

# **Carer Support Payment amendment regulations: impact assessment considerations - policy note**

**April 2024**

## Carer Support Payment amendment regulations: impact assessment considerations - policy note

### Background

The principal Carer Support Payment regulations set out the rules and eligibility criteria for the benefit, which is replacing Carer's Allowance in Scotland. The benefit is a form of assistance to provide support to people providing regular and substantial care to someone who receives a qualifying disability benefit.

A suite of impact assessments were prepared alongside the development of Carer Support Payment policy and laid with the principal Carer Support Payment regulations which came into force on 19 November 2023. The impact assessments concluded that Carer Support Payment would have a broadly positive impact on a range of equalities groups, island communities, and to improving the realisation of children's rights and wellbeing.

These original impact assessments included:

- [Equalities Impact Assessment \(EQIA\)](#)
- [Child Rights and Wellbeing Impact Assessment \(CRWIA\)](#)
- [Business and Regulatory Impact Assessment \(BRIA\)](#)
- [Data Protection Impact Assessment \(DPIA\)](#)
- [Fairer Scotland Duty Assessment \(FSDA\)](#)
- [Islands Communities Impact Assessment \(ICIA\)](#).

Carer Support Payment launched on 20 November 2023 in the pilot areas of Dundee City, Perth and Kinross and Na h-Eileanan Siar (the Western Isles). The Carer Support Payment amendment regulations will provide for a phased rollout approach to follow. This will gradually expand Carer Support Payment to the remaining local authority areas across Scotland, with the benefit becoming available nationally by autumn 2024. This is broken down as follows:

	Date	Local Authority Areas	Proportion of cases handled by Social Security Scotland
<b>Pilot</b>	20 November 2023*	Western Isles, Dundee City and Perth and Kinross	6.1%
<b>Phase 2</b>	24 June 2024	Angus, North Lanarkshire, South Lanarkshire	24%
<b>Phase 3</b>	19 August 2024	Aberdeen City, Aberdeenshire, East Ayrshire, Fife, Moray, North Ayrshire, South Ayrshire	47%
<b>National</b>	04 November 2024	All 19 remaining Scottish local authorities**	100%

\* The pilot launched on 20 November 2023 but the regulations came into force on 19 November 2023 to allow eligible carers to receive payments for the first full award week, which runs Sunday-Saturday.

\*\* The local authority areas that the benefit will be expanded to as part of the national roll out are: Argyll and Bute, Clackmannanshire, Dumfries and Galloway, East Dunbartonshire, East Lothian, East Renfrewshire, City of Edinburgh, Falkirk, Glasgow City, Highlands, Inverclyde, Midlothian, Orkney Islands, Renfrewshire, Scottish Borders, Shetland Islands, Stirling, West Dunbartonshire and West Lothian.

The principal Carer Support Payment regulations also included provision to extend entitlement to a further group of students with exceptional circumstances within [regulation 13\(2\)](#). This group of students aged 16-19 may be eligible for certain reserved benefits such as Universal Credit in their own right. Universal Credit is normally only available to people aged 18 and over, but this group are able to receive support due to particular circumstances. This will include being without parental support, being responsible for a child or qualifying young person, being assessed as having a limited capability to work, or being part of a couple where one or both are students.

The amendment regulations will bring forward the commencement date of these provisions in the principal Carer Support Payment regulations. This will extend entitlement to this group of students with exceptional circumstances, from 01 October 2024 to 23 June 2024. This will enable these students to benefit from this change sooner, once the benefit is available in their area.

As the amendment regulations will expand eligibility to a further group of students from June 2024, they will also include additional backdating provisions for this group.

Special backdating provisions will also be introduced to provide that certain individuals can have their entitlement backdated to the date when Carer Support Payment first became available. This includes individuals who:

- are in full-time advanced education and aged 16 to 19, or full-time education at any level and are over the age of 20;
- did not satisfy the Carer's Allowance past presence test (2 out of 3 years) but do satisfy the Carer Support Payment past presence test (26 out of 52 weeks); or
- benefit from certain exemptions to the past presence test which are not available under Carer's Allowance.

These special backdating rules are intended to ensure that clients living outside the initial pilot areas will not be disadvantaged in terms of their entitlement to support compared with those living in the pilot areas. The special backdating provisions are limited to these specific groups because they would not have been eligible for Carer's Allowance during the pilot period and therefore would have been unable to access any carer benefits during that time. Other carers living outside of the initial pilot areas would have been able to apply for Carer's Allowance and have their benefits transferred later to Carer Support Payment as part of the case transfer process.

We considered whether the range of impact assessments produced for the principal Carer Support Payment regulations should be updated and republished alongside laying the amendment regulations. It was considered that, as the amendment regulations mainly extend the areas in which Carer Support Payment is available, and policy is unchanged from the principal regulations, that this would not be required.

The full range of impact assessments carried out alongside the development of Carer Support Payment are live documents. We continue to work to improve the data and information we have on carers and others who may be affected by Carer Support Payment policy and services. We will continue to use this method to consider how we may improve our service. This includes direct research such as that undertaken by our Experience Panels and consideration of stakeholder and other research which will include Client Surveys in future. We continue to hold annual equalities sessions with our Carer Benefits Advisory Group as part of our work to address the gaps in data and understanding identified by our impact assessments.

At the same time, we are also working on finalising our evaluation plans for both Carer Support Payment new claims and case transfer from Carer's Allowance. These will bring together a range of data, including bespoke research, to help us to consider the impacts of Carer Support Payment.

We are also continuing to work on considering and developing future improvements to Carer Support Payment as set out in our impact assessments. We are continuing to utilise and develop our impact assessments alongside this work. We plan to publish a full set of updated impact assessments as part of this work which would include further regulations to provide for the changes.

This note therefore provides further information on our considerations of the potential impacts of the roll out approach for the benefit. In particular, this piece of work will consider whether any groups of carers will be disadvantaged as a result of the amendment regulations. This could be due to either living within an area where the benefit is rolled out later, or by being part of a specific demographic.

## **Equality impact considerations and analysis**

### **Data source**

Limited data was available from DWP Stat-Xplore on existing Carer's Allowance recipients in Scotland. This data was categorised by local authority area, age and sex, which this analysis was drawn from, broken down into cases in payment and cases with underlying entitlement only. This data has been utilised as our best indicator for future Carer Support Payment applications. The nature of the eligibility criteria for Carer Support Payment and expansion to groups such as more full-time students, for example, means that it is challenging to estimate the number of carers in any local authority area in Scotland who may become eligible in future as a result. The smaller sample size in some datasets may account for some variation in these estimates and it has been noted where this occurs.

It should also be noted from the table above that the final national rollout phase will include a total of 19 local authority areas, or 53% of total applications in Scotland. Though this does not provide an estimate for the number of new applications in these areas, at the time of writing there are 45,304<sup>1</sup> Carer's Allowance recipients who receive payments in this group. Their awards will soon transfer over to Social Security Scotland. This accounts for the largest number of local authority areas included in the final phase (19 local authority areas in comparison to only 7 rolled out in phase 3). A number of cities with higher populations are also included in the final stages of the rollout, including Glasgow City which holds the highest number of carers receiving Carer's Allowance, at over 13,000<sup>2</sup>.

Therefore any disproportionate impacts will predominantly be felt in the final rollout phase, though this naturally is to be expected due to the number of local authorities included as part of this. With this being said, it should also be noted that Carer Support Payment has already launched for new applications in Dundee City as part of the initial pilot phase.

## Sex

DWP Stat-Xplore data illustrates that a majority of unpaid carers within all local authority areas across Scotland are female. This accounts for around 69% of the current Carer's Allowance caseload in Scotland<sup>3</sup>.

This could be due to a number of factors, including that women are more likely to be in part-time or low paid work<sup>4</sup> and rely on social security payments to top-up their incomes than their male peers<sup>5</sup>. Consequently, this means that women have been disproportionately impacted by cuts to disability benefits<sup>6</sup>. Cultural and social norms or expectations may also play a role. Women traditionally are more likely take on caring roles for family members, including elderly parents and children<sup>7</sup>. This accounts for people in receipt of support – however many parents or guardians who care for a child with a disability may not identify as a carer. The Carers UK State of Caring report highlighted that many view themselves as a family member first, which acted as a barrier to recognising themselves as a carer<sup>8</sup>.

In general, as considered in the EQIA for the principal regulations, we expect that the positive impacts of Carer Support Payment will mainly benefit women. This is because women account for a majority of the people currently getting Carer's Allowance. Therefore we expect that a majority of unpaid carers in Scotland (and elsewhere) are female. As there isn't a disproportionate representation of women in different areas in Scotland, we do not expect the amendment regulations to have a negative impact on this group.

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<sup>1</sup> DWP Stat-Xplore <https://stat-xplore.dwp.gov.uk>

<sup>2</sup> DWP Stat-Xplore <https://stat-xplore.dwp.gov.uk>

<sup>3</sup> Summary statistics for Carer's Allowance Supplement to October eligibility date 2023: [1 \(www.gov.scot\)](https://www.gov.scot)

<sup>4</sup> Engender – Research and Policy – The Labour Market - [The labour market | Engender](#)

<sup>5</sup> Close the Gap briefing – [www.closesthegap.org.uk](http://www.closesthegap.org.uk)

<sup>6</sup> ShapingScotFuture - [ShapingScotFuture \(engender.org.uk\)](http://ShapingScotFuture.engender.org.uk)

<sup>7</sup> Entrenched social norms prevent the equal distribution of caring responsibilities between men and women – OECD – 2018 – [Données - OCDE \(oecd.org\)](https://www.oecd.org)

<sup>8</sup> Carers UK – State of Caring Report 2023 - [State of Caring survey | Carers UK](#)

## Age, including children and young people and older adult carers

### Young carers

There are an estimated 28,000 young carers in Scotland<sup>9</sup> and according to Census 2011 data, around 8,200 16-18 year olds provide some hours of unpaid care<sup>10</sup>. This is expected to be an underestimate, again due to barriers in young people self-identifying themselves as carers<sup>11</sup>. Approximately 500 carers under the age of 18 are currently in receipt of Carer's Allowance<sup>12</sup>.

From the limited DWP Stat-Xplore data available on carers aged under 20 who receive Carer's Allowance payments, a majority of around 52% live within an area included within the final stage of the phased rollout approach<sup>13</sup>. This means that many will therefore need to wait longer to apply than carers living within areas in the earlier phases of the rollout. This group are also the most likely to be impacted by the full-time education restrictions for 16 to 19 year olds in non-advanced education, as detailed further below. However, this group accounts for around 2% of current Carer's Allowance recipients in payment<sup>14</sup> and therefore any impacts are not expected to be significant. Again, some variation in this figure is expected due to the small sample size.

We plan to alleviate these impacts through special backdating rules, set out within the amendment regulations. These rules will allow carers who are students and who are eligible for Carer Support Payment but not Carer's Allowance to apply to backdate their award to 19 November 2023, the date the principal Carer Support Payment regulations came into force. They would need to apply within 13 weeks of the benefit becoming available in their area (or later where they have a good reason for not applying sooner) to fully backdate for this period. We recognise that these rules may be complex, and are working on our communications relating to this. This includes working with Social Security Scotland communications colleagues to deliver targeted stakeholder sessions and communications which will help to reach young and/or student carers. This is with the aim of enhancing both their awareness and understanding of the rollout approach and special backdating rules.

### Older adult carers

From the limited DWP Stat-Xplore data available, we know that pension-age carers in receipt of Carer's Allowance are disproportionately living within an area included in the final phase of the rollout, but only slightly<sup>15</sup>. The variability present in this data is more likely to be a result of the small sample size, similarly to the available data for young carers under 20. From the data available, we estimate that pension-age carers account for less than 1% of the current Carer's Allowance in-payment caseload<sup>16</sup>. Of the small number of pension-age carers who currently receive Carer's Allowance, this group may also be less likely to be affected by the changes in

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<sup>9</sup> [Scotland's Carers Update Release March 2024](#)

<sup>10</sup> Scottish Government (2015) - [Scotland's Carers](#)

<sup>11</sup> Scottish Government - National Carers Strategy 2022 - [5. Young Carers - National carers strategy - gov.scot \(www.gov.scot\)](#)

<sup>12</sup> DWP Stat-Xplore <https://stat-xplore.dwp.gov.uk>

<sup>13</sup> DWP Stat-Xplore <https://stat-xplore.dwp.gov.uk>

<sup>14</sup> DWP Stat-Xplore <https://stat-xplore.dwp.gov.uk>

<sup>15</sup> DWP Stat-Xplore <https://stat-xplore.dwp.gov.uk>

<sup>16</sup> DWP Stat-Xplore <https://stat-xplore.dwp.gov.uk>



eligibility for Carer Support Payment. This includes changes to full-time education and 'past presence' rules. However, in cases where this did apply, older adult carers would also be able to benefit from the special backdating rules.

In general, older adult carers are more likely to have what is known as 'underlying entitlement' to Carer's Allowance or Carer Support Payment. Carer Support Payment is an 'income-replacement' benefit in the same way as Carer's Allowance. This means that carers are not able to receive the full amount of Carer Support Payment and the full State Pension because they are considered to be 'overlapping benefits' as the purpose for both is to replace income. This means many carers getting State Pension will have entitlement to Carer's Allowance or Carer Support Payment but not receive any payments. This 'underlying entitlement' may allow carers on lower incomes to access additional support in other benefits, such as Pension Credit.

We do not expect pension-age carers with underlying entitlement to be disadvantaged by the phased rollout approach, as we don't expect them to be particularly affected by the changes in eligibility being made through Carer Support Payment and, where they do, the special backdating rules would apply and their 'underlying entitlement' award could be backdated. In addition to this, we are not making any changes to the overlapping benefit rules. Carers living in later phases of the rollout who meet the eligibility criteria for Carer's Allowance could apply for their benefit and have their underlying entitlement award transferred automatically to Carer Support Payment.

Additionally, we share information on Carer Support Payment awards with the Department for Work and Pensions (DWP). This information sharing agreement will enable carers to receive any linked support they were entitled to in respect of the backdated period. Carers will also receive an award notification which will set out any backdated entitlement to Carer Support Payment, and the start date of their entitlement.

## **Student carers**

From previous data, it is also estimated that around 1,500 additional carers will benefit from the extension of eligibility for Carer Support Payment to full-time students. We anticipate that around 52% of these carers will be included in the final phase of the rollout. This is in line with the proportion of the overall caseload expected to be included in this phase. However, it should also be noted that this figure is an estimate that has been drawn from the limited data available on the current Carer's Allowance caseload aged 20 and under<sup>17</sup>.

With this being said, we recognise that the latest national phase will include Edinburgh and Glasgow, cities which are expected to have higher than average student populations than elsewhere in Scotland.

By way of example, we know that Glasgow City will have a higher than average student population. There are an estimated 185,000 students split between its five

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<sup>17</sup> DWP Stat-Xplore <https://stat-xplore.dwp.gov.uk>

higher education institutions and three colleges<sup>18</sup>. Similarly, data available from 2021/22<sup>19</sup> shows that the City of Edinburgh has an estimated 99,157 further and higher education students, who will also be included in the final rollout phase.

This means that student carers may be disproportionately represented in the final phase of the rollout. These carers may need to wait longer to apply for and receive Carer Support Payment than carers living in areas included in earlier rollout phases. Special backdating rules have therefore been provided for in the amendment regulations, which will mean that student carers living within later rollout phases will be able to backdate their award to November 2023. This is the date when the benefit first became available in Scotland for new applications. This would apply as long as they apply within 13 weeks of the benefit becoming available in their area, or later where they have a good reason for not applying within 13 weeks. Targeted communications will be utilised to convey this backdating information to student carers. This will include bespoke stakeholder sessions on complex areas and communications products, to help reach student carers and improve their understanding of the backdating rules and overall rollout approach.

We also recognise that the timings of the national roll out mean that carers may be considering or starting new full-time education courses at a point in the middle of the roll out. Carers could also try to apply before the benefit becomes available in their area, with potential for confusion or barriers around starting education. To mitigate this we have worked closely with the Student Awards Agency Scotland (SAAS) and the Scottish Funding Council (SFC) to ensure that the extension of entitlement to Carer Support Payment is fully reflected within relevant guidance. We have also worked with them to ensure that overall levels of support for full-time student carers across social security and further and higher education are maintained. This approach has been taken to avoid any unintended consequences of extending eligibility for support. We will also continue to engage with SAAS, SFC and colleagues in further and higher education to ensure we can provide clear information on Carer Support Payment. This will include sharing information on eligibility, availability and education rules for student carers and prospective students.

## Race

We also considered whether the roll out approach may have any particular impacts for any group due to race. As highlighted though in the original EQIA for Carer Support Payment, the DWP do not publish data on the race or ethnic minority status of carers eligible for Carer's Allowance. We therefore considered UK Census data on carers more generally.

UK Census data<sup>20</sup> found that 96% of carers are of a 'White Scottish / British / Irish' ethnicity, while 4% are of 'Other' ethnic backgrounds. 9% of people in Scotland provide unpaid care and this varies across ethnic groups. People from older ethnic groups such as 'White: Scottish' and 'White: Other British' were the most likely to

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<sup>18</sup> Complete University Guide – Universities in Glasgow - 2023 - [Universities in Glasgow \(thecompleteuniversityguide.co.uk\)](https://www.thecompleteuniversityguide.co.uk/universities-in-glasgow) and British Council - Discover why you should study in Glasgow - 2024 - [Discover why you should study in Glasgow | Study UK \(britishcouncil.org\)](https://www.britishcouncil.org/education/study-in-glasgow)

<sup>19</sup> City of Edinburgh Council - Number of students in Edinburgh - 2022 - [edinburgh-by-numbers-2022](https://www.edinburgh.gov.uk/number-of-students-in-edinburgh-2022)

<sup>20</sup> Office for National Statistics – Census – [Census - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/census)



provide unpaid care. People from ethnic groups with younger age profiles (such as the 'Arab' and 'White: Polish' groups) were least likely to provide weekly unpaid care. People from the White: Gypsy/Traveller group were most likely to be providing unpaid care for 35 hours or more, which is also the caring hours requirement for Carer's Allowance. The next most likely group to provide 35 hours or more of unpaid care were Bangladeshi and Pakistani groups. It should also be noted that we are aware that some communities of Gypsy/Traveller and black and minority ethnic carers may be less likely to identify as carers for a variety of reasons, including that in some languages there is no direct translation for 'carer'. This is could also be due to factors such as cultural or social norms or expectations<sup>21</sup>.

We know from data available from the end of December 2023, that Glasgow City has the highest proportion of people in need of refugee protection in Scotland<sup>22</sup>. It is possible that people in need of refugee protection could be disproportionately impacted by the phased roll out approach. This is due to local authority areas such as Glasgow City and the City of Edinburgh having a higher number of carers who fall within these groups<sup>23</sup>, and each of these larger local authority areas being included in the final release for Carer Support Payment.

Special backdating rules provided for as part of the Carer Support Payment regulations will enable people who meet the more generous 'past presence test' used for Scottish benefits to backdate their award to 19 November 2023 (the date the principal regulations came into force) as long as they met the eligibility criteria for Carer Support Payment during this time and apply for the benefit to be backdated within 13 weeks of it becoming available in their local authority area (or later where they had good reason for not applying within 13 weeks). We will utilise targeted communications to ensure this message is conveyed and understood by people within this group.

The remaining other protected characteristics were also considered as part of the Carer Support Payment EQIA for the principal regulations. However from the limited existing data available, nothing was found which would suggest any disproportionate impact of the amendment regulations. We will however keep this under review as we begin to collect data for future Carer Support Payment evaluations, as part of our approach to continuous improvement.

## **Socio-economic disadvantage**

We also considered whether the roll out approach and wider elements of the regulations may impact differently on carers in terms of carers facing socio-economic disadvantage. As set out above, data on existing Carer's Allowance recipients is limited. We therefore considered whether, in general, areas in later stages of the roll out may be disproportionately those with more areas of deprivation.

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<sup>21</sup> Carers UK – Supporting Black, Asian and minority ethnic carers A good practice briefing – January 2023 – [cuk-black-asian-and-minority-ethnic-carers-good-practice-briefing.pdf \(carersuk.org\)](#)

<sup>22</sup> House of Commons Library – Asylum Statistics – 1 March 2024 – [SN01403.pdf \(parliament.uk\)](#)

<sup>23</sup> Scottish Government - Refugee integration - role of local authorities: research – November 2023 [1. Introduction - Refugee integration - role of local authorities: research - gov.scot \(www.gov.scot\)](#)

Data available from both the Scottish Index of Multiple Deprivation (SIMD) 2020<sup>24</sup> and the related Scottish Government analysis of this data<sup>25</sup> breaks down deprivation status of specific local authority areas by seven domains. This includes income, employment, education, health, access to services, crime, and housing.

The available data from 2020 shows that Inverclyde is the area with the largest local share of deprived areas, with 45% of data zones among the 20% most deprived areas in Scotland<sup>26</sup>. Inverclyde will also be included in the final phase of the rollout, meaning that carers living within this area will be one of the last who are able to access the benefit. Similar levels of deprivation are present within Glasgow City, with deprivation levels around 44% (around a 4% fall from comparable 2016 data).

Some of the other local authority areas with higher levels of deprivation include North Ayrshire at 40%, where Carer Support Payment will be available from August 2024 as part of phase 3 of the rollout. West Dunbartonshire also has similar levels of high deprivation and will be included in the final national phase of the rollout from November 2024. Lastly, Dundee City also shows similar levels of deprivation as these areas, however Carer Support Payment has already launched in this local authority for new applications in November 2023.

From the SIMD data available, we have concluded that generally, areas with high levels of deprivation are dispersed across Scotland. We therefore we do not consider that the proposed phased rollout approach would have a disproportionate impact in the later phases in comparison to the earlier phases.

However, because of the limited DWP data available, we also do not know if eligible carers experiencing socio-economic disadvantage may be disproportionately in the later areas. We will therefore continue to keep this under review as part of our wider evaluation strategy and as part of our approach to continuous improvement. The special backdating rules set out in the amendment regulations are also aimed to ensure that people don't lose out on support depending on where they live in Scotland.

## **Island communities**

Our full Island Communities impact assessment for the principal regulations found that the introduction of Carer Support Payment is expected to have a positive impact on carers across Scotland, regardless of location. However, it also noted that the cost of living on average is higher for island and rural carers, and that both presented challenges in relation to connectivity and accessibility. This will be alleviated through the Social Security Scotland Local Delivery Service, which will offer more flexibility and choice in carers accessing support.

The Western Isles were included in the initial phases to allow us to test and identify any particular issues that clients may face in accessing or receiving Carer Support Payment. Further island communities will be included in phase 3, in North Ayrshire,

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<sup>24</sup> Scottish Index of Multiple Deprivation 2020 - [SIMD \(Scottish Index of Multiple Deprivation\)](#)

<sup>25</sup> [Scottish Index of Multiple Deprivation 2020 - gov.scot \(www.gov.scot\)](#) and Scottish Index of Multiple Deprivation 2020v2 local and national share calculator

<sup>26</sup> Scottish Index of Multiple Deprivation 2020 - [Scottish Index of Multiple Deprivation 2020 - gov.scot \(www.gov.scot\)](#)

with the majority in the final phase. Where carers in island communities are unable to apply for Carer's Allowance but would meet the criteria for Carer Support Payment, they will be able to apply for backdated support under the special backdating rules.

## **Summary and conclusion**

We have considered the demographics of people getting Carer's Allowance in the different phases of each local authority area. We have then compared these against our existing EQIA for the principal regulations and DWP Stat-Xplore data. From the information available, we do not believe there to be any significant variation so would not expect any particular impact to be disproportionately felt by any one group. Any impacts to groups who will benefit from changes to Carer Support Payment and would not have been eligible for Carer's Allowance, including students and people moving to Scotland, will be mitigated through special backdating rules. These rules will allow people who would have been eligible for Carer Support Payment in the earlier phases of the rollout to backdate to 19 November 2023, or 23 June 2024 in the case of students in certain exceptional circumstances. They would need to meet the eligibility criteria on their chosen start date and apply for support within 13 weeks of the benefit becoming available in their area, or later if they have good reason for not applying within 13 weeks.

Clear communications, including communications targeted to reach students and those who support them, will be employed to ensure that carers are aware of the special backdating rules in place to mitigate these impacts. Crucially, we will also provide clear communications on the 13 week window in which they must apply for backdated support to fully backdate their award, and around the 'good reason' provision for carers unable to apply within 13 weeks.

Following the pilot launch of Carer Support Payment, we are continuing to consider questions to include in both Social Security Scotland client surveys and future evaluation plans. This work is part of our ongoing approach to continuous improvement. This will include bespoke research undertaken as part of future evaluations and improvements to the availability of management information. This will enable us to monitor information on who is receiving the benefit and how we can address any 'gaps' in our data or address any arising issues as part of this work.



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