

Social Justice and Social Security Committee
2nd meeting, 2021 (Session 6), Thursday 2 September 2021
Carer's Allowance Supplement (Scotland) Bill
Summary of Submissions

Introduction and summary

This paper summarises the main themes in the 133 responses to the Committee's call for views on the Bill. Individual submissions are available on the Committee's [webpages](#). The Parliament's Participation and Communities Team (PACT) also sought to engage with individual carers – a summary of their work is in Annexe 2.

Nearly all respondents welcomed the measure, although many said that more was needed – including more financial support, greater recognition of the role of unpaid carers, improved health and social care support and greater availability of breaks from caring.

A common observation was that not all carers were eligible for Carer's Allowance Supplement (CAS) payment. Another common view was that COVID-19 has increased difficulties for carers but that many difficulties existed before COVID-19.

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Responses Received

133 responses were received, 17 from organisations. (Listed in the annexe).

From their responses it was clear that almost all individual respondents were carers.

Responses from some organisations drew on their own research and engagement with unpaid carers. In particular the National Carer Organisation's response includes analysis of their survey of over 600 carers. Lanarkshire Carers included views from focus groups and The Family Fund referenced their research on the impact of COVID-19 on carers.

The themes raised in all these were consistent with those raised in individual responses to the Committee.

There was a great deal of consistency across all the responses – whether from individuals or organisations or in PACT's engagement work.

Overall level of support

Almost all (92%) agreed with the proposal to make a double CAS payment in December (122 of 133 respondents).

Only five disagreed with the Bill - all individuals. They disagreed because not all carers will get the payment.

Fourteen of the 17 organisations responding agreed with the Bill and the remaining three didn't answer.

Issues with Carers Allowance Supplement

Many submissions raised general issues with the Carer's Allowance Supplement (CAS) – rather than just the proposal for a single additional payment.

The main issues raised with the rules for CAS were that:

- Not all carers are eligible (31 said it should be available to more or all unpaid carers)
- It should be paid weekly or monthly rather than as a lump sum (9 responses)

For example, an individual carer with Lanarkshire Carers said:

“I’m disappointed that those that already receive carers allowance are getting even more money and support yet I have to work and struggle with my caring role and receive absolutely no income or support for it.”

Several (9) respondents suggested that a more regular payment (either monthly or weekly) would be helpful, instead of it being made as a lump sum.

For two respondents, the existence of a strict qualifying date caused a problem. For example one person would miss out because they will start to get their state pension just before the qualifying date for the December payment. This means that even though they were a carer who got Carer’s Allowance during the pandemic, they will not get the additional CAS payment in December.

CPAG point out that the interaction between Carer’s Allowance, CAS and Universal Credit results in individuals considering there is no financial incentive for them to apply for Carers Allowance. They considered it needed to be made clearer this was not the case in Scotland and that there was merit in claiming Carers Allowance to qualify for CAS.

Issues with Carer’s Allowance

Many responses raised issues with the qualifying rules for Carer’s Allowance. This linked to views that CAS should be provided to more unpaid carers. The two main rules mentioned were:

- Carers who work and earn more than £128 per week are disqualified
- Carers who get an overlapping benefit (eg state pension) are disqualified

Other rules mentioned as being problematic were:

- Carer’s Allowance is counted as income for some other benefits
- Carer’s Allowance can’t be received if the person being cared for gets a Severe Disability Premium
- Full time students can’t get Carer’s Allowance
- There’s no additional payment for caring for more than one person
- Only the higher rates of Disability Living Allowance are qualifying benefits
- Residency requirements disqualify those with no recourse to public funds

These responses suggest areas for reform that people may look for when Scottish Carer’s Assistance is introduced. For example, the National Carer’s Organisations note some priorities for Scottish Carer’s Assistance:

“This includes expanding eligibility, increasing the level of the benefit, recognising those unpaid carers with more than one caring role and providing support for those who are not currently eligible.

[...]

For those unpaid carers who are not eligible, there is an opportunity to develop, for example, a Carers Recognition Payment with the supplement providing a model for delivery.”

The amount of payment

Generally the additional payment was welcomed but many thought that further support was needed (31 responses). For many, this was financial support but non-financial support was also mentioned frequently.

Many made general comments about the low level of carer benefits. Often this was compared to what it would cost to employ a carer. Eighteen responses compared the level of Carer's Allowance and CAS to wages, many also referring to how much money carers save the government in social care expenses.

Citizens Advice Scotland echoed many in their view that:

“the main purpose of carer's social security payments should be to equally to compensate carers for income that would have been earned through employment.”

Viewed in this light, current payment levels, even with the supplement are very low.

However, this didn't prevent most people welcoming the payment as a step in the right direction. For example, the MS Society said:

“The Government are correct to prioritise additional financial support for carers, but the supplement alone will not replace money lost by carers during the pandemic.”

Practical impact of the payment

Some respondents thought the payment will only have a small impact but despite this, it was still welcome. Asked about impact, one said:

“Realistically? Not an awful lot but it will allow for a little ease of pressure felt during winter months it certainly helped me fill the oil tank.”
(Individual)

Others thought the extra payment would have a huge impact (9 responses), but again, a common response was that it was not enough or should be available to more carers. For example:

“A huge impact but it's not enough. It may mean an overdue bill paid, some extra shopping for the winter months. It means for one month one can breathe and not worry. One month!” (Individual)

“Personally no impact on me or my brother as neither of us qualify. I think it will slightly help carers who are eligible but the payment needs to be far much more.” (Individual)

The timing of the payment close to Christmas was often commented on. For example:

“The doubling of the standard payment allows me and my family to have a good Christmas free of worries about being able to afford treats.”
(Individual)

Two respondents said it would be particularly important giving the impending removal of the £20 Universal Credit uplift.

“It will have a Huge impact as come the end of October people who claim universal credit will be losing £80 a month because it was a extra payment due to the Covid.” (Individual)

What the payment would be used for

Asked what the impact of the payment would be, a number of respondents mentioned what it might be spent on. Items listed included:

- Paying bills (most often food and heating)
- Getting a break – either through hobbies, or a respite break
- Paying off debt
- A small treat
- Winter costs – including Christmas

Emotional impact of the payment

Many responses referred to feeling undervalued, and that the CAS payment was a welcome bit of recognition (33 responses) For example:

“Yes the money is important but the additional knock on effect of feeling valued and at least this small recognition of carers additional hardship and struggle during the pandemic is the most important benefit!”
(Individual)

Many responses said the payment would relieve financial stress (17 responses)

“Takes away a small amount of the daily stresses” (Individual)

Impact of COVID-19

Some respondents said the pandemic exacerbated existing difficulties rather than creating new ones. For example:

“I believe the pandemic has made things far more difficult in my view but I take the view that these difficulties have always been present in the main.”

Others described how COVID-19 had made things more difficult. For example:

- Removal of services such as respite
- Increased expenses
- Increased strain of caring
- Additional requirement for caring

The removal of services during COVID was often mentioned in responses across a number of questions. For example, Lanarkshire Carers said:

“The need for self-isolation or shielding, the closure of respite and day-care services and reduced support from social care providers have had a disproportionate effect on carers.”

The need for respite or some kind of break from caring was a common theme. MS Society said:

“Accessible, safe and comprehensive respite services are key to supporting unpaid carers with the challenges faced as a result of the COVID-19 pandemic.”

It was noted by many that the impact of COVID-19 has been felt by all unpaid carers – not just those in receipt of Carer’s Allowance/CAS.

Is the CAS payment the best way to support unpaid carers with the challenges created by COVID-19?

Over half of respondents agreed with this statement. (76 of 133 responses, 57%).

A fifth disagreed (28 responses, 21%)

19 weren’t sure and 5 didn’t know.

Those who disagreed considered that:

- Other/additional support is needed. (11 respondents) Respite care and mental health support were mentioned.
- Carer’s should get greater financial support (10 respondents)
- It doesn’t support all unpaid carers (6 respondents)
- It’s a short term measure (2 respondents)

In fact there was little difference between those that agreed that the double payment was the best way to support carers and those that didn’t. All answers were generally qualified by saying it was welcome but should be part of broader measures. For example, while agreeing, one respondent said:

“It will do for the time being. Really need to address all full time unpaid carers though.” (Individual)

Alternative approaches

The main alternative approaches mentioned have already been discussed and were:

- More or all unpaid carers should be included (31 responses)
- The amount should be higher (18 responses compared Carers Allowance to wages)

- It should be spread throughout the year rather than a lump sum based on a qualifying date (11 responses)
- It should be permanent (5 responses)

Additional Support

As discussed, many responses recommended additional measures that were needed. As Lanarkshire Carers said:

“carers who are eligible for the Carer’s Allowance Supplement welcomed the one-off double payment but thought that it was just a starting point.”

Close the Gap point out that:

“the scope of this Bill is too narrow to address the wider social, economic and labour market inequalities faced by women who have unpaid caring responsibilities.”

The main other type of support mentioned was respite care. (32 responses) For most, this was needed in addition to the payment. For others, it was more important than cash. One respondent said:

“For me, respite facilities, the chance of a few days off, would be worth so much more than cash.” (Individual)

The main other theme was the need for improved health and social care support. The National Carer’s Organisations called for a COVID-19 recovery action plan, who said of the pandemic:

“It has stretched unpaid carers to limit and beyond (and continues to do so) and has exacerbated existing impacts and inequalities. It will take much work across all policy areas – care, education, health, social security, employability and more - to even begin to restore unpaid carers to what was a low starting base of wellbeing.”

The ALLIANCE endorsed the Carer’s Trust Scotland in their call for a ‘national remobilisation plan’ and also recommended:

“better communication by commissioning bodies to make sure their asks of carers services are realistic; transparency on how local authorities spend Carers Act funding; and for continued support for workforce development to protect the wellbeing of staff in carer services.”

The ALLIANCE also called for:

“Other non-financial support for unpaid carers that should be pursued include implementation of the recommendations of the Independent Review of Adult Social Care, improvements in the implementation of the Carers (Scotland) Act 2016, and remobilisation of social care day services.”

Financial Memorandum

52 people responded to the question on the financial memorandum (43%). However this was generally to re-iterate points made elsewhere or to state they had no views. There were very few substantive comments on the estimates presented. Two specific points made were:

- “To be participatory, i need to know how big the budget could be, what else the money could be spent on, and I would need transparency around how the costing outlined here relate broadly to other spending commitments. “ (Individual)
- You may want to consider the natural increase in age increase in the population forecast. Can you afford to be so generous in 10 or 15 years time? (Individual)

Regulation making power

94 people responded to this question (71%). 57 of those provided a clear indication of whether there should be a high, medium or low level of scrutiny.

- High – 22 responses (including ‘super-affirmative SSI’)
- Medium – 10 responses (including ‘affirmative SSI’ or ‘vote in parliament’)
- Low – 25 responses (including ‘negative SSI’)

Responses were mixed, with some considering that the additional payment should require little scrutiny because it is self-evidently desirable and others considering that it should have full scrutiny because support for carers is important. For example:

“To make an additional payment to them shouldn’t have to go through scrutiny again and again unless of course the rules for payment changes.” (Individual)

“Regulations subject to the affirmative procedure provide a balance between scrutiny and speed; in relation to simply amending the amount of a benefit, as in this case, this seems a sensible approach to take.” (Low Income Tax Reform Group)

“We would like to see all regulations on social security [...] come to the Scottish Parliament as a super-affirmative Scottish Statutory Instrument, and therefore be subject to scrutiny by The Scottish Commission on Social Security. The complexity of social security legislation, and the ways that the legislation and different payments interact, means that it is very important that all social security legislation should have sufficient scrutiny.” (CPAG)

Camilla Kidner
SPICe,
17 August 2021

Annexe 1: List of organisations responding

Aberdeenshire council
 Glenlaw house parent/carer support group
 Inclusion Scotland
 Low Incomes Tax Reform Group
 Shetland Islands Council
 Child Poverty Action Group in Scotland
 Glasgow City Health and Social Care Partnership
 Close the Gap
 Family Fund
 Lanarkshire Carers
 MS Society Scotland
 Covid-19 Review Observatory, University of Birmingham
 Perth and Kinross Association of Voluntary Service (PKAVS) Ltd
 National Carer Organisations
 Citizens Advice Scotland
 MND Scotland
 Health and Social Care Alliance Scotland (the ALLIANCE)

Annexe 2: Participation and Communities Team - Engagement

During July 2021 PACT approached a small number of organisations supporting carers and third sector umbrella bodies to invite them to participate in scrutiny of the Bill. We asked organisations if they would support carers views to be heard by the committee and we offered the opportunity to set up sessions, calls or any other method that would suit carers, and the organisations. This is in line with our working methods to work in partnership with organisations who are known and trusted to the individuals with lived experience that we wish to hear from. We also shared the Call for Views. A couple of organisations responded and were interested but were unable to get carers involved due to the short timescale. Organisations also pointed out, such as MND Scotland and the Coalition of Carers, that they were running their own social media campaigns to recruit the views directly from carers or through their own lived experience and support groups. They were planning to collate and submit the results as written evidence to the committee.

Organisations approached: Advocacy Western Isles, Baillieston Community Care, Coalition of Carers, Dixon Community Carers, Dunfermline Advocacy, Glasgow Third Sector Interface, Motor Neurone Disease Scotland, Western Isles Third Sector Interface.

PACT spoke with one individual from the MND Scotland Carers support group.

29 July 2021

On Zoom

Carer (contacted through MND Scotland support group)

Kate Smith, PACT

[Full notes here](#)

BG is a full-time Carer for her husband AG who is critically ill with motor neurone disease. She was a learning support assistance with the local council, a job which she loved. Her husband is terminally and when she had to become a carer for him she asked to keep her job open, in order to return. The council refused, and she was offered a contract and a sum of money (£900) to say that she would never work with the council again. She became a Carer in October 2019 and receives Carers Allowance. She attends a support group with MND Scotland.

- The increased payment of the Carer's Allowance Supplement is "Brilliant. Helped with financial stability. Good time of year. We had no idea of the impact of living with a disability and have been shocked at the difficulty in receiving support and services and of the extra costs."
- The timing is good.
"June and December time a good time. Better not spread out over a year. A lump sum at that time is good and works for us."
- "Money is the best way is the to support unpaid carers. We can allocate it where we need it. It suits us. The money coming in is better as a lump sum."
- In terms of Parliamentary scrutiny "The quicker things can get done the better. Happy that this has come in quickly this time. Decision should be able to be made quickly."
- How has the pandemic changed your role?
Loss of services and increased costs, personal risk and lack of support. "I got Covid and still was providing personal care for my husband. I did all his personal whilst ill. We had no help to buy the PPE, I wouldn't have known where to get. It was expensive. This showed us that we cannot only rely on me so we have since arranged for another carer to come in and (from Strathcarron Hospice). 8 hours care allocated to him £18.65 and we pay £29.35 for the carer per hour. Loss of massage and physio service. Had to stop using gym do to Covid and is now unable.
- Increased costs of getting shopping delivered. Not able to go the shop. Bills and heating costs. Media costs buying own PPE for caring and paying for therapeutic services such as massage which we received through a charity (MND) and which stopped and has not resumed.
- No changes that would reduce money everything costs money.
- Views on the Bill. "Really good that the Gov is thinking about us (Carers). They know it is required in the first place."