

## Response from the National Carer Organisations to “Recognising Carers: Scottish Labour Discussion Paper on Carer's Allowance”

### 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.

#### 1. Should the financial health check service be provided as a matter of course to all Social Security Scotland clients, in particular households with a disabled person to establish eligibility for carer’s assistance?

*Many carers have to give up their work to provide care, thus losing income and in many cases becoming isolated. No carer should be struggling to cope with needs because they are caring. Their income should be sufficient.<sup>1</sup>*

We agree with a financial health check. There is also a specific need for tailored advice for carers with an underlying entitlement to ensure they are supported to claim any income related benefits such as pension credit.

There is also a need to remove reduction on disability benefits in certain circumstances when a claim for Carer’s Assistance is made. This should be done as a matter of urgency. Many people don’t claim it because of the impact on disability benefits. Income maximisation is particularly helpful for new carers and hard to reach carers

There is a need to ensure that any increase in income is not lost through charges elsewhere. This is particularly relevant to charging for non-residential care services, where carers who are partners or spouses can have part of their income taken into account when calculating care charges.

#### 2. What services should be linked to carer’s assistance eligibility, or “passported”, to minimise carers’ costs and maximise incomes?

*I feel there should be a provision for carers to qualify for the concessionary travel pass as although those being cared for are able to gain a pass, oftentimes carers are left to fund bus fares and train fares for shopping and other trips out of their own finances. Some provision for this should also be available for carers<sup>2</sup>.*

There are a range of options that should be considered. In the first instance, this should be making available passporting to help with health costs such as dental treatment and glasses and help with travel costs for hospital appointments.

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<sup>1</sup> Quotes from NCO survey 2017

<sup>2</sup> Quotes from NCO survey 2017

Further consideration should be given to extending passporting to include concessionary or reduced fare transport, leisure and fitness concessions and expanding help with travel costs to hospital to include hospital visiting.

Finally, Carers Allowance should be considered to help with housing benefit and council tax.

**3. Should disability and carer's assistance regulations specifically rule out any reduction in entitlement where both forms of assistance are claimed?**

Yes, as a priority

**4. Should carer's assistance be disregarded from Council Tax Reduction calculations, while the carer premium and earnings disregards are maintained, or if a recipient of carer's assistance should attract full passported status?**

*Carers Allowance is - for many women - their only income. Women are also more likely to have to give up work to care and so are more likely to be dependent on CA. And increase of just £10 is simply not enough. In our case, that increase will be eaten up by the planned increase to Council Tax and we are not entitled to any help with this.<sup>3</sup>*

It should at a minimum be disregarded from Council Tax Reduction calculations. However, it may be more straightforward to simply make Council Tax Reduction available to all on carer's assistance

**5. Should the earnings limit within Carer's Allowance be based on the National Living Wage at 16 hours per week? Should a taper be applied to Carer's Allowance once an earnings limit has passed?**

*One other thing I would add is that the upper level of income you are allowed before you can claim carers allowance is too high. It should be a sliding level so that if you are earning just a wee bit more than the current upper limit you still receive a certain percentage which then gets less the more you earn until a certain point (to be fairly determined) where you earn too much to claim - i.e. you earn enough that you don't need to claim because that is why we claim - because we need to, not because we want to. We as carers are saving the government a massive amount of money. Our vital role in society should be shown the correct level of respect and the government should acknowledge that most of us who are carers are either having to quit our jobs or work far less so our income and/or our potential income is far less than it would be otherwise. That is why we claim it. Not because we think we should be paid to look after our loved ones, but because we need it<sup>4</sup>*

Consideration could be given to a range of options e.g.

1. At a minimum the earnings threshold should be set at 16 hours at Real Living Wage which is £144 per week. This aligns with the Scottish Government Business Pledge and priority to encourage employers to pay the Real Living Wage.
2. Aligning the threshold rather than hours but instead with the median part time hours salary in Scotland of £10474<sup>5</sup>, equivalent of £201 per week.
3. Aligning the threshold with 35 hours at the Real Living Wage. This recognises the fact that carers can and do provide care at significant levels whilst also in employment or further education. This would equate to £315 per week or an annual threshold of £16,380 per annum. Even adding Carers Assistance to this income would mean carers were several thousand pound below the median full-time salary in Scotland.

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<sup>3</sup> Quotes from NCO survey 2017

<sup>4</sup> Quotes from NCO survey 2017

<sup>5</sup> SPICe 2017

4. Whatever decision is made on the earning threshold, be that hours or a financial threshold, a taper must be in place to remove the cliff edge that is currently in place for Carers Allowance. We prefer this based on number of hours but need to model both to see which has more benefits for carers.

In addition, we would like to see the development of a Fair Start type employability programme for carers, particularly carers at the end of their caring journey (but open to all carers). As with Fair Start, this should be voluntary

**6. Would the removal of all restrictions on studying benefit carer's assistance recipients, and how could eligibility for carer's assistance better "passport" access to education?**

All restrictions should be removed. Eligibility for carer's assistance should be considered within student support. This should include financial and practical support.

**7. How should fluctuating conditions should be accommodated in new carer's assistance alongside the "regular and substantial" rule requiring 35 hours of care per week?**

The following would help to make carers assistance more accessible to carers looking after someone with a fluctuating condition:

1. Since carers assistance requires the cared-for person to be in receipt of a disability benefit, Social Security Scotland should work with disabled people to ensure the application process takes account of fluctuating conditions.
2. In some situations, the cared-for person may decide not to apply for disability benefits. In these cases an alternative process for carers assistance could be considered, Such as providing proof of diagnosis and looking at hours caring over a 6 month period,
3. It is essential that caring is not defined purely by physical and personal care tasks. The application process should widely define caring tasks to include for example, being with someone who is anxious, attending appointments with the cared-for person and assisting them with everyday tasks such as shopping.
4. The eligibility for carers assistance could be lowered from 35 hours a week. There is evidence<sup>6</sup> of impact on poverty and employment from 20 hours caring per week. For example, the poverty rate among working-age carers increases with the number of hours they care for, particularly after 20 hours per week. Research has found that intensity of care is an important not only on participation, but also on wages earned. They found that above a threshold of 20 hours of care provided per week, carers are not only less likely to participate in the labour market, but their hourly earnings are also lower than those of non-carers.<sup>7</sup>

**8. What proposals can fully recognise the contribution of carers, how this discovery work and modelling should be delivered, and who should initiate this.**

*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. Disabilities and long term sickness demand additional resources from the most vulnerable, and so should not be means tested; likewise those caring for these people should also not be means-tested for contributing to society.<sup>8</sup>*

There are a number of options. These could include:

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<sup>6</sup> New Policy Institute (2016), Informal care and poverty in the UK

<sup>7</sup> European Commission (2013) The indirect costs of long-term care: Research Note 8/2013

<sup>8</sup> Quotes from NCO survey 2017

A Minimum Income Guarantee similarly to that in place for pension credit.

A basic income for carers

Developing a two tier system that recognises that many carers have a caring role of such intensity or complexity, or care for more than once person and, as such cannot undertake any level of paid employment.

*Unlike the majority on jobseekers most of us will never be able to enter part or full time work due to our care responsibilities. The jobseekers allowance is viewed as temporary payment and at a level to try encourage those to actively seek work. The weekly amount for a carer who does not have the opinion to pursue entering the workplace to bring in more money would still be far far below that sustainable to live with rising energy and food costs.<sup>9</sup>*

The National Carer Organisations have the past proposed such a two-tier carer benefit. The first tier would be a **Carers Allowance equivalent** that would provide support to all carers eligible for it. There would be a permitted earnings rule, with the opportunity for carers to undertake paid employment.

The second tier would be a premium payment available to those carers who are undertaking more intensive caring roles (defined by hours per week, as currently). The premium payment would be available to all qualifying carers, including those over state pension age, to compensate them for the additional costs of caring and/or to enable them to purchase help, goods or services to ease the pressure of their caring role. This payment could be set at similar levels to similar payments such as child benefit, i.e. between £25 and £50 per week.

We believe this approach would begin to address the issues of poverty, gender inequality and access to employment currently faced by carers. Furthermore, it would enable people to be economically active alongside caring and contribute to the economy. This would also reflect the investment the government has made in childcare to support parents with young children.

#### **9. Should carer's assistance continue while a cared-for-person is in hospital, and for a longer period after the death of the cared-for-person?**

Consideration should be given to aligning this with proposals in relation to parents with a disabled child. The Scottish Government indicated its intention to remove the 84 day (12 weeks) rule in this case. Even if this were not possible, consideration should be given to examining options from 3-6 months.

#### **10. What's missing?**

Carers of pension age. There is a need to consider how carers of this age are recognised for their caring role. Those caring for multiple people. In the first instance could an additional rate or top up be available? Secondly could carers meet the hours criteria with hours combined for multiple caring roles?

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<sup>9</sup> Quotes from NCO survey 2017