



Response from the National Carer Organisations to the Scottish Commission on Social Security: Carer's Assistance (Carer Support Payment) (Scotland) Regulations 2023.

Introduction

The National Carer Organisations welcome the opportunity to submit views to the Scottish Commission on Social Security regarding Carer's Assistance (Carer Support Payment) (Scotland) Regulations 2023.

The National Carer Organisations are Carers Trust Scotland, Carers Scotland, the Coalition of Carers in Scotland, MECOPP, Shared Care Scotland, and the Scottish Young Carers Services Alliance.

Together we have a shared vision that all of Scotland's unpaid carers will feel valued, included and supported as equal partners in the provision of care. The National Carer Organisations aim to achieve this through the representation of unpaid carers and giving them a voice at a national level.

We believe we can deliver more for unpaid carers by working together to share our knowledge and experience, and by focusing our collective efforts on achieving improvements in areas of policy and practice that are of greatest concern to unpaid carers.

Questions

- **Education.** The Scottish Government plans to extend entitlement to most carers in full-time education from the launch of Carer Support Payment in spring 2024.

Young people have a right to education and the Scottish Government wants to ensure it is not seen to incentivise young people taking on significant caring roles. Eligibility will, therefore, not be extended to 16 to 19 year olds in full-time, non-advanced education. Do you have views or experiences to share on the advantages or disadvantages for young carers of not extending entitlement while they are studying non-advanced courses?

Response:

The National Carer Organisations are delighted that Scottish Government intends to extend entitlement to Carer Support Payment to most unpaid carers in full-time education from launch. We have been calling to extend entitlement to Carer's Allowance to unpaid carers in full-time education for a number of years.

However, we do not share Scottish Government’s concerns that extending eligibility to 16 to 19 year olds in full-time non-advanced education would incentivise young people taking on significant caring roles. Instead, we believe this proposed rule adds unnecessary complexity, confusion and will further disadvantage many unpaid carers aged 16 to 19 years old who are already fulfilling the required 35 hours of caring each week. The proposal also creates a distinction between those in advanced and non-advanced education of the same age. This could result in those unpaid carers aged 16 to 19 in non-advanced education to feel that their study level is regarded inferior and their caring roles are undervalued in comparison to unpaid carers aged 16 to 19 years old in advanced education.

Extending eligibility of Carer Support Payment to 16 to 19 year olds in non-advanced education could also improve life chances for these young people, encouraging them to sustain and progress in education, and reducing pressures to leave education to secure employment to contribute financially to the household. This proposal could have a more adverse impact on those unpaid carers aged 16 to 19 years old in non-advanced education who are living in low income households and in some of the most economically deprived communities.

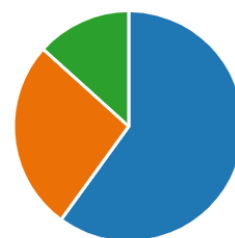
Additionally, we believe it to be deeply unfair that 19 year old unpaid carers studying in full-time non-advanced education will not be entitled to either Carer Support Payment or Young Carer Grant; the National Carer Organisations believe that this anomaly must be addressed.

Survey: To help inform our response to this question, we engaged with unpaid carers aged 16 to 19 years old in full-time non-advanced education. We undertook a short online survey, which we promoted across the Scottish Young Carers Services Alliance and disseminated via social media platforms. 15 young carers shared their views through our online survey. The majority of respondents were aged 16 (60%).

1. What age are you?

[More Details](#)

● 16	9
● 17	4
● 18	2
● 19	0



We asked them their views on what they thought the advantages are for young carers by not extending entitlement to 16 to 19 year olds studying in non-advanced courses, one respondent said:

“There aren’t any advantages as they are not getting enough.” (Unpaid Carer)

When we asked respondents about what they thought the disadvantages would be, the majority stated that not extending entitlement for unpaid carers aged 16 to 19 studying non-advanced courses is extremely unfair. One young person noted that it is unjust for those studying below HNC level, despite still studying full-time hours while balancing a caring role. Others also raised concerns:

“We will be financially disadvantaged.” (Unpaid Carer)

“It’s not fair on the people who aren’t studying at a HNC or above level.” (Unpaid Carer)

“It’s hard enough trying to balance being at school and caring for my Mum, education is meant to be something that is supported, however it feels we are being punished...” (Unpaid Carer)

Some respondents highlighted that lack of financial support has a negative impact on life outside of caring, including opportunities to socialise:

“You miss out on money you should be entitled to. You are unable to socialise or get yourself nice things.” (Unpaid Carer)

“You’re getting less for doing more and it puts too much pressure on people to do better and it means less opportunity to do things with friends.” (Unpaid Carer)

Focus group: We also held a focus group in North Lanarkshire with four unpaid carers aged 16 to 18 years old in non-advanced education and with two unpaid carer support workers. Participants were pleased to see the proposal for the full-time study rule being removed for most unpaid carers when Carer Support Payment launches in Scotland. They stated that this was a positive change in the right direction in supporting unpaid carers in education. The main theme from this focus group was that unpaid carers in full-time non-advanced education need greater financial support. Despite the Young Carer Grant offering some support for young carers, it was repeatedly stated that £359.65 a year is not enough, particularly for those young people who are juggling full-time education with a full-time caring role. One support worker gave the example of a young person, aged 16, as sole unpaid carer for their parent and sibling. They were expected to go home every lunch time during the school day to provide support. Whilst this young person received emotional support from their local carer service, they were in need of financial support:

“Young Carer Grant is not enough, it should be Carer’s Allowance.” (Unpaid Carer)

“We (young carers) save the government so much money.” (Unpaid Carer)

One unpaid carer in the group noted that they had taken on a part-time job whilst studying in their final year at school. This has been difficult for them to manage alongside caring and greater financial support would be welcome. It was expressed that young carers aged 16 to 19 do not have a lot of income to spend on themselves, whether this be a hobby or spending time with friends.

The group also raised concerns around the differences in full-time timetables in non-advanced and advanced education. For example, a young carer, aged 17, studying full-time at school will be expected to attend five days a week. Whilst another young carer aged 17 studying at HNC level at college, may be considered a full-time student but only expected to attend lectures or seminars twice a week. The group found this to be unfair in that the young person at school would not be entitled to Carer Support Payment, yet managing more hours at education whilst balancing their caring role. They argued that non-entitlement could encourage more young carers to leave school earlier in order to benefit from a more flexible timetable at college, whether this be part-time or full-time:

“The more you do in your caring role it seems as though you get less.” (Unpaid Carer)

It was stated during the discussions that some unpaid carers choose not to study at university due to anxiety around leaving their cared-for person. If they choose a course at a college closer to home, it means they are penalised if studying a National Vocational Qualification at Level 3 as they will not be entitled to Carer Support Payment. The group felt this was another barrier for unpaid carers aged 16 to 19 years old who are looking to further their education:

“It is unfair to have another hoop to jump through.” (Unpaid Carer)

“A lot of young carers couldn’t get into college because of having to look after someone, so they will not have qualifications for HNC.” (Unpaid Carer)

The two unpaid carer support workers also shared their views on the proposal that eligibility will not be extended to 16 to 19 year olds in full-time non-advanced education:

“It is a bit discriminatory to those who are trying to get an education while juggling a caring role. Some young carers are unable to sustain education due to the demands of their care responsibilities. Surely all young carers should be entitled to equal opportunities regardless of their education status.” (Unpaid carer support worker)

“I think it is good that it is changing however it limits the amount of young carers that can access Carer’s Allowance. I do not believe that this is fair and would be interested to know the reasoning behind this.” (Unpaid carer support worker)

- **Earnings.** The rules for calculating earnings are complex. Do you have any views or experiences about how the earnings are verified and calculated by Department for Work and Pensions under Carer’s Allowance? Are expenses being correctly offset? Are there any particular issues for self-employed carers?

Please note that the Scottish Government plans to launch Carer Support Payment with the same earnings limit as for Carer’s Allowance and consider improvements in the future when everyone on Carer’s Allowance has transferred to Carer Support Payment.

Meanwhile the detailed rules for calculating and averaging earnings are not yet included in the draft regulations for scrutiny.

Response:

The earnings threshold and rules around earnings are too complex. Our response to the issues of overpayments and the proposal goes on to explore this in more detail but much of the challenge around these issues are simply because of the complexity of the calculation of earnings, the low level of the earnings threshold and the cliff edge of the benefit.

Carer Support Payment on launch will not address these underlying issues. For example, the earnings threshold for Carer's Allowance (and thus Carer Support Payment on introduction) is not sufficiently high or consistently uprated annually to reflect increases in the National Living Wage. In 2023 it will fall even further behind, rising by 5.5% whilst the National Living Wage rises by 9.7%¹.

Added to this is, as we explore in overpayments, Carer's Allowance has such a significant cliff edge where a matter of pennies can remove all entitlement. This means that unpaid carers can lose out on thousands of pounds worth of support because of small changes to their earnings. Until the Scottish Government sets in place a realistic and fair earnings threshold, uprated annually and sets out its regulations for addressing the cliff edge within Carer Support Payment, we cannot fully respond. But, needless to say whatever is brought forward must be fair, understandable and reflect wider Scottish Government policy to reduce poverty and support unpaid carers to have a life outside of caring.

We would however, at this point wish to raise one point of significant concern. The National Carer Organisations are concerned that if the UK Government chooses not to increase the threshold in 2024-25 or within the "safe and secure" transfer period, unpaid carers will continue to be disadvantaged and face ongoing confusion, loss of benefit and risk of overpayment. Whilst we understand the Scottish Government's concern about equity during this transfer period, it cannot be right that a poor system for calculating earnings is embedded into the early days of Carer Support Payment. We urge the Scottish Government to seek to find a resolution to uplift the earnings threshold for Carer Support Payment in 2024/25 and in subsequent years until full transfer; even if the UK Government chooses not to do this for Carer's Allowance.

- **Overpayments.** Carer's Allowance overpayments are usually a result of unreported changes in earnings. Do you have views on how the risk of overpayments could be reduced? Do you have examples of the impacts on carers and their families of overpayments of Carer's Allowance?

Response:

¹ <https://www.carersuk.org/press-releases/unpaid-carers-in-employment-forced-to-reduce-their-hours-or-risk-losing-vital-benefit-carer-s-allowance/>

The National Carer Organisations reflect the inquiry in the House of Commons and the National Audit Office report² on overpayments of Carer's Allowance. We are concerned that continuing complexity of the benefit, particularly in relation to earnings, continues the confusion for unpaid carers that both the inquiry and the National Audit Office found. They found that very few overpayments were proven to be fraudulent, with the number of people referred for prosecution for fraud falling from 1,176 in 2014-15 to 483 in 2018-19. The greatest majority of overpayments arose because unpaid carers failed, as soon as 'reasonably practicable', to notify the DWP with correct information about their earnings.

In the House of Commons inquiry, Carers UK provided evidence³, drawn from unpaid carers experiences, particularly raised within our online forum and helpline enquiries. This indicated that there were a range of different circumstances including:

- instances where unpaid carers had declared earnings but had not realised that they had gone over before that by just a £1-£2.
- changes in earning circumstances such as a move to self-employment or zero hours contract and with the unpredictability of working hours, alongside intense caring roles, meant that unpaid carers forgot to inform or informed the DWP of changes late.
- challenges of fluctuating earnings and how earnings are averaged out – with unpaid carers and the DWP interpreting this differently.

This is reflected in our poll of unpaid carers for this response. All unpaid carers in paid employment said they found it difficult to calculate earnings and two thirds of those who are self-employed said the same.

"I got backdated wages in Nov, then a training day in Dec which took my earnings so my claim was stopped. Sent away my pay slips for Nov, Dec, Jan and Feb to show wages are back to "normal" but still haven't heard anything. I would definitely be entitled to it again in April anyway but haven't heard anything." (Unpaid Carer, CSP regulations polling)

"The last time it took them 12 weeks to "calculate" if I was still eligible. It's literally a 2-minute sum!!!"

In addition, changes to the earnings threshold remain consistently a challenge. When the National Living Wage increases and the Carer's Allowance earnings threshold does not, unpaid carers can immediately fall foul of overpayments in what can be one of the harshest parts of the benefits system. The penalty for going even £1 over the earnings limit is losing the entirety of your benefit and having to pay back the full amount of the benefit.

² National Audit Office: Investigation into overpayments of Carer's Allowance, 2019

³ Work and Pensions Committee, Inquiry into overpayments of Carer's Allowance, 2018 (oral evidence) <https://committees.parliament.uk/oralevidence/8693/html/>

“No as I only work 12 hours a week and there is talk of a wage increase of 9% which will make me £2 over the allowance which is crazy, I think it should be based on the amount of hours you work not what you earn.” (Unpaid Carer, CSP regulations polling)

“I could rant all day about this. I’m on stop again. I’ve been on stop for 8 out of the last 12 months. Constantly stopping my claim every time there is a minor change. It’s ridiculous. The whole point is regular income for people who cannot work full time due to caring responsibilities!” (Unpaid Carer, CSP regulations polling)

Thus, the onus must be on Social Security Scotland to ensure that systems for unpaid carers to declare their incomes is both fair and understandable, and responsive to maintain unpaid carers incomes. This must include recognising that unpaid carers lives are complex and intense and there must be sufficient flexibility to reduce unpaid carers liability for any overpayment. We go on to discuss the need for effective information in the next section on £0 awards and this. Simple ways to report changes is critical.

- **£0 awards.** There is a new provision in draft regulation 23 setting the rate of Carer Support Payment to £0 for up to 26 weeks when a carer has earnings over the limit. The rate will also be set at £0 when someone has “underlying entitlement” because they receive an “overlapping benefit” such as the State Pension (draft regulation 16).

When applied because the earnings threshold has been exceeded, payments restart when earnings reduce without a carer having to reapply. Otherwise, entitlement ends after 26 weeks. The intention is that a £0 award in these circumstances would not give carers access to passported benefits. Do you have views on whether there are any unintended consequences in setting payments to £0?

Response:

The National Carer Organisations support the intention to set the rate of Carer Support Payment to £0 where an unpaid carer has exceeded the earnings limit and where there is an overlapping benefit. This was supported by the majority of unpaid carers (99%) polled as part of this response. However, we believe that this must be aligned with effective information on ensuring that unpaid carers are informed about all options for reducing their earnings below the threshold, including adding additional amounts to their occupational/personal pensions where possible and how to correctly apply rules on “care charges” that can be deducted.

The rules are complex, and the National Carer Organisations believe that the Scottish Government’s duty to increase benefit take up should extend to ensuring that unpaid carers can be actively supported to continue eligibility to the full amount of Carer Support Payment.

“I don't understand why they can't adjust accordingly like other benefits, I got a wage rise that took me 24p over and had to start a work pension (even though I still don't earn enough for work contributions) you can't just put £1 monthly into it though so I actually take home less after my payrise with the current carers rules. It seems a great idea but a penny over should not reduce your entire carers to £0.”

(Unpaid Carer, CSP regulations polling)

“It's better than the current system but I do wonder if they could have a sliding scale or £0, half award and full award or something like that. Some people only earn a tiny bit over.” (Unpaid Carer, CSP regulations polling)

However, unpaid carers believe strongly that the earnings threshold needs significant work - at pace - to make it fairer to those who juggle work and care, recognising that their contribution is worth £13.1 billion each year, dwarfing the cost of providing even an extended Carer Support Payment. The National Carer Organisations therefore restate our belief that this should be an area for priority activity with regulations ready to go as soon as those currently on Carer's Allowance are safely transferred to Carer Support Payment. With the delays in introducing Carer Support Payment and the high levels of poverty amongst unpaid carers, it is critical that positive change is made as quickly as possible.

“If you're a full time carer and working your earnings shouldn't come into it as your saving each local authority millions on care they would need to cover to pay.”

(Unpaid Carer, CSP regulations polling)

Secondly, unpaid carers also raised the issue of entitlement to Carer's Allowance Supplement and there was some confusion as to whether a £0 payment would bring entitlement to the payment. At present those who have an underlying entitlement are not eligible and they highlighted that setting a Carer Support Payment to £0 could be an opportunity to remedy this. The National Carer Organisations believe that this is an option to explore further, particularly as a means to implement the policy intention of a longer-term unpaid carer payment for those who have an underlying entitlement.

The confusion around entitlement to Carer's Allowance Supplement reflects a wider issue around ensuring that those who have an underlying entitlement are, in all cases, appropriately supported to claim other benefits. Whilst Universal Credit and Pension Credit are both reserved, Social Security Scotland advisers have a key role to play in supporting unpaid carers to understand possible entitlements to reserved benefits and to assist in making such claims. Equally, on introduction of Carer Support Payment, the Scottish Government must do more to ensure that unpaid carers understand the possible benefits to incomes of applying, even where their award may be £0.

- **Take up.** Do you have views on any barriers to take up of Carer Support Payment and how take up can be increased? Are there any particular issues for carers who get Universal Credit or Pension Credit? Are some carers not claiming Universal Credit or

Pension Credit because they don't realise that they could get a higher amount of these benefits through a carer increase?

Response:

The National Carer Organisations believe that many of the barriers that exist regarding take up of Carer's Allowance will still be evident after the transition to Carer Support Payment. It is important that the transition to the Carer Support Payment is accompanied by a robust information campaign to avoid any potential confusion for those already in receipt of Carer's Allowance and to assist in the identification of new recipients. It is crucial that these information campaigns are culturally appropriate and accessible to unpaid carers from all ethnic communities, as many unpaid carers do not identify as such for cultural reasons. Hence, the information needs to be available in several languages, translation services should be in place, and non-digital versions should be available.

The relationship between Carer's Allowance and other benefits that an unpaid carer could be eligible for is complicated. The National Carer Organisations believe that this will continue to be the case after the transition to Carer Support Payment. However, meeting the eligibility criteria for Carer Support Payment and establishing status as a 'carer' will be beneficial if the unpaid carer also needs to claim Universal Credit or Pension Credit. Many unpaid carers are unaware of this, and we therefore believe that the communication regarding overlapping benefits needs to be clearer. We see the transition to Carer Support Payment as a welcome opportunity to get in touch with unpaid carers and inform them about their rights, available support, and other relevant benefits, including concessions for unpaid carers.

We believe that the information on potentially overlapping benefits should be included in award letters and other guidance provided by Social Security Scotland regarding the transition to Carer Support Payment. The communication to unpaid carers transitioning to Carer Support Payment should also include a signpost to carers organisations and carers' centres. The complexity of potentially overlapping benefits is increased for unpaid carers who do not have English as their first language. Additionally, they often do not have the digital skills to be able to manage online application systems. Communication targeted specifically to these groups is therefore necessary to ensure that they are aware of the support that is available to them.

Further, we believe that support and communication especially needs to be targeted to unpaid carers who are in a transitional phase of their caring role, such as during the change from young carer to unpaid adult carer, at the start, and at the end of the caring role. These transitional phases are often moments in which unpaid carers are unsure of available benefits/support. The support provided should include emotional, employability support and financial advice for income maximisation.

Additionally, we believe that Social Security Scotland and the DWP need to collaborate actively on identifying unpaid carers on Universal Credit who may be entitled to additional support. It is essential that the systems have effective measures in place that will identify unpaid carers who are eligible for additional financial support and that the

information will be shared between agencies. The information across agencies and services needs to be streamlined to help unpaid carers navigate the application processes.

Any change to benefit schemes has the potential to be confusing and stressful for unpaid carers. We therefore welcome the plans to implement a pilot launch of the Carer Support Payment and the draft provisions to allow advance applications.

Survey: To help inform our response to this question, we conducted an online poll to engage with unpaid carers. 64 voted in the poll on 'Barriers to claiming Carer's Allowance'.

The poll showed that only 2% of the respondents thought that the application process for Carer's Allowance is too difficult. We therefore recommend that the application process for Carer Support Payment to be simple and not too dissimilar to the current process for Carer's Allowance.

The poll also showed that there is a potential lack of knowledge on benefits among unpaid carers, as 62% voted that unpaid carers may not be aware that they are eligible for Carer's Allowance. It is evident that awareness campaigns are needed and should be carried out as part of the transition to Carer Support Payment.

More than one third (36%) voted that negative perceptions and stigma around claiming benefits may discourage eligible people from claiming Carer's Allowance. This shows that there is still a stigma around Carer's Allowance and other benefits that needs to be addressed. The stigma is especially evident in some ethnic communities. An example of this can be found in the South Asian community's perception of dementia, as 'beliefs' about the causes of dementia and that cognitive decline as a normal part of the ageing process, acted as a deterrent to seeking help. Stigma associated with the illness, cultural expectations that female members of the family would provide care and a reluctance to engage with health services reinforces an unwillingness to seek advice and support.

Additionally, the poll showed that many unpaid carers believe that the eligibility criteria for receiving Carer's Allowance is too strict. Many comments from unpaid carers mentioned that they were unable to apply because their earnings from their pension or employment took them over the threshold:

"Many carers are also working in jobs, but the threshold is so low they don't qualify for carers allowance. This could be a reason that many carers don't apply." (Unpaid Carer)

Others mentioned that receiving a pay rise could actually lead to a decrease in overall income because of the earnings threshold:

"As a carer I worked 15 hours and after a wage increase, I had to ask my work to reduce my hours or I had to leave working, as I was over threshold by 10-15 a month and would lose over 200 in income" (Unpaid Carer)

A number of unpaid carers also commented that they did not believe applying for Carer's Allowance was worth the effort as it will lead to a reduction in their Universal Credit:

"I know some people who refuse to claim it as it is taken pound for pound from their Universal Credit and since they are no better off there is no point, so they just don't bother." (Unpaid Carer)

- Draft regulations for Carer Support Payment use the term '**cared for person**' instead of 'severely disabled person' which is used in Carer's Allowance. Do you have views on the change to 'cared for person'?

Response:

The National Carer Organisations support the proposal to change the use of the term 'severely disabled person' to 'cared for person'. This aligns more closely with other relevant legislation such as the Carer's (Scotland) Act 2016 and is therefore widely recognised and understood. We also feel that this term better recognises that caring roles can be the result of a wide range of illnesses and conditions, including but not limited to severe disability.

To inform our position, we undertook a poll which received 112 responses. 97% voted that their preference would be to change the wording to 'cared for person' with only 3% voting to keep the wording as 'severely disabled person'.

- **Payment frequency:** For new claims the Government intends to pay carers every 4 weeks, with weekly advance payments only in cases of terminal illness. There are no plans to give claimants the choice of weekly payments. Do you have any views about payment frequency?

Response:

The National Carer Organisation's position is that unpaid carers should have a choice about the payment frequency of Carer Support Payment and should have the option of being paid weekly, or every four weeks. This is the current position in relation to the payment of Carer's Allowance and removing this choice would be a retrograde step.

This position also reflects the views of unpaid carers who participated in a recent poll on payment frequency. We asked them: *'For new claims the Government intends to pay carers every 4 weeks, with weekly advance payments only in cases of terminal illness. There are no plans to give claimants the choice of weekly payments. Do you have any views about payment frequency?'* (Unpaid Carer, Payment Frequency Polling)

144 unpaid carers responded to the poll:

- 11% voted that it's a good idea to move all Carer Support Payments to every four weeks.
- 89% voted that it's not a good idea, and unpaid carers should have the choice of weekly or four weekly payments.

Many respondents said they preferred to receive their payments weekly and they cited several reasons for wanting to retain the choice of how frequently payments are made. Reasons included:

- Those who currently receive Carer's Allowance on a weekly basis and have budgeted accordingly:

'I get mine weekly and I prefer it knowing that I'll always have a wee bit extra at the start of the week makes it easier to budget.' (Unpaid Carer, Payment Frequency Polling)

'I've always had weekly payment. It ensures I can top up gas and electricity and buy some food...I rely on it as other monies are monthly. It'll be very difficult to change my budgeting habits if this option isn't available.' (Unpaid Carer, Payment Frequency Polling)

- There are challenges of managing monthly payments when on a low income and this exacerbates the potential issue of unpaid carers accruing debt and ending up in poverty. For example, an unintended consequence could be unpaid carers taking out payday loans:

'If the ScotGov is serious about helping people out of poverty then they cannot force carers onto a monthly payment. It wouldn't really be an issue to me, but it certainly could be an issue to many other people on a low income, I can't support this change at all.' (Unpaid Carer, Payment Frequency Polling)

- One unpaid carer suggested weekly payments were easier to manage if you have children, as it was easier to manage day-to-day expenses:

'When you have kids, weekly is also probably better than monthly.' (Unpaid Carer, Payment Frequency Polling)

- Several unpaid carers who also claim other social security benefits which are paid monthly, expressed a preference to have their Carer Support Payment paid weekly to allow them to manage their budget more easily:

'Many on universal credit prefer carers payments weekly, as Universal Credit is paid monthly, weekly payments help those struggling to budget' (Unpaid Carer, Payment Frequency Polling)

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