



T: 0300 244 4000
E: scottish.ministers@gov.scot

Dr Sally Witcher OBE
Scottish Commission on Social Security
c/o Secretariat
Victoria Quay
Edinburgh
EH6 6QQ

info@socialsecuritycommission.scot

21 June 2019

Dear Sally

Thank you for your letter of 17 May and accompanying report on the Young Carer Grant (YCG) draft regulations. The production of your first report is a significant and historical milestone and I greatly appreciate the work that has gone into this. Having considered the points and recommendations in your report, I am now in a position to respond as I will shortly be laying the YCG regulations.

I welcome the Commission's overall view that YCG is a welcome and progressive policy consistent with the social security principles and the Scottish Government's human rights obligations. As the Commission notes, YCG will be part of a wider package of support for young carers.

I am pleased to confirm that I have accepted the majority of the recommendations in the report. A table of responses to each recommendation is detailed at **Annex A**

Policy Intention

I welcome that the Commission recognises the value of YCG as a new benefit and our work to address the challenges faced by young people with caring responsibilities.

Policy Development

As the Commission notes, the Scottish Government has engaged with young carers and young carer organisations throughout the design of YCG. Engagement will continue through user testing up until the launch of YCG this Autumn.

The Commission's report emphasises the need to engage with young carers with protected characteristics. **Recommendation 1** invites the Scottish Government to provide information on any specific engagement undertaken with equalities groups, those from seldom-heard groups and cared-for people.

I have today published a number of Impact Assessments detailing the efforts taken to address the needs of young carers who have protected characteristics. An Equalities Impact Assessment sets out the Scottish Government's work to promote economic equality through the Young Carer Grant and the steps taken to ensure it does not discriminate against those with protected characteristics. A Children's Rights and Wellbeing Impact Assessment assesses the policy against the UN Convention on the Rights of the Child (UNCRC). We have also carried out an Island Communities Impact Assessment to understand how YCG can be tailored to those living in rural and remote communities. Scottish Government officials visited island communities to understand the challenges specific to young carers living in those communities.

Recommendation 2 suggests that the Scottish Government seek to improve its approach to engaging with a broader range of people directly affected by a proposed policy as a matter of priority. Specific engagement has been carried out with ethnic minority charities and Gypsy Traveller organisations. We are currently engaging with a British Sign Language (BSL) organisation to tailor the application form to specific needs. We will continue to reach out to groups that represent young carers with protected characteristics as I am aware that there can be a higher proportion of young carers in these groups that face specific barriers and challenges.

Policy content issues

Age of eligibility

I welcome the Commission's response to our decision to amend the regulations so as to extend eligibility to all young carers aged 16-18, regardless of their educational status. **Recommendation 3** suggests that the Scottish Government give consideration to extending eligibility to YCG to young adults over the age of 18 who are not eligible for Carer's Allowance and invites the Scottish Government to provide costings for this.

Currently, we do not plan to extend the age criteria for YCG. I have sought information on the implications of extending eligibility to those aged 19 to 25. Doing so would increase the caseload from 2,400 to approximately 9,700, increasing expenditure from 700,000 to approximately £3 million, in 2020/21.

Qualifying benefits

Recommendation 4 invites the Scottish Government to reflect on how it might address the identified eligibility gap in relation to young people delivering care to people not in receipt of a qualifying benefit, and to comment on whether the devolution of disability benefits may provide a means to help achieve this.

It is not currently anticipated that the entitlement criteria for Disability Assistance will significantly extend eligibility to new groups. Therefore it is not expected that the implementation of Disability Assistance would result in an increase of those eligible for YCG.

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.

Payment Levels

Recommendation 5 invites the Scottish Government to provide more clarity on the evidence base, and process undertaken, to identify £300 as an appropriate, adequate level of payment and to comment on the extent to which it believes the grant will deliver on its policy aims.

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. The YCG Working Group agreed that £300 was sufficient to make a significant difference to young carers. Concern was expressed by the YCG Working Group and in responses to the consultation that an amount significantly higher than £300 could result in pressure on the young carer to remain in a caring role or risk the professionalization of care.

Recommendation 6 invites the Scottish Government to comment on what it sees as the appropriate balance between different forms of support for young carers and how it will ensure that the value of YCG is not eroded by reductions or deficits elsewhere.

A Section 104 order has been requested from the UK Government which will prevent the grant being counted as income should the young carer apply for any reserved income related benefits. YCG will also not affect council tax reliefs.

YCG is one part of a wider package of support that we are introducing for young carers. Young carers aged between 11 and 18 will have access to non-cash benefits through the Young Scot National Entitlement Card. Recipients of YCG will be entitled to free bus travel subject to piloting from 2020/21.

We are continuing to explore further ways that we can support young carers. Results from the Skills Development Scotland evaluation of the Enhanced Apprenticeship Contribution model will be available this year which includes research into Young Adult Carers and Modern Apprenticeships.

Recommendation 7 invites the Scottish Government to provide more clarity on the extent to which it expects the YCG will do more than contribute towards the meeting of basic subsistence needs and whether this reflects the Scottish Government's policy aims.

There are a range of Scottish Government policies which aim to bring people, including carers and their families, out of poverty. Duties under the Carers Act require local authorities to establish information and advice services which must cover, amongst other things, income maximisation for carers.

We have been clear that the YCG is not intended to be used to meet basic subsistence needs or to provide an incentive to care. Although we have not placed any conditions on how the Grant must be spent, the intention is to help young people improve their quality of life and take part in opportunities that are the norm for other young adults.

Hours of Care

Recommendation 8 invites the Scottish Government to consider whether the rules relating to the qualifying period can be adapted to mitigate the risks that it could negatively impact people who care for those with fluctuating conditions and that it is insufficiently flexible to reflect the needs and circumstances of young people.

We recognise the varying and challenging circumstances of young carers as they often have to balance their caring responsibilities with education and employment. The regulations have therefore been re-drafted to reference that the care provided need only take place in 10 weeks out of the 13 week qualifying period. This addresses concerns raised by the Commission about breaks in care. It also provides flexibility for young carers to take respite and holidays.

Definition of Care

Recommendation 9 suggests that the Scottish Government abolishes the proposed definition of care in favour of a more flexible approach. I note the Commission's view that the Scottish Government's aim of providing greater clarity could be better achieved through improved guidance and targeted outreach activity.

In response to your recommendation, we have changed the definition of care in the regulations to read:

Care provided must –

Involve activity that promotes the physical, mental or emotional well-being of the person being cared-for.

This provides a flexible approach recommended by the Commission and, as suggested by the Commission, we intend to include user stories within the application and examples of what different types of care may look like in marketing materials and operational guidance.

Completely removing the definition of care would have an impact on the journey of the young carer and affect the operational delivery of the grant. Engagement with young carers has highlighted how young people often struggle to identify as a carer. If we were to remove the definition of care completely, young carers may find it harder to understand their eligibility for the grant.

YCG will be paid on a non-discriminatory basis. The removal of the definition could create a difficult decision making process for the agency when delivering YCG with no definition to inform that decision. We do not wish to carry out pre-award verification checks which involves contacting the cared-for person in the same way that DWP do for Carer's Allowance.

Valid Applications

Recommendation 10 the Scottish Government is invited to clarify what will constitute a valid claim, including evidence requirements, for YCG, taking account of the Commission's view that the approach should be as flexible and accessible as possible.

Although the design process for YCG is ongoing, we aim to be as flexible and accessible as possible. We are working with young carers to understand what types of ID they are able to provide. We understand that young people may not have access to items that other forms of benefits require during the application.

Drafting Issues

References to "Invalid Care Allowance"

As suggested in **Recommendation 11**, the draft regulations have been updated to remove the reference to "Invalid Care Allowance".

Possible Circularity

Recommendation 12 invites the Scottish Government to consider whether Regulation 7(1) could be phrased more clearly to avoid the risk of confusion about what counts as being "in receipt" of carer's assistance.

We understand the need to be clear around what counts as being "in receipt" of Carer's Assistance. In this respect, publicity material and guidance will clearly cover the eligibility criteria in a way that the regulations cannot. Removal of the current reference would create a need to amend the regulations when Scottish Carer's Assistance starts to be provided instead of Carer's Allowance. This will be evaluated following the launch of the grant to consider any evidence of confusion caused by the wording of the draft regulations.

Widening exceptions to one grant for each cared for person

Recommendation 13 invites the Scottish Government to consider whether the exception made in regulation 7(4)(b) could be broadened to encompass other circumstances than the death of the original YCG recipient, where caring responsibilities reasonably shift between young people.

We recognise the varying and often changing circumstances of carers and, in particular, young carers. However, through the user research which has been undertaken to date, we have not come across examples of transitional care, for

example passing down the caring responsibilities from one sibling to another, so it is difficult to understand if this issue may occur. As we do not intend to verify the care is taking place for each application, we would be unable to verify that the care has stopped or that the care provider has changed.

Determination following backdated award of assistance

Recommendation 14 invites the Scottish Government to consider whether regulation 11 as drafted makes adequate provision for other circumstances in which it would be reasonable to expect that Scottish Ministers would award a Grant without application.

I welcome the Commission's recognition of our attempts to reduce the burden on young carers during the application process. We understand that the circumstances of young carers may change over the course of an application. Therefore regulations have been re-drafted to reflect that Scottish Ministers will make a determination without receiving an application if an award of a qualifying disability benefit has been made to the person(s) being cared for which is a backdated award.

Payment in kind

Recommendation 15 invites the Scottish Government to consider whether the regulations could be strengthened to underline that the form YCG is given in is wholly the choice of young carers, invites the Scottish Government to comment on how it will ensure young carers are fully informed about this and to outline the options that can be offered, as shaped by the consultation.

This part of the YCG draft regulation replicates what was used for Best Start Grant to allow the option of the grant to be paid in a non-monetary form. This is not something we are considering for the launch of the grant later this year. Should we consider this option in the future, the young carer would have to agree that their payment can be made in a non-monetary form and can withdraw their consent at any time before the non-monetary payment is made. This requirement is in the Social Security (Scotland) Act.

This would be set out in any communications, marketing material and operational guidance if and when this option becomes available.

Multiple definitions of "regular and substantial" care

Recommendation 16 invites the Scottish Government to clarify whether Schedule 2 of the Social Security (Scotland) Act 2018 leaves scope for different definitions of "regular and substantial care" to appear in different sets of regulations. If so, the Scottish Government is invited to offer a view on whether this risks inconsistency, complexity and confusion.

The powers the Scottish Government has allow us to create Carer's Assistance only in cases where there is regular and substantial provision of care. This means that no assistance can be provided unless the care is regular and substantial. That may mean that there are different qualifying rules for different forms of Carer's Assistance. For example, YCG will have different eligibility rules from Carer's

Assistance with one being paid in the form of a grant and the other an income replacement benefit.

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.

Policy impact and improvement

Recommendation 17 suggests a number of specific areas for the Scottish Government to monitor, evaluate or research.

Meeting the policy intent

Recommendation 17a, and **17b** relates to monitoring the impact of YCG on the lives of young carers and the monitoring of whether the policy objectives have been met. The Scottish Government is developing a monitoring and evaluation framework to monitor the impact of YCG on the quality of life of young carers. On-going stakeholder engagement will provide the Scottish Government with further opportunities to refine our approach in monitoring the impact of YCG.

Payment Level

Recommendation 17c relates to the sum of £300. As set out in my previous responses, the £300 grant will be part of a wider package of support and is not intended to meet subsistence levels. **Recommendation 17d** relates to monitoring whether YCG contributes to a reduction in poverty. We intend to examine some of the intermediate impacts on young carers that may lead to improved financial outcomes. Attributing trends to YCG presents challenges both to the small sample size of those who receive YCG and to the wide range of factors that determine poverty. However we have taken steps through our research and presented our work to address these concerns in an Equalities Impact Assessment to ensure that YCG promotes economic equality.

Qualifying Period

Recommendation 17e is regarding the monitoring of the qualifying period. As I stated in my response to **Recommendation 8**, the regulations have been re-drafted to reflect that care need only take place in 10 out of the 13 week qualifying period to allow for respite and breaks in care.

Definition of Care

Recommendation 17f asks the Scottish Government to evaluate the impact of any new definition. We intend to engage with analysts in order to consider the best way of testing the revised definition. Stakeholder engagement beyond the launch of the grant will help us monitor the impact of the definition of care.

Equality and Diversity

Recommendation 17g and 17h asks the Scottish Government to gather evidence on young carers with protected characteristics and specifically on young women. Currently this information is collected by means of an optional equalities monitoring questionnaire.

I agree with your recommendation to gather evidence of the impact of YCG on young women in particular in principle. However, in the short term we do not have programme capacity to include this additional data in the application form. In the longer term, we can look again how to improve data gathering, but user research to date has shown that participants have regularly highlighted their concern at being asked what they deem to be 'unnecessary' questions for awarding the benefit for which they are applying. Without further user engagement and consultation it may also raise issues in providing a seamless user journey and our ability to build a service based on co-design, dignity and respect. Questions of this type are within the bounds of GDPR and require adequate measures to ensure data security.

Recommendation 17i asks the Scottish Government to monitor the impact, should people subject to immigration control be granted exemption. We have engaged with individuals subject to immigration control and will continue this engagement should they be granted an exemption with regards to YCG.

Valid Claims

Recommendation 17J asks the Scottish Government to monitor the impact of the operational approach to determining what should constitute a valid claim. As with definitions of care, we, or the agency, can, if requested explore the likelihood of a decision on the threshold for validity through a variety of channels.

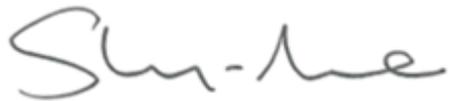
Future implications

Recommendation 17k asks the Scottish Government to consider whether the eligibility rules for devolved disability benefits, once decided, have implications for the eligibility and the impact of YCG. As I stated in my answer to **Recommendation 3**, we do not intend to widen eligibility.

Recommendation 17l asks the Scottish Government to consider the interface of YCG when developing Carers Assistance to prevent or remedy undesirable inconsistencies or complexity. I agree that the interface of YCG should be clear and consistent. We will engage with analysts to consider the best way to test proposals for Carer's Assistance, for example through existing User Research or Experience Panels.

Once again, I thank you for the open manner in which you have conducted your report and issued your recommendations on the draft regulations of YCG. I trust that this reassures you of the extensive consideration we have given to your recommendations and the valuable input you have made to the development of this policy.

Yours sincerely

A handwritten signature in cursive script, appearing to read "Shirley Anne-Somerville".

Shirley Anne-Somerville

SCoSS recommendation	Accept/Partially accept/Decline	SG Response
<p>1. The Commission invites the Scottish Government to provide information on any specific engagement or consultation undertaken with equalities groups, those from seldom-heard groups and cared-for people.</p>	<p>Yes</p>	<p>During Discovery 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. We have spoken to charities that support young carers who are going through a ‘transition’ phase as they could no longer attend school due to their caring responsibilities, and we have also arranged both research and testing with a charity who supports young carers in an armed forces family.</p> <p>We 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.</p>
<p>2. In the event that there was no specific engagement or consultation undertaken by Scottish Government with equalities groups, those from seldom heard groups and cared-for people on this occasion, the Commission recommends that it seeks to improve its approach to engaging with a broader range of people directly affected by a proposed policy as a matter of priority.</p>	<p>Yes</p>	<p>As mentioned above, user research is well underway and will continue through the Beta phase, right up until the Young Carer Grant launches this autumn.</p>
<p>3. The Commission recommends that the Scottish Government give consideration to the case for extending eligibility, now or in the</p>	<p>No</p>	<p>Currently, we do not plan to extend the age criteria for YCG.</p>

<p>future, to young adults over the age of 18 not eligible for Carer's Allowance and invites Scottish Government to provide information on projected costs.</p>		<p>We have sought information on the implications of extending eligibility to those aged 19 to 25. Doing so would increase the caseload from 2,400 to approximately 9,700, increasing expenditure from 700,000 to approximately £3 million, in 2020/21.</p>
<p>4. The Commission invites the Scottish Government to reflect on how it might address the identified eligibility gap in relation to young people delivering care to people not in receipt of a qualifying benefit, and to comment on whether the devolution of disability benefits may provide a means to help achieve this.</p>	<p>No</p>	<p>Although entitlement criteria may diverge from current rules when disability benefits are devolved, it is not currently anticipated that the entitlement criteria for Disability Assistance will significantly extend eligibility to new groups of individuals. For this reason it is not expected that the implementation of Disability Assistance would widen the number of people who, as a result of caring for someone normally paid a disability benefit, will be eligible for the Young Carer Grant.</p>
<p>5. The Scottish Government is invited to provide more clarity on the evidence base, and process undertaken, to identify £300 as an appropriate, adequate level of payment; and to comment on the extent to which it believes the grant will deliver on its policy aims.</p>	<p>Yes</p>	<p>The suggestion of £300 per year was initially used as a point for discussion with stakeholders. Those discussions demonstrated that this amount was considered to provide enough support to make a significant difference to young carers; for example, to allow for purchase of some forms of short break or allow them to take part in leisure activities that they may not otherwise afford if their household income is low due to disability of a family member. The level is similar to comparable grants, such as the Time to Live fund.</p> <p>Specifically, the YCG Working Group felt that £300 was at a level which would be sufficient to make a difference to the young carer, for example to fund a short break or driving lessons, whilst being low enough to avoid pressure on the young carer to take on or remain in a caring role, providing sufficient safeguards were in place.</p>

		<p>Our response at Recommendation 17c details how we propose to monitor the extent to which the value of grant meets the policy aims.</p>
<p>6. The Scottish Government is invited to comment on what it sees as the appropriate balance between different forms of support for young carers and how it will ensure that the value of YCG is not eroded by reductions or deficits elsewhere.</p>	<p>Yes</p>	<p>A Section 104 order has been requested from the UK Government which will prevent the grant being counted as income should the young person apply for any reserved income related benefits. An SSI will be progressed to amend the income and capital rules for council tax reduction, so that the grant does not affect council tax reliefs.</p> <p>The grant is just part of the new package of support which is being introduced for young carers.</p> <p>Young Carers aged 11-18 will be able to access the non-cash benefits available through the Young Scot National Entitlement Card.</p> <p>Recipients of the grant will also be entitled to free bus travel from 2020/21.</p> <p>In addition to this, Skills Development Scotland (SDS) commissioned the Young Adult Carers and Modern Apprenticeships Research paper in 2018 to explore the potential to expand the enhanced contribution rates to include young carers.</p> <p>The findings of this research will be considered as part of a wider SDS evaluation of the Enhanced Apprenticeship Contribution model, the results of this evaluation are expected to be available in June 2019.</p>

<p>7. The Scottish Government is invited to provide more clarity on the extent to which it expects the YCG will do more than contribute towards the meeting of basic subsistence needs and whether this reflects the Scottish Government's policy aims.</p>	<p>Yes</p>	<p>We have been clear that the Young Carer Grant is not intended to be used to meet basic subsistence needs.</p> <p>However, there are a range of Scottish Government policies which aim to bring people, including carers and their families, out of poverty. Duties under the Carers Act require local authorities to establish information and advice services which must cover, amongst other things, income maximisation for carers. Other support may include income replacement benefits and employment support initiatives.</p> <p>Although we have not placed any conditions on how the Grant must be spent, the intention is to help young people improve their quality of life and take part in opportunities that are the norm for other young adults.</p> <p>This may include, for example, being able to take part in social or leisure activities or support to study.</p>
<p>8. The Commission invites the Scottish Government to consider whether the rules relating to the qualifying period can be adapted to mitigate the risks that it could negatively impact people who care for those with fluctuating conditions and that it is insufficiently flexible to reflect the needs and circumstances of young people.</p>	<p>Yes</p>	<p>The regulations have been re-drafted to reference that the care provided need only take place in 10 weeks out of the 13 week qualifying period.</p> <p>This addresses the concerns about breaks in care and also provides flexibility for respite and holidays.</p>
<p>9. The Commission recommends that the Scottish Government abolishes the proposed definition of care in favour of a more flexible</p>	<p>Partially Accept</p>	<p>In response to your recommendation, we have changed the definition of care in the regulations to: "Care provided must –</p>

<p>approach. The Commission’s view is that the Scottish Government’s welcome aim of providing greater clarity could be better achieved through improved guidance and targeted outreach activity.</p>		<p><i>Involve activity that promotes the physical, mental or emotional well-being of the person being cared-for.”</i></p> <p>This provides a flexible approach recommended by the Commission.</p> <p>Supporting guidance and marketing material will include examples of different caring circumstances including physical, psychological and emotional care. This would allow a flexible approach to defining care for the purposes of the application whilst offering guidance to encourage the self-identification of young carers.</p>
<p>10. The Scottish Government is invited to clarify what will constitute a valid claim, including evidence requirements, for the YCG; taking account of the Commission’s view that the approach should be as flexible and accessible as possible.</p>	<p>Yes</p>	<p>The design of YCG is not yet finalised, however, our aim is to be as flexible and accessible as possible. There are outstanding questions surrounding things like the Identification & Verification process and we are working with young carers to understand what forms of ID they may be able to provide – understanding that they may not have access to the items on our standard list. Once this is finalised, we will be able to confirm what constitutes a valid application.</p>
<p>11. The Scottish Government should check with DWP that the term “Invalid Care Allowance” is obsolete and, if so, consider removing reference to it from the draft regulations.</p>	<p>Yes</p>	<p>The draft regulations have been updated to remove the reference to “Invalid Care Allowance”.</p>
<p>12. The Scottish Government is invited to consider whether Regulation 7(1) could be phrased more clearly to avoid risk of confusion</p>	<p>No</p>	<p>Publicity material will clearly cover the eligibility criteria in a way that the regulations cannot. Removal of the current reference would create a need to amend the regulations when Scottish Carer’s Assistance starts to be provided</p>

<p>about what counts as being “in receipt” of carer’s assistance.</p>		<p>instead of Carer’s Allowance. We will evaluate our approach following the launch of the grant and can consider amending the regulations if there is evidence to suggest they are causing confusion.</p>
<p>13. The Scottish Government is invited to consider whether the exception made in regulation 7(4)(b) could be broadened to encompass other circumstances than the death of the original YCG recipient, where caring responsibilities reasonably shift between young people.</p>	<p>No</p>	<p>Through the user research which has been undertaken to date, we have not found evidence to suggest that transitional care exists, for example passing down the caring responsibilities from one sibling to another.</p> <p>Operationally, as we do not intend to verify the care is taking place for each application, we would be unable to verify that the care has stopped/care provider has changed.</p>
<p>14. The Scottish Government is invited to consider whether regulation 11 as drafted makes adequate provision for other circumstances in which it would be reasonable to expect that Scottish Ministers would award a Grant without application.</p>	<p>Yes</p>	<p>The regulations have been re-drafted to reflect that Scottish Ministers will make a determination without receiving an application if an award of a qualifying disability benefit has been made to the person(s) being cared for which is a backdated award.</p>
<p>15. The Commission invites the Scottish Government to consider whether the regulations could be strengthened to underline that the form YCG is given in is wholly the choice of young carers, and invites Scottish Government to comment on how it will ensure young carers are fully informed about this and to outline the options that can be offered, as shaped by the consultation.</p>	<p>No</p>	<p>This part of the YCG regulations replicates what was used for Best Start Grant to allow the option of the grant to be paid in a non-monetary form. This is not something we are considering for the launch of the grant later this year, but may consider this option in the future.</p> <p>Should this become an option, the client would have to agree that their payment can be made in a non-monetary form and can withdraw their consent at any time before the non-monetary payment is made.</p>

		This would be set out in any communications, marketing material and operational guidance if and when this option becomes available. This requirement is in the Social Security (Scotland) Act.
16. The Scottish Government is invited to clarify whether Schedule 2 of the Social Security (Scotland) Act 2018 leaves scope for different definitions of “regular and substantial care” to appear in different sets of regulations. If so, the Scottish Government is invited to offer a view on whether this risks inconsistency, complexity and confusion.	Yes	<p>The powers the Scottish Government has allow us to create Carer’s Assistance only in cases where there is regular and substantial provision of care. This doesn’t mean the same definition must be used for what care is provided, in all situations in which assistance is provided. However it does mean that no assistance can be provided unless the care is regular and substantial. That may mean that there are different qualifying rules for different forms of Carer’s Assistance. For example, YCG will have different eligibility rules from Carer’s Assistance with one being paid in the form of a grant and the other an income replacement benefit.</p> <p>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.</p>
<p>17. Building on the analysis and recommendations offered throughout this report, the Commission recommends that the Scottish Government monitors, evaluates or researches:</p> <p>a) The real world use and impact of the Grant and the extent of the positive difference YCG has made to young carers’ lives</p>	Partially Accept	<p>a & b) We are intending to evaluate the impact of YCG by conducting primary research with young people in receipt of YCG to establish what their perspective on the impact of the benefit has been on their quality of life. This may be enhanced by access to better data on their background and outcomes (see below), but we will at least have some insight into those questions.</p> <p>c) Depending on the evaluation above, we should have an idea whether this is considered by a group of young carers</p>

<p>b) The extent to which this suggests that the policy aims have been fulfilled. If the policy aims have not been fulfilled, what factors have prevented this?</p> <p>c) The extent to which the £300 grant is meeting the Scottish Government's ambitious policy aims and whether the evidence suggests this sum should be revisited.</p> <p>d) The extent to which the Grant contributed to a reduction in poverty for the people who receive it.</p> <p>e) If the Scottish Government does not rethink the qualifying period, whether there is evidence of an impact on take-up, including among specific groups of young carers.</p> <p>f) If the Scottish Government does not follow the Commission's recommendation on reverting to a broader definition of care, it should seek to evaluate the impact of the new definition.</p> <p>g) Gather evidence of varying take-up or wider impact on young carers with protected characteristics, intersectional characteristics or those belonging to seldom heard groups.</p>		<p>to have made a difference to their quality of life, or whether they believe it essentially had no difference. What we won't be able to do is examine the exact difference in their lives before and after, or quantify exactly what the amount should have been. However, this will be part of the evidence base which policymakers will consider in the normal course of the events. As noted at Recommendation 7, YCG is not intended to meet subsistence levels, or provide an incentive to undertake caring activity.</p> <p>d) We intend to be able to examine some of the intermediate impacts on young carer's that may lead to an improved financial outcome. Measuring the poverty outcomes for 16-18 year olds does present challenges because of small sample sizes. Attributing any trends to YCG presents a further difficulty because of the wide range of factors that determine poverty.</p> <p>e) As set out at Recommendation 8, the regulations have been re-drafted to reflect care need only take place in 10 out of the 13 weeks qualifying period.</p> <p>f) We intend to engage with analysts to consider the best way to test the revised definition, for example through existing User Research, Experience Panels or a one-off study. Estimating take-up will be difficult however, as all the issues around identifying the eligible population, and the applicability of their caring activity apply.</p> <p>g) Currently this information is collected by means of an optional equalities monitoring questionnaire. However, considering the optional nature of the survey and the size of</p>
--	--	---

<p>h) Gather evidence of the impact of the YCG on young women in particular</p> <p>i) Monitor the impact, should people subject to immigration control be granted exemption.</p> <p>j) To monitor the impact of the operational approach to determining what should constitute a valid claim e.g. is this encouraging or restricting applications.</p> <p>k) Consider whether the eligibility rules for devolved disability benefits, once decided, have implications for the eligibility and impact of YCG.</p> <p>l) Consider the interface of YCG when developing Carers Assistance to prevent or remedy undesirable inconsistencies or complexity.</p>		<p>the Young Carer Grant user base (circa 2400) it is unlikely that this will attract meaningful responses in adequate numbers for smaller equality groups. This also means that any meaningful analysis of differences between groups or over time is highly vulnerable to statistical error and non-response bias. In addition any groups of BME, LGBT or trans carers will negligible, and this will be exacerbated for groups in more than one category (intersectional characteristics).</p> <p>To date the response rate to the optional monitoring questionnaire for existing benefits is too small to provide a meaningful conclusion if applied to YCG, it is highly unlikely that existing methods for collecting equalities data will be adequate.</p> <p>Our dilemma however is that in the short term we do not have programme capacity to include this additional data in the application form. In the longer term, we can look again how to improve data gathering, but user research to date has shown that participants have regularly highlighted their concern at being asked what they deem to be ‘unnecessary’ questions for awarding the benefit for which they are applying. Without further user engagement and consultation it may also raise issues in providing a seamless user journey and our ability to build a service based on co-design, dignity and respect. You are aware that the balance between following people’s wishes and collecting equality data has previously been a point of contention in relation to the Experience Panels. Questions of this type are within the bounds of GDPR and require adequate measures to ensure data security</p>
--	--	---

		<p>h) Programme is currently reviewing the requirement to ask gender for all applications for reporting purposes. However as above this has similar implications as collecting protected characteristics information. This is a sensitive area and, as such, a significant amount of user research and testing needs to take place to ensure that any implementation of this question recognises and respects the needs of the user in relation to the needs of the Scottish Government. As part of this review of the requirement, in addition to end users and business needs, the programme also needs to consider the interests of wider stakeholders and how this information is used. This work is progressing and it is not anticipated that this information will be collected as part of the Young Carer Grant application form at the launch of the benefit.</p> <p>i) This will require identification of people in this group, either through direct question in the application or linkage with necessary data held by DWP/HMRC (presumably national insurance numbers). Failure to collect information to identify this group will make monitoring difficult, and again numbers in this category are already likely to be small for analytical purposes. Currently it is unlikely that we will be able to capture data on immigration status, as per the limitations of collecting the wider characteristics data set out above, and with the size of the client base it is unlikely that this would provide a statistically meaningful response.</p> <p>j) As with definitions of care, we, or the agency, can, if requested explore the likelihood of a decision on the threshold for validity through a variety of channels. The issues about estimating take-up nonetheless all apply.</p>
--	--	---

		<p>k) we don't have an intention to widen eligibility. We would have to consider the impact on YCG claims if this arose.</p> <p>l) We will engage with analysts to consider the best way to test proposals for Carer's Assistance, for example through existing User Research, Experience Panels or a one-off study</p>
--	--	---