



Engender response to the Scottish Government's Scottish Carer's Assistance consultation

May 2022

1. INTRODUCTION

Engender is a feminist policy and advocacy organisation working to realise women's equality and access to rights, power, resources and safety in Scotland. We advocate for change to the gendered systems that serve to maintain women's inequality with men, by highlighting the impacts of sexist discrimination on women and on wider society. We welcome the opportunity to respond to this consultation on Scottish Carer's Assistance. In March 2022, Engender ran two engagement events with women who are unpaid carers and circulated a survey based on this consultation. Our response is informed by the views of the women who participated, alongside years of work engaging with and highlighting unpaid care as a key issue of women's inequality.

Between 60% and 70% of unpaid care is delivered by women in Scotland,¹ care that is worth approximately £10.8 billion to the economy per annum.² Beyond this headline figure, the shape of women's caring roles also differs significantly from those of men. Women are twice as likely as men to give up work to carry out unpaid care,³ and are much more likely to juggle caring with (often low-paid) employment, to hold multiple caring roles, and to provide care for more than 35 hours per week.⁴ The Covid-19 pandemic has also had a significant impact on carers; during the first lockdown for example, 78% of carers reported having to provide more care since the start of the pandemic.⁵

¹ The last Census figure was 59%, however women are less likely to self-identify as carers due to cultural gender roles and expectations. Carers organisations have estimated an actual figure of around 70%.

² Carers UK (2015) Valuing carers 2015. Available at: <https://www.carersuk.org/for-professionals/policy/policy-library/valuing-carers-2015>

³ Skills for Care (2012) Carers Matters – Everybody's business. Available at: <https://www.skillsforcare.org.uk/Documents/Topics/Supporting-carers/Our-carers-matter-part-two.pdf>

⁴ Engender (2016) Securing women's futures: Using Scotland's new social security powers to close the gender equality gap. Available at: <https://www.engender.org.uk/content/publications/Securing-Womens-Futures---using-Scotlands-new-social-security-powers-to-close-the-gender-equality-gap.pdf>

⁵ Engender (2020) Gender & Unpaid Work: the impact of Covid-19 on women's caring roles. Available at: https://www.engender.org.uk/content/publications/1594974358_Gender--unpaid-work---the-impact-of-Covid19-on-womens-caring-roles.pdf

Unpaid carers have plugged gaps that have emerged throughout the pandemic, where social care services and support were withdrawn – sometimes overnight – and where assessments were delayed.⁶ By early stages of the pandemic, there were an estimated 1.1 million unpaid carers in Scotland, an increase of 34% percent as a result of the crisis.⁷ The majority of these ‘new’ carers have been women. All of this must be well understood and integrated in order to make policy that works for women, and to achieve Scottish Government’s commitment to create social security that advances equality and non-discrimination.

The provision of unpaid care, and its interactions with social care, are closely interlinked with systemic and harmful gender roles that constrain women’s lives. Women’s access to paid work, leisure time and power remains heavily constrained by the provision of care and gendered expectations around its value and delivery. Little is known about impacts of further forms of structural oppression on women’s ascribed roles as carers in Scotland, including racism, homophobia and transphobia. However limited data suggests that Black and minority ethnic women may be even more likely to hold informal roles and at a younger age.⁸

Underpinning all of this is the broader cultural undervaluation of care in Scotland, whether formal or informal, and the integral and cyclical link this has with women’s inequality. Both paid and unpaid care work are chronically undervalued by our society and by our economy, precisely *because* it is work that has typically been undertaken by women, and is seen as ‘women’s work’. This drives ongoing occupational segregation and undermines Scottish Government’s strategic objectives to address the gender pay gap and other policies aimed at tackling women’s inequality.

Our key messages in this consultation response are therefore that:

- **Robust and iterative equality impact assessment** of the proposals are needed, including from an intersectional gender perspective.
- Existing levels of support are **inadequate**, and the new ‘additional person’ entitlement is proposed at an **unacceptably low level**.
- Proposals to expand eligibility for Scottish Carer’s Assistance in the longer-term are welcome, but should be viewed as a **starting point for further expansion in future**.
- **Policy coherence** with work in development on the National Care Service and Minimum Income Guarantee is vital.

⁶ Glasgow Disability Alliance (2020) GDA’s COVID-resilience engagement and response: Interim report. Available at: https://www.sdsscotland.org.uk/wp-content/uploads/2020/05/GDAs-Covid-Resilience-Interim-report-27April_alt-text.pdf

⁷ National Carer Organisations (2021) A manifesto for unpaid carers and young carers. Available at: <https://carers.org/downloads/scotland-pdfs/nco-carers-manifesto-for-scottish-parliament-election-2021.pdf>

⁸ MECOPP (2017) Informal caring within Scotland’s Black and minority ethnic communities. Available at: https://www.carersuk.org/images/Carers_Parliament_Delegate_Information/mecopp_briefing_BME_carers.pdf

Engender does not work directly with carers or service providers. Our analysis sits at the intersection between carers' rights and women's economic and social equality. As such, we do not have views on every question and this consultation response is focused on key elements of the proposals from a women's equality perspective.

2. QUESTIONS

SECTION 1: SCOTTISH CARER'S ASSISTANCE FROM LAUNCH

Question 3: Do you agree or disagree with the proposed residency criteria for Scottish Carer's Assistance? [Agree, Disagree, Unsure.]

Disagree.

Question 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

Scotland is committed to forging a divergent path from the UK in terms of welcoming refugees and asylum-seekers to the country, and creating a more humane immigration system within the extent of its powers. Scottish Government is also committed to advancing intersectional gender and race equality.

We believe that Carer's Allowance should be extended to people subject to immigration controls, many of whom are experiencing perilous economic insecurity. Women with insecure immigration status and no recourse to public funds (NRPF) face heavily gendered risks related to the aggravated financial precarity associated with caring, including as lone parents and in terms of domestic abuse and other forms of gender-based violence. 85% of people applying to have the NRPF condition removed are women.⁹ Many people currently subject to immigration controls face significant barriers to securing an income, including institutional racism and practical and linguistic issues, in addition to the pressures of finding an income which is compatible with their unpaid caring roles. **Scotland should do everything in its power to increase security for these groups.**

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

As above, **we advocate for the broadest form of access possible.** Women and others providing unpaid care are providing direct and preventative savings to health and social care services that are worth billions of pounds to Scotland's economy. This does not change depending on where unpaid carers have been resident in preceding years – they are

⁹ Unity project (2019) Access denied: The cost of No Recourse to Public Funds policy. Available at: <https://static1.squarespace.com/static/590060b0893fc01f949b1c8a/t/5d0bb6100099f70001faad9c/1561048725178/Access+Denied+-+the+cost+of+the+No+Recourse+to+Public+Funds+policy.+The+Unity+Project.+June+2019.pdf>

providing that care in the present for members of Scotland's communities, and in doing so many are experiencing negative impacts on employment and educational opportunities, and on their own health and wellbeing. In turn, this has an impact on Scottish Government's ambitions to advance women's equality. **We believe support should be extended to all carers that meet criteria and are resident in Scotland at the time of application.**

Question 6: Do you agree or disagree with the proposed re-determination timescales for Scottish Carer's Assistance? [Agree, Disagree, Unsure.]

Disagree.

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

We agree that the timescale should be extended for carers to request a redetermination. Life for unpaid carers is often incredibly hectic, unpredictable, and emotionally draining, and time pressures around the personal administration of social security entitlements can add to the strains experienced by many. Sandwich carers, who care for both children and for disabled or older people, are amongst those who can hold responsibility for a large amount of household administration and management. The gender split of sandwich caring is particularly skewed, with middle-aged women undertaking a significant majority of this unpaid work.

However, we question why a time limit for challenging a claim is necessary. 10 additional days is not a great deal of time in the world of intensive caring, and would mean that Social Security Scotland would have longer to make a decision than for unpaid carers would have to challenge it. **We recommend that the time limit is removed or extended.**

SECTION 2: EXTRA MONEY FOR CARERS IN SCOTLAND

Question 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? [Agree, Disagree, Unsure.]

Unsure.

Question 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.

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

As the consultation document indicates, some carers experience benefits from receiving the current lump sum payment and others find the prospect of a regular increment more

manageable. Participants at our workshops on this consultation clearly expressed favour for keeping the current arrangement with two lump-sums paid on a 6-monthly basis rather than incorporating it into their weekly payments. They felt it was useful in the current format as it made it easier to allocate towards larger needed purchases.

“If you got it weekly you wouldn’t really notice it”

Quote from Engender engagement with women who provide unpaid care

This clearly differs for individuals based on circumstances and budgeting preferences. As the six-monthly system is already in place and the proposal is for a new system of delivery to be developed, **we wonder whether carers might be given the option that best suits their needs**. This would be in line with the commitment to design social security ‘with the people of Scotland’¹⁰ and to work with carers to design systems that work for them.

Question 19: Do you agree or disagree with the proposed eligibility criteria for Carer’s Additional Person Payment? [Agree, Disagree, Unsure.]

Disagree. **We strongly oppose the stringency of the proposed eligibility criteria.**

Question 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.

Engender has advocated for many years for narrow eligibility criteria for support for carers to be widened. Unpaid carers with multiple caring roles, the majority of whom are women, are amongst those whose labour is the most critically undervalued and under-recognised. The example given below, quoted in our report on the devolution of social security to the Scottish Parliament,¹¹ reflects realities that are faced by women across Scotland. These include the informal and entirely unrecognised support from older women, often grandmothers, in providing unpaid care; the ‘sandwich’ caring that middle-aged women routinely provide in tandem for older relatives and children, which again is not recognised by the social security system; and the obligation to give up paid work in order to care, which is a highly gendered dimension of the type and shape of unpaid care provision and which has profound implications for women’s financial security and wellbeing in the immediate term and into older age.

¹⁰ Social Security Scotland (2019) Our charter. Available at: https://www.socialsecurity.gov.scot/asset-storage/production/downloads/Our-Charter_1.pdf

¹¹ Engender (2016) Securing women’s futures: Using Scotland’s new social security powers to close the gender equality gap. Available at: <https://www.engender.org.uk/content/publications/Securing-Womens-Futures---using-Scotlands-new-social-security-powers-to-close-the-gender-equality-gap.pdf>

Jennifer was in full time employment before she had Tommy, who is profoundly deaf and was diagnosed with autism when he was a toddler. With the help of her mother Jennifer was able to return to work part-time so she could give Tommy the care and attention that he needed.

But that all changed when her mother had a stroke, which meant that the only person in her life that was able to help Jennifer care for her son was now disabled herself. So, Jennifer's caring duties had doubled. Her mother relied on Jennifer to do her shopping, cleaning, attending medical appointments and all her personal care. Jennifer had no choice but to leave employment to become a full-time carer for two people, receiving Carers Allowance of £62.10. She has experienced depression since leaving employment, linked to loss of income and the lack of control from being forced to give up work. Crucially, although Jennifer is looking after more than one person, she can only claim one payment of Carers Allowance.

Case study provided by the National Carer Organisations

We therefore welcome the proposal to create an additional person payment. However, **we are appalled at the inadequacy of the level that is proposed** and at the number of additional hours caring hours needed to meet criteria. We do not believe that expecting carers to provide a minimum of 55 hours of unpaid care per week before they are eligible to access an additional person payment is in line with Social Security Scotland's charter, in particular the commitments to embed dignity and respect throughout the system and to advance equality and non-discrimination. **The proposed £10 per week for an additional 20 hours of care works out at a maximum rate of 50p per hour, or around a quarter of the current rate for Carer's Allowance** (£67.70 per week or a maximum of £1.93 for 2021/22).

We consider this to be a demeaning and damagingly low offer. Undervaluing care work serves to marginalise the lives of disabled and older people, and exploits those that provide it. It also denies the reality of the care economy. Carers are undertaking skilled work that saves devolved services huge sums of money, and caring for more than one person requires specific high levels of skill.

"Shocking. Absolutely shocking. What does £10 a week buy you? Not a lot. And for caring for two people. Insulting, actually."

"It feels as if the government think it's ok for an unpaid carer to care for 55hrs per week as a minimum just to get that extra £10."

"Not enough. An insult for the bulk of carers eligible who still provide significant care with no financial recompense."

Quotes from Engender engagement with women who provide unpaid care

Scotland must start tackling the chronic cultural undervaluation of care and treating unpaid care as the (often rewarding) work that it is. It is widely recognised that the social care system is in crisis, in part because its overwhelmingly female workforce is undervalued and underpaid,¹² and proposals for a new National Care Service recognise that this must be addressed. Policy coherence and determination to move past rhetoric on the care economy across Scottish Government are essential at this juncture and time of crisis.¹³ This would be undermined by the creation of a new payment that can only be understood as an extra £10 per week pocket money for 20 hours of additional care. Participants in our workshops regarding this consultation expressed anger at the fact that people caring for a second person for less than 20 hours would miss out on the support.

Once more, this is a gendered issue. Women undertake the majority of unpaid care across all age groups, but this is particularly acute with regards to intensive care. Women are significantly more likely to provide care for older relatives and children at the same time, and to spend more than 35 hours a week caring.¹⁴ Women are four times as likely as men to give up paid work due to multiple caring responsibilities.¹⁵ This has major impacts on women's access to work, career progression, training and learning, as well as on physical and mental health. Though data is lacking in Scotland, it is likely that this is also an issue of race equality and an intersectional issue. In England, research from Carers UK shows that BME carers provide proportionally more care than white carers and are significantly more likely to provide round the clock care.¹⁶ Women's financial security has also been disproportionately impacted by the Covid-19 pandemic, particularly for Black and minority ethnic women, disabled women and young women,¹⁷ including as a result of stepping in to provide care when state services were withdrawn. The current cost of living crisis will have negative impacts on gender equality, on carers, and on those they care for, not least due to soaring energy costs given the particular needs of some older and disabled people.

¹² IRASC (2021) Independent review of adult social care in Scotland. Available at: <https://www.gov.scot/binaries/content/documents/govscot/publications/independent-report/2021/02/independent-review-adult-social-care-scotland/documents/independent-review-adult-care-scotland/independent-review-adult-care-scotland/govscot%3Adocument/independent-review-adult-care-scotland.pdf>

¹³ Engender (2020) Response to Scottish Government's consultation on a National Care Service for Scotland. Available at: <https://www.engender.org.uk/content/publications/ENGENDER-RESPONSE-TO-SCOTTISH-GOVERNMENTS-CONSULTATION-ON-A-NATIONAL-CARE-SERVICE-FOR-SCOTLAND.pdf>

¹⁴ Carers UK (2014) Caring and family finances inquiry. Available at: <https://www.carersuk.org/for-professionals/policy/policy-library/caring-family-finances-inquiry>

¹⁵ Carers UK (2012) Sandwich caring: Combining childcare for older or disabled relatives. Available at: <https://www.bl.uk/collection-items/sandwich-caring-combining-childcare-with-caring-for-older-or-disabled-relatives>

¹⁶ Carers UK (2011) Half a million voices: improving support for BAME carers

¹⁷ Close the Gap (2021) Joint briefing on the impact of Covid-19 on young women's employment, financial security and mental health. Available at: <https://www.closesthegap.org.uk/content/resources/Joint-briefing-on-the-impact-of-Covid-19-on-young-womens-employment-financial-security-and-mental-health---October-2021.pdf>

For many years, Engender has advocated that financial support for carers should be in line with at least the real living wage, in recognition of the work that carers do and of the enormous monetary and broader value of the care economy.

“I don’t think this £67 per week reconciles with what the government is prepared to pay paid carers, and the free personal care, which we are providing.”

“We’re getting in a day what someone else is getting in an hour”

Quotes from Engender engagement with women who provide unpaid care

We are calling for the Carer’s Additional Person Payment to be set proportionally in line with Carer’s Assistance, in the first instance. Based on the 2021/22 rates used in the consultation, this would be a minimum of £38.20 per week. In the context of the emerging cost of living crisis and ongoing impacts of the pandemic, this would be a more realistic starting figure than £10 per week. Over time, the adequacy of all Scottish carers payments should be reviewed with a view to increasing carers’ incomes substantially over the longer-term.

Question 21: Do you agree or disagree with the proposed payment frequency for Carer’s Additional Person Payment? [Agree, Disagree, Unsure.]

Unsure.

Question 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.

We agree that the proposal to pay Carer’s Additional Person Payment at the same time as Carer’s Assistance, whether every four or six weeks, appears logical. We note, however, that the majority of carers in receipt of Carer’s Allowance Supplement are in favour of the lump sum award every six months and wonder whether further engagement with carers would be advisable, to seek views on the preferred approach and uncover any unintended consequences.

Women have unequal access to resources as compared with men in terms of earnings, pensions, and disproportionate reliance on social security set at levels that fuels poverty. Widespread domestic abuse undermines women’s financial security, with research showing that 89% of women experience financial abuse as part of their experience of domestic abuse.¹⁸ Budgeting and household management is also a highly gendered issue, with women

¹⁸ Refuge (2008) ‘What’s yours is mine’: The different forms of economic abuse and its impact on women and children experiencing domestic violence. Available at: <https://www.refuge.org.uk/files/Whats-yours-is-mine-Full-Report.pdf>

taking on the majority of this labour. The timing and size of social security payments therefore have gendered impacts.

However, we are cautious of recommending engagement with carers, many of whom are extremely time-poor, unless best standard practices for participation are closely adhered to.¹⁹ These include equalities competence, including gender and cultural competence, a clearly defined process that includes updating participants on decision-making together with rational, and adequate recompense.

“As an unpaid carer you spend your life doing admin”

Quote from Engender engagement with women who provide unpaid care

SECTION 3: CHANGES TO SCOTTISH CARER’S ASSISTANCE

We are pleased to see the impact on equality prominently listed amongst the criteria for ranking potential changes to eligibility. We also note the inclusion of cost in this list and, while we recognise budgetary challenges, we strongly argue that **a cost-benefit analysis that weighs women’s lives and gender equality within a narrow financial framework is inappropriate**. If Scotland is to develop a model of support for carers that will advance equality and non-discrimination, as it is legally obliged to, then the Scottish Government will have to pay for it. Likewise, if Scottish Government is going to move beyond commitments on paper to improve gender equality and fulfil its ambitions to mainstream equality and human rights throughout its operations, significant financial investment will be needed.

1. Access to education and training

Question 26: Do you agree or disagree with the proposed future change to allow carers in fulltime education to get Scottish Carer’s Assistance? [Agree, Disagree, Unsure.]

Agree.

Question 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.

Gendered expectations around unpaid care act as barriers to education and training for women and girls. This ultimately works to undermine women’s earning potential and is a driver of the gender pay and pension gaps. Recent analysis from Age UK indicates that pension poverty amongst women has risen by six percentage points over the last ten years, with 20% of women of pensionable age now “living below the breadline”. This shocking

¹⁹ E.g. Scottish Community Development Centre (n.d.) National standards for community engagement https://static1.squarespace.com/static/5943c23a440243c1fa28585f/t/5c000b516d2a737f69d510e7/1543506813945/NSfCE+online_October.pdf

figure is even more acute for Black and minoritised women, one in three of whom experience pension poverty. It is likely that BME women undertake unpaid care at greater rates than white women, though data is lacking at the Scottish level. One small-scale study found that 76% of BME carers were women, and that the peak age for caring in BME communities was earlier than for the white population, due in part to demographics. It also highlights the underreporting of informal care, with many BME women not identifying as carers.²⁰ **Research on BME women's experiences of unpaid care, across different communities, is sorely needed in Scotland.**

Engender has advocated for restrictions regarding education to be abolished for many years. The reality that carers are penalised for providing necessary care, with profound implications for their wellbeing and economic security throughout their lives, is nonsensical and archaic. **We welcome this proposal to take this much-needed step forward.**

2. Recognising different caring situations

Question 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, Disagree, Unsure.]

Agree.

Question 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.

As above, **we believe that the current rules on multiple caring are nonsensical.** We welcome Scottish Government's intentions to iron out this inherited inequality,²¹ whilst taking stock of points raised by carers and carers organisations regarding the complications of applying for support. The consultation document states that limited information on people caring for multiple people means that the impact of this policy change on equality and poverty is unknown. However, the gender split of caring is particularly acute across carers between 25 and 49 years old, and women are much more likely to take on care for the care for older relatives as well as children. According to official figures two thirds of carers aged 25-49 are women, but the scale of women's caring within this cohort is unknown.

Cultural expectations that female relatives will automatically take on care for older people as and when needed persist, including in explicit ways from health practitioners in Scotland.²² This was a strong theme to emerge from our recent workshops with women who

²⁰ MECOPP (2017) Informal caring in Scotland's Black and minority ethnic communities

²¹ Current eligibility for Carer's Allowance was developed by the UK Government. Social security was devolved to the Scottish Parliament in 2016.

²² Engender engagement events with unpaid carers; Engender (2012) Preparing to care: woman to woman. Available at: <https://www.engender.org.uk/content/publications/Preparing-to-Care-A51.pdf>

provide unpaid care in Scotland. There was overwhelming agreement from participants that gendered assumptions around caring being a 'woman's job' was the key factor in why they became unpaid carers. These assumptions came from healthcare professionals, family members, employers and from participants themselves, and carried a lot of power. Participants reported similar experiences of assumption regardless of whether the cared-for person was a child, elderly relative or neighbour.

"There's a natural assumption that the female parent will assume the role."

"I do have my brother around, but there was never even a question of him caring for them, (...) the daughter will do it, even though I'm the youngest and I'm a single parent, it'll be me."

"It also has to do with pay. Because in a family group, men are likely to earn more than you. So it's easier for a woman to give up (work)"

"Can your missus not do it?" (participant sharing a reaction from her partner's employer with regard to his new caring role)

Quotes from Engender engagement with women who provide unpaid care

We believe that proposals to extend support for carers with multiple caring responsibilities will have a positive impact on gendered inequalities related to unpaid care.

We note the challenges set out regarding shared care and support further consideration of options in the future. As above, we lack data on the demographics of care for older people, which continues to automatically fall to women in the family in many cases. The consultation document anticipates that those affected by shared care will largely affect couples and notes potential implications for groups such as lone parents. A gender analysis of these dynamics will be needed going forward, including with regards to the fact that over 90% of lone parent households are headed by women. We suggest that research into understanding these demographics and dynamics, as well as the nature of shared care is undertaken by Scottish Government as part of future work on this.

3. More stable support where life events have affected the cared for person

Question 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, Disagree, Unsure.]

Agree.

Question 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.

This is a more realistic and compassionate approach, reflecting financial, practical, and emotional realities for carers in extremely difficult circumstances.

Question 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, Disagree, Unsure.]

Agree.

Question 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.

This is a more realistic and compassionate approach, reflecting financial, practical, and emotional realities for carers in extremely difficult circumstances.

"I get fear every time a brown letter comes through the letterbox...is this going to be a reassessment? Am I going to lose everything?"

Quote from Engender engagement with women who provide unpaid care

4. Access to paid work

Questions 34: Do you agree or disagree with the proposed future change to increase the earnings limit for Scottish Carer's Assistance? [Agree, Disagree, Unsure.]

Engender agrees that the earnings limit for accessing support should be increased.

Question 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.

In principle we are supportive of policy change that aims to increase income for more carers. This is in line with our core concern that carers and the care economy are grotesquely undervalued and recognised. Set against the overall gender demographics of unpaid care, women's disproportionate provision of unpaid care is even more acute for working-age women between 25 and 49 years old. Women are twice as likely as men to give up paid work in order to care, and women aged 44-54 are more than twice as likely to have reduced working hours as a result of caring responsibilities.²³ Women are also

²³ Employers for Carers and Carers UK (2015) Caring and isolation in the workplace. Available at: <https://www.carersuk.org/for-professionals/policy/policy-library/caring-and-isolation-in-the-workplace>

disproportionately more likely to be in paid employment than men, often juggling low-paid and part-time 'mini-jobs' that fit around caring roles. It is widely recognised that women's unpaid caring roles are a driver of the gender pay gap. **A threshold that actively prevents women from accessing better paid opportunities and career progression with resounding impacts throughout their lives is a penalty on carers.**

Linda is 68 and cares for her 44-year-old daughter who has had mental health problems since she was 16. Over her life, Linda has had to balance working with her caring role. As her daughter gets very anxious when she's alone, Linda has had to make sure that always worked close to home and that her employers were flexible, which limited her earning potential. She is retired now but struggling to make ends meet. She is not entitled to Carers Allowance as she is receiving a state pension.

Case study provided by the National Carers Organisations²⁴

Many participants at our engagement sessions for this consultation discussed experiences of navigating the so-called 'cliff-edge' when it comes to earnings, and the time and energy they expend on ensuring a balance which will not jeopardise their current claim while still enabling them to provide financially for their families and manage their caring roles. As a result there were several participants for whom giving up work was the most viable option.

"On my old wage, I could only be working 9 hours a week. And there's no job that will take at my level that would take me on for that"

"(...) it should be based on the amount of hours you care for, not on the profession of the carer."

"I would love to go back to do some kind of work. I had to give up my job...I loved my job."

"There's a need to recognise that for some people if they have a supportive employer, work can function as respite."

Quotes from Engender engagement with women who provide unpaid care

We believe that increasing the threshold at the level proposed is a welcome start. However, an earnings limit of £158 per week – based as it is against the living wage – remains restrictive and will continue to penalise some carers, placing constraints on their choices, opportunities and future prospects.

²⁴ Case study from Engender (2016) Securing women's futures: Using Scotland's new social security powers to close the gender equality gap. Available at: <https://www.engender.org.uk/content/publications/Securing-Womens-Futures---using-Scotlands-new-social-security-powers-to-close-the-gender-equality-gap.pdf>

Over the longer-term, we advocate for universal access to Scottish Carer's Assistance, as was the case with Child Benefit until 2013. **Radical approaches to tackle the undervaluation of care are urgently needed, and there are clear opportunities for this new entitlement to contribute to this.**

Question 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? [Agree, Disagree, Unsure.]

Unsure.

Question 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.

We have not had the opportunity to fully analyse this approach from a gender perspective, and urge Scottish Government to **ensure robust and intersectional equality impact assessment is taken throughout further development of this policy proposal.** We are unclear on precisely what is being proposed, but would not support an approach that limits options for carers by prescribing a cap on the number of hours a carer could work. **Maximum flexibility across Scottish Carer's Assistance, in line with the principle to advance equality and non-discrimination, should be pursued.**

Question 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, Disagree, Unsure.]

Unsure.

Question 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.

As above, we have not had the opportunity to fully analyse this proposal from a gender perspective. Scottish Government must ensure that rigorous and intersectional equalities analysis is applied to every aspect of these proposals, as per its obligations under the public sector equality duty.

5. Recognition or support for a wider group of carers

Question 40: Do you agree or disagree that a payment for long term carers should be considered further? [Agree, Disagree, Unsure.]

Agree.

Question 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.¹⁴

We fully support the proposal to explore more expansive payments for unpaid care, including for long-term carers. **The long-term financial impacts of caring disproportionately affect women and have ramifications for women's equality more broadly**; on average women become carers earlier in their lives than men do, and routinely give up paid work in order to care.

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

We have no comments to make on the specifics of a new payment for long term carers at this point.

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

Engender endorses calls from the National Carers Organisations and the Social Renewal Advisory Board to financially support carers providing upwards of 20 hours of care. Twenty hours represents between 0.5 and 0.6 FTE in paid employment and a hugely significant portion of a carer's week. Of course, those with caring roles do not 'clock off' from the job in the same way that many other workers are able to, many providing round the clock care and/or emotional engagement. However, **unpaid care is a form of labour, one which is often very intensive as well as often very rewarding, and Scottish Government must move beyond a rhetoric of appreciation if we are to see any shift in how we perceive and value care as a society.**

Engender is pleased to see the conversation on Minimum Income Guarantee that is happening in Scotland and to be represented on Scottish Government's MIG steering group. However, we are very far from seeing a form of basic income implemented in Scotland, and stalling on difficult conversations around unacceptably low social security entitlements cannot be justified in terms of early thinking on MIG. Women and others experiencing financial insecurity and anxiety around long-term access to resources as a result of caring cannot wait for this policy idea to (possibly) materialise. They are in need of well-earned support now.

Lastly, we reiterate our points about policy coherence and the need for Scottish Government departments to work together. Social security policy for carers must be consistent with Scottish Government's broader commitments to tackle gender inequality, including in terms of the mainstreaming imperatives articulated by the First Minister's National Advisory Council on Women and Girls (NACWG). Similarly, there should also be coherence with other policy and programme development that directly engages and impacts carers. For instance, emerging thinking and development of the National Care Service (NCS) should be in step with the driving aims and objectives of social security policy. Notably, however, the Scottish Government's consultation on the NCS – which ran to 137

pages – was gender blind.²⁵ Failure to account for the reasons that care is so chronically undervalued in Scotland, both financially and culturally, can only serve to undermine efforts to address this across government. Fundamentally, this includes the fact that both unpaid and paid care is associated with women. Development of Carer's Assistance in Scotland, particularly with regard to the longer-term phase set out in Section 3 of this consultation, should seek to engage wider work with import to carers, including the National Care Service.

Equality impact assessment

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

Our response is focused on the impacts of proposals on women and on women's equality. As such relevant information is integrated throughout this paper. We have by no means, however, undertaken an equality impact assessment of these policy proposals from a gender perspective, nor would this be possible within the scope of a consultation response.

We welcome references to equalities impact on specific proposals in the consultation document, such as they are, as well as framing around the need to improve equality. However, these references are patchy and on occasion indicate a lack of relevance where clear implications for women and women's equality exist.

Ongoing and intersectional EQIA, including efforts to plug data gaps as indicated, will be essential throughout development of Scottish Carer's Assistance. Crucially, EQIA must also identify where gaps in the data exist and lead to action to mitigate this. In relation to Scotland's unpaid carers, this opportunity should be used to catalogue lacking evidence and data on the experiences of BME women, LGBT women and women from minority faith groups, amongst other marginalised communities.

FOR FURTHER INFORMATION

Contact: Jill Wood, Policy Manager, Engender

Email: jill.wood@engender.org.uk

ABOUT US

Engender is Scotland's feminist policy and advocacy organisation, working to increase women's social, political and economic equality, enable women's rights, and make visible the impact of sexism on women and wider society. We work at Scottish, UK and international level to produce research, analysis, and recommendations for intersectional feminist legislation and programmes.

²⁵ Gender blindness refers to a complete lack of gender analysis. Gender analysis takes account of culturally ascribed gender roles and their impact on women's social, cultural, economic and political inequality with men. The NCS consultation did not mention women once despite the profoundly gendered nature of care.