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Thank you for your letter and accompanying report on the Young Carer Grant (YCG) draft regulations on 10 December 2018. Now that the consultation and scrutiny carried out by Scottish Commission on Social Security (SCoSS) has concluded, I am in a position to respond to your report as I will shortly be laying the YCG regulations.

I welcome the recommendations made by the Disability and Carers Expert Advisory Group (DACBEAG) in the report and I am pleased to confirm that I have accepted almost all of these.

It should be noted that a number of changes have been made to the draft regulations in response to the consultation and engagement with stakeholders and young carers since the DACBEAG issued their report.

### **Eligibility**

The Group made a number of comments on the eligibility criteria for YCG specifically on the issues of multiple applications and eligibility gaps.

The Group commented that a young carer should be eligible for YCG when another carer gets Carer's Allowance for the same cared-for person. The intent of YCG is to recognise the care provided by young people in a variety of situations. We therefore now intend to pay YCG to a young person providing care to someone with another carer who receives Carer's Allowance as suggested by **Recommendation 1**.

In line with **Recommendation 2**, young carers will be allowed to combine hours caring for up to three people to reach the 16 hour per week threshold. The Scottish Government recognises that the total hours spent caring is what matters to young carers. The impact of this will be monitored.

The group commented that the eligibility criteria excluded young carers aged 18 who are not at school but who are at a pivotal transition period in their lives. This concern was also reflected in wider engagement with stakeholders and in the consultation. The policy has therefore been updated to widen eligibility to include all young carers between the ages of 16-18. There is no stipulation that they have to be in education to receive the grant. We therefore accept **Recommendation 3**.

### **Application process**

The report emphasises the need for a straightforward application process that does not place an unnecessary burden on young people. This is expressed in **Recommendation 4**. The Scottish Government is carrying out extensive user testing to ensure that the application process is concise, light-touch and easy to understand.

The application form will be made available in multiple formats including an easy read version in order to address a range of needs.

**Recommendation 5** suggests changing the definition of care as defined in the draft regulations to allow a more flexible definition of care. We recognise the need for any definition to capture a wide range of caring situations. Therefore we have altered the definition of care to make it less prescriptive.

However, we also recognise that young carers often do not self-identify as carers. Taking out the definition completely would risk removing an important tool for young people with caring responsibilities to identify as a young carer and understand that they are eligible for YCG.

Removing completely a definition of care would also turn the award of YCG into a decision making process rather than a discretionary benefit as it is intended at the moment. Agency staff would have to make a case by case decision on what constitutes care for each application without a standard definition to refer to. A flexible definition keeps the decision process consistent and helps young carers identify that they may be eligible for YCG.

The report advises monitoring whether a 31-day timeframe to request a re-determination is sufficient and whether there are particular impacts on different protected groups. We recognise that young people with no prior engagement with the benefits system may need more support with the process. We accept **Recommendation 6** and will monitor whether the 31 calendar day time limit for requesting a re-determination is sufficient following the launch of the grant.

### **Promotion and take-up/ signposting**

The report highlights the need for targeted promotion to reach young carers from marginalised or under-represented groups. We accept **Recommendation 7** to promote YCG to under-represented groups and to promote take up of other relevant support, including support services.

We have spoken to seldom heard groups including Gypsy Travellers, those living in more rural areas and the cared for person alongside the young carer. We have also

reached out to other ethnic minority charities as we are aware there will be a higher proportion of young carers in these groups who face specific barriers and challenges.

We have spoken to a range of charities that support young carers who can no longer attend school due to their caring responsibilities. We have also arranged both research and testing with a charity who supports young carers in an armed forces family and are engaging with a BSL charity and intend to test the application form with those that use BSL to make sure the language works for them.

The eligibility criteria for all benefits will be clearly communicated and carefully marketed to ensure that there is no confusion when there are differences to who may be eligible. We will provide clear signposting to other financial and wider support services to young carers when someone comes into contact with social security Scotland.

The design of YCG has been carried out in collaboration with young carers. We are committed to further user testing and user research in order to tailor promotional materials to young carers with protected characteristics supported by evidence gathered through the Equalities Impact Assessment.

I am aware that you have been directly in touch with my officials regarding equalities issues. I have encouraged them to meet with you now that the I have responded to your report and published the Equalities Impact Assessment.

### **Administering YCG**

The report recommends that flexible payment arrangements are offered to young carers. We accept **Recommendation 8** which recognises the needs of young carers without bank accounts.

YCG will be provided as a bank transfer payment as standard but we recognise that some young carers may not have a bank account. Therefore we will offer alternative payment methods through i-movo (in line with Agency wide policy) and we can also pay into a Credit Union account.

The report expresses concern over how best to support marginalised and disadvantaged groups. The Scottish Government has carried out an Islands Community Impact Assessment in order to understand how rural and remote communities will interact with YCG and a Children's Rights and Wellbeing Impact Assessment that assess YCG against the United Nations Convention on the Rights of the Child (UNCRC). The design of YCG has been carried out in collaboration with young carers.

The Scottish Government is carrying out a range of user research and testing to ensure that the application process is as simple as possible. This process will be guided by feedback from young carers.

### **Safeguarding**

The Scottish Government has carried out four impact assessments in total: an Equalities Impact Assessment; a Business and Regulatory Impact Assessment; a Children's Rights and Wellbeing Impact Assessment; and a Island Communities Impact Assessment.

The Scottish Government is committed to signposting to other support services. We recognise that mental health conditions are more prevalent among young carers in comparison to young people without caring responsibilities<sup>1</sup>. One of the aims of the YCG is to improve mental and physical health outcomes of young carers.

The report expresses concerns about the potential for incentivising care for young people. It was felt by many stakeholders and respondents to the consultation that £300 was an appropriate rate to recognise the contribution of young carers and to level the playing field between them and young adults who do not provide care.

YCG allows young carers to continue to care if they wish to but also to have a life alongside caring. It aims to improve health and education outcomes for young carers and remove some barriers to pursuing opportunities. The impacts of YCG on young carers will be monitored by the Scottish Government.

I trust that this reassures you of the extensive consideration we have given our recommendations and the valuable input you have made to the development of this policy.

**Shirley Anne-Somerville**

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<sup>1</sup> Scotland's Census, 2011