

Carer's Allowance Supplement

Child Rights and Wellbeing Impact Assessment

August 2018



Scottish Government
Riaghaltas na h-Alba
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Child Rights and Wellbeing Impact Assessment - Carer's Allowance Supplement (CAS)	
Policy/measure	Carer's Allowance Supplement
Summary of policy aims and desired outcomes	<p>Scottish Ministers acknowledge the immense contribution carers make in Scotland and it is essential that they are supported and sustained in this role. Scottish Ministers have therefore committed to using the new social security powers to increase the rate of Carer's Allowance to the same level as Jobseekers Allowance, in recognition of the important role that carers have in society.</p> <p>The aim of the Carer's Allowance Supplement is to help recognise the contribution that carers make, and to improve outcomes for carers by providing some additional financial support.</p>
Directorate Division Team	<p>Social Security Directorate Social Security Policy Division Carer Benefits Team</p>
Executive Summary	<p>The Carer's Allowance Supplement (CAS) will increase Carer's Allowance (CA) (£64.60 per week¹) to the rate of Jobseeker's Allowance (£73.10 per week²). It will be paid as two six month lump sums a year (each of around £221) to carers aged 16 and over in receipt of CA in Scotland. It is a temporary measure until the Scottish Government takes on full delivery of Carer's Allowance. The aim of CAS is to increase support for some of the lowest income carers in Scotland, helping to improve outcomes and provide additional recognition for their caring roles.</p> <p>CAS will mainly affect young people (16 and over) who are in receipt of CA, with indirect impacts on children and young people who are cared for by someone in receipt of CA.</p> <p>According to Census 2011 data, around 8,200 16-18 year olds provide some hours of unpaid care³. As of November 2017, there are 72,942 carers in receipt of CA in Scotland, of whom approximately 260 are aged under 18⁴. While some recipients may have significant capital and non-earnings income, most recipients are expected to have lower than average incomes⁵. Research has shown that caring can have negative impacts on carers' health and wellbeing:</p> <p>Young carers may often not recognise themselves as carers, and as such may be less likely to receive support for their caring role. Studies have suggested that this is especially</p>

	<p>common among some minority cultural and ethnic communities⁶. The implementation of CAS provides an opportunity to increase take-up of CA among eligible young carers and to raise awareness to wider young carer support available.</p> <p>Based on the evidence gathered, the Scottish Government considers that the policy does not infringe upon the rights of the child as set out in the articles of the UNCRC, or the indicators of wellbeing as set out by the Children and Young People (Scotland) Act 2014.</p> <p>The results of this CRWIA show no potentially negative impacts of the policy. Any impact of the policy should be neutral or positive. CAS is expected to have positive impacts on those children and young people directly affected.</p> <p>However, it is recognised that the limitations of the data available mean it is not possible to get a complete picture of the experiences of young carers in receipt of CA, or children and young people who are cared for, or living with, people in receipt of CA. We also recognise that the current eligibility criteria for CA may impact more negatively on children and young people because of the restrictions on study hours and the requirement to provide at least 35 hours a week of caring.</p> <p>When we take full control over CA we will consider what further research and evidence may be required in developing a Scottish CA. We will be working with carers and stakeholders to consider this, and any changes to CA over the longer term.</p> <p>We are also introducing a new Young Carer Grant of £300 per year for carers aged 16, 17 and 18 if still at school, who are not in receipt of CA. This new grant will provide some financial support and is intended to recognise the contribution of young carers who are not eligible for CA and therefore won't receive CAS.</p>
<p>Background</p>	<p>The Social Security powers that have been devolved through the Scotland Act 2016 give the Scottish Parliament responsibility for £2.8 billion of social security expenditure (around 15% of total benefit expenditure in Scotland). The Scotland Act 2016⁷ provides specific responsibility for benefits for disabled people, those who are ill and carers.</p> <p>Scottish Ministers made an early policy commitment to increase CA for eligible recipients in Scotland at a rate equivalent to Jobseeker's Allowance once powers are devolved to the Scottish Parliament. The Ministerial Statement delivered on 30 May 2017 regarding the first wave of benefits,</p>

committed to CAS being the first payment that will be delivered by the new Scottish social security agency.

Provisions for CAS are included in the Social Security (Scotland) Act 2018. As set out in the Policy Memorandum for the original Bill,⁸ the aim of the policy is to improve outcomes for carers by providing some additional financial support.

It has been agreed with the UK Government through the Fiscal Framework, that any new benefits or discretionary payments introduced by the Scottish Government, which provide additional income for a recipient, will not result in a reduction in their entitlement elsewhere in the UK benefit system.

The key social security outcomes for carers that are relevant to this policy are 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, can engage in training, education and employment opportunities, as well as social and leisure
- have an increased sense of control and empowerment over their lives.

The policy aligns with both the Healthier and Wealthier & Fairer Strategic Objectives, and contributes to the following National Outcomes:

- We live longer, healthier lives
- We have tackled the significant inequalities in Scottish society
- Our people are able to maintain their independence as they get older and are able to access appropriate support when they need it

We consider that of the eight wellbeing indicators (Safe, Healthy, Achieving, Nurtured, Active, Respected, Responsible, Included) set out in the Children and Young People (Scotland) Act 2014, the policy relates to:

- Healthy: having the best possible standards of physical and mental health; support to make healthy, safe choices
- Active: having opportunities to take part in a wide range of activities
- Included: being a full member of the communities in which they live and learn; receiving help and guidance to overcome inequalities

	<p>Of the UNCRC considerations, the policy relates to:</p> <ul style="list-style-type: none"> ▪ Article 23 (children with a disability). A disabled child has the right to enjoy a full and decent life in conditions which ensure dignity, promote self-reliance and facilitate the child's active participation in the community. Governments must recognise the right of the disabled child to special care, and ensure the disabled child has effective access to education, training, health care, rehabilitation, preparation for employment, and recreational opportunities. ▪ Article 26 (social security). Every child has a right to benefit from social security, taking into account the resources and circumstances of those who have responsibility for the child. ▪ Article 42 (knowledge of rights). Governments undertake to make the principles and provisions of the UNCRC widely known, by appropriate and active means, to adults and children alike.
<p>Scope of the CRWIA</p>	<p>Consideration has been given to the impact of the policy on the rights and wellbeing of children and young people in Scotland. CAS will mainly affect young people in receipt of CA, and children and young people who are cared for, living with, or closely related to someone in receipt of CA. Eligibility for CAS is based on receipt of CA from the Department for Work and Pensions (DWP). Changes to CA are not within scope of this CRWIA.</p> <p>According to Census 2011 data, around 8,200 16-18 year olds provide some hours of unpaid care.⁹ As of November 2017, there are 72,942 carers in receipt of CA in Scotland, of whom approximately 260 are aged under 18¹⁰. Data on the numbers of children and young people who are cared for, or living with someone in receipt of CA is not available.</p> <p><u>Wider context</u></p> <p>The CRWIA should be read in conjunction with the other impact assessments conducted for the policy, and for the Social Security (Scotland) Bill 2018 as a whole (namely, the Business and Regulatory Impact Assessment, Island Screening Assessment and Data Protection Impact Assessment¹¹ and the Equality Impact Assessment).</p> <p>The Equality Impact Assessment (EQIA) for CAS considers the potential impact of the policy on each of the protected characteristics, including on children and young people. A Data Protection Impact Assessment (DPIA) will consider the impact of the policy's provisions and implementation on an individual's right to privacy.</p>

	<p>Impact assessments for CAS, and impact assessments undertaken for the original Bill as a whole, including a CRWIA screening and partial Equality Impact Assessment are available on the Scottish Government website.¹²</p>
<p>Children and young people's views and experiences</p>	<p>The proposal to increase CA to the rate of Jobseeker's Allowance was included in the Scottish Government's consultation on Social Security in Scotland. This ran from 29 July 2016 to 28 October 2016.</p> <p>Of the 241 organisations that responded to the consultation, 81 were stakeholder groups relating to children/young people, equalities and human rights, disability and long term conditions, and carers. All non-confidential responses to the consultation have been published on the Scottish Government website.¹³</p> <p>We have also engaged with, and taken views from, stakeholders from a range of advisory groups including the Carer Benefit Advisory Group, consisting of representatives of carer organisations (including one with a focus on young carers), health and social care and local authority representatives. The Scottish Government has established 'Experience Panels' to ensure people with experience of receiving benefits, including carers and younger people, can help to shape the new system. The Experience Panel on carer benefits has input to our approach on CAS, specifically in relation to communicating the policy to carers. The Scottish Government is committed to regularly publishing reports on Experience Panel activities to provide updates on our progress.¹⁴</p> <p>Scottish Government Carer Benefits Team officials and Communities Analysis Division colleagues also examined the Census 2011 and Scottish Health Survey 2012-13 to support this impact assessment.</p>
<p>Key Findings</p> <p>To include impact on UNCRC rights and contribution to wellbeing indicators</p>	<p>CAS will mainly affect young people (16 and over) who are in receipt of CA as they will receive an increase in financial support. We would also expect indirect impacts on children and young people who are cared for by someone in receipt of CA, or living with someone who receives this increase in financial support.</p> <p>Young carers in receipt of CA represent a very small proportion of young carers overall, largely due to the eligibility criteria which require carers to be 16 or over, not in full time education, and providing 35 hours of care or more per week. Carers aged up to 24 are more likely to be caring below 35</p>

hours than carers in other age groups.¹⁵ Data on the demographics of young carers in receipt of CA is not available.

Research from carers organisations has shown that carers can experience poor health, financial difficulties¹⁶ and social isolation¹⁷ as a result of caring. CA is currently the lowest of all working age benefits.

Research on carers in receipt of CA specifically is limited, and the experiences of those in receipt of CA is likely to differ from carers in general for a number of reasons. However, broader research has shown that caring can have negative impacts in terms of carers' finances and health and wellbeing:

- Research from Carers Scotland in 2017 found 57% of carers said their physical health has worsened and 74% said they had suffered mental ill health (e.g. stress, anxiety or depression) as a result of their caring role. Carers Trust Scotland found that 45% of young carers reported experiencing mental health problems.¹⁸
- Research from Carers UK in 2017 found 81% of carers have felt lonely or socially isolated as a result of their caring role. Within this, a larger proportion of younger carers reported feeling isolated. 31% of carers overall said not being able to afford to participate in social activities made them feel lonely or socially isolated.¹⁹
- Carers Scotland's research found 38% of Scotland's carers reported they were struggling to make ends meet, with 23% of respondents saying they are or were in debt as a result of caring.²⁰ Research from the Scottish Youth Parliament found 74% of young carers were struggling financially and some were using student support funding to pay for basic family needs rather than to support study.²¹
- Research from both the Carers Trust and the National Union of Students indicate that many young adult carers are living in low income households and some are living in poverty.²²

Research on young carers indicates that young carers may often not recognise themselves as carers – and as such may be less likely to receive support for their caring role. Studies have suggested that this is especially common among some minority cultural and ethnic communities.²³ This lack of self-recognition will be a barrier to seeking support through social security and elsewhere.

Data on the numbers of children and young people who are

cared for, or living with, someone in receipt of CA is not publically available.

However, many of the children and young people who are cared for by someone in receipt of CA are likely to be disabled children. This is because eligibility for CA is based on the cared-for person being in receipt of a qualifying disability benefit.

A review of research and policy relating to disabled children by the Children's Commissioner for Scotland found studies showing disabled children felt they didn't have enough money, or had less money than non-disabled children, to pursue the social activities they wanted to do, which may be related to relative poverty among families with disabled children.²⁴

Our assessment of the impact of the policy on the relevant articles of the UNCRC is as follows:

- Article 23 (children with a disability). Many children and young people with a disability may be cared for by people in receipt of CA. Eligibility criteria for CA require that the cared for person is in receipt of specific disability benefits. The increase in CA is intended to provide additional support to these carers which should have an indirect positive impact on those they care for. No data is available on disabled young carers in receipt of CA.
- Article 26 (social security). Young people aged 16 to 18 who are receiving CA will receive an increase in support. Children and young people who are looked after by people in receipt of CA will also benefit indirectly. Our work to promote awareness and understanding of the CAS will also consider how best to reach young people who are entitled to this support.
- Article 42 (knowledge of rights). As part of the implementation of CAS and the wider devolution of a number of social security benefits we are working to increase awareness and take up of benefits. We have already run two waves of a campaign to increase take up of CA among young people and the communications work for CAS will build on this.

The relevant wellbeing indicators for this policy are:

- Healthy: The additional payment for carers is intended to help improve the health and wellbeing of carers by providing some additional support. This could have a positive impact on the health of young people who are receiving CA or children and young people who are cared for by those in receipt of CA.

	<ul style="list-style-type: none"> ▪ Active: The additional payment for carers may also help to improve the ability of carers (and those they care for) to access more opportunities. ▪ Included: The additional payment for carers is intended to provide additional support for carers to help them in their role, addressing inequalities they may face as a result of caring – for example, carers may be less able to take on paid employment or studies.
<p>Conclusions and Recommendations</p>	<p>This policy contributes to Scottish Government Strategic Objectives and National Outcomes, and relates to the ‘Healthy’, ‘Active’ and ‘Included’ wellbeing indicators of the Children and Young People (Scotland) Act, and articles 23, 26 and 42 of the UNCRC considerations on children with a disability, social security and knowledge of rights.</p> <p>Based on the evidence gathered, the Scottish Government considers that the policy does not infringe upon the rights of the child as set out in the articles of the UNCRC, or the indicators of wellbeing as set out by the Children and Young People (Scotland) Act 2014. Any impact of the policy should be neutral or positive.</p> <p>However, it is recognised that the limitations of the data available mean it is not possible to get a complete picture of the experiences of young carers in receipt of CA, or children and young people who are cared for, or living with, people in receipt of CA. We also recognise that the current eligibility criteria for CA may impact more negatively on children and young people because of the restrictions on study hours and the requirement to provide at least 35 hours a week of caring.</p> <p>CAS is a temporary measure. When we take full control over CA we will consider what further research and evidence may be required in developing a Scottish CA. We will be working with carers and stakeholders to consider this, and any changes which may be made at this point or over the longer term.</p> <p>We are also introducing a new Young Carer Grant of £300 per year for carers aged 16, 17 and 18 if still at school, who are not in receipt of CA. This new grant will provide some financial support and is intended to recognise the contribution of young carers who are not eligible for CA and therefore won’t receive CAS. The detail of the grant is being developed through our Young Carer Grant Working Group, and involving our Young Carer Panel (volunteer young carers who are helping to design the new grant). Proposals will be subject to public consultation and Impact Assessments ahead of implementation in autumn 2019.</p>

	<p>The implementation of CAS provides an opportunity to increase uptake of CA among eligible young carers and to raise awareness to wider young carer support available. In advance of CAS implementation we have already run benefit take up campaigns aimed at young carers, people over 65 and the population in general. Activity to promote the uptake of CA amongst young people aged 16-24 took place during the summer of 2017. This consisted of two phases of activity, delivered in partnership with Young Scot, with interactive webpages hosted by Young Scot, including guidance, infographics, and videos for young carers, which will remain in place for the long-term.</p> <p>We continue to work with carers organisations and wider stakeholders through for example our CAS Practitioners Group and beyond, to build on this work through the communications on CAS. As part of this work we will ensure information and advice provided on CAS, including by Social Security Scotland, is as accessible as possible, and provided in places and formats which will reach young carers. We are also testing CAS communications products with stakeholders and with the Experience Panels, to ensure these meet the diverse needs of carers. We are working to also join up with communications around the Carers (Scotland) Act 2016 to ensure that young carers can be signposted to further advice or support that they may be entitled to.</p>
<p>Monitoring and review</p>	<p>We will monitor the impact of CAS on an ongoing basis, through our regular engagement with stakeholders and wider partners who support carers and the people they care for. We will monitor the service delivery and performance of Social Security Scotland – the new Agency which will be delivering CAS. We will also update this CRWIA as needed in response to this information.</p> <p>However, for the duration of the CAS, we anticipate we will have limited information on the protected characteristics of CAS recipients and will therefore be unable to look in detail at any variation there may be in the impact of CAS or experience of receiving CAS among young people, including those with one or more protected characteristics. We have requested additional data from DWP but they have indicated that it will not be possible for them to provide it. We continue to engage with DWP to maximise the data provision on CAS, over and above gender, age and geography.</p> <p>We will be undertaking a more comprehensive CRWIA as part of the development of regulations to provide a replacement for CA in Scotland, and wider changes to carer benefits. Once Social Security Scotland is fully responsible for delivering</p>

	future carer benefits, we will have greater control over the information that is gathered and more scope to assess the impact of these benefits on young people, including those with one or more protected characteristics.
CRWIA Declaration	
CRWIA required	CRWIA not required
✓	
Authorisation	
Policy lead Ellen Searle, Team Leader, Social Security	Date 15 August 2018
Deputy Director or equivalent Ann McVie, Deputy Director, Social Security	Date 23 August 2018

¹ Carer's Allowance on gov.uk <https://www.gov.uk/carers-allowance>

² Single person's 25+ rate of Jobseeker's Allowance – from gov.uk <https://www.gov.uk/jobseekers-allowance>

³ Scottish Government (2015) [Scotland's Carers](#)

⁴ DWP Stat-Xplore: <https://stat-xplore.dwp.gov.uk/webapi/jsf/login.xhtml>

⁵ Carers UK (2017) [State of Caring 2017](#), Carers Scotland (2017) [State of Caring in Scotland 2017](#)

⁶ Children and Young People's Commissioner Scotland (February 2017) ["Coping is difficult, but I feel proud" - Perspectives on mental health and wellbeing of young carers](#)

⁷ <http://services.parliament.uk/bills/2015-16/scotland.html>

⁸ <https://beta.parliament.scot/-/media/files/legislation/bills/previous-bills/social-security-scotland-bill/introduced/policy-memorandum-social-security-scotland-bill.pdf>

⁹ Scottish Government (2015) [Scotland's Carers](#)

¹⁰ DWP Stat-Xplore: <https://stat-xplore.dwp.gov.uk/webapi/jsf/login.xhtml>

¹¹ Scottish Government Social Security: <http://www.gov.scot/Topics/People/fairerscotland/Social-Security>

¹² <http://www.gov.scot/Topics/People/fairerscotland/Social-Security>

¹³ Consultation on Social Security in Scotland, [Published responses](#)

¹⁴ Scottish Government Social Security, Engagement on Social Security: <https://www.gov.scot/policies/social-security/engagement-on-social-security/>

¹⁵ Scottish Government (2017) [Scottish Health Survey 2016](#)

¹⁶ Carers UK (2017) [State of Caring 2017](#), Carers Scotland (2017) [State of Caring in Scotland 2017](#)

¹⁷ Carers UK as part of the Jo Cox Loneliness Commission (2017) [The world shrinks: Carer Loneliness](#)

¹⁸ Carers Scotland (2017) [State of Caring in Scotland 2017](#)

¹⁹ Carers UK as part of the Jo Cox Loneliness Commission (2017) [The world shrinks: Carer Loneliness](#)

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- ²⁰ Carers UK (2017) [State of Caring 2017](#), Carers Scotland (2017) [State of Caring in Scotland 2017](#)
- ²¹ Scottish Youth Parliament (2014) [A Costly Youth: The Impact of Caring on Young People in Scotland](#)
- ²² Carers Trust Scotland (2015) [Time to be Heard for Young Adult Carers](#)
- ²³ Children and Young People's Commissioner Scotland (February 2017) ["Coping is difficult, but I feel proud" - Perspectives on mental health and wellbeing of young carers](#)
- ²⁴ Stalker, K and Moscardini, L (2012) [A critical review and analysis of current research and policy relating to disabled children and young people in Scotland](#)



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