



**Scottish Women's Convention response to the  
Scottish Government's consultation on:**

# **Scottish Carer's Assistance**

**May 2022**



## Premise

Carer's Allowance is currently paid by the Department for Work and Pensions (DWP) and provides support to unpaid carers who meet certain criteria and are caring for 35 hours or more a week for someone receiving a disability benefit.

The Scottish Government is currently working with the DWP to devolve social security, with Carer's Allowance being the most complex of these. As part of this joint programme, Scottish Carer's Assistance will replace Carer's Allowance in Scotland.

This consultation seeks views on proposals for how Scottish Carer's Assistance could be different from Carer's Allowance, and is split into three main sections:

1. Scottish Carer's Assistance when it first launches - who will be eligible for support, benefit rules, and how carers can link to wider services and support.
2. Extra money for carers in Scotland - the Carer's Allowance Supplement, plus proposed new support for people getting Scottish Carer's Assistance and looking after more than one person who is getting a disability benefit.
3. Changes to Scottish Carer's Assistance - case transfer, and the long-term changes proposed to the benefit.

## The Scottish Women's Convention (SWC)

The Scottish Women's Convention (SWC) is funded to engage with women throughout Scotland in order that their views might influence public policy. The SWC uses the views of women to respond to a variety of parliamentary, governmental, and organisational consultation papers at both a Scottish and UK level.

The SWC engages with women using a range of methods, including roadshow events, thematic conferences, and regional contact groups. This submission provides the views of women, reflecting their opinions and experiences in key areas relevant to women's equality.

The SWC is currently engaging with women through digital roadshows, online surveys, asking women to comment by email, and by telephoning those who want to talk. We are also using our wide network to ask women to collate views in their local communities and forward these to us on a regular basis. We are continuing to review innovative ways of engaging with women throughout Scotland using whichever medium is appropriate to them.

## Scottish Carer's Assistance when it first launches – a service that works for carers

**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).**

- There should be phone helplines as well as online
  - But these need to be sufficiently well-resourced as carers do not have time to sit around waiting on the phone for hours
- Making appointments more accessible (e.g., more flexible times or being able to bring the person they care for with them if needed)
- Less paperwork and hoops to jump through to apply
- Not having to reapply if circumstances haven't changed
- Better training for staff dealing with carers so they do not feel judged or undeserving
- Taking into account informal caring responsibilities (e.g., childcare or supporting other carers in their circles)
- More understanding that sometimes circumstances can change very quickly
  - For example, one woman we spoke to is a long-term carer to her brother with schizophrenia. She can go long periods where he does not need much support from her but if he experiences a crisis, she has to give up work completely for a period to care for him round the clock)

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

- National support services (e.g., Carer's Trust Scotland)
- Local support groups
- Citizens Advice
- Food banks
- GPs and community health services
- Women's support groups
- Respite services and support

## Scottish Carer's Assistance when it launches – who will be eligible

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

Disagree

**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.**

Women had mixed views on this topic:

- Some felt that any carer, regardless of circumstance, should be entitled as soon as they move to Scotland.

- Some felt that it should be based on the residency of the person being cared for and, as long as they have been ordinary resident in Scotland for a period, then the carer should be entitled straight away.
- Some felt that they should be eligible after one year of living in Scotland.

### **Scottish Carer's Assistance when it launches – what happens when a carer isn't happy with a decision**

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

Disagree

**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.**

Women thought the period should be longer (e.g., 60 days) as they felt "caring gets in the way of dealing with other things" and sometimes they can struggle to find time for administrative tasks like these.

### **Scottish Carer's Assistance when it launches - when payments need to stop temporarily to check entitlement or protect clients**

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

Disagree

**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.**

- Carers need to continue to be paid for longer than is being proposed.
- The rationale for someone to have their benefits suspended during an extended stay in hospital, for example, is that they are having their ordinary living expenses like food and electricity supplied by the hospital. However, a carer at home still has living costs to pay for and would not be able to find alternative employment in such a short period to mitigate that.
- Times when the person being cared for has their benefits suspended are normally very turbulent or stressful periods (e.g., hospital stay of a loved one). It is unfair to add the worry of impending destitution by withdrawing the carer's income so quickly.
- Carers will have to travel to and from hospitals and still do caring tasks such as washings for the person they care for. They will also have to be on call for any changes to the person being cared for at any moment.

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

**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.]**

Unsure

**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.**

Women had mixed views on this:

- Some agreed that they should be paid together.
- Some disagreed and felt that the Supplement should be paid in between the regular payments to spread things out and help budgeting.

## **Extra money for carers in Scotland – Carer's Additional Person Payment**

**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.]**

Unsure

**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.**

- While this is a good starting point, there needs to be recognition that there are many unpaid carers who have no idea they may be entitled to anything and are not in the system at all.

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

- Women felt that the additional payment should be the same again for each additional person being cared for.
- They emphasised that “carers are saving a huge amount of money for the government led caring services” and it is therefore not at all unreasonable to be recompensed fairly for their hard work.

## **Changes to Scottish Carer's Assistance - education rules**

**Question 26: Do you agree or disagree with the proposed future change to allow carers in fulltime 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.**

- Many unpaid carers have to leave education because they cannot afford to maintain their studies and caring responsibilities without paid employment.
- A carer in education still has to do the same amount of care work as other carers so should be paid for it.
- Many carers from more deprived areas, especially young carers, have their opportunities for self-improvement or career development restricted if they are not supported financially for their care work and responsibilities. This is especially the case for young women, for whom there is often a gendered expectation that they will care for a family member or partner, and they feel they have no choice.
- Now a lot of courses are hybrid or online, there are more opportunities for carers to access education from home while fulfilling their caring responsibilities so they should not be penalised.

### **Changes to Scottish Carer's Assistance - different caring situations**

**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.**

- They are still putting in the hours of work so should be recompensed accordingly.
- Many women have spoken about how they have caring responsibilities for both their children and also their parents and often either one or other of these goes unrecognised meaning they do not believe themselves to be eligible which is unfair.
- The effects of COVID mean that more people are living with underlying health conditions like long COVID, complications from COVID or mental health problems. They may not individually need full-time care but there may be multiple family members experiencing difficulties, for example. In these situations, gender stereotypes mean it is disproportionately women having to take on these caring responsibilities but may not see themselves as being eligible because they're "just doing a few hours here for so-and-so and a few hours there for someone else" but these all add up and they need to know that their time is valued.

### **Changes to Scottish Carer's Assistance - extending payments**

**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.**

- The death of a loved one is a very stressful time and there needs to be a safety net for carers to find a new job.
- After a death, the carer may have to move, either for personal reasons of not wanting to be reminded but also because they may not be allowed to stay in social housing with adaptations if they themselves are not disabled. This is a big upheaval and they need financial support during this time.
- After bereavement, people cannot be expected to just jump into alternative employment immediately as often being a carer has been a big part of their identity. There needs to be more understanding on a human level and counselling for those who want it.
- Equally, if someone has been a carer for a long time, perhaps even their whole working life, they may not be qualified to do anything aside from caring. However, they may not want to apply for a paid job in the care sector because it may be too traumatising for them. This can leave them struggling for options for employment.
- In addition to the financial support, there needs to be better practical support for long-term carers in particular to retrain or get into employment if they want it.

**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.**

Same as response to question 31

### **Changes to Scottish Carer's Assistance - access to paid work**

**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.**

- It is common sense that the rate should go up with inflation. Given the increased cost of living, even the proposed £158/week is not very much money to live on.
- Carers have been underpaid and undervalued for too long. It is important that as many carers as possible are included and eligible.

**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.**

- It is important for carers to have some financial and personal independence and time outside of their caring role.
- They need to have some supplement as it is hard to live on the benefits alone.
- There have been a lot of problems with Universal Credit in terms of the way that it responds to people on precarious contracts whose earnings fluctuate from month to month depending on how many hours they can get at work. This needs to be given due consideration in relation to Scottish Carer's Assistance.

**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.**

- Women also felt there should be a taper whereby payments of Scottish Carer's Assistance continue over the limit but would be reduced as earnings increased.

### **Changes to Scottish Carer's Assistance - support for a wider group of carers**

**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.**

- There needs to be a lot of cultural change around the way that carers are viewed and valued.
- There needs to be better practical and emotional support in addition to the financial.
- The application process needs to be simplified in order for more eligible carers to actually take up the benefits they deserve. More work needs to be put into outreach and awareness raising to improve uptake.



## **Scottish Carer's Assistance – Impact assessments**

### **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.**

- In some BME communities, extended households under one roof are more common, meaning that women may be more likely to be caring for multiple family members.
- In some BME communities, gender stereotypes are more engrained and cultural norms around caring for older generations mean that women do not see themselves as being “carers” but rather fulfilling their familial duty. This may mean that they do not apply for the support they are entitled to.
- There needs to be consideration of carers with no recourse to public funds.
- Migrant women may not be aware of what they are entitled to and may struggle to access information in their first language.
- There can sometimes be issues for LGBT+ carers who, for their own reasons, do not want to declare the nature of their relationship to the person they are caring for.

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

- The cost of living is generally more expensive in island communities which may mean there needs to be consideration of whether these carers need more of a supplement.
- Reliable part-time work is often harder to get in island communities so many carers may struggle to get enough money to live on and still be a carer.
- Amenities are often further away or more scarce in island communities. This may mean that, compared to a carer with the same responsibilities on the mainland, an island carer may have to devote more time to their caring responsibilities in travel etc and therefore not have time for paid employment.
- There can be issues with carers in island communities feeling very isolated.

### **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.**

- Many carers want to see a UBI implemented in order to tackle socio-economic disadvantage and to demonstrate that their work is valued.
- Carers and disabled people are often some of the most economically disadvantaged. As the recent Joseph Rowntree report demonstrates, poverty rates among informal carers are consistently higher than among other groups. When we know that living costs are generally more expensive for disabled people (e.g., home adaptations, need for heating, reliance on single-use products, specialist food requirements), more needs to be done to keep people out of poverty.

## Conclusion

The SWC is grateful for the opportunity to respond to the Scottish Government's consultation on Scottish Carer's Assistance. As an organisation, we will continue to work with women from across Scotland to gather voices and experiences relating to this topic and its effects on women's equality.

For further information, please contact

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