



The Health and Social Care Alliance Scotland (the ALLIANCE)



**Make Work Pay: Consultation on
employment rights for unpaid carers
and parents of seriously ill children**

ALLIANCE response

Introduction

The Health and Social Care Alliance Scotland (the ALLIANCE) welcomes the opportunity to respond to the UK Government's consultation on employment rights for unpaid carers and parents of seriously ill children.¹ Unpaid carers, alongside disabled people and people living with long term conditions, are one of the primary groups that the ALLIANCE seeks to advocate on behalf of.

Unpaid carers make an enormous contribution to individual health and wellbeing, to wider society, and to the economy. They are invaluable and irreplaceable, yet they are not always appropriately valued through our social security and employment systems. This consultation offers positive suggestions for how to improve unpaid carers' experiences of employment, and the ALLIANCE warmly welcome all the proposals put forward: unpaid carer's leave, the right to return, paid carer's leave, and paid leave for the parents of seriously ill children.

We especially strongly support the proposal to introduce paid carer's leave. Given that poverty rates amongst unpaid carers are much higher than amongst the general population, offering paid carer's leave has the greatest potential to support carers to remain in and enter employment, whilst improving their personal finances.

However, it is important that the interplay between employment and social security payments for carers (known as the Carer Support Payment in Scotland) is recognised. The current "cliff-edge", which creates a band of income between approximately £10,000 and £14,000 where carers are made worse off by taking on additional work as they lose entitlement to that payment and its England and Wales equivalent, should be replaced with a taper. This would further help to support carers to remain in and enter employment, as well as make better use of their skills and qualifications by taking on better paid work.



Question 5: How easy is it for employers to access information on how to support carers in the workplace?

Neither difficult nor easy.

Question 6: In your view, are there any factors that prevent employers from accessing information on how to support carers in the workplace?

Several factors can create barriers for employers. Organisational size and capacity are significant considerations, as smaller employers may have limited resources to access, understand and implement appropriate support.

Although there is a substantial amount of general information available, it does not always address specific situations or provide practical solutions. Employers may also require specialist legal advice in some cases, which can be costly.

In addition, some individuals do not recognise themselves as carers, while others may be reluctant to disclose their caring responsibilities. This can make it more difficult for employers to identify support needs and access information that is directly relevant to unpaid carers in the workplace.

Question 7: What, if any, additional guidance or information would help employers support carers?

It would be helpful to provide practical examples and case studies that illustrate different caring situations and the potential support employers could offer. Similar guidance already exists in relation to reasonable adjustments for disabled people and people with long-term health conditions. A comparable approach for carers could help employers understand what support may be appropriate, achievable and legally compliant. If such guidance already exists, it needs to be more visible.



Many organisations are understandably risk-averse, so clear guidance, worked examples and good practice scenarios could increase confidence and encourage more effective support for carers.

Question 8: How easy is it for employees to access information on their rights that support their caring responsibilities in the workplace?

Don't Know.

Question 10: What, if any, additional guidance or information would help carers understand and use their rights in the workplace?

We would emphasise the importance of making sure that information is provided in a range of inclusive formats. This includes large print, braille, British Sign Language (BSL), and community languages. By making sure this range of formats is easily accessible, unpaid carers with a diversity of characteristics and backgrounds will find it easier to access information about their rights.

Question 11: Would specific guidance on support for carers in particularly challenging situations help employers and carers in the workplace (e.g. – parents of seriously ill children, those providing end-of-life care)?

Yes.

Question 12: If yes, what challenging situations should this guidance cover?

Guidance should cover situations such as end-of-life care, caring for a seriously ill child, sudden deterioration in a person's condition, and crisis situations that require significant time away from work.

It would also be beneficial for guidance to explain the financial support available to both employers and carers, including whether employers can access funding to support unpaid carers who require extended leave allowing them to pay the carer, and whether carers can access financial assistance directly.



Guidance should include details of specialist organisations and support services to which employers can signpost carers. These resources should be able to provide practical advice, emotional support, peer networks, and assistance in maintaining good mental health and wellbeing. The guidance should also outline the role employers can play in supporting carers, including practical workplace adjustments, fostering an inclusive culture and helping carers access appropriate support at the right time.

Question 13: How aware are you of the employment rights currently available to unpaid carers?

Somewhat Aware.

Question 14: From your perspective, how effective are existing employment rights at helping unpaid carers balance work and care?

Don't Know.

Question 15: In what circumstances should unpaid carers be able to take carer's leave entitlements?

- To provide personal and emotional support
- To provide practical support (for example cleaning, gardening, paying bills)
- To help with official or financial matters
- To provide personal and/or medical care (for example washing, dressing, administering medicine)
- To make arrangements for the provision of care
- To accompany people to appointments
- To allow the carer to rest and recuperate, take up carer support, and/or maintain their health and wellbeing

Question 16: From your perspective, who should a carer be able to take carer's leave entitlements to support?

- A spouse or civil partner
- A child
- A parent



- Any person who lives in the same household as the employee (otherwise than by reason of being their employee, tenant, lodger, or boarder)
- Any person who reasonably relies on the employee for care, regardless of familial relationship or cohabitation

Question 17: Would extending the existing unpaid carer's leave entitlement be helpful for carers balancing work and care?

Very Helpful.

Question 18: If the current entitlement of up to 5 days unpaid leave was to be extending, how many days of unpaid leave a year would be appropriate?

10 days.

Question 19: In your view, what would be the impact of extending unpaid carer's leave on employees with caring responsibilities?

Maximising the flexibility for unpaid carers to take leave is likely to have positive impacts, giving unpaid carers greater flexibility to combine employment with their caring responsibilities. Even where an individual does not need to use their entitlement to unpaid leave, the knowledge that it is available to them may help to reduce the stress and worry about entering or remaining in employment. It may be similarly reassuring to the person they are caring for to know that their carer will have greater capacity to support them when necessary, for example for hospital appointments, periods of ill health, and emergencies.

However, we recognise that not all unpaid carers will be able to afford to take unpaid leave. Research by Carers Scotland in 2024 found that 28% of unpaid carers in Scotland were living in poverty, with one in 12 in deep poverty.² This represents a rate 56% higher than those who do not provide unpaid care. Whilst in ideal cases employment has the potential to lift people out of poverty, reliance on unpaid care leave may limit this potential. As such, we agree with Carers UK that paid leave should be a priority, whilst enhancing the unpaid leave offering to provide additional flexibility.³



Question 20: In your view, what would be the impact of extending unpaid carer's leave on employers?

The impact would depend largely on the nature and duration of the caring responsibilities.

For example, where a carer requires occasional time off, such as accompanying someone to monthly hospital appointments, the impact on most employers would likely be minimal. However, where extended leave is needed, such as during end-of-life care, the impact could be more significant, particularly for smaller organisations with limited staffing and financial resources. Such employers may struggle to secure temporary cover or absorb the additional workload.

Medium-sized organisations may be better positioned to reprioritise work and redistribute responsibilities, while larger organisations are generally more likely to have staff with the skills and capacity to provide cover.

Ideally, any extension to carer's leave would be accompanied by government financial support for both employers and employees in situations involving prolonged caring responsibilities. This would allow organisations to pay for higher temporary staff rates, and carers should be paid. It would be unfair to penalise someone for caring.

Question 21: Would a longer period away from work with a “right to return” be helpful in supporting carers to balance work and care?

Very Helpful.

Question 22: If a “right to return” were to be introduced, who should be eligible?

All unpaid carers.

Question 23: If a “right to return” were to be introduced, what form of evidence should employees have to provide to prove their eligibility?

Self-certification (e.g. – written statement from employee).



Question 24: How long would be appropriate for an extended period of leave with a “right to return”?

10-12 months.

Question 25: In your view, what would be the impact of having access to a “right to return” on employees with caring responsibilities?

We believe that a right to return would have positive impacts, giving unpaid carers greater flexibility to combine employment with their caring responsibilities. For many people receiving unpaid care, it is not possible to predict when circumstances that would require their carer to take time off may arise, nor how long they will last. What begins as a short illness could become a long-term health emergency which, through a combination of stress and increased demand on their carer’s time, may mean that carer is unable to work for an extended period.

Similarly to our earlier response to Question 19, even where an individual does not need to use their entitlement to a right to return, the knowledge that it is available to them, and that their job is secure, may help to reduce the stress and worry about entering or remaining in employment. It may be similarly reassuring to the person they are caring for to know that their carer will have greater capacity to support them when necessary.

We agree with Carers UK that this entitlement should be flexible. An employee with caring responsibilities may need substantial periods of leave at different points throughout a year, sometimes for reasons that can be foreseen such as a series of planned operations that will necessitate heightened support for a few weeks, but in between which the carer could return to work.

Question 26: In your view, what would be the impact of a “right to return” for unpaid carers on employers?

Assuming this provision is intended primarily for carers who need to take an extended period away from work, for example to provide end-of-life care, the impact on employers is likely to be manageable.



Provided there are reasonable limits on the duration of leave, the impact would be comparable to existing arrangements such as maternity leave or shared parental leave. A right to return would provide carers with greater security and peace of mind, allowing them to focus on their caring responsibilities without the additional stress of uncertainty about their employment, which could benefit employers through improved performance and job satisfaction.

Question 27: Would the introduction of a statutory paid carer's leave entitlement be helpful in supporting carers to balance work and care?

Very helpful.

Question 28: If paid carer's leave was introduced, what evidence should employees have to provide to prove their eligibility for it?

Self-certification (e.g. – written statement from employee).

Question 29: How long would be appropriate and reasonable for a potential paid leave entitlement? (per year, pro-rata depending on working hours)

Over 5 days.

Question 30: If paid carer's leave was introduced, what baseline level of remuneration would be appropriate for those taking it?

Equivalent to Statutory Parental Pay - £194.32/week

Question 31: From your perspective, what would be the impact of introducing paid carer's leave on employees with caring responsibilities?

We believe the introduction of paid carer's leave would have a highly positive impact on unpaid carers, giving them greater flexibility to combine employment with their caring responsibilities. Similar to our responses to Questions 19 and 25, even where an individual does not need to use their entitlement to paid leave, the knowledge that it is available to them may help to reduce the stress and worry about entering or remaining in employment. It may be similarly reassuring to the person they are caring for



to know that their carer will have greater capacity to support them when necessary, for example for hospital appointments, periods of ill health, and emergencies.

In addition, as noted earlier, unpaid carers are more likely to experience poverty, including deep poverty, than the general population. Poverty has severely negative impacts on both carers and the people they care for, including on their physical and mental health. Carers who may be unwilling to take unpaid leave due to the impact on their finances are likely to be much more willing to take paid leave. The availability of paid leave therefore has the potential to reduce poverty and to support carers to remain in and enter work.

Question 32: From your perspective, what would be the impact of introducing paid carer's leave on employers?

The impact would depend on the duration of leave, the level of pay provided, and how it is funded.

For short periods of leave, such as attending appointments or managing occasional caring responsibilities, the impact on employers would likely be limited. However, longer periods of paid leave could present challenges, particularly for smaller organisations or those operating within tight financial constraints.

The extent of the impact would also depend on whether financial support is provided by government. If employers were required to fund extended periods of paid leave without assistance, this could place a significant financial burden on some organisations e.g. if they had to pay the carer and for an additional employee to cover their role.

Consideration would also need to be given to consistency and fairness across different types of family related leave e.g. if carers were able to take extended periods of leave on full pay, this could create questions about parity with other forms of leave, such as maternity leave, where employees may not receive equivalent levels of pay despite also undertaking



substantial caring responsibilities. A balanced approach would therefore be important.

Regardless, carers should receive financial support during extended periods of leave. They provide a significant social benefit by undertaking responsibilities that might otherwise fall to health and social care services. It is unfair that they should face financial hardship while also coping with the emotional and practical challenges associated with caring.

Question 33: In your view, what should the main government focus be for any immediate action following the review?

Helping employees to balance work alongside caring responsibilities.

Question 34: In your view, which, if any, of the approaches discussed in Chapters 1 and 2 would best address this focus and why?

We believe that introducing paid carer's leave would have the greatest potential to help employees balance work with caring responsibilities. As stated earlier, this has the potential to help reduce poverty amongst unpaid carers, which would also have positive knock-on effects on the health and wellbeing of carers and those receiving care. Unpaid carers who are less worried about their finances, are happier and healthier, and who feel supported by their employer, are more likely to remain in employment.

Question 35: From your perspective, which potential approach might best help employers and carers balance work and care?

We also believe that paid carer's leave would best help employers to balance employee's caring and work responsibilities. Unpaid carers who feel supported by their employer and who are happier and healthier are likely to perform better in the workplace, benefitting their employer.

As noted earlier however, it is important that government support is made available for employers to fund paid carer support. For smaller employers, for example many third sector employers, a statutory duty to provide paid carer's leave would be unaffordable if not backed up by government funding.



Question 36: How aware are you of the support currently available to parents of seriously ill children?

Not aware at all.

Question 37: Would the introduction of a paid leave entitlement for parents of seriously ill children help parents in this situation?

Very helpful.

Question 38: If paid leave for parents of seriously ill children was introduced, how should we define “serious illness”?

Serious illness should be flexibly defined, ensuring that parents or those with a caring responsibility for children are able to access paid leave in the widest possible range of circumstances. This should include terminal and life-shortening conditions, conditions and diseases that otherwise require significant medical interventions and appointments over a prolonged period, and serious physical injuries.

This list is not exhaustive and broadly speaking any health emergency facing a child that would require their parents or those responsible for their care to take additional time to support their treatment or recovery should qualify.

Question 39: If paid leave for parents of seriously ill children was introduced, who should be eligible to use this entitlement?

Although this consultation uses the term “parents”, it is important that legislation is not limited to parents, either biological or adoptive. There are many other people who may for various reasons bear primary responsibility for caring for a child, including but not limited to grandparents, aunts and uncles, siblings, and foster carers.

Regardless of precise relationship, the child they are caring for taking seriously ill will be an incredibly difficult and distressing period for them, requiring time off both to support the child and to help manage their own stress. Any such person acting in a parental capacity for a seriously ill child should therefore be eligible for paid leave.



Entitlement should also be set in a way that does not disadvantage single parents, or responsible adults, over other family arrangements. For example, if entitlement was set at 10 days, this should be available flexibly, allowing a single parent or responsible adult to take the whole 10 days, or allowing a couple to divide it between themselves as best fits their needs.

Question 40: If paid leave for parents of seriously ill children was introduced, what form of evidence should employees have to provide to prove their eligibility?

Self-certification (e.g. – written statement from employee).

Question 41: If it were introduced, how long would be appropriate and reasonable for a one-off paid leave entitlement per child?

More than 12 weeks.

Question 42: If paid leave for parents of seriously ill children was introduced, what should be the baseline level of remuneration for those taking it?

Equivalent to Statutory Parental Pay - £194.32/week.

Question 43: Which of the following approaches to support parents of seriously ill children would be most helpful to parents, their families and employers?

A shorter, paid period of time away from work to provide financial support in the immediate aftermath.

Question 44: From your perspective, what would be the impact of introducing paid leave for parents of seriously ill children on parents in this situation?

Similar to our response to several earlier questions, we believe paid leave for parents of seriously ill children will have positive effects in giving unpaid carers greater flexibility to combine employment with their caring responsibilities. Even where an individual does not need to use their entitlement to paid leave, the knowledge that it is available to them may help to reduce the stress and worry about entering or remaining in



employment. It may be similarly reassuring for the child they are caring for to know they can rely on their parent, or other carer, to support them through their illness.

Question 45: From your perspective, what would be the impact of introducing paid leave for parents of seriously ill children on employers?

Parents of seriously ill children who feel supported by their employer and who are happier and healthier are likely to perform better in the workplace, benefitting their employer.

As noted earlier however, it is important that government support is made available for employers to fund paid carer support. Especially for smaller employers, for example many third sector employers, a statutory duty to provide paid carer's leave would be unaffordable if not backed up by government funding.

Question 46: Is there any other information that you think would be valuable to share on employment rights for unpaid carers, including parents of seriously ill children?

Although this consultation does not relate directly to the social security system, it is important to understand the intersection between employment and Carer Support Payment (in Scotland) or Carer's Allowance (England and Wales) – for simplicity, we will refer to these collectively in this section as “Carer's Payments”. The ALLIANCE have previously noted the problems posed by the “cliff-edge”, where unpaid carers entirely lose entitlement to their Carer's Payments after reaching a certain earnings limit. This has the effect of creating a band of income where carers will lose money by taking on additional hours or higher pay.

In a response to last year's consultation on the Pathways to Work Green Paper we noted that at that time, there was a band between approximately £10,200 (the earnings limit) and £14,500 (incorporating the roughly £4,300 Carer's Payment in Scotland) where it would to their detriment for a carer to have additional earnings from work.⁴ This cliff-edge both disincentivises



carers from taking up more hours or higher paid jobs that they would like and have the capacity to do, whilst also contributing to higher poverty rates.

Whilst we would welcome the implementation of all the measures proposed in this consultation, their impact will be greater if the cliff-edge for Carer's Payments is removed. In our previous response, we called for the cliff-edge to be replaced by a taper, which would gradually reduce the amount of Carer's Payment someone was entitled to as their earnings increased beyond the threshold. This would help more unpaid carers to enter and remain in employment, without fear of being left worse off by doing so.

Although Carer's Payments are devolved to Scotland, the UK Government abolishing the cliff-edge for England and Wales would make it financially easier for the Scottish Government to follow suit through block grant adjustments. When doing so, the UK and Scottish Governments should work together closely to ensure that the removal of the cliff-edge is coordinated, so that no carers across Scotland, England or Wales lose out relative to their counterparts in another nation, even for a short period.

About the ALLIANCE

The Health and Social Care Alliance Scotland (the ALLIANCE) is the national third sector membership organisation for the health and social care sector. We bring together over 3,500 people and organisations dedicated to achieving our vision of a Scotland where everyone has a strong voice and enjoys the right to live well, with dignity and respect. Our members are essential in creating a society in which we all can thrive, and we believe that by working together, our voice is stronger.

We work to improve the wellbeing of people and communities across Scotland by supporting change in health, social care and other public services so they better meet the needs of everyone in Scotland. We do this by bringing together the expertise of people with lived experience, the third sector, and organisations across health and social care to shape better services and support positive change.

The ALLIANCE has three core aims.



We seek to:

- **Empower people with lived experience:** we ensure disabled people, people with long term conditions, and unpaid carers are heard and that their needs remain at the heart of the services and communities.
- **Support positive change:** we work within communities to promote co-production, self management, human rights, and independent living.
- **Champion the third sector:** we work with, support and encourage co-operation between the third sector and health and social care organisations.

The ALLIANCE is committed to upholding human rights. We embed lived experience in our work and aim to ensure people are meaningfully involved at every level of decision-making.

Working together creates positive, long-lasting impact. We work in partnership with the Scottish Government, NHS Boards, universities, and other key organisations within health, social care, housing, and digital technology to manage funding and develop successful projects. Together, our voice is stronger, and we can create meaningful change.

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¹ UK Government, 'Make Work Pay: employment rights for unpaid carers and parents of seriously ill children' (June 2026), available at:

<https://www.gov.uk/government/consultations/make-work-pay-employment-rights-for-unpaid-carers-and-parents-of-seriously-ill-children>

² Carers Scotland, '28% unpaid carers across Scotland are living in poverty, with 1 in 12 in deep poverty' (September 2024), available at: <https://www.carersuk.org/press-releases/28-unpaid-carers-across-scotland-are-living-in-poverty-with-1-in-12-in-deep-poverty/>

³ Carers UK, 'A Right to Paid Carer's Leave', available at:

<https://www.carersuk.org/news-and-campaigns/our-campaigns/a-right-to-carers-leave/>

⁴ The ALLIANCE, 'Pathways to Work: Reforming Benefits and Support to Get Britain Working Green Paper, ALLIANCE Response' (June 2025), available at:

<https://www.alliance-scotland.org.uk/wp-content/uploads/2025/06/Pathways-to-Work-Green-Paper-ALLIANCE-Response.pdf>

