

Response from the National Carer Organisations to “Consultation on Job Grant”

About the National Carer Organisations

The National Carer Organisations are brought together by a shared vision that all Scotland’s unpaid carers will be valued, included and supported as equal partners in the provision of care and will be able to enjoy a life outside of caring. They are Carers Scotland, the Coalition of Carers in Scotland, Minority Ethnic Carers of Older People Project (MECOPP), Carers Trust Scotland, the Scottish Young Carers Services Alliance, Crossroads Caring Scotland and Shared Care Scotland.

Questions on Policy Proposals

- 1. Are the eligibility criteria for the Job Grant clear? Yes**
- 2. We have proposed applications for Job Grant can be made 14 days in advance of the employment start date and up to 14 days after employment has commenced. Do you think that the proposed application period for Job Grant is suitable? No**
- 3. If no to question 2, please provide comments.**

We believe that the application window should be extended to at least 28 working days in advance of and after the employment start date. But ideally, we would advocate for the application window to be extended to three-months in advance of and after the employment start date.

Based on the current proposed application window, when a young person is applying for the grant before their start date and by the time applications are processed and the financial support is received, this leaves them with little time to purchase work clothes, arrange travel passes, buy a bicycle etc - as expressed in the consultation paper as some of the suggested uses for Job Grant. Having such a narrow application window could be a deterrent for young people to apply for their entitlement and can be perceived as intended.

Commencing a new job can be a busy time for anyone but for those young people who have unpaid caring responsibilities or who are transitioning from the end of a caring role, they may need to organise alternative care arrangements for their cared-for person. This may be time consuming and young adult carers may be disadvantaged and unable to apply due to narrow application windows.

Research has shown that carers are more likely to put the needs of the person they care for before their own and, as such, the proposed 14 days prior and after the start date of employment does not provide an adequate amount of time to apply. Additionally, eligible young adult carers also require to be aware of and able to apply for the grant within this restricted timeframe. We would welcome more information on how the Scottish Government plans to raise awareness of this grant to ensure young people who are entitled will be made aware of this support.

As well as the specific challenges outlined earlier that young people who are carers face, our rationale for suggesting a three-months application window in advance of and after the employment start date includes recognising that many jobs require references, background and Protecting Vulnerable Groups scheme checks as a condition of employment. These checks can take a few months to be processed and returned before the young person is able to start employment. We also believe that providing young people with a more reasonable amount of time to be able to claim Job Grant is more in line with principles of dignity, fairness and respect.

We are aware that having a short application window may result in it being less likely for Job Grant payments to be given to young people who do not progress with their employment offers. However, we also note that applicants are only able to receive the Job Grant support once and therefore we believe that the risk of misuse is minimal.

- 4. We have proposed that Job Grant consists of one payment of £250, or £400 for young people with children. Do you agree with the proposed format of the payment? No**
- 5. If no to question 4, please provide comments.** Research has found that young adult carers are more likely to be living in poverty, feel socially isolated, are less likely to take part in opportunities, and have poorer physical and mental wellbeing than young people who do not have caring responsibilities. Taking this into account, we believe that young adult carers should be entitled for the larger £400 Job Grant to give them a fairer chance to pursue employment opportunities.
- 6. Do you agree that the proposals for Job Grant set out in this consultation paper meet the policy intent to support a smooth transition into employment for young people on low incomes by helping to meet the initial costs of starting work? Yes**
- 7. If no to question 6, please provide details.**

We welcome Job Grant policy and think this is progressive and will help some young people to enter or re-enter employment. We agree that the proposals for Job Grant will meet the policy intent to support a smooth transition into employment for young people on low incomes to a certain extent. However, there are some points we would like further clarity on and have identified some unintended consequences listed further below.

The age criteria for Job Grant states that the young person needs to be 16-24 years old (16-25 years old inclusive for care leavers) on the date the job offer is made, and applications can be made 14 days in advance of employment start date and up to 14 days after employment has commenced. We would like clarity on what counts as a job offer being made? For example, is this the date the verbal offer is made or date the conditional e-mail/letter confirmation is received? Or perhaps post references being received and a start date arranged? If the latter is the case, then this will often result in the grant being awarded after the young person is in employment, they will therefore not benefit from the opportunity to access financial assistance to help with costs associated with preparing for work, such as purchasing suitable clothes.

We are also concerned that a young person could be 24 years old when a verbal offer is received, but due to the process of references, background checks and start date, they celebrate their 25th birthday before they have received the written offer or are given a start date and this now falls outside the

restricted application window timeframe - 14 days in advance of and after the employment start date. Clarity is needed here, and we would advise an application window of at least 28 working days which also allows to make backdated claims to counteract some of the potential unfairness due to the timely employment processes particularly for those young people approaching 25 years old.

Youth work provision in Scotland is generally extended up to the age of 25 years old. Additionally, young people aged 11-25 (inclusive) in Scotland are able to receive and utilise the Young Scot National Entitlement Card. Taking this into account and for consistency to avoid unnecessary confusion, we believe that the Job Grant should be extend to all young people aged 16-25 (inclusive).

8. Can you identify any potential unintended consequences which we have not considered in these proposals? Yes

9. If yes to question 8, please provide details.

In the Scottish Parliament Chamber during Carers Week 2018, the First Minister (Nicola Sturgeon MSP), said:

This week, carers week, marks the remarkable contribution that all the 788,000 carers across Scotland make in caring for their friends and family and in wider society. I appreciate all that carers do, and we are committed to supporting them as much as we can.

When the First Minister has committed to supporting carers as much as the Scottish Government can, we are astonished that Carer's Allowance was not added to the qualifying benefits criteria for Job Grant. The Scottish Government should be supporting young adult carers who are in receipt of Carer's Allowance who decide to look for work and they should not lose out on Job Grant support.

If Carer's Allowance was added to the qualifying benefits list there may be circumstances where a young adult carer could receive Job Grant and continue to be in receipt of Carer's Allowance if they do not exceed the earnings threshold (£120 a week after tax and expenses). Under current Carer's Allowance earnings restrictions, this may be especially relevant for young adult carers aged 16-18 and earning the National Living Wage (£4.35) for their age for 16 hours work or those young adult carers aged 18-20 and earning the National Living Wage (£6.15) for their age for 16 hours per week without breaching the current Carer's Allowance earnings threshold.

In circumstances where a caring role ends and a young person may transition from receiving Carer's Allowance to being in receipt of Job Seekers Allowance, we find it unfair and not in line with the principles of dignity and respect that the young person will need to wait six months before they become eligible to receive a Job Grant. As noted previously, we believe that Carer's Allowance should be added into the qualifying benefit criteria. However, at a minimum we are calling for a similar arrangement to care leavers. We believe that young people who transitioned from receiving Carer's Allowance to one of the qualifying benefits should become eligible for Job Grant as soon as they start receiving a qualifying benefit.

Lives are complex for all, but especially for carers, so that flexibility is required to facilitate improvements for carers. This would enhance their wellbeing, allow learning and part-time return to the workforce and so contribute to the prosperity for all.¹

¹ Quotes from NCO survey 2017

We have some concerns regarding the required 16 hours average per week or more over a four-week period, and the job being expected to be for at least three months or more condition. Firstly, we think it would be extremely difficult for a young person to be able to affirm this in their application if they are starting a new post with a zero hours contract. This is especially true taking into account the narrow application window of 14 days in advance of the employment start date and up to 14 days after to apply for a Job Grant as they won't necessarily be confidently aware of how many hours of work that they will have on average in advance of starting or within the short two week period after they have started. Additionally, we would be interested to find out how the Scottish Government would plan to monitor that the job is expected to be for at least three months or more? If the Scottish Government does not intend to monitor this aspect of the eligibility, then it should be removed as an eligibility condition and listed as an expectation or aspiration.

Impact Assessments

10. Are you aware of any impacts on groups who share protected characteristics we have not identified here? No

11. If yes to question 10, please provide details. No further comments.

12. Are you aware of any impacts on children's rights and wellbeing which are not identified here?
Yes

13. If yes to question 12, please provide details.

Young carers and adult carers have a right to be supported. Under the Carers (Scotland) Act 2016 all carers have a right to request an Adult Carer Support Plan or Young Carers Statement from their local authority. Certain things which must be included in the assessment and support planning process, such as discussions about emergency and future planning, information about the carer's ability and willingness to provide care, and what the carer's personal outcomes for support are. Therefore, a carer's own aspirations to explore employment options should be considered in this process and they have a right to be supported to progress this if they opt to.

Young adult carers under 25 years old are more likely to live in an area of multiple deprivation. Research by Carers Trust Scotland found that 45% of young adult carers have reported having mental health problems and experience social isolation. Employment can improve quality of life, mental health, social networks and social inclusion. Therefore, we are disappointed that the Scottish Government have not proposed any specific conditions so young adult carers are specifically able to benefit from Job Grant support.

Not all young adult carers may feel that they are able to progress with employment opportunities, but for some young adult carers their circumstances may allow them to find work. The Job Grant support could help to provide them with some financial support to enter the labour market. It is important that young adult carers are able to participate fully in society and are able to choose to engage in training, education and employments opportunities, as well as social and leisure if they wish.

But, without extending the narrow application window, adding Carer's Allowance to the qualifying benefits list or allowing young adult carers who transitioned from receiving Carer's Allowance to one of the qualifying benefits to apply for Job Grant application from the point they start receiving a

qualifying benefit, the proposals are unfair and could result young adult carers being further marginalised and disadvantaged.

14. Are you aware of any impacts on businesses which are not identified here? No

15. If yes to question 15, please provide details. No further comments.

16. Are you aware of any impacts on island communities which are not identified here? No

17. If yes to question 16, please provide details. No further comments.

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