the grant and that it does not come with any assumptions about their future caring role.</p> <p>6. The Scottish Government is carrying out a range of user research and testing to ensure that the application process is as simple as possible. This process will be guided by feedback from young carers. YCG will be provided as a bank transfer payment as standard but we recognise that some young carers may not have a bank account. Therefore we will offer alternative payment methods through i-movo (in line with Agency wide policy) and we can also pay into a Credit Union account.</p>
<p>Q3. As the role of carers and the needs of the cared-for person are known to often change over time, the consultation document proposed</p>	<p>Yes – 57 No – 15 Not Answered – 3</p>	<p>Comments typically focused on the re-application process. Some respondents requested that some form of opt-in or standard reminder be sent to clients shortly before they need to re-apply as it was felt that many young carers would be likely to forget and that any re-application process needed to be kept as simple as possible for clients. It was felt that</p>	<p>A majority of participants agree that some form of re-application process is necessary. The Scottish Government is working to map user journeys in order to make the re-application process as light touch as possible in order to minimise disruption and stress for young carers.</p>

<p>that young carers would make a new application each year in order to receive payment. Do you agree with this proposal?</p>		<p>clients should not be expected to complete the form afresh each year, but rather they could be asked to review their previous application, or have the form pre-populated from their previous application and to confirm that the details were still accurate.</p> <p>Several respondents believed that re-applications were not necessary. Some felt that the grant should automatically cover young carers for the three year period. It was argued that the need to reapply would most likely result in discouraging some young carers from applying, and that the most vulnerable young carers and those that care for people with long term conditions may be the most adversely impacted.</p>	
<p>Q4. Should applicants be able to combine hours caring for more than one person to meet the required 16 hours average each week?</p>	<p>Yes – 75 No – 0 Not Answered – 0</p>	<p>There was unanimous support for this proposal. Many respondents noted that the carer was still providing the required number of hours, irrespective of who/how many people were being cared for. Indeed, a few suggested that it may be more stressful for the young carer to have responsibility to care for more than one person (meaning that they would be even more likely to benefit from the grant).</p> <p>Some noted that a lot of young carers provide care for more than one person, and to only allow an application based on one cared-for person would exclude/ discriminate against</p>	<p>The Scottish Government recognises that the total hours spent caring is what matters to young carers. An applicant may combine hours caring for up to three persons during the qualifying period. The impact of this will be monitored.</p>

		<p>many young carers. It was noted by one that additional parental responsibilities undertaken by young carers was not well reflected in the draft regulations.</p> <p>Other issues raised included: the difficulty for young carers to quantify the number of hours of care they provide, particularly where a routine has been established and the young person no longer perceives certain tasks as caring; and a concern that the requirement risks making 16 hours of care a target.</p>	
<p>Q5. Should young carers be eligible for YCG when another carer is in receipt of Carer's Allowance for providing care for the same person?</p>	<p>Yes – 75 No – 0 Not Answered – 0</p>	<p>There was unanimous support for this proposal. All respondents agreed that young carers should be eligible for YCG, even when another carer is in receipt of Carer's Allowance. Many respondents felt that, as long as the young carer was providing the required average of 16 hours of care per week then they should be entitled to the grant, irrespective of who else may be providing care or claiming a related benefit.</p> <p>Some respondents noted that YCG was aimed at supporting the young carer and not the cared-for person or other carers who may be receiving Carer's Allowance. Therefore it was important that the grant was based on the young carer's circumstances alone. It was noted that caring for someone with complex needs often requires more than one carer.</p>	<p>A young carer will be eligible for YCG when the cared for person is also being cared for by someone in receipt of Carer's Allowance. At present, only one person can claim Carer's Allowance for a person even if there are multiple carers. However the Scottish Government recognises the needs of people who require more than one carer and the eligibility criteria for YCG differs to that of Carer's Allowance. Therefore allowing a young carer to be eligible for YCG who provides care for someone is also being cared for by someone receiving Carer's Allowance would recognise the contribution of the young carer and it would not require additional verification checks.</p>

		<p>It was highlighted that such circumstances (i.e. where both a young carer and a Carer's Allowance recipient are involved in the provision of care for one person) are likely to be in households on low incomes. They felt that, without YCG, some young carers with significant caring responsibilities will remain disadvantaged.</p>	
<p>Q6a. Is 31 calendar days an acceptable time limit for requesting a redetermination?</p>	<p>Yes – 61 No – 12 Not Answered – 2</p>	<p>Most respondents (81%) felt that this was an acceptable time limit. Those respondents who did not agree typically indicated that they felt 31 calendar days was not long enough.</p> <p>Some respondents suggested that six weeks, two months or three months may be more acceptable timescales. It was noted that this was necessary because young carers are less likely to have interacted with, and will have less knowledge of, the benefits system. Respondents noted that some young carers may have chaotic home lives and should not be expected to have the same level of maturity/responsibility as an adult. As such, it was considered important that Social Security Scotland adopt an open, flexible and supportive approach to young carers.</p> <p>It was suggested by some that the timescale should be monitored for impact once the grant becomes available and, should issues arise, it should be extended. Meanwhile, it was noted</p>	<p>The Scottish Government will monitor whether the 31 calendar time limit for requesting a re-determination is sufficient following the launch of the grant.</p> <p>The Scottish Government will provide clear signposting to other financial and wider support services to young carers when someone comes into contact with social security Scotland.</p>



		<p>that it would be important to monitor the impact of the timescales on different equality groups. It was felt that an unsuccessful application may provide an opportunity to refer applicants to support services. They suggested that Social Security Scotland should play a leading role in identifying and working with organisations across Scotland who can both provide support to young carers and help them identify support.</p>	
<p>Q6b. Is 16 working days an acceptable time for a re-determination to be completed by Social Security Scotland?</p>	<p>Yes – 64 No – 10 Not Answered – 1</p>	<p>Most respondents (86%) agreed that the proposed 16 working day timescale for Social Security Scotland to complete a re-determination was acceptable. Answers from those who disagreed with the proposed timescale indicated that respondents had misunderstood the proposal, mistaking it to refer to the time available to young carers to request a re-determination.</p> <p>One respondent suggested a longer timescale (i.e. 20 working days) to ensure that the final decision was not rushed.</p> <p>Meanwhile, three respondents preferred a shorter timescale. One suggested that a three week wait for a response was too long. Another suggested that 10 working days would be more suitable as this would keep the decision to just a two week period. The third suggested reducing this to 15 working days to provide consistency with the Best Start Grant</p>	<p>Social Security Scotland will complete a redetermination within 16 working days. This strikes a balance between accuracy and fairness whilst minimising the length of time a young carer has to wait for a decision.</p>

		and Funeral Expense Assistance.	
Q7. Do you have any comments on the proposed approach to residency?	Yes – 17 No – 55 Not Answered – 3	<p>Less than a quarter of respondents (23%) indicated that they had any comments on this proposed approach. Those who supported the proposal felt that requiring applicants to be habitually resident in Scotland was reasonable, sensible and consistent with the approach taken for other devolved benefits.</p> <p>Others felt that all young carers should be entitled to the grant, regardless of their immigration status, provided they meet all the other requirements. Some respondents felt that the grant should be available to asylum seekers and other young people. Respondents noted that Scottish Ministers intend to make the case to the UK Government for an exception to be made for the Best Start Grant to allow asylum seekers to receive this support, and the same should be done for YCG.</p> <p>It was also noted that consideration will be needed regarding how Brexit might affect this policy with regards those resident in the EEA.</p>	<p>The majority of respondents agreed with the approach to residency which is consistent with the eligibility requirements for other benefits. Some suggested that YCG should be available to all young carers living in Scotland, regardless of their immigration status.</p> <p>If the Home Office add YCG to their list of controlled funds, then young migrants in receipt of YCG may become liable for deportation due to a breach of their visa conditions. For this reason, we are discussing the possibility of paying YCG to people with no recourse to public funds who meet the other eligibility criteria with the Home Office.</p> <p>The residency requirements takes into account the impact of the United Kingdom leaving the EEA. The regulations state that a person will have to be habitually resident in the UK, the Channel Islands, the Isle of Man, the EEA, or Switzerland to receive YCG.</p>
Q8. Are you aware of any equality impacts on age, disability, gender reassignment, marriage or civil	Yes – 15 No – 60 Not Answered – 0	<p>Most respondents (80%) indicated that they had identified no further specific impacts on groups with protected characteristics, while some (20%) offered suggestions. The main concerns focused on the age range and educational requirements for eligibility. One</p>	<p>An Equality Impact Assessment has been published alongside the YCG regulations.</p> <p>The application form will be made available in multiple formats including an easy read version in order to address a range of needs.</p>

<p>partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation of YCG that we have not identified?</p>		<p>respondent suggested that the upper age limit should be extended to age 20. Others felt that restricting eligibility to those in education for 18 year old recipients was discriminatory towards those who have chosen other means of education, such as home education, college or university.</p> <p>A link between the age/educational limits and potential gender impacts was highlighted. It was indicated that female carers aged 16 to 24 were less likely to enter education compared to male carers, and suggested that YCG could provide an opportunity to support young female carers to access education.</p> <p>It was felt that alternative formats of the application paperwork and promotion materials needed to be made available.</p>	
<p>Q9. Are you aware of any impacts of YCG on children's rights and wellbeing that we have not identified?</p>	<p>Yes – 6 No – 76 Not Answered – 2</p>	<p>The importance of ensuring the YCG allows young carers to make autonomous choices regarding their caring role and that it does not inadvertently lead to some young people continuing in unsuitable caring roles was stressed. There were suggestions that additional support should be given to young carers to ensure that their caring role is age-appropriate, and to help them decide on their own future goals and ensure that their caring role is not a barrier to them pursuing these. It was felt that there was a need to support</p>	<p>A Children's Rights and Wellbeing Impact Assessment has been published alongside the YCG regulations.</p> <p>YCG allows young carers to continue to care if they wish to but also to have a life alongside caring. It aims to improve health and education outcomes for young carers and remove some barriers to pursuing opportunities.</p> <p>It is not possible to claim Carer's Allowance and YCG. This will be made clear in the application</p>

		<p>young carers in managing their finances, for example, by assisting them to set up a bank account and/or supporting them in deciding what they wish to use the grant for.</p> <p>There was also a call for the Scottish Government to clarify whether being in receipt of YCG will have any impact on entitlement to other support.</p> <p>It was felt that the issues of hidden carers along with the barriers that exist for young carers accessing support and information services, and the stigma related to addictions and mental health could be relevant to the YCG.</p>	<p>process. Because most benefits require the applicant to be 18 years old or over, receiving YCG will not affect the entitlement of 16 and 17 year olds to other support.</p> <p>The Scottish Government is committed to signposting to other support services. We recognise that mental health conditions are more prevalent among young carers in comparison to young people without caring responsibilities<sup>5</sup>. One of the aims of the YCG is to improve mental and physical health outcomes of young carers.</p>
Q10. Can you identify any business related impacts of YCG that we have not identified?	Yes – 4 No – 69 Not Answered – 2	<p>Only four respondents indicated that they were able to identify additional business related impacts. It was felt that further quality assurance was needed and that they could not know the impact on businesses because there was no way to know what young carers would spend the money on.</p> <p>A respondent who indicated that they could identify additional impacts suggested that, while the estimated spend of £500,000 into the economy would be good for business, the payments were too low and did not reflect the</p>	<p>A Business Regulatory Impact Assessment has been published alongside the YCG regulations.</p> <p>We will make it clear during the application process that young carers can spend the grant as they choose. It may be that they use it for a short break or leisure activity.</p> <p>As a result of extending the eligibility to all 18 year olds, we are putting over £700,000 into the pockets of young carers. We expect that this will have a positive impact on the economy and, because a disproportionate amount of young carers are from</p>

<sup>5</sup> Scotland's Census, 2011

		<p>true cost of having to deliver equivalent replacement care (which they estimated would total £26 million). As such, they felt that the grant did not reflect the main principles of the Carers Act.</p> <p>One respondent agreed that the introduction of Social Security Scotland could cause additional requests for information and support from existing advice services.</p>	<p>areas of multiple deprivation, we expect it to have a positive impact on economic equality.</p>
<p>Q11. Do you have any additional comments on the content and proposals of this document?</p>		<ol style="list-style-type: none"> <li>1. Some respondents felt the draft regulations lacked detail regarding the nature and extent of evidence that may be required in support of an application.</li>   <li>2. There were calls for the monetary value of the grant to be increased, especially where access to support services and travel costs can be challenging. It was suggested that the provision for free bus</li> </ol>	<ol style="list-style-type: none"> <li>1. The Scottish Government will access the cared-for persons data to verify that they are normally paid at least one of the qualifying benefits. The young carer will sign a declaration prior to submitting their application in which they will confirm that they have informed their cared-for person they are applying and that their benefit record will be accessed as part of the verification checks. The system will be based on respect and trust and recognises that young carers may not be able to provide a large amount of evidence, which may deter them from applying.</li>   <li>2. Stakeholders and the DACBEAG have expressed concerns about the potential for incentivising care for young people. It was therefore felt by many stakeholders and respondents to the consultation that £300</li> </ol>

		<p>travel could be extended to a free travel card for use on all forms of transport. It was felt that, compared to other support, such as the Education Maintenance Allowance (EMA) which provides higher levels of funding per person, YCG was likely to be less impactful.</p> <p>3. It was indicated that promotional campaigns needed to take account of marginalised groups, including ethnic minorities, rural and island communities, gypsy/traveller communities, people with learning disabilities and people with experience of homelessness.</p>	<p>was an appropriate rate to recognise the contribution of young carers and to level the playing field between them and young adults who do not provide care.</p> <p>The YCG Working Group felt that £300 was at a level which would be sufficient to make a difference to the young carer, for example to fund a short break or driving lessons, whilst being low enough to avoid pressure on the young carer to take on or remain in a caring role, providing sufficient safeguards were in place. Free bus travel will be rolled out subject to piloting from 2020/21 as well as a range of other non-cash benefits for young carers through the Young Scot National Entitlement Card.</p> <p>3. The Scottish Government has carried out a highlands and islands impact assessment in order to understand how rural and remote communities will interact with YCG. The design of YCG has been carried out in collaboration with young carers. We are committed to further user testing and user research in order to tailor promotional materials to young carers with protected characteristics supported by evidence gathered through the Equalities Impact Assessment.</p>
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St Andrew's House  
Edinburgh  
EH1 3DG

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