**[Scottish Carers Assistance Consultation](https://www.gov.scot/publications/scottish-carers-assistance-consultation/pages/1/)**

Scottish Government Social Security Directorate

23 May 2022

Age Scotland welcomes the opportunity to respond to this consultation on Scottish Carers Assistance.

It is estimated that around one quarter of carers in Scotland are age 65 and older. The Carer’s Trust estimate that three in five people will become carers at some point in their lives. According to the 2020 Carers’ Week report, an estimated 26% of the UK adult population is providing unpaid care to an older, disabled or ill relative or friend – that is equivalent to one in four adults[[1]](#footnote-2).

The Carers Trust and Scottish Government estimate the value of unpaid care in Scotland to be over £10 billion each year[[2]](#footnote-3). Even when viewed in monetary terms alone, it is clear the contribution to our society by older carers is enormous, and we know the value of unpaid care in Scotland goes so far beyond the financial.

Age Scotland sees the transition of the current UK Department for Work and Pensions delivered Carers Allowance to Scottish Carers Assistance delivered by Social Security Scotland as a strong opportunity for the Scottish Government to recognise the distinct and vital contribution made to our communities by older carers in Scotland, as well as young people and adults of working age. Whilst we recognise the restricted financial parameters within which the Scottish Government are planning to deliver this benefit, we feel this is an opportunity that is currently being overlooked, with the particular experiences and challenges faced by older carers receiving insufficient attention.

Many carers find that their relationships are impacted, that they often struggle to balance work and care, and that they are facing their own health problems as a result of their caring role. There is a strong social, rights-based and indeed financial imperative to ensure carer benefits work to support as many older carers as possible.

Quote from State of Caring report ‘*I don’t have luxuries, can’t afford life, car insurance or house insurance. At 60 I shouldn’t be using food banks and made to feel inadequate because I can’t afford petrol*.”[[3]](#footnote-4)

Ensuring older carers receive the right support, including the right remuneration, at the right time is a critically important part of preserving and respecting the physical and mental health and wellbeing of older carers, as well as the people that they support.

**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).**

Inclusive communication including non-digital channels

We welcome Social Security Scotland’s commitment to inclusive communication – in practice this should mean real and meaningful channels for non-digital engagement, application and support through which to apply for this benefit. This should be preference-led, based on the wishes and needs of the person concerned. There are around 500,000 over 60s in Scotland who do not have access to the internet, and up to 600,000 over 60s without a smartphone. While for some people this is a choice which should be respected, for others it may be because they live in an area with connectivity issues, they don’t own a suitable device, they do not feel they have the confidence or skills, or they are disabled and do not have access to suitable accessible devices. Many of those on the lowest incomes may be at risk of experiencing digital exclusion because they cannot afford the cost of equipment or a broadband connection. In the Scottish Household Survey 2019, only half of over 60s in the “most deprived” areas used the internet, compared to 83% in the “least deprived” areas.

Key feedback from carers that Age Scotland works with, who are either older carers, carers for an older person or both, is that more flexibility should be built into the system, along with practical support both for carers and people receiving care.

We welcome the commitment to independent advocacy support for carers, and the Local Delivery Service that can support people to claim.

The current claims process for overlapping benefits/ underlying entitlement should be improved to ensure it is as easy as possible for users and applicants to navigate.

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

* Carers participating in Age Scotland events and training including social security training workshops have suggested that Scottish Carers’ Assistance should automatically alert a carer’s local authority of their carer status.
* As has been introduced for the new Adult Disability Payment, a change of circumstance form could be sent along with decision correspondence.
* A link to adult care support plans would add value, whereby a local authority point of contact is automatically notified and required to get in touch within and reasonable and defined time window.
* Self-Directed Support should also be factored in or triggered for people receiving care and for carers – this could help to raise the profile of SDS options too, though not a one size fits all for care packages.
* When carers apply for Scottish Carer’s Assistance, they should also be linked to their local Carers Centre at this point: there are many carers not currently aware of these services.
* Upon application for Scottish Carers Assistance, a benefit check should be carried out (or referral made for this) to identify potential entitlement to UK Department for Work and Pensions or Social Security Scotland means-tested benefits.
* It is important to acknowledge the negative impacts that caring whilst of working age can have on pension finances and eligibility later in life. Where people are or have been unable to undertake paid work due to caring responsibilities, State Pension Award, National Insurance (where Carers Credit is not claimed), private pension and other savings pots may all be adversely affected. Many carers with whom Age Scotland has engaged, including via our helpline and in training, advice and support sessions are currently unaware of Carers Credit for National Insurance, particularly in situations where this is not automatically awarded – communication about this should be improved.

**Question 3: Do you agree or disagree with the proposed residency criteria for Scottish Carer’s Assistance? [Agree, Disagree, Unsure.]**

Agree

**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.**

We support the proposal to review the residency criteria for Scottish Carers Assistance eligibility, with a view to reducing the ‘past presence test’, ensuring consistency with child and adult disability payments, which require the applicant to be resident in Scotland and in the UK for 26 of the last 52 weeks.

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

We agree with the proposal to make the past presence test less stringent thereby excluding fewer people from this benefit on residency grounds, and ensuring alignment with child and adult disability payment residency requirements.

**Question 6: Do you agree or disagree with the proposed re-determination timescales for Scottish Carer’s Assistance? [Agree, Disagree, Unsure.]**

Agree

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

We support the decision to extend the timeline for a redetermination request to 42 days, and support the proposal to introduce a time limit for Social Security Scotland to respond. In a situation where an applicant is re-determined as being eligible for Scottish Carers Assistance, this should be backdated appropriately where possible, and short-term assistance pending appeal provided wherever appropriate.

**Question 8: Do you agree or disagree with the proposals on when payments of Scottish Carer’s Assistance should be suspended? [Agree, Disagree, Unsure.]**

Agree

**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.**

Agree with the proposal to avoid suspension of payment except in very limited circumstances – for example where there is suspicion of fraud or issues with third party payment company.

**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.**

In this situation, administrators must have the capacity and flexibility to respond appropriately to each occurrence of this. If suspension is due to a change in eligibility or determined shift in circumstances, we recommend continuing Scottish Carers Assistance payment for 12 weeks, in line with proposals for payment timelines where a cared for person enters a care home or dies.

**Question 11: Do you agree or disagree with the proposals for when an award of Scottish Carer’s Assistance should be set to £0? [Agree, Disagree, Unsure.]**

Agree

 **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 you want to share on this question.**

Age Scotland welcomes continuation of £0 awards, and expansion of this to include situations in which a cared for person’s qualifying benefit is set to £0 (improving on the current situation in which in this case, the award would be ended), recognising that a carer is still a carer in this case, even if there is a temporary change in circumstance. We further agree with the award being set to £0 where the earnings threshold is exceeded.

**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? [Agree, Disagree, Unsure.]**

Agree

**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.**

We agree with the decision to provide Short Term Assistance in a situation where the person they are caring for is also receiving Short Term Assistance. This will help minimize the negative financial impact of paused entitlements on carers.

**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.**

**Question 16: Do you agree or disagree that Carer’s Allowance Supplement should be paid alongside carers’ regular payments of Scottish Carer’s Assistance in future? [Agree, Disagree, Unsure.]**

Agree

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

We appreciate the complexities of regular payments and therefore more consistent help weighed against the challenges this may add for recipients in terms of recording and reporting income. The consultation suggests this should be explored in further detail, with a view to offering recipients a choice regarding how the payment is made. We support this approach.

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

We urge the Scottish Government to consider extension of the eligibility of the Carers Allowance Supplement beyond those who are eligible for Carers Allowance, for example, to recipients with a £0 award. Evidence demonstrates that carers frequently spend their own money on costs relating to the care that they provide.

The 2021 State of Caring report highlights that over two-thirds of participants reported that they regularly use their own income or savings to pay for care or support services, equipment or products for the person they care for. The average carer looking after someone outside of residential care faces a financial penalty of over £114 a month.

Carers allowance supplement could be offered as some small recognition of the role and costs, in situations where carer income or overlapping benefit rules preclude them from receiving Scottish Carers Assistance. The lump sum could help with larger required costs – for example beds and white goods, day-to-day expenses, or for activities that support the health and wellbeing of the carer. We know that the cost to health and social care services if older people did not undertake unpaid care work would be significant, so it is vital that all possible resourcing and support is offered, especially to support the health and wellbeing of older carers.

Feedback from carers received via Age Scotland’s About Dementia Programme indicates that carers would only apply for funding if they felt they needed it.

**Question 19: Do you agree or disagree with the proposed eligibility criteria for Carer’s Additional Person Payment? [Agree, Disagree, Unsure.]**

Disagree

**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.**

Eligibility requires at least 20 hours of care per week for every additional person supported. This excludes those providing a meaningful amount of care for more than one person that falls below this threshold.

It will also be important for the Scottish Government to consider the impact of the Additional Person Payment on the Severe Disability Premium (SDP). Currently, people receiving care become ineligible for SDP where associated Carers Allowance is claimed. Consideration should be given to the eligibility/ process for claiming SDP where care is being provided for an additional person of less than 35 hours – a disabled person may be financially penalised, without receiving a full week of care.

**Question 21: Do you agree or disagree with the proposed payment frequency for Carer’s Additional Person Payment? [Agree, Disagree, Unsure.]**

Agree

**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.**

We welcome the Scottish Government commitment to explore options for this payment (which would be optional for carers) including provision alongside regular Scottish Carers Allowance payments and lump-sum payment every six months. Given the potential impact on other awards that has been highlighted, we recommend the impact and consequences are fully explored by the Scottish Government, and a decision is chosen based on lack of impact/ net improvement on carers finances overall.

**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? [Agree, Disagree, Unsure.]**

Disagree

**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.**

We would welcome expanded eligibility criteria including broadening to include people with underlying entitlement to Scottish Carers Assistance. We support the extension of any Additional Person Payment to carers who care for more than one person of any age.

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

Feedback from carers groups has indicated that some carers see the additional person payment amount of £10 / week proposed as insulting. The stringent criteria mean that access to this additional payment is limited in practice and will exclude many of Scotland’s carers who undertake caring roles.

We would be interested to understand the number of people who would benefit from this proposed change.

**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? [Agree, Disagree, Unsure.]**

Agree

**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.**

This is currently an artificial barrier – a carer may currently study full time but still have caring responsibility at home for 35 or more hours per week.

**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? [Agree, Disagree, Unsure.]**

Agree

**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.**

This marks a positive change in approach and we are supportive of the change. Where a carer is supporting more than one person to make up the 35 hours, the impact on them remains the same as if the care provided were for just one person. As highlighted above, any implications for the benefits of people receiving care will need to be thoroughly considered and communicated to ensure no unintended negative consequences of this change.

**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? [Agree, Disagree, Unsure.]**

Agree

**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.**

We support the lengthening of this payment – particularly at what is likely to be a very difficult time for people who have been providing many hours of care for a loved one. The proposed change will go some way to ensuring a carer’s financial situation is preserved as they navigate a challenging transition.

**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? [Agree, Disagree, Unsure.]**

Agree

**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.**

Again, this marks a huge transition for the carer and is a more compassionate timeframe. An extension to 12 weeks can also help to maintain entitlement to UK Department for Work and Pensions means tested benefits or additional premiums on those benefits. The change reduces likelihood of stopping and starting payments, and potentially the need to apply for different benefits where the cared for person may require prolonged hospital rehabilitation.

 **Question 34: Do you agree or disagree with the proposed future change to increase the earnings limit for Scottish Carer’s Assistance? [Agree, Disagree, Unsure.]**

Agree

 **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.**

We agree with the proposal to adjust the upper earning limit which will ensure more people are eligible for this benefit, and allow carers to earn a small amount more, marking a small improvement to their financial situation.

**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? [Agree, Disagree, Unsure.]**

Agree

**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.**

Agree with raising the earning threshold, and broadly support using a calculation of 16 hours at the real living wage, noting the challenge for people earning below this hourly rate.

**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? [Agree, Disagree, Unsure.]**

Agree

**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.**

We are supportive of all steps to maximise the number of carers in Scotland eligible for carers benefit, and to mitigate the damage of a ‘cliff edge’ in payments as far as possible.

 **Question 40: Do you agree or disagree that a payment for long term carers should be considered further? [Agree, Disagree, Unsure.]**

Agree

**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.**

Evidence demonstrates the negative impacts acting as a carer can have on an individual’s finances. The longer-term the caring role, the greater this impact may be. There is an economic rationale for providing the maximum possible support for carers – and this includes monetary awards. Currently, over 39000 State Pension recipients have underlying entitlement for Carers Assistance. Age Scotland strongly supports exploration of a payment for long term carers that is also awarded to those with underlying entitlement as a way to recognise this, and go some way to reducing financial pressure.

Age Scotland would welcome consideration of carers for people living with dementia as an eligibility criteria for this payment.

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

Age Scotland is supportive of commitment to explore awarding this payment to SCA recipients including those with underlying entitlement. As with the supplement currently funded by the Scottish Government, we recommend this payment is not considered as income, in order to prevent the payment from reducing regular benefit/ income payments.

Respondents to the UK-wide 2021 State of Caring report called for introduction of a Carers Hardship Grant. Age Scotland would be supportive of the Scottish Government introducing such a fund on introducing SCA – which could be considered as part of a long-term carer payment. One option is to consider amending the Scottish Welfare Fund to ensure that claims by carers are prioritised.

*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.*

Many older people currently have no access to support from Carers Assistance because of overlapping benefit rules. Low income pensioners can receive additional amounts in Pension Credit, Housing Benefit or Council Tax Reduction, but those marginally above the income and capital thresholds receive no support.

*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.*

Carers Assistance is classed as an income replacement benefit, but at £1.99 an hour for a career who only carries out 35 hours of care a week, it does not replace income in any meaningful way. Due to overlapping benefit rules, over 39,000 older carers miss out on the payment because they receive a State Pension[[4]](#footnote-5). This does not recognise:

* The negative effect (estimated at £92.22 per month on average) acting as a carer can have on an individual’s finances whilst caring[[5]](#footnote-6)
* That State Pension has already been earned through previous paid or unpaid work
* Potential lost earnings due to past caring – including reduced or removed ability to undertake paid work due to caring responsibility, and therefore reduced ability to save and make private pension contributions. We know that carers are more likely to be women so it is vital that the gendered impact of providing unpaid care on finances is addressed.

**Want to find out more?**

As Scotland’s national charity supporting people over the age of 50, Age Scotland works to improve older people’s lives and promote their rights and interests. We aim to help people love later life, whatever their circumstances. We want Scotland to be the best place in the world to grow older.

Our Policy, Communications and Campaigns team research, analyse and comment on a wide range of public policy issues affecting older people in Scotland.

Our work is guided by the views and needs of older people themselves.

**Further information**

Contact the Age Scotland Policy, Communications and Campaigns team:

policycomms@agescotland.org.uk

0333 323 2400

Twitter [@agescotland](http://www.twitter.com/agescotland)

Facebook [/agescotland](http://www.facebook.com/agescotland)

LinkedIn [Age-Scotland](https://www.linkedin.com/company/age-scotland/)

[www.agescotland.org.uk](http://www.agescotland.org.uk)

1. <https://www.carersuk.org/images/CarersWeek2020/CW_2020_Research_Report_WEB.pdf> [↑](#footnote-ref-2)
2. <https://carers.org/our-work-in-scotland/our-work-in-scotland> [↑](#footnote-ref-3)
3. <https://www.carersuk.org/for-professionals/policy/policy-library?task=download&file=policy_file&id=7736> [↑](#footnote-ref-4)
4. <https://www.gov.scot/publications/scottish-carers-assistance-consultation/documents/> [↑](#footnote-ref-5)
5. <https://www.carersuk.org/for-professionals/policy/policy-library?task=download&file=policy_file&id=7736> [↑](#footnote-ref-6)