



Consortium for the Regional Support for Women in Disadvantaged and Rural Areas

Response to: Carer's Leave

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Women's Regional Consortium: Working to Support Women in Rural Communities and Disadvantaged Urban Areas

1. Introduction

1.1 This response has been undertaken collaboratively by the members of the Consortium for the Regional Support for Women in Disadvantaged and Rural Areas (hereafter, either the Women's Regional Consortium or simply the Consortium), which is funded by the Department for Communities and the Department of Agriculture, Environment and Rural Affairs.

1.2 The Women's Regional Consortium consists of seven established women's sector organisations that are committed to working in partnership with each other, government, statutory organisations and women's organisations, centres and groups in disadvantaged and rural areas, to ensure that organisations working for women are given the best possible support in the work they do in tackling disadvantage and social exclusion.¹ The seven groups are as follows:

- ♀ Training for Women Network (TWN) – Project lead
- ♀ Women's Resource and Development Agency (WRDA)
- ♀ Women's Support Network (WSN)
- ♀ Northern Ireland's Rural Women's Network (NIRWN)
- ♀ Women's TEC
- ♀ Women's Centre Derry
- ♀ Foyle Women's Information Network (FWIN)

1.3 The Consortium is the established link and strategic partner between government and statutory agencies and women in disadvantaged and rural areas, including all groups, centres and organisations delivering essential frontline services, advice and support. The Consortium ensures that there is a continuous two-way flow of information between government and the sector. It also ensures that

¹ Sections 1.2-1.3 represent the official description of the Consortium's work, as agreed and authored by its seven partner organisation

organisations/centres and groups are made aware of consultations, government planning and policy implementation. In turn, the Consortium ascertains the views, needs and aspirations of women in disadvantaged and rural areas and takes these views forward to influence policy development and future government planning, which ultimately results in the empowerment of local women in disadvantaged and rurally isolated communities.

1.4 Employment law was devolved to the Northern Ireland Assembly in 1998. Over the years most of the employment legislation passed by Westminster has also been enacted in Northern Ireland. While the proposals made in this consultation apply to Great Britain only (England, Wales and Scotland), Northern Ireland normally mirrors the legislative changes made in Great Britain therefore we feel it is important to respond to these proposals. We do not wish to see carers in Northern Ireland being denied access to any new rights.

1.5 The Women's Regional Consortium appreciates the opportunity to respond to the DBEIS Consultation on Carer's Leave given that, as the consultation acknowledges, it impacts disproportionately on women, who are the main providers of unpaid care. As the Family Resources Survey shows in all age groups, up to the age of 74, women were more likely to provide informal care than men² so this is clearly a gendered issue.

2. General comments

The most recent statistics from Carers UK have estimated that as of 2019 there could be as many as 8.8 million adult carers in the UK. Every day another 6,000 people take on a caring responsibility equalling over 2 million people each year. 58% of carers are women and 42% are men.³

² Family Resources Survey 2018/19, Department for Work and Pensions, March 2020
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/874507/family-resources-survey-2018-19.pdf

³ <https://www.carersuk.org/news-and-campaigns/press-releases/facts-and-figures#:~:text=58%25%20of%20carers%20are%20women%20and%2042%25%20are,as%208.8%20million%20adult%20carers%20in%20the%20UK.>

Carers UK have also highlighted that carers save the economy £132 billion per year, an average of £19,336 per carer. 1 in 7 of the workforce (around 5 million people) are juggling caring responsibilities with work. The significant demands of caring mean that 600 people give up work every day to care for an older or disabled relative.⁴

“Care doesn’t stop.”

- *Carer’s Interview*

Caring in Northern Ireland

In Northern Ireland there are 220,000 carers and it is estimated that by 2037 the number of carers could have increased to 400,000. These carers save the Northern Ireland economy over £4.6 billion a year which is more than the annual NHS spend in Northern Ireland. 15% of the Northern Ireland workforce are balancing work and care. Northern Ireland figures show that 64% of carers are women and 36% are men.⁵

“If you price what it costs for someone to go into care against what carers provide it would be very expensive. The Government are saving billions on this type of care. There really had to be a little given back to carers.”

- *Carer’s Interview*

There are a number of characteristics of the Northern Ireland economy which make addressing the issue of caring an important issue here. This includes the fact that caring is still very much seen to be “*women’s work*” and in more traditional, patriarchal societies like Northern Ireland it often falls to women to provide this care.

Northern Ireland has a large rural population. Over 80% of the Northern Ireland land mass is rural and more than one in three of the population (36%) live in rural areas.⁶

⁴ Ibid

⁵ <https://www.carersuk.org/northernireland/news-ni/facts-and-figures>

⁶ Key Rural Issues, Northern Ireland 2019, Department of Agriculture, Environment and Rural Affairs,

Research by the Northern Ireland Rural Women's Network (NIRWN) shows that rural women are under increasing pressure from the economic climate: *"Historic underfunding of rural women's activities and underinvestment in rural areas; centralisation of service support; lack of infrastructure, and the burden of caring responsibilities is leaving rural women experiencing more poverty and social isolation than ever before."*⁷

In addition Northern Ireland is a small business economy. Small businesses account for 99.9% of all businesses in Northern Ireland and employ more people than all the larger businesses and the entire public sector combined.⁸ It can be more difficult for small businesses to provide flexible working opportunities and to provide enhanced leave as they can experience more problems with disruption to their business. Flexible working including additional leave entitlements depends on genuinely supportive employers so that these policies go beyond words and are committed to in practice. These small businesses need to be better helped and supported by Government so that any increased rights to leave do not simply exist on paper and employees have realistic access to them.

"I show up to my job every week, on time and do my job. Yet I feel like I'm begging for leave in relation to my caring role, it's like I owe them a favour if I am off. That emotional side of it plays a part too."

- Carer's Interview

Caring and Women

The statistics outlined above, both nationally and locally, show that women are more likely than men to provide care. By the time they are aged 46, half of women have been a carer. Men have the same 50:50 chance by age 57 – eleven years later.⁹

<https://www.daera-ni.gov.uk/sites/default/files/publications/daera/Key%20Rural%20Issues.pdf>

⁷ Rural Women's Manifesto, NIRWN, September 2015

<https://www.nirwn.org/wp-content/uploads/2016/12/NIRWN-Rural-Womens-Manifesto.pdf>

⁸ <https://www.fsb.org.uk/standing-up-for-you/national-offices/northern-ireland>

⁹ Will I care? The likelihood of being a carer in adult life, CarersUK, November 2019

http://www.carersuk.org/images/News_campaigns/CarersRightsDay_Nov19_FINAL.pdf

The Women and Equalities Committee said in 2016 about the causes of the gender pay gap: *“a large part of the gender pay gap is down to women’s concentration in part-time work. Many women are trapped in low paid, part-time work that doesn’t make use of their skills. This is partly due to women’s disproportionate responsibility for unpaid caring, but also because many of the sectors women work in, like retail and care, offer predominantly low-paid, part-time work.”*¹⁰

These findings show that caring is a feature of many women’s lives and typically happens at a younger age for women than men. This means that women are more likely to find themselves in a caring role at an age when they would be expected to be in paid work. Women are more likely than men to be forced out of the labour market by caring responsibilities. Caring affects their participation in the workforce and ultimately reduces their earnings over their lifetime. This has clear implications for gender equality.

“We are classed as the silent sufferers. Government know we will do the job, they have never cared about us, we’re just left to do it. Because you love the person you care for you are going to do it anyway and they know that.”

- *Carer’s Interview*

Coronavirus Pandemic

The Coronavirus pandemic and subsequent lockdown has brought a sharp focus on the importance of caring. It has led to a surge in unpaid care work and women have taken the bulk of this burden. The pandemic has shown that care work, mostly carried out by women, is vitally important to the economy yet is massively undervalued and needs to be at the forefront of social and economic recovery plans.

New figures released by Carers UK for Carers Week 2020 show an estimated 4.5 million people in the UK have become unpaid carers as a result of the Coronavirus

¹⁰ Gender Pay Gap, Second Report of Session 2015-16, House of Commons Women and Equalities Committee (HC 584), March 2016

<https://publications.parliament.uk/pa/cm201516/cmselect/cmwomeq/584/584.pdf>

pandemic.¹¹ This adds to the 9.1 million unpaid carers already providing care before the outbreak, bringing the total to 13.6 million. There are 2.8 million extra workers juggling work and unpaid care since the start of outbreak. These figures show that of all unpaid carers, 58% are women and 42% are men.

A survey by Carers UK in April 2020¹² showed that 70% of unpaid carers in the UK are having to provide more care for their loved ones during the Coronavirus outbreak. On average carers are picking up an additional 10 hours of unpaid care per week, helping their loved ones with personal care, practical tasks and emotional support. A third (35%) of them are providing more care because their local care and support services have been reduced or closed. This has particular impacts for many women who may find themselves unable to return to work if special schools, day centres and other support services are not in place.

Specific to Northern Ireland Carers UK research¹³ found that:

- 15% of respondents said they were already providing care before the COVID-19 outbreak (212,000 people) and a further 7% stated that they have started caring since the outbreak (98,000 people). Using population projections, it can be estimated that there are as many as 312,000 unpaid carers in Northern Ireland;
- 59% of respondents stated that unpaid caring responsibilities was having a detrimental impact on their ability to do paid work;
- 54% identified the financial impact of additional care costs as a key concern;
- 49% expressed high concern over not having anyone to talk to about the challenges of caring;
- 54% of respondents in Northern Ireland stated that they are now more aware of the role of unpaid carers than before and 74% thought that carers were not well valued or valued at all;

¹¹ Carers Week 2020 Research Report: The rise in the number of unpaid carers during the coronavirus (COVID-19) outbreak, Carers UK, June 2020

https://www.carersuk.org/images/CarersWeek2020/CW_2020_Research_Report_WEB.pdf

¹² Caring behind closed doors, Forgotten families in the coronavirus outbreak, Carers UK, April 2020
https://www.carersuk.org/images/News_and_campaigns/Behind_Closed_Doors_2020/Caring_behind_closed_doors_April20_pages_web_final.pdf

¹³ Carers Week 2020 Research Report: The rise in the number of unpaid carers during the coronavirus (COVID-19) outbreak, Carers UK, June 2020
https://www.carersuk.org/images/CarersWeek2020/CW_2020_Research_Report_WEB.pdf

- 72% of respondents in Northern Ireland do not believe that unpaid carers have been supported by the Government during the COVID-19 pandemic;
- 74% of the public in Northern Ireland believed that the government should increase support; for example, through increased financial support, investment in care and support services so unpaid carers can take a break and through further investment in social services.

The pandemic has compounded the challenges for carers with many having to spend more money on household bills and necessities during the outbreak.

Research carried out by Carers UK in April 2020¹⁴ showed that 81% of carers had to spend more money on necessities such as food and household bills.

Statistics also show that carers are twice as likely to have relied on a foodbank due to the pandemic. They show that over 106,000 carers in the UK said that their household had used a foodbank in the last month. The figure for foodbank use by female carers was twice as high as that for male carers.¹⁵

Carer's Allowance

Carer's Allowance, the main benefit for people caring unpaid for family or friends, remains the lowest benefit of its kind at just £67.25 per week (2020/21 rates). Part of the eligibility for Carer's Allowance is an earnings limit of just £128 a week. These low values in terms of payment and earnings means that many carers struggle to make ends meet. Many organisations including Carers UK¹⁶ have been calling for some time for the value of Carer's Allowance to be raised and for the earnings limit for claiming Carer's Allowance to be raised to ensure those juggling work and care on low pay also receive support.

¹⁴ Caring behind closed doors, Forgotten families in the coronavirus outbreak, Carers UK, April 2020 https://www.carersuk.org/images/News_and_campaigns/Behind_Closed_Doors_2020/Caring_behind_closed_doors_April20_pages_web_final.pdf

¹⁵ CARING and COVID-19, Hunger and mental wellbeing, University of Sheffield, University of Birmingham, Carers UK, Economic and Social Research Council, June 2020 https://www.carersuk.org/images/publications/Caring_and_COVID-19_Hunger_and_mental_wellbeing.pdf

¹⁶ <https://www.carersuk.org/news-and-campaigns/campaigns/fairer-for-carers>

Providing care has the potential to result in a reduction in income as many carers will be forced to reduce their working hours and face extra costs associated with caring. Previous research from 2016¹⁷ shows that overall 1.2 million informal carers were in poverty. The Coronavirus pandemic has exacerbated the financial struggles that many unpaid carers face. Many have experienced increased costs because of the crisis combined with living on a limited income to meet these costs.

Carers UK and many other organisations representing unpaid carers have joined together to call on the Work and Pensions Secretary to recognise the financial impact that Coronavirus has had on carers. An open letter¹⁸ sent to the Work and Pensions Secretary, Rt Hon Therese Coffey MP and Chancellor, Rt Hon Rishi Sunak MP, calls for better financial support for unpaid carers who have faced rising costs during the pandemic.

Locally the Women's Policy Group (WPG) in Northern Ireland¹⁹ (the Women's Regional Consortium are represented on this Group) have called for an end to carer's financial hardship.²⁰ The WPG have called for financial support for carers to be urgently improved as this would particularly benefit women who are more likely to be caring and providing higher levels of care. The WPG are calling on the UK Government and Northern Ireland Assembly to immediately increase the level of Carer's Allowance and also to provide a one-off Coronavirus supplement of £20 a week to those entitled to Carer's Allowance to match the rise in Universal Credit.

Personal Impact of Caring

Caring can be difficult and can put stress on a carer's health and wellbeing. Carers Week research from 2018²¹ found that 6 out of 10 people (61%) said their physical

¹⁷ Informal carers & poverty in the UK, New Policy Institute, May 2016

https://www.npi.org.uk/files/2114/6411/1359/Carers_and_poverty_in_the_UK_-_full_report.pdf

¹⁸

https://www.carersuk.org/images/FairerforCarers/Open_letter_re_level_of_Carers_Allowance_to_Work_and_Pensions_Secretary_-_vFINAL.pdf

¹⁹ The Women's Policy Group Northern Ireland is made up of women from trade unions, grassroots women's organisations, women's networks, feminist campaigning organisations, LGBT+ organisations, support service providers, human rights and equality organisations and individuals

²⁰ COVID-19 Feminist Recovery Plan, Women's Policy Group Northern Ireland, July 2020

<https://wrda.net/wp-content/uploads/2020/07/WPG-NI-Feminist-Recovery-Plan-2020.pdf>

²¹ Supporting Carers to be Healthy and Connected, Research Summary for Carers Week 2018, Carers UK, June 2018

https://www.carersweek.org/images/Resources/CW18_Research_Report.pdf

health has worsened as a result of caring, while 7 out of 10 (72%) said they have experienced mental ill health. Carers providing 50 hours or more of care per week are more than twice as likely to be in bad health than non-carers.

Carers can experience loneliness and isolation particularly if they are providing substantial amounts of care. Research by Carers UK showed that 8 in 10 (81%) of all carers reported having ever felt lonely or isolated as a result of their caring role with carers being seven times more likely to say they are always or often lonely compared with the general population.²²

The case of Barbara MacArthur, a 93-year old sole carer for her disabled son has recently received a huge reaction on social media following her letter to The Guardian.²³ Barbara described her life as a carer for her son as “*continuous years of strain*” and that she felt that “*more cutbacks mean that there is even less help available than ever.*” She also described that in her 60s and 70s she was “*caring for elderly relatives for 16 or 17 years who otherwise could have cost the state quite a lot as they had no money, but they dreaded the thought of going into care so gave up their council flat to live with us. It was hard, unpaid work as I was ineligible for Carer’s Allowance.*”

Caring and Work

Recent research by Carers UK found that the number of those juggling work and care could be far higher than previously thought – around 4.87 million (compared with 3 million in the Census 2011). This is one in seven of all workers.²⁴

Juggling caring with working responsibilities can be a struggle for many carers and in some cases can lead to carers having to reduce their working hours or even give up work as they are unable to balance the two. Statistics from Carers UK²⁵ show that 38% of all carers reported that they had given up work to care and 18% had reduced their working hours. 1 in 6 carers (17%) said that they work the same hours but their job is negatively affected by caring, for example, because of tiredness, lateness, and

²² State of Caring, A snapshot of unpaid care in the UK, Carers UK, July 2019
http://www.carersuk.org/images/News_campaigns/CUK_State_of_Caring_2019_Report.pdf

²³ <https://www.theguardian.com/society/2020/jul/29/at-93-i-am-still-my-sons-sole-carer>

²⁴ Ibid

²⁵ Ibid

stress. 12% of carers said that they have had to take a less qualified job or have turned down a promotion to fit around their caring responsibilities. Just over 1 in 10 carers (11%) said that they had retired early to care. It is important to note that this research shows that only 4% of respondents of all ages said that caring has had no impact on their capacity to work.

Knowledge of rights to additional leave is also an important issue for employees. Lack of knowledge of rights and entitlements in employment is a significant issue in accessing the help that is available across the full range of employment rights. This means that some people can miss out on the rights they are entitled to. It is therefore vital that the provision of advice and information around any new policy on carer's leave is carefully considered by Government and should form a consideration of this consultation. Information and guidance, available in ways that people can easily understand, must be available for both employees and employers on any new leave provisions.

Conclusion

It is clear from the research and statistics outlined above that much more needs to be done to support and improve the lives of the many hundreds of thousands of unpaid carers in our society. Given the disproportionate levels of unpaid caring responsibilities taken on by women and the negative impacts this can have on women's participation in paid work and earnings over their lifetimes this is a gendered issue which must be addressed in order to prevent further embedding of gender inequality.

Figures show that in total 26% of all workers are juggling work and unpaid care - one in four workers.²⁶ This illustrates the importance of providing a supportive working environment to these carers. If there is insufficient investment in carers and support for those providing unpaid care then there is a risk they will be lost to the workforce and the economy as a whole.

²⁶ Carers Week 2020 Research Report: The rise in the number of unpaid carers during the coronavirus (COVID-19) outbreak, Carers UK, June 2020
https://www.carersuk.org/images/CarersWeek2020/CW_2020_Research_Report_WEB.pdf

The Coronavirus pandemic has shone a light on the importance of this work and it is vital that coming out of the pandemic that measures to support and enhance the lives of carers should be part of the Government's social and economic recovery plans. We therefore welcome these plans to introduce Carer's Leave as part of what must be an ongoing process to support and value carers and their contribution to society.

"It is just expected that we will continue to provide this care for nothing."

- *Carer's Interview*

The proposals outlined in this consultation are to introduce a new right which would allow qualifying employees to take a week of unpaid leave each year to provide care. It is clear that providing leave to carers to help them juggle work and care has benefits not only for the carer, the person they look after but for businesses in retaining skilled employees and also to support the health service and social care more broadly.

While we welcome any moves to provide additional support to carers we believe that in order for them to be truly effective some changes need to be made to the proposals outlined in this consultation. The most vital among these is to provide for any new entitlement to carer's leave to be paid. This would help to ensure uptake levels and provide a realistic choice for carers many of whom so desperately need additional help.

"This leave needs to be paid."

- *Carer's Interview*

There is ample evidence within other leave policies, such as paternity leave, to suggest that pay is an important factor in ensuring the take up of rights. Pay is a significant barrier to employees taking the time off they need to provide care in whatever form that may take. Many people, particularly those on the lowest

incomes, cannot afford to take unpaid leave as their finances are already under pressure. There is simply no point in having rights on paper that do not provide proper support for carers and therefore do not get used in practice. Any new rights must provide a realistic option for carers to enable them to take leave when they need it without worrying about how they are going to pay their bills.

“For many it is not an option to take a week off work without any pay.”

- *Carer's Interview*

Carers already receive some of the lowest levels of help as is evidenced by the rates of Carer's Allowance and by the fact that so many carers provide unpaid care. It is time for caring to be valued and valued properly and providing for paid carer's leave is an important step in this process.

“Paid Carer's Leave would really come in handy for many carers.”

- *Carer's Interview*

We fully support calls by the Women's Policy Group in Northern Ireland²⁷ that more needs to be done by employers and by Government to ensure that there are carer-friendly policies in place that enable working carers to balance their caring responsibilities with work. The WPG fully supports Government plans to introduce an entitlement to carer's leave for working carers but is also calling for this leave to be paid.

Recommendation – The Women's Regional Consortium in Northern Ireland welcomes the Government's intention to introduce a week of leave to employees to provide care but we urge Government that this leave must be paid to ensure its effectiveness to carers.

²⁷ COVID-19 Feminist Recovery Plan, Women's Policy Group Northern Ireland, July 2020
<https://wrda.net/wp-content/uploads/2020/07/WPG-NI-Feminist-Recovery-Plan-2020.pdf>

Recommendation – We support the call by Carers UK that Government make a pledge to move to two weeks (ten days) of paid carer’s leave and to a longer period of unpaid leave of up to six months.

Consultation questions

1. Have you or your employees used any of the below options to take time out of work to fulfil caring responsibilities? Please select all that apply.

We asked local Women’s Centres this question and they responded using a mix of the following options to take time out of work to fulfil caring responsibilities:

- Annual Leave
- Formal flexible working (meaning a change to contracted hours or location of work)
- Time off for dependants (the statutory right to leave in emergencies)
- Unpaid parental leave
- Informal flexible working (such as afternoon or morning off or occasional home working)
- Other (such as special/compassionate leave granted by the employer)

The leave was used for a variety of situations including caring for someone after major surgery, family bereavement, looking after children with long-term illnesses, change in working hours due to caring responsibilities after surgery, leaving work early after a parent was rushed to hospital, changes to contracted hours to accommodate a caring role, use of annual leave/TOIL for hospital/medical appointments.

“I have a very flexible, understanding employer who is prepared to work with staff to blend with their particular circumstances and arrangements. In my time working for my employer my contracted hours have changed four times to accommodate family commitments. Working from home has always been an option as well as flexible working. TOIL often covers the need to attend medical/other appointments. If I did

not have this flexibility I would not have stayed working for the organisation for as long as I have. This is critical to my work, life balance. I know irrespective of the law it is not the norm so I am grateful for it and appreciate it.”

2. Do you agree that this provides an appropriate definition of caring relationships for the purpose of Carer’s Leave?

- Strongly agree

This definition broadly mirrors the dependant relationships under the right to time off for dependants and therefore should be familiar to employers. It also provides flexibility in terms of the different relationships for which care may be provided by including “*someone else who reasonably relies on the employee for care*”.

3. Are there other caring relationships that you think should be considered for inclusion within the scope of Carer’s Leave?

No.

4. Which conditions on care need do you believe are appropriate for Carer’s Leave? Please select all which apply.

The definition of disability in Northern Ireland discrimination law is in Part 1 and Schedule 1 of the Disability Discrimination Act 1995 (DDA). The definition is largely the same as in Equality Act 2010 for the rest of the UK. We agree that there should be an automatic qualification under the Disability Discrimination Act for disability. To improve understanding we suggest examples must also be given of invisible conditions such as mental illness.

We do not agree that Government is proposing to restrict Carer’s Leave to where the care need is likely to last for a longer period of time such as six months or a year. We do not think there should be a minimum time as conditions and caring situations can vary greatly. For example, where an older person has a fall and needs

rehabilitation or replacement surgery or where someone is recovering from COVID-19. Both of these examples are likely to last less than six months.

We do agree that there should be some specific care needs which should automatically qualify regardless of their duration such as terminal illness, cancer, HIV and MS and include examples of mental illness.

“It doesn’t seem fair to limit the availability of Carer’s Leave to conditions longer than 6 months.”

- *Carer’s Interview*

5. If you do not believe that any conditions about care need are appropriate, please explain why and comment on any other conditions which might be appropriate.

n/a

6. Which qualifying period do you believe is appropriate for Carer’s Leave. Please select one option.

- A day one right (no qualifying period, but with appropriate notice period)

We strongly believe that entitlement to Carer’s Leave should be a Day One right. Caring is often unpredictable and it could be hard for some carers to determine when they may need access to this right. Providing this right from Day One would enable all employees to avail of this right, be carer positive and will not create a hierarchy of employees.

“Providing some kind of flexibility would have made all the difference. Being able to take time off and getting paid for it and my employer just being nice about it all would have really helped me.”

- *Carer’s Interview*

7. Do you agree with the proposed reasons for taking Carer's Leave?

- Agree

We agree with the Government's proposed reasons for taking Carer's Leave. We are pleased to see a broad definition that encompasses most situations that may arise.

8. Are there any other reasons that you think should be included?

We strongly agree with the need to add accompanying people to appointments to the proposed reasons. As the consultation acknowledges "*Caring may also involve accompanying someone to hospital, the GP, optician, dentist, chiropodist, physiotherapy, mental health assessments or other recurring appointments (such as with the bank) which usually occur during normal working hours.*"

These are important appointments where it could be beneficial for the carer to be present particularly if there are communication issues. For many others, particularly those that live in rural areas, access to public transport may be poor.

In many cases carers are currently having to take this out of their annual leave entitlement and others will not have access to flexible working. Providing Carer's Leave for these situations would therefore be vital.

"Having an extra weeks leave would be really beneficial so you could set it aside for appointments that you can't get outside working hours. That would really make a difference."

- *Carer's Interview*

9. Do you agree that childcare (other than where the child has a disability or other longer-term caring need) should be out of scope for Carer's Leave?

- Agree

We agree that childcare, where the child does not have disability or a longer-term caring need, should be out of the scope for Carer's Leave. Rights and entitlements to parental leave and family friendly rights are covered by different measures. As women's sector organisations we regularly advocate for the improvement of childcare provisions but the changes we wish to see made in relation to childcare are not to be addressed within the context of this consultation.

10. Do you agree that caring for a person with short-term care needs should be out of scope for Carer's Leave?

- Disagree

We disagree that caring for short-term care needs should be out of scope for Carer's Leave. We believe that some short-term care needs must be within scope in situations where if the carer was not able to take leave to provide help it would have a detrimental long-term impact on the person's recovery/rehabilitation.

We believe that it is important to allow carer's to have leave to support recovery for shorter-term care needs such as recovery after a broken limb or a minor operation. We believe that it is unfair to expect carers to take this leave out of their annual leave entitlement.

"I have to take annual leave or unpaid leave if I have to leave work because of my caring responsibilities."

- *Carer's Interview*

11. Are there any other circumstances or activities which Carer's Leave should not be taken for?

Carers UK have reported that their evidence suggests that Carer's Leave is only taken when absolutely necessary and we also believe that the majority of carers will only request this leave when they feel that they really need it.

12. Do you agree that an employee should in the first instance be able to self-certify their eligibility for Carer's Leave?

- Strongly agree

We agree that a light touch approach would work best. This process should not be onerous for carers or it will simply serve to put them off asking for this leave. We suggest that any further evidence required should be in general terms only for the purposes of data protection of the person being cared for.

13. If you strongly agree or agree, how often do you think an employee should self-certify their eligibility for Carer's Leave?

- Each time they request the leave

Caring is often unpredictable and it could be hard for some carers to determine when they may need access to this right. It is easier to do this when it is needed rather than trying to predict or remember for a year.

14. Do you agree that an employer should be able to request further evidence if they are not satisfied with the self-certification?

- Agree

We agree that an employer should be able to request further evidence to ensure the policy is used for its intended purpose and not abused. We agree that employers

should be able to request additional evidence but only where it is reasonable to do so.

15. If agree or strongly agree, please describe what evidence could be provided to demonstrate:

As with Time Off for Dependants leave we believe that the provision of evidence should not be specified but left open for the small minority of cases where it may be reasonable for an employer to request this.

16. Please comment on the key difficulties or challenges associated with providing and appropriately handling evidence, including data protection issues related to information about a person's health.

Evidence collected should be general only to allow for data protection issues.

17. Please comment on the pros and cons for employees and employers, if the leave was available to take as:

- **A week of unpaid leave, available to take as a single block?**
- **A week of unpaid leave, available to take as individual days?**

We believe that the leave should be available to take as individual days (including half days) up to a block of one week. We suggest that it is more useful for both carers and employers to take the leave they need rather than taking it in a block. This ensures that time taken off is not wasted and kept for those times when it is really needed. This could be particularly useful where a carer needs to accompany the person they care for to a medical or other appointment that normally takes place during working hours. Allowing the leave to be taken in this way provides much needed flexibility for carers with ongoing caring responsibilities.

“It would be better if this leave could be taken in small blocks. That would work out better for the person who is being cared for and the carer. It is much handier to have this leave able to be spread out. It makes it more flexible.”

- *Carer's Interview*

“Carer's Leave should be able to be taken in a way that best suits the carers which should include half days. One size does not fit all.”

- *Carer's Interview*

18. Do you agree that an individual should be required to give their employer notice ahead of taking Carer's Leave?

- Agree

We agree that is reasonable to expect a carer to give their employer notice ahead of taking Carer's Leave and this differentiates this leave from time off for emergencies.

19. If you strongly agree or agree, what do you think a reasonable notice period would be for a block of one week of Carer's Leave?

We believe that the notice period should be the same as the current minimum notice periods for annual leave. This makes it easier for both employers and carers as they are already familiar with these notice requirements. This would mean a notice period of double the length of time required for the leave that has been requested, for example, one days' notice to take half a day of leave, two days' notice to take one day of leave, etc. However we suggest that where possible employers should be flexible as in some cases a person's caring responsibilities may not be entirely foreseeable.

“When you are caring for someone who is not well, you never know what the next day will bring so it is hard to plan in advance.”

- *Carer's Interview*

20. If you strongly agree or agree, what do you think a reasonable notice period would be for single day of Carer's Leave? Please select one:

As above, we believe this should follow existing annual leave notice requirements of double the length of time required for the leave that has been requested.

21. Please comment on how employers would manage the process for requesting and recording the leave, and any associated issues.

Keeping this process similar to existing leave arrangements, for example, annual leave, time off for dependants, etc should help employers to manage this process as it keeps the management of the process similar to existing arrangements. As previously stated keeping arrangements around Carer's Leave light touch should help to ensure that management of this process should be easier for employers.

“It's the embarrassment factor of having to ask. My son could maybe have three or four seizures in the space of a month. It's having to go back to your employer and saying you need to leave again as there is no one else to look after him. I can't leave him with my mother, she's in her 70s. It sounds like I'm making it up. If I had access to a weeks leave it would remove some of that embarrassment and guilt.”

- *Carer's Interview*

22. What benefits for employers would arise from introducing a right to unpaid Carer's Leave?

Some of the statistics outlined at the start of this document (and summarised below) help to show the extent of this issue and the possibilities for benefits to employers of introducing a right to Carer's Leave (and to reiterate, we believe that this right should be paid):

- 1 in 7 of the workforce were juggling caring responsibilities with work;
- The impact of the Coronavirus pandemic has resulted in an extra 2.8 million workers juggling work and unpaid care since the start of the outbreak – 1 in 4 workers;
- 38% of carers reported giving up work to care, 18% reduced their working hours and 1 in 6 said they were working the same hours but their job was negatively affected by caring because of issues like tiredness, etc;
- Only 4% said that caring had no impact on their capacity to work.

The benefits to employers are therefore clear – the retention of experienced staff, reductions in employee turnover and associated costs, potential reductions in sick leave and boosting employee wellbeing/productivity.

Being carer friendly and providing for carers within an organisation can also help with staff loyalty as well as enabling the organisation to attract new staff.

“It would have helped if my employer had been more supportive and understood the difficulty balancing work and caring. Some employers just don't understand.”

- *Carer's Interview*

23. What are the most significant costs for employers which would arise from a right to unpaid carer's leave?

There will be administrative costs associated with this new right in terms of recording details, making requests, etc. However if the process is kept similar to other forms of leave then some of these processes should already be in place and the costs should not be excessive. Keeping notice arrangements and evidence requirements light-touch and similar to existing forms of leave will also help to reduce familiarisation costs.

There will be costs in terms of the re-organisation of work because of an absent employee. However we would suggest that the benefits of providing this leave would outweigh these costs. Carers who are properly supported in the workplace will benefit from increased wellbeing and feel better able to balance their caring role with their work commitments. This has the potential to translate into less sickness absence and the possibility for improved productivity as wellbeing levels improve as the employee is able to take leave instead of trying to work and cope with tiredness, lateness and stress.

“My employer was not very supportive of my caring role. I had to take unpaid leave if anything happened. It came to the point it all got too stressful. My partner, who I care for, rang me in distress and I needed to leave. My employer told me I couldn't go. I ended up walking out and I left the job, it was far too stressful.”

- *Carer's Interview*