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29 September 2021

Dear Neil/Convener,

### **Development of Scottish Carer's Assistance**

In my letter to you on 10 August regarding the Carer's Allowance Supplement Bill, I provided an update on the development of Scottish Carer's Assistance, in response to the Committee's request for further information on this work.

Work has progressed on the Multi Criteria Analysis process set out as part of that letter, and I wanted to share with the Committee a further update on this work which was sent last week to our Carer Benefits Advisory Group (CBAG) and wider stakeholders.

We want to create a Scottish Carer's Assistance that works better for carers than the current Carer's Allowance. The improvements we make will build on changes we have already made, and those already planned, to improve support for Scotland's unpaid carers, which has been a priority with our social security powers.

Since September 2018, over £149 million has been paid to around 120,000 carers through the Carer's Allowance Supplement. The planned increase, through a further Coronavirus Carer's Allowance Supplement payment this December, would be an additional investment of £21 million, meaning carers in Scotland could be more than £690 better off this year compared to those south of the border. We would of course welcome any move from the UK Government to follow our lead by increasing the rate of UK Carer's Allowance. This would allow our Carer's Allowance Supplement to go even further for carers.

We have also now invested around £1.3 million since October 2019 through our Young Carer Grant, the first support of its kind in the UK, and have heard from young carers how his has helped make a difference to their lives<sup>1</sup> and helped them access more opportunities.

The Carer's Allowance Supplement and the Young Carer Grant are just two of seven new benefits we have delivered since 2018, providing over £540 million in payments to support

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<sup>1</sup> <https://www.gov.scot/publications/young-carer-grant-interim-evaluation/>  
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low income families and carers, and to tackle child poverty. We are also working to develop another new payment for those carers who are caring for more than one disabled child – for whom there is no extra support available through Carer’s Allowance – and looking at how this could best be extended to support those caring for more than one person of any age.

We are continuing to work with carers, and organisations that represent and support them, to consider the options to improve support through Scottish Carer’s Assistance, ahead of the consultation planned for this winter. As you will be aware, any changes we make would require funding to be identified from within the Scottish budget, meaning we will always need to consider these changes as part of a much wider picture.

It is more important than ever that we prioritise where investment is made, by listening to carers about what will have the greatest impact, taking in account the significant amount of evidence we have gathered from a range of work to date, including our evaluation of the Carer’s Allowance Supplement.<sup>2</sup> It is also vital that we continue our focus on ensuring that budgets are targeted at supporting those on low incomes, and in most need.

We also recognise that social security support is just one part of how we can improve the lives of unpaid carers. Unpaid carers also need support for their health and wellbeing, access to respite, and quality social care services for the people they care for. We are continuing to work with colleagues across government to ensure the changes we make will join up with, and build on, the range of improvements which will be delivered as part of work to implement the recommendations of the Independent Review of Adult Social Care.

We have heard from the Committee their desire to see improved support delivered through Scottish Carer’s Assistance as soon as possible. We are of course intending to deliver the additional payment for those caring for more than one disabled child as part of Scottish Carer’s Assistance and, as highlighted above, we are working to ensure this can be extended to cared for persons of any age. We will continue to look for opportunities to make further changes at the earliest possible opportunity but our priority, as set out in the update to the Carer Benefits Advisory Group, will continue to be delivering safe and secure transfer for existing clients.

This update is enclosed and I hope will be of interest to the Committee.

Best regards,



**BEN MACPHERSON**

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<sup>2</sup> <https://www.gov.scot/publications/evaluation-carers-allowance-supplement/>

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## Carer Benefits Advisory Group (CBAG) update Scottish Carer's Assistance - Multi Criteria Analysis Wednesday 22 September 2021

### Background

- As discussed at our update meeting on 21 September, work is progressing on the Multi Criteria Analysis (MCA) process to consider options for Scottish Carer's Assistance.
- A number of options for change have been put forward, and the MCA allows these to be assessed against a number of different factors.
- As part of the MCA, discussion events with CBAG members and wider stakeholders were held in June and July 2021, to take feedback on draft aims developed for Scottish Carer's Assistance<sup>3</sup>, the options for change to be considered, and the criteria against which the options should be assessed.

### Feedback from discussion events

- Overall feedback on the draft aims was that while these were clear and positive, and covered the right areas, it could be better articulated what they will mean in practice and how they will be used. The aims are being updated based on this feedback, and will be included in the Scottish Carer's Assistance consultation.
- The list of options to be considered was also updated based on feedback from the discussion events. An option was added to look at a 'run on' of carer support when a cared for person loses their disability benefit for any reason, separately from existing options looking at what happens where a cared for person passes away, or goes into hospital or residential care. A further option was also added to look at removing the requirement that the cared for person must be in receipt of a qualifying disability benefit. The full list of options considered is set out at **Table 1** below.
- Feedback from the events also informed the final assessment criteria and the importance weights given to the criteria. The criteria and weights reflect the points raised regarding the importance in particular of improving carer incomes – including those of the lowest income carers in particular - protecting existing support, including reserved benefit support, linking with wider support, keeping application processes simple, improving carers' prospects and removing barriers to work, and promoting take-up. The final 18 assessment criteria and weightings used in the MCA are set out in **Table 2** below.

### Options ranking and next steps

- Each of the 15 options were assessed and ranked against each of the 18 criteria. A summary of the assessment of each option is in **Table 3**.
- A sensitivity analysis of the rankings was also carried out. This tests the weighting of the assessment criteria by shifting weights to see whether there are impacts on the overall ranking, making sure a robust judgement about weighting has been made. The sensitivity testing found that changes to weights did not significantly impact overall results.
- The table splits the options into two groups. We plan to carry out further development work on the first group of options as a priority. Consideration of next steps for the second group of options is ongoing, and we will provide a further update in due course. No decisions have yet been made on which proposals will be taken forward to the public consultation and the next stages of development work will inform these decisions.

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<sup>3</sup> Draft aims are included in the Scottish Carer's Assistance discussion paper, published March 2021: <https://www.gov.scot/publications/scottish-carers-assistance-discussion-paper/>

- The further development and analysis work will look in more detail at how the options could work, including more detailed implications for delivery. For example, for changes to the earnings thresholds we would look at differing levels at which the threshold could be set. In addition to this, as all options were considered in isolation, further work will also allow us to consider interactions between the options, and consider options as part of work looking at what the role and form of Carer's Allowance Supplement should be once case transfer is complete.
- As discussed, we are inviting CBAG members to take part in this work through a series of workshops, and suggested dates for these will be sent out shortly. The series will also include sessions on additional payments for people with multiple caring roles, and some cross-cutting Scottish Carer's Assistance policy issues.

#### Scottish Carer's Assistance consultation

- Following the further development work which will include the CBAG workshops, proposals for Scottish Carer's Assistance will be included in a public consultation planned for this winter.
- As previously discussed, the options under consideration as part of the MCA process are for changes which could be made once case transfer for Carer's Allowance is complete, when eligible carers in Scotland are all receiving Scottish Carer's Assistance from Social Security Scotland instead of Carer's Allowance from DWP. This is to protect the safe and secure transfer of benefits for existing recipients of Carer's Allowance. Effective delivery of any changes to Scottish Carer's Assistance is also dependent on securing agreement with DWP and HMRC given the complexity of the interactions between the existing Carer's Allowance benefit and reserved systems.
- The consultation will also include detail on proposals for additional payments for those with multiple caring roles.

**Table 1. Final options considered as part of the Multi Criteria Analysis**

<b>Option Group</b>	<b>Option</b>
<b>A. Life events affecting care recipient</b>	Extend the period for which Carer's Allowance is paid after the death of a cared for person.
	Extend the period for which Carer's Allowance is paid after a cared for person is admitted to hospital or residential care.
	Extend the period for which Carer's Allowance is paid after the cared for person loses their relevant qualifying benefit for any reason.
<b>B. Eligibility thresholds (earnings/ education)</b>	Increase the earnings threshold link it to working hours per week and an hourly wage rate.
	Remove the earnings threshold and introduce an hours per week threshold.
	Remove the rule that prevents carers in full-time education from receiving Carer's Allowance.
<b>C. Earnings stability</b>	Introduce a taper rate so that the award is reduced gradually as earnings exceed the weekly threshold.
	Introduce a run-on period after earnings exceed the earnings threshold, with gradual reductions of the award over a period of time.
<b>D. Care requirements and responsibilities</b>	Allow carers to add together hours spent caring for up to three people to reach the 35 hours per week caring requirement.
	Allow more than one person to claim Carer's Allowance for the same cared for person where they meet all of the other eligibility criteria.
	Reduce the caring hours requirement from 35 hours per week to 20 hours per week.
<b>E. Underlying entitlement / unpaid carers recognition</b>	Continue to pay Carer's Allowance to carers in receipt of State Pension (currently as Carer's Allowance and State Pension are 'overlapping benefits' carers can't receive both).
	Introduce a Carer Recognition Payment to be paid to carers with 'underlying entitlement' to Carer's Allowance due to the overlapping benefits rule.
	Introduce a Carer Recognition Payment for all carers.
	Replace the requirement that a cared for person is in receipt of a qualifying benefit with verification from an approved third party that the carer is providing 35 hours or more of care a week to a cared for person.

**Table 2. Assessment criteria**

<b>Overarching Criteria Sets</b>		<b>Criteria</b>	<b>Description</b>	<b>Weight</b>	<b>Overall Weight</b>
<b>Dignity and Respect</b>	1	Simplicity and Transparency	Assess how likely the option is to be straightforward, unambiguous and easy for Social Security Scotland to communicate and for carers to use. Assess how likely each option is to keep the application process simple.	50%	20%
	2	Carer experience of the system	Evaluate how likely the option is to make carers feel they are recognised for their contribution, and can rely on Scottish Carer's Assistance to provide stable support, and how likely it is to improve the perception of carers.	25%	
	3	Flexibility	Assess how well the option is likely to support changes to be built upon and enable a 'learning system'.	25%	
<b>Equality and Poverty</b>	4	Interaction with equality characteristics	Assess how well each option would interact with carer groups who have specific needs. Equality characteristics and priority groups such as those identified in the tackling child poverty delivery plan will be considered.	35%	15%
	5	Income & Poverty	Assess how likely the option is to increase incomes of carers in the most need.	35%	
	6	Take-up	Evaluate how likely each option is to increase take-up of Scottish Carer's Assistance.	30%	
<b>Efficiency and Alignment</b>	7	Interaction with reserved benefits	Assess how each option interacts with the reserved benefit system. This includes assessing how each option is likely to have an impact on reserved benefits, require new or amended legislation on DWP's side and risk direct and behavioural 'spillover' effects.	30%	25%
	8	Alignment with devolved public services	Assess how efficiently each option would be embedded in the current system of devolved policies and programmes...	15%	
	9	Fraud and error	Evaluate how efficiently each option could respond to system controls and fraud and error prevention processes.	25%	
	10	External Exposure and Liability	Assess how likely the option is to be affected by policy changes to benefits currently reserved to DWP and HMRC.	20%	
	11	Internal Exposure and Liability	Assess how likely the option is to be exposed to policy changes in devolved disability benefits.	10%	

<b>Overarching Criteria Sets</b>		<b>Criteria</b>	<b>Description</b>	<b>Weight</b>	<b>Overall Weight</b>
<b>Implementation and Risk</b>	12	Scale of Change and Timings	Assess how quickly the option is likely to be delivered. This is an assessment of the preparation required for the benefit to be delivered, including technological solutions and operational skills, legislation and analytical work to scope options further.	30%	30%
	13	Scale of Policy Cost	Assess the scale of the cost of each option, including 'spillover' cost (where possible).	40%	
	14	Delivery and Operational Risk	Evaluate how well the option is likely to be delivered given the impact on the Social Security Programme and on the Reserved Benefits system.	15%	
	15	Policy Risk	Evaluate how likely the option is to introduce upside risks to policy expenditure.	15%	
<b>Economy and Society</b>	16	Social Outcomes	Evaluate how well each option is likely to improve social outcomes for carers and care recipients, including education, health and wellbeing.	50%	10%
	17	Employment Prospects	Assess how likely the option is to improve carers' prospects in the labour market. This could look at time and financial investment in training and learning opportunities as well as expenses associated with work.	40%	
	18	Access to Work	Assess how likely the option is to support carers to enter the labour market or increase hours of work if they wish to.	10%	

**Table 3. Assessment of options – Summary of analysis from MCA process**

Option	Rank	Summary of analysis from MCA process
<b>Group 1 – Priority options for further development</b>		
<p><b>Extend the period for which Scottish Carer’s Assistance is paid after a cared for person is admitted to hospital or residential care.</b> Currently a cared for person’s qualifying disability benefit stops after 4 weeks (unless they are under 18) and Carer’s Allowance will stop too.</p>	1	<p>This option would provide stability at a difficult time, and in the MCA it ranked top or well on four out of the five criteria sets. It is simple, low cost, is likely to have minimal impact on reserved benefits and unlikely to have behavioural impacts. It ranked middle or lower on equality and poverty as it would not improve carer incomes substantially, would have no impact on employment prospects, and is unlikely to affect take-up of the benefit. It ranked close to the option looking at extending support after the death of a cared for person, though it was considered to be a better fit with existing policies to support carers.</p>
<p><b>Extend the period for which Scottish Carer’s Assistance is paid following the death of the cared-for person.</b> Carer’s Allowance is currently paid for 8 weeks after the cared-for person dies, to allow the carer to adjust. Carers and stakeholders have suggested this needs to be longer.</p>	2	<p>This ranked top or well on four out of the five criteria sets. It is expected to be simple to explain, not complicate application, and provide support and stability for carers at a difficult time. It is likely to be low cost, apply to a small group of carers, and have relatively small impacts on wider benefits. It is expected to benefit mainly those caring for older people. It would not have a significant impact on carer income overall, and is not expected to affect take-up as it is less likely to induce changes in people’s behaviour.</p>
<p><b>Extend the period for which Carer’s Allowance is paid after the cared for person loses their relevant qualifying benefit for any reason.</b> This option was added following stakeholder discussions, intended to add stability where a cared for person loses entitlement to disability benefits.</p>	3	<p>Ranked well across four out of the five criteria sets. This would provide more stability for carers, though carers may have to report new changes to Social Security Scotland, which would not be the case with the other two options looking at extending periods of support. It would however, apply to potentially all recipients, and is more targeted at those caring for children and working age people than the other options of extended payment periods, given the relevant disability benefits are more likely to be affected by reviews. It is likely to be low cost and there is low risk of behavioural impacts, but may add complexity around devolved disability assistance and short-term assistance. It would also have limited impacts on employability. It would be a bigger and more complex change than the options to extend support after the death or hospitalisation of a cared for person.</p>

Option	Rank	Summary of analysis from MCA process
<p><b>Increase the earnings threshold and link it to working hours per week and an hourly wage rate.</b> Current earnings threshold is £128/week and is not linked to any particular measure, with no requirement to uprate.</p>	4	<p>Ranks in the middle or higher across all criteria sets. Expected to be easy to communicate as a change to the existing earnings threshold and would improve stability, but would keep the 'cliff edge' of the existing threshold. It would allow carers to increase earnings, and reduce the number who lose entitlement due to fluctuating earnings. It is expected to fit well with existing employability policies, and considered to be low risk for fraud or error as earnings could potentially be monitored with HMRC data. Considered a relatively easy change to make, scoring lower for policy costs and risk as the cost is higher than other options (though variable depending on the threshold level) and there is the potential for behavioural impacts (e.g. people reducing work to become eligible), and may have impacts on devolved and reserved benefits. This ranked less well on social outcomes and employability than options looking at tapers (due to not removing the cliff edge), but may do more to support carers to enter employment.</p>
<p><b>Introduce a run-on period after earnings exceed the earnings threshold, with gradual reductions of the award over a period of time.</b> Currently carers will lose all of their Carer's Allowance for a period in which their earnings exceed the threshold.</p>	5	<p>This option would address problems around the current earnings 'cliff edge'. In the MCA, its rankings varied across individual criteria within each of the five criteria sets. It could support carers to remain in work or keep their support, provide stability and flexibility for carers, and fits well with wider employability policy. It would also be easy to communicate. However, it would also add some complexity, and scores lower on interactions with devolved benefits, as paying varied amounts of SCA would add complexity for DWP benefits. It may also increase the likelihood of error, again due to different amounts being paid, though not to the same extent as a taper. It ranked lower than changes to the threshold as it is less likely to support new carers into work.</p>
<p><b>Remove the rule that prevents carers in full-time education from receiving Carer's Allowance.</b> Currently carers can't receive Carer's Allowance if studying full time, or for more than 21 hours a week.</p>	6	<p>This option could help provide stability and improve future employment prospects, particularly for younger carers. Ranking varied across criteria within the five criteria sets. It is likely to be relatively inexpensive in terms of benefit costs, deliverable in a short space of time (though interactions with student finance would need to be carefully considered), and is straightforward to communicate. It could align well with wider student carer support, and significant behavioural effects or impacts on reserved benefits are not anticipated. While it could help young adults more likely to be in relative poverty, and full-time students out of term time, the expected comparatively small number of carers affected means that it scores only in the middle for equality and poverty, and would be expected to only have a moderate impact on benefit take-up.</p>

Option	Rank	Summary of analysis from MCA process
<p><b>Introduce a taper rate so that the award is reduced gradually as earnings exceed the weekly threshold.</b></p>	7	<p>Like the run on period option, this would remove the ‘cliff edge’ earnings threshold in Carer’s Allowance and so provide carers with more stability, helping them to remain in work and retain support. It would cost less in benefit costs than the run on option or threshold increase, and would be less likely to have behavioural effects than a change in the earnings threshold. However this option is comparatively more difficult to design and communicate than other options earnings options. It would increase complexity in interactions with reserved benefits and HMRC, as the amount paid would vary. This increases the likelihood of fraud and error.</p>
<p><b>Allow carers to add together hours spent caring for up to three people to reach the 35 hours per week caring requirement.</b> Currently carers need to spend 35 hours a week caring for one person to qualify.</p>	8	<p>This option would bring about policy consistency for people whose lives are equally affected by caring – that is, they have a substantial caring role which impacts negatively on their capacity to work or take up employment. The MCA has identified that it could increase take up, it is expected to be low cost although there is uncertainty around this, and there is low fraud risk. While it is straightforward to understand as an option, it would add complexity for carers, in that having two or three cared for people would mean, for example, two or three times as many potential changes in circumstance. This also means that it would take longer to build systems to accommodate this option. It also ranked low in some areas because lack of data on carers who would be newly eligible means it is not clear how many people it would benefit, or what it would mean for interactions with DWP benefits.</p>
<p><b>Introduce a Carer Recognition Payment to be paid to carers with ‘underlying entitlement’ to Carer’s Allowance due to the overlapping benefits rule.</b> Currently carers in receipt of benefits such as State Pension, provided for the same purpose, don’t receive any support from Carer’s Allowance.</p>	9	<p>This option is not expected to have significant impacts beyond recognition. It would mainly benefit carers on State Pension, and as such, it is not expected to improve employment access and prospects or incomes of carers on the lowest incomes. This option ranked around the middle on equality and poverty, as carers with underlying entitlement are more likely to be older, disabled and caring for some of the longest hours. This option would require the creation of completely new systems, and could have large costs due to the number of carers with underlying entitlement. It would be simple to communicate, and as a completely new benefit would sit outside the current system and therefore be straightforward in respect of interactions with DWP benefits. However, any increase in the number of people receiving disability assistance could result in a marked increase in eligibility for this payment. The impact of this option on take-up is unclear.</p>

Option	Rank	Summary of analysis from MCA process
<b>Group 2 – Next steps for development to be considered</b>		
<p><b>Remove the earnings threshold and introduce an hours per week threshold.</b> This would allow carers to take on higher paying employment while still working part time.</p>	10	<p>This option ranked well in alignment with public services as it was considered this would fit well with fair work commitments. It would allow for career progression and higher wage work, and reduce some of the stress associated with the current earnings restrictions. However, it would be complex to communicate, apply for, build and operate. It would require an altogether new system to monitor hours, and checks with carers on working hours which could result in a high fraud and error risk. It could lead to large increases in the numbers who are eligible, and there is uncertainty around the numbers affected, meaning challenging negotiations with DWP and potentially large spillover costs.</p>
<p><b>Introduce a Carer Recognition Payment for all carers caring for at least 20 hours per week.</b> Carer's Allowance can only be paid to those caring 35+ hours for someone on a disability benefit. It has been raised that this is a small proportion of carers (around 83,000 from 690,000).</p>	11	<p>This option is expected to have limited impact on equality and poverty as it is not targeted, although it would enable a better understanding of the group caring for 20 to 35 hours. It would not be expected to have significant impacts on employment prospects and scores low on alignment with wider services. It would be a significant extension of eligibility, and could lead to large volumes of applications, and high costs, with large policy risks due to uncertainty around numbers eligible. Although it ranked well in respect of interactions with reserved benefits (because it would effectively sit outside the current benefits system), it would be difficult to design and vulnerable to fraud because of the challenges in verifying hours spent caring. It is unclear what impact there would be on SCA take-up, and what take-up of the new payment would be. As a payment to provide recognition to a wider range of carers, it ranked well on the dignity and respect criteria set.</p>
<p><b>Continue to pay Carer's Allowance to carers in receipt of State Pension</b> (currently as Carer's Allowance and State Pension are 'overlapping benefits' carers can't receive both).</p>	12	<p>Rankings are mixed across criteria sets – this would be a substantial extension to eligibility, though not too complex to communicate as carers would already have underlying entitlement. However it would be a significant shift from the income replacement purpose of the benefit, and could disadvantage working age carers, if pension age carers can receive SCA and Pension income. It would provide recognition and a substantial increase in support for older carers, who may care for longer hours and are more likely to be disabled, but it is not targeted at the lowest income carers as the 65+ group are less likely to be in poverty. It ranks high for take-up as carers with underlying entitlement are already recorded on systems. There may be some behavioural impacts, but those with underlying entitlement will already receive passported DWP support, and it is not expected to significantly increase fraud and error. It would, however, require new systems to be built and administered and costs would be very significant.</p>

Option	Rank	Summary of analysis from MCA process
<p><b>Reduce the 35 hours a week caring requirement to 20 hours a week.</b></p>	13	<p>Ranks low across criteria sets with the exception of employability criteria – as it could support those caring fewer hours and help them to work. While it wouldn't add complexity to applications, reduced hours may be difficult to communicate, and could be viewed negatively by existing recipients who are often caring significantly more than 35 hours a week, and receiving no additional support. It is unlikely to be targeted at those in most need or with most intensive caring roles. As those caring 20 hours rather than 35 may be more able to combine caring with work or education it makes other eligibility criteria more problematic, and it may have less impact on take up as a result. As a significant expansion of eligibility, it would be particularly challenging to negotiate continued passporting with DWP and it is unclear how checks on eligibility would work to prevent fraud and error. It could generate a large number of applications, would have high costs and could have significant impacts on wider delivery, with numbers being very uncertain.</p>
<p><b>Allow more than one person to claim Carer's Allowance for the same cared for person where they meet all of the other eligibility criteria.</b> Currently if more than one person provides care for the same disabled person, only one of them can get Carer's Allowance.</p>	14	<p>Ranked low across all criteria, except for take up, as existing recipients could encourage those they share care with to apply. It would add complexity to applications and operations as having two carers for the same person is likely to require additional checks on the caring situation, a significant shift in how the benefit currently works. It is anticipated it would largely benefit parent carers in couples, but excludes people providing long hours of care by themselves, such as lone parents. While more carers could receive support, they would face earnings restrictions so impacts on carer income and employability could be mixed. Numbers impacted are uncertain and it would be particularly challenging to negotiate continued passporting with DWP. It would require significant design changes, with behavioural risks high as the number of people who could apply for support could double in some cases.</p>
<p><b>Replace the requirement that a cared for person is in receipt of a qualifying benefit with verification from an approved third party that the carer is providing 35 hours or more of care a week to a cared for person.</b> This would allow those caring for someone not on a disability benefit to get support.</p>	15	<p>Ranks low across all criteria, except for internal exposure, as it would break the link between disability benefits and SCA, meaning it wouldn't be affected by changes to disability assistance. It would be a significant shift from the current benefit and require an alternative verification of the caring role. This would need new systems and is expected to add significant complexity and operational challenges. It also raises questions around the need for care when a cared for person doesn't need disability assistance. More carers would receive support but could be those with less intensive caring roles, and it may be less likely to increase take-up if they are less in need of support. It creates significant challenges for interactions with DWP benefits, and alternative verification of care presents significant fraud risks. It has the highest potential costs, with substantial uncertainty around numbers who could be eligible. It is not expected to improve work prospects as carers would still need to provide 35 hours of care.</p>