



**For the attention of the Scottish Parliament, Finance Committee**

**Shared Care Scotland's views on the financial costs associated with the implementation of the Carers (Scotland) Bill**

*Don Williamson*

**Chief Executive  
Shared Care Scotland**

30 April 2015

A company limited by guarantee registered in Scotland SC161033  
Registered charity SC005315

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

## **THE CARERS (SCOTLAND) BILL**

### **FINANCIAL MEMORANDUM**

#### **SHARED CARE SCOTLAND RESPONSE**

1. These are Shared Care Scotland's views on the information contained in the Financial Memorandum relating to the Carers (Scotland) Bill as introduced in the Scottish Parliament on the 9<sup>th</sup> March 2015.
2. Shared Care Scotland<sup>1</sup> is a national charity that works collaboratively with a wide range of organisations and individuals, including carers and service providers, to improve the quality, choice and availability of short breaks (respite care) across Scotland.
3. Our comments relate to the estimated costs produced for the Financial Memorandum concerned with the provision of breaks from caring. We have also contributed to the National Carer Organisations response to the Finance Committee which covers the wider financial aspects.
4. We fully support the intentions of the Bill to provide better, more consistent support to Scotland's adult and young carers. Access to breaks from caring (respite care or short breaks) is one such area of support that is highlighted time and again as a vital to maintaining carers health and well-being, and to sustaining the caring relationship.
5. The financial projections contained in the Financial Memorandum, detailing the expected costs of implementing the Bill, are significant but they must be set against the estimated <sup>2</sup>£10.3 billion annually that carers save the Scottish economy.

#### **Scottish Government Respite Care Data**

6. Government information<sup>3</sup> on local authority respite care shows a considerable variation in the levels of provision across Scotland. Furthermore, recent data shows an overall decrease in provision over the last 12 months of almost 2,000 weeks despite continued additional government funding to local authorities to sustain levels of respite care. An analysis of this data over 6 years<sup>4</sup> reveals that 11 out of 32 local authorities are providing less respite than when measured in 2007-08 when government first began allocating this additional funding.
7. For this reason we believe strongly that future funding to support carers, including short breaks, has to be provided within a robust monitoring and evaluation framework to ensure funding is being used for purposes intended. In the absence of ring-fencing we

---

<sup>1</sup> [www.sharedcarescotland.org](http://www.sharedcarescotland.org)

<sup>2</sup> University of Leeds/Carers UK, Valuing Carers 2011, Calculating the Value of Unpaid Care  
<http://www.carersuk.org/professionals/resources/research-library/item/2123-valuing-carers-2011>

<sup>3</sup> <http://www.gov.scot/Topics/Statistics/Browse/Health/Data/Carers>

<sup>4</sup> <http://lx.iriss.org.uk/content/scottish-government-respite-care-data-2014-shared-care-scotland-summary>

believe there must be clear, measurable success indicators in place so that progress can be reliably tracked and corrective action taken if necessary.

### **Levels of funding to support carer short breaks**

8. We agree with Scottish Government that estimating costs in this area is extremely challenging, especially in the absence of reliable local information on short breaks, a limited understanding of levels of unmet need, and the wide-ranging needs of families.

9. However, we believe it is vitally important that costs are not underestimated. If sufficient funding is not attached to the Bill, particularly to cover the costs of implementing the Duty to Support, then local authorities will adjust their eligibility criteria thresholds 'upwards' to reduce the number of carers falling within the scope. This will seriously undermine the preventative aims of the Bill. This is also one of the reasons the National Carer Organisations and others are arguing for the development of National Eligibility Criteria.

10. In paragraph 82 the government has estimated **20% of carers** would potentially be eligible to receive short break support which would amount to **149,000** adult carers and **8,800** young carers.

11. Based on these figures, and an average support cost of £300<sup>5</sup> per carer, this would produce a total figure of **£47.3m** annually recurring (combined adult and young carer = 157,800 x £300). If you take away the £2.36m specifically identified in the Financial Memorandum for supporting carers short breaks this still leaves **£44.9m** annually recurring to be found. However, the total amount identified in 2017-18 to cover all costs associated with the Duty to Support only amounts to **£6.8m**. This eventually rises to **£60m** by 2021-22. The position therefore appears to be that the estimated levels of eligible need, which exists now, will **not be met** until at least 2021-22. We believe this needs explanation.

12. Furthermore if **79%** (£47.3m/£60m x 100 in 2021) of this overall funding is expected to meet the carer short breaks costs then this leaves very little to deliver other forms of essential support covered by the Duty. In other words the estimated costs to meet the Duty to Support appear to be significantly underestimated.

### **Carer short breaks that require replacement care**

13. In the Financial Memorandum the short break costs (£300 per carer) identified exclude any costs associated with the provision of a service to the cared-for person that enables a break for the carer. This might include a range of services that could be provided in-home, or in a day centre, or in a residential setting.

---

<sup>5</sup> Important to note this funding is for the carer to purchase a break and does not cover the replacement care that may be needed to facilitate the break. This is not particularly clear in the memorandum.

14. We would expect the need for such services to rise as more people take on caring roles, and caring roles intensify. In paragraph 19 of the Financial Memorandum the wider demographic context is set out in terms of the “cost of support in the future”. Identified here is an increase in older people aged 75+ of 28% by 2022, an age group for support where the caring role is already significant, and likely to grow. Additionally the continuation of the trend for more intensive caring is evident from the 2001 and 2011 census: “The proportion of carers caring for 20 or more hours each week has increased from 37% (in 2001) to 45 per cent (in 2011).”

15. The financial impact of more carers reaching eligibility and requiring some form of replacement care to enable a break will therefore be significant, and these costs do not appear to have been factored into the Financial Memorandum.

### **Short Break Statements**

16. The Scottish Government has estimated an initial £13,000 per local authority to prepare a short breaks service statement, followed by a recurring cost of £5,000 per area. The costs appear to be largely associated with the staff time involved.

17. We would expect the process of preparing, publishing and promoting a short breaks services statement to be highly dynamic exercise which would involve initial research of existing provision and levels of unmet need, and consultation and engagement activities across all stakeholder groups. There would be ongoing monitoring and review too. We are not confident the costs associated with these activities have been properly taken into account. Furthermore, it is unclear if a single local authority-wide statement is expected or if a separate statement for children and adult services will be needed. Again this may mean additional costs.

18. Short Break Statements have been in place in England since 2011 (as part of a Short Breaks Duty for disabled children and their families) and therefore there may be useful cost information that could be shared with Scottish Government.

### **Waiving charges for support**

19. We note in paragraphs 88-98 that government is currently in discussion with COSLA to resolve difficulties in implementing the existing waiving charges regulations - linked to the Social Care (Self-directed Support) Scotland Act - where local authorities are not to charge for any support they provide to carers. The principle here is that carers are equal partners in care and must not be charged for services or support they receive which helps their caring role, and protects their health and wellbeing. Short breaks from caring, with the help of replacement care where required, can provide this critical support. We would therefore not wish to see any charges being introduced which would become a barrier to carers accessing the breaks they are assessed as needing.