

Response ID ANON-A4SP-TSRE-P

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

1 Please give us your views on how Scottish Carer's Assistance services could be designed to suit carers' needs.

Give us your views:

Carers often struggle to find time for other tasks outside of their caring responsibilities therefore the design of the service must take these demands into consideration.

SASW agrees that carers should be able to access help for any of those activities identified in Q1 from a number of community-based venues to negate the need to travel further afield and disrupt the care that they provide.

Carer Centres are ideally placed for locating support to carers on a range of matters. Being able to access information, make application, inform of changes in circumstances and find peer support in such a venue would be of significant benefit to carers.

The processes should be straightforward uncomplicated and free from unnecessary bureaucracy. They should permit carers to pass on information or apply for assistance using a range of mediums including online, using a portal, over the phone, individual visit from a benefits advisor or by using hard copies of forms. Many carers are digitally excluded and they must not be further disadvantaged through access arrangements. Irrespective of the method used, carers should not be disadvantaged by using one particular method over another.

The relationship between devolved benefits and reserved benefits is complex. Carers should be able to report their changes to either DWP or Social Security Scotland when they receive benefits from both with seamless behind the scenes collaboration that avoids the need for repeat notifications.

Carers are often known to social workers who have a key role in supporting them through good conversations and relationship-based practice as well as undertaking assessments of need. The local authority has a duty to provide information and advice services for carers and to provide money advice services. These services work hand in hand with social workers trying to mitigate the impact of poverty experienced by people they support. Signposting carers to appropriate community venues for help specific to the Scottish Carers Assistance would be undertaken by social workers on many occasions in the way they currently refer carers for benefit and money advice to relevant services.

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

Give us your views:

Social workers are key to supporting carers through relationship-based practice providing a positive source of support in their caring responsibilities. They also have a responsibility to assess carers' needs and support them to explore ways in which their needs can be met. Where specific information is required in relation to benefits, social workers support carers to access this or sign post as appropriate. The social worker is often called to provide support endorsing the individual's application for benefit.

Many third sector organisations employ social workers, benefits advisors and money advisors who provide good support for carers in these areas. Social workers work across the sector and have substantial experience of supporting carers to access community services and support as required.

SASW agrees that carers should have a range of routes to access support and recognises the investment in and valuable work done by carers centres that should not be lost.

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

3 Do you agree or disagree with the proposed residency criteria for Scottish Carer's Assistance?

Agree

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.:

SASW respects this difference between devolved and reserved benefits and the subsequent complexity where they interconnect. We generally accept the proposed residency criteria. However, as eligibility for Scottish Carers Assistance will be based on where the carer lives and not where the person they care for lives, our view is that there must be a reciprocal arrangement maintained with the DWP where a carer living in England, just over the border, crosses the border into Scotland to support someone who lives there. The carer must not be disadvantaged by the eligibility criteria or fall between Social Security Scotland or DWP, where neither accept responsibility.

5 Please give us your views on the 'past presence test' which should be used for Scottish Carer's Assistance.

Give us your views:

The recent changes to the rules for 'past presence test' in disability benefits for both adults and children which saw the qualifying period reduce from three years to two years should also be applied to the Scottish Carer's Assistance benefit. SASW supports consistency and fairness across the benefits

system where without this change the disabled person can access disability benefit but the carer is excluded from accessing Scottish Carer's Assistance for a further year. This would be unfair to carers many of whom will be on reduced income as a result of the caring responsibilities they have.

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

6 Do you agree or disagree with the proposed re-determination timescales for Scottish Carer's Assistance?

Agree

7. Please write the reason why you agree or disagree with the proposed re-determination timescales for Scottish Carer's Assistance, or any other information you want to share on this question.:

SASW supports the increased timescales proposed for re-determinations to bring them into line with the re-determination timescales for disability benefits. Consistency is required as it would be confusing for applicants to work to different timescales especially when the benefits are so closely linked.

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

8 Do you agree or disagree with the proposals on when payments of Scottish Carer's Assistance should be suspended?

Disagree

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.:

SASW agrees that the suspension of carers benefits should be a rare occurrence and that protecting carers where there is financial abuse is critical. Social workers have a statutory role in adult support and protection. Suspension for other reasons such as non-provision of information must only happen when every other option to resolve the presenting difficulties has been tried and exhausted. No-one must be left without a financial safety net or face destitution. Every effort must be made to offer carers practical support and assistance rather than punishment.

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.

Give us your views:

The suspension of benefits is likely to cause serious financial hardship and, potentially, destitution. Every effort must be made to exhaust all other possibilities and avoid this action being taken. Where it is taken every effort must be made to resolve the issues that resulted in this happening and no-one should be left in destitution and without a financial safety net.

Scottish Carer's Assistance when it launches - Setting the value of Scottish Carer's Assistance awards to £0

11 Do you agree or disagree with the proposals for when an award of Scottish Carer's Assistance should be set to £0?

Disagree

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.:

SASW agrees that carer's underlying entitlement to carers benefit should be recognised and all carers providing significant levels of care should be paid.

Overlapping benefits mean that if carers don't receive SCA, they also won't get other benefits for which SCR is a gateway. Therefore, we agree that an award of £0 at the very least recognises this. However, the earning limits for Scottish Carer's Assistance needs to be substantially increased to reflect the increase in costs of living and inflation increases as well as recognising the valuable role carers have and where they may be able to combine caring with part time working.

Older people in receipt of state pension should not lose the Scottish Carer's Assistance payment. This payment should be paid along with the state pension because older people are being unduly penalised when they are still undertaking caring duties and caring duties do not stop on reaching pensionable age. To do otherwise perpetuates ageism

While someone is in hospital, their carer is unlikely to be relieved of all caring responsibilities. They will have a different set of responsibilities but will still be required to provide support and assistance during this time. The nature of the support will change, but nonetheless they will still be actively involved in caring for the person and meeting their needs both on a practical and emotional level. Carers are actively encouraged to support their loved one when in hospital, and especially where their needs are complex or they have communication difficulties. They cannot be asked to contribute in this way and lose access to their carers allowance where it assumed they are no longer carrying out caring duties. This also assumes that, for the period a person is in hospital, their carer can go and find work or will apply for other benefits thereby creating a more complex benefits system than is necessary. Also, when a person is in hospital, carers may find that many expenses increase such as travel. For this reason, SASW supports the removal of the 28-day cut off and advocates carers should receive full Scottish Carer's Assistance while supporting the cared for person in hospital.

Scottish Carer's Assistance when it launches - Short-term assistance

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

14. Please write the reason why 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, or any other information you want to share on this question.:

When the cared for person is receiving short term assistance it should be recognised as a qualifying benefit for Scottish Carer's Assistance. Their carer could then receive the Scottish Carer's Assistance until such times the decision on the challenge has been concluded. Should the challenge be unsuccessful any monies received during that period should not be required to be paid back.

15 Please give us any other views you want to share on the proposals for Scottish Carer's Assistance when it is first launched.

Give us your views:

SASW advocates a high public profile launch of Scottish Carer's Assistance and targeting, in the first instance, those geographic areas where poverty rates are highest. There should be 'uptake' campaigns and investment in welfare rights agencies and income maximisation staff to ensure they have the necessary knowledge and understanding to support applicants. Social media should be used to the fullest effect and carers should be able to apply in a range of different ways. Social workers are in contact with carers and information should be available in leaflet form and ready reckoners that they may leave it with carers during visits and follow up with support as required. Some carers will be able to complete applications without assistance but there should be assistance available for all carers who need it. SASW will be very happy to promote the launch through bulletins and other communications with our members.

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

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?

Unsure

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.:

SASW supports the recognition of carers for the valuable work that they do and any decision about the frequency of the Carers Allowance Supplement should be consistent with the views of carers on this.

Having options where carers can opt to have the amount paid alongside their regular payments of Scottish Carers Assistance or have it paid twice in the year as lump sums or as a single annual lump sum may be required. No single option will work for all carers and building in an element of choice may help meet the different financial needs that exists among carers.

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

Give us your views:

SASW supports the position that the Scottish Carers Allowance Supplement should be tax free in the same way PIP is tax free. When they apply for other benefits, carers' benefits count as an additional income and acts against them ruling them out for accessing other financial support. Many carers do some paid work but still undertake significant caring tasks and duties which means they lose out on financial assistance.

SASW recognises the negative financial impact caring has on carers and the poverty they often experience as a result. SASW is concerned about increasing levels of poverty, including in work poverty which is further compounded by the cost of living crisis. This is likely to hit carers harder than most as they are often at home for longer periods in a day, making use of utilities to meet the needs of the person they support. They also incur additional costs for example, charging hoists, electric power chairs, electric beds, and for the use of washers and dryers for increased laundry. SASW supports action that helps to relieve this situation for carers and provides additional income.

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

19 Do you agree or disagree with the proposed eligibility criteria for Carer's Additional Person Payment?

Disagree

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.:

There is a lack of clarity about how the £10 figure was decided upon. While any additional payment to carers is welcomed, the Additional Person Payment of £10 per week does not reflect the additional duties or responsibilities of caring for more than one person. SASW is concerned that this amount would not compensate for the loss of potential earnings of carers who need to give up employment because of their caring duties. As the majority of carers are women, they are disproportionately affected. This would not alleviate the finance burden carried by carers or lift many carers out of poverty. Where a carer is in receipt of Universal Credit the additional amount would be deducted from UC and there would be no financial gain to carers.

21 Do you agree or disagree with the proposed payment frequency for Carer's Additional Person Payment?

Unsure

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.:

The payment frequency must reflect the views of carers. Perhaps it is necessary to have options where carers can opt to have the amount paid alongside their regular payments of Scottish Carers Assistance or have it paid twice in the year as lump sums or as a single annual lump sum. No single option will work for all carers and building in an element of choice may help meet the different needs that exists among carers.

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?

Disagree

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.:

SASW disagrees with targeting Carer's Additional Person Payment to carers who are getting Scottish Carer's Assistance Payments because it excludes carers who have underlying entitlement. SASW believes all carers providing substantial caring support that prevents them from gainful employment/ self-employment or limits the number of hours they can work should receive Scottish Carer's Assistance payments and Carers Additional Person Payment.

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

Give us your views:

Where carers are in receipt of universal credit any additional payment will result in an adjustment to their universal credit resulting in no financial gain for carers.

Changes to Scottish Carer's Assistance - education rules

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

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.:

SASW supports the removal of the study rule that prevents carers in full time education from receiving Scottish Carer's Assistance allowance. Many courses are now delivered on line or through hybrid arrangements that affords carers greater flexibility and increased opportunities for learning. This should be welcomed .

Changes to Scottish Carer's Assistance - different caring situations

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

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.:

SASW supports the change to permit carers to add together hours spent caring for two people to reach the 35-hour caring requirement to access Scottish Care's Assistance. The current system is unfair to carers who are allocating the same number of hours to providing care but are not eligible for support because the care is split across two or more people as opposed to for a single person. The proposed change will ensure that they get access to the same level of support.

Changes to Scottish Carer's Assistance - extending payments

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

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.:

An increase in the time the Scottish Carer's Assistance should be paid after the death of the cared for person from 8 to 12 weeks is welcomed. SASW queries whether the extension is sufficient to allow carers to properly grieve and recover from extended periods of caring that is documented to take its toll on carers health and well-being.

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

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.:

SASW supports the extension of the time period to 12 weeks where a carer will continue to receive Scottish Carer's Assistance however some people require to remain in hospital or in intermediate residential care for extended periods of time beyond 12 weeks. While someone is in hospital or in intermediate care their carer is unlikely to be relieved of all caring responsibilities. They will have a different set of responsibilities and will still require to provide support and assistance during this time. The nature of the support will change but nonetheless they will still be actively involved in caring for the person and meeting their needs both on a practical and emotional level. Carers are actively encouraged to support their loved one when in hospital or in intermediate care, especially where their needs are complex or they have communication difficulties. Carers cannot be asked to contribute in this way and lose access to their carers allowance where it assumed they are no longer carrying out caring duties. This also assumes that, for the period a person is in hospital, their carer can go and find work or will apply for other benefits thereby creating a more complex benefits system than is necessary. Also, when a person is in hospital, carers may find that many expenses increase such as travel.

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

34 Do you agree or disagree with the proposed future change to increase the earnings limit for Scottish Carer's Assistance?

Agree

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.:

The earning limits for Scottish Carer's Assistance needs to be to be substantially increased to reflect the increase in costs of living and inflation increases as well as recognising the valuable role carers have and where they may be able to combine caring with some part time working if circumstances allow.

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?

Disagree

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.:

SASW supports an increase in the earnings threshold but if the earnings limit was based on the living wage many carers will still struggle financially as they incur significant additional costs for caring. Examples include increased heating costs, additional costs for charging up of electrical equipment such as hoist, adjustable electric beds, air pumps and many more crucial pieces of equipment. SASW advocates the earnings limit is calculated to compensate for the additional costs that are impacted by caring.

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

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.:

The proposal for a 'run on' period after a carer earns over the earnings limit would provide carers with some transitional time to adjust to financial changes. It is disappointing that the systems are driving the change to avoid 'earnings tapering' and, despite it being a fairer way, is not being pursued because of the complications of the system.

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

40 Do you agree or disagree that a payment for long term carers should be considered further?

Agree

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.:

SASW supports the idea for long term carers to receive a payment to recognise the significant impact of a long-term caring role on carers' finances.

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

Give us your views:

SASW recognises those carers likely to be impacted are individuals with underlying entitlement such as those in receipt of state pension. It is unfair that particular group of carers are penalised in this way. While their state pension is more than Scottish Carers Assistance, SASW supports that all carers should receive payment for the difficult and challenging role they undertake and it must be noted that individuals do not stop undertaking this role because they have become of pensionable age.

Carers can only access Scottish Carer's Assistance if they care for someone for 35 hours or more a week. The new arrangements will allow them to add their caring hours across two people to meet that requirement but there are many carers who provide substantial support that is fewer than 35 hours. Caring for someone fewer than 35 hours per week can still have a substantial impact on a carer's capacity to work and subsequent income. If the main purpose of Scottish Carer's Assistance is income replacement, individuals who do not meet the 35 hours but who have had their capacity to generate their own income reduced through caring, should be entitled to financial support.

43 Please give us any other views you want to share about the proposals for future changes to Scottish Carer's Assistance.

Give us your views:

SASW supports proposals for future changes to Scottish Carer's Assistance that improve the financial support to carers. Any changes should better meet the needs of carers, be fair and reflect their preferences for payment frequency.

Scottish Carer's Assistance – Impact assessments

44 Please set out any information you wish to share on the impact of Scottish Carer's Assistance on groups who share protected characteristics.

Give us your views:

SASW welcomes the intention to gather a wider range of equality information for Scottish Carer's Assistance. It's important that no protected group is potentially left behind by any changes and that all need, views and experiences are considered. We would like to see this approach continued beyond the consultation stage as part of an ongoing commitment to improving equality. This means engaging proactively and regularly with all groups who share protected characteristics to ensure their voice is heard and that their needs are being met.

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

Give us your views:

Many of Scotland's island residents are getting older with the 2019 National Plan for Scotland's Islands indicating 21% of the island resident's population were 65 and over . The figures are above the national average with a consequential increased demand for care. While most older people wish to remain at home as they age, islanders say that a lack of available on-island support in terms of home care and assisted living or care homes can make that difficult and some need to leave the island to get the support they need. The lack of options means that more people rely on family support with most of that falling to women . There is an expectation that women within families should take on the role of carer, be that for older relatives, younger children, their spouse, family members and neighbours . Island communities are impacted significantly by the current cost of living pressures . The cost of living for people in rural parts of Scotland is estimated to be 15-30% higher than in urban areas of the UK. Fuel poverty is a particular challenge in island communities, with households likelier to have much higher fuel poverty rates than the national average. SASW welcomes the proposed changes to Scottish Carer's Assistance that improves the financial situation for carers but the specific needs of carers in the Scottish Islands should be considered and appropriate measure taken that reduces inequality they experience.

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.

Give us your views:

SASW welcomes the positive changes in the Scottish Carer's Assistance but would like to see it go further as expressed in the responses. Informal carers are more likely to live in poverty than those without caring responsibilities. 44% of all working age adults who are caring for 35 hours or more a week are in poverty and the poverty rate for those caring for 20-34 hours per week is 17%. These figures indicate the need for significant changes to alleviate this situation. Carers are restricted in their life opportunities because of their continued caring responsibilities and when they experience the loss of the person they cared for, the opportunity to recover, improve their own health and wellbeing and to explore other options must be given. SASW recognises the impact of caring on all aspects of a person's life and supports the continuation of financial assistance to carers during this transitional period. During the times of caring individuals may lose skills they had prior to undertaking their caring role and may require to upskill, retrain, attend educational establishments, undertake courses or training online. This may challenge their confidence and carers need time to adjust to different demands upon them. Social workers have a role to play in supporting carers through these life events and SASW advocates that this transition can take longer than the 12 weeks identified in the proposals.

47 Please set out any information you wish to share on the impact of Scottish Carer's Assistance on children's rights and wellbeing.

Give us your views:

Where carers are living in poverty there is the inevitable impact on children within the family. Poverty can make parenting more difficult. The stress of living in poverty can make family life harder, increasing anxiety and depression, damaging both mental and physical health for family members. There is significant evidence that social and economic inequalities, particularly poverty and debt, increase the stressors in families and communities. Poverty is

also a mediating factor among various factors that increase the risk of child abuse and neglect Providing increased amounts for carers through the Scottish Carer's Assistance would help relieve some of these pressures and improve the situation for children living in families where there are significant caring requirements. Many young people are carers. Based on the 2012/13 Scottish Health Survey (SHeS) there are an estimated 93,000 young carers and young adult carers in Scotland . The changes to Scottish Carer's Assistance that removes the eligibility barrier for accessing full time education will mean that more carers (and young adult carers) will be able to study/retrain alongside their caring responsibilities if their circumstances afford that possibility. This in turn may create additional opportunities for carers to be involved in other opportunities outside of their caring role.

48 Please set out any information you wish to share on the impact of Scottish Carer's Assistance on businesses.

Give us your views:

The increase in the earnings limit for carers and the increase in hours that carers are able to work could benefit employers. There have been workforce shortages with recruitment and retention of staff remaining challenging in the public, third sector and independent sector. While not all carers will be able to work, it will depend on their individual circumstances, but those who can may help ease the workforce challenges across the sectors while improving their financial situation. The pandemic has taught that standard work patterns can change; hybrid working and working from home are attractive options and offer flexible arrangements that may suit some carers. The impact on business in each of the sectors will require them to become flexible and creative in their contractual arrangements with staff.

About you

What is your name?

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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:
Scottish Association of Social Work (SASW)

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent