# EQUALITY IMPACT ASSESSMENT

<table>
<thead>
<tr>
<th>Title of Policy</th>
<th>Young Carer Grant</th>
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<tr>
<td><strong>Summary of aims and desired outcomes of Policy</strong></td>
<td>The Young Carer Grant (YCG) is intended to enhance the quality of life for young carers in Scotland. It is expected to help these young people improve their health and education outcomes by offering financial assistance and have a life alongside caring. This will break down barriers that they can experience in accessing opportunities that are the norm for many other young people. YCG will also help to alleviate material deprivation and tackle economic inequality.</td>
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| Directorate: Division: Team | Social Security Directorate  
Social Security Policy Division  
Carer Benefits Team |
Executive summary

1. The Young Carer Grant (YCG) is a new policy and will be delivered on an entitlement basis. It will consist of a £300 one off payment, which can be applied for annually, for young carers aged 16-18 with significant caring responsibilities who meet all of the eligibility requirements.

2. The public sector equality duty is a legislative requirement that requires the Scottish Government to assess the impact of applying a proposed new or revised policy or practice. Policies should reflect that different people have different needs. Equality legislation covers the protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation.

3. This Equality Impact Assessment (EQIA) has considered the potential effects of YCG and how it impacts on groups with protected characteristics, presented below in the Key findings section. The findings here are based on stakeholder engagement and feedback, desk based research and analysis of the Scottish Government’s consultation on YCG.

4. This EQIA has not identified any aspects of YCG which would negatively impact on young carers from protected groups, or to people in these groups who are cared for. It is not considered that any changes to YCG policy should be made as a result of the assessment, as the evidence and data gathered indicate that overall the policy will have a positive impact for young carers and equality groups. It therefore builds on the Social Security (Scotland) Act 2018 framework of a new system that is underpinned by dignity, respect and a human rights based approach.

5. However, the EQIA has identified opportunities to improve data sources in order to increase our understanding of young carers who belong to particular equality groups, including their experiences of caring. This will be used to inform further policy development and tailor communication with particular equality and representative stakeholder groups as YCG progresses through the secondary legislative process and in the implementation of the policy. Once implemented we will continue to learn from ongoing monitoring and evaluation of YCG to feed into future policy developments and adapt communication materials to aid in ensuring that all eligible young carers can benefit from this support.

6. This impact assessment is one of a package to accompany YCG policy. The others are: Business and Regulatory Impact Assessment (BRIA); Child Rights and Wellbeing Impact Assessment (CRWIA); and Island Community Impact Assessment (ICIA).

7. The Young Carer Grant Working Group, consisting of a range of carer representative and support organisations, young carers, and internal stakeholders has helped inform and shape the policy and we will continue to work

with the group to support the successful implementation of the grant. Further information about membership of the Young Carer Grant Working Group and stakeholder engagement is described below at *Who was involved in this EQIA?*

8. We aim to further raise awareness and understanding of young carers through the implementation of the policy, across all groups, to maximise uptake of the benefit where possible, and to reinforce the importance of the role played by unpaid young carers in society.
Background

Policy aims

9. The policy intends to provide additional financial resource for young people with significant caring responsibilities to help them improve their health and education outcomes with funds expected (but not directed) to be used to pay for short breaks, or to purchase goods and services.

10. Additional provision for young carers was proposed in the Scottish Government’s consultation on Social Security in Scotland, which ran from 29 July 2016 to 28 October 2016. Further to cross portfolio Ministerial engagement, on 20 September 2017 Nicola Sturgeon (First Minister of Scotland) announced a new package of support for young carers, with YCG as its centrepiece, which will be paid by autumn 2019. Also announced in the package of support was that recipients of YCG will be provided with free bus travel from 2020/2021 subject to successful piloting and the introduction of a bespoke carer element to the Young Scot National Entitlement Card, providing non-cash benefits for young carers aged 11-18, which will be rolled out from June 2019.

11. The Scottish Government carried out a consultation on the draft regulations of YCG which ran for 12 weeks from 17 December to 10 December 2018.

12. The policy aligns closely with the Healthier, Wealthier and Fairer Strategic Objectives, but also links with the Smarter Objectives as well.

13. The policy contributes to the following National Outcomes:
   - We grow up loved, safe and respected so that we realise our full potential
   - We are healthy and active
   - We tackle poverty by sharing opportunities, wealth and power more equally
   - We are well educated, skilled and able to contribute to society
   - We respect, protect and fulfil human rights and live free from discrimination.

14. Specifically, YCG Grant will help deliver the Social Security Outcomes that carers:
   - are supported to look after their own health and wellbeing, improve their quality of life and reduce any negative impact of caring
   - participate fully in society and, if they choose, can engage in training, education and employment opportunities, as well as social and leisure
   - have an increased sense of control and empowerment over their lives.

15. Eligibility for YCG will require that the young person is caring for someone who is normally paid a specific qualifying disability benefit. They must also be providing care for an average of 16 hours per week for a minimum of three months, be a habitual resident in Scotland and not be in receipt of Carer’s Allowance.
16. Research has shown that many young adult carers are more likely to be living in low income households, feel socially isolated and have poorer physical and mental health and wellbeing than non-carers. The grant will mainly affect young adult carers with significant caring responsibilities aged 16 to 18 and is designed to provide additional financial resource to these young people to help improve their outcomes and provide some recognition of their unpaid caring role and their contributions to society.

17. The principle of co-design has been central to developing the approach to delivering YCG. The Scottish Government has established the Young Carer Panel and has reached out to third sector organisations that support young people with protected characteristics. This encouraged engagement to ensure all young people with lived experience can help to shape the policy for the young people of Scotland.

Who was involved in this EQIA?

18. YCG has been developed involving colleagues from within the Scottish Government and with a range of external stakeholders and the wider public.

19. Stakeholders have been engaged through a range of advisory groups including the Disability and Carers Benefits Expert Advisory Group, the Carer Benefit Advisory Group and the Young Carer Grant Working Group. The Disability and Carers Benefits Expert Advisory group is an independent group to advise Scottish Ministers on specific policy options, including Carer’s Allowance. The Carer Benefit Advisory Group was set up to advise Scottish Ministers on developing policy for social security benefits for carers and is the parent group of the Young Carer Grant Working Group. The Young Carer Grant Working Group has been instrumental in the development and implementation planning of YCG policy detail. Membership of this group includes young carer representatives, local and national carer organisations, national youth organisations, and CoSLA and Scottish Government officials. Equality matters have been discussed across all working groups.

20. Young carer’s views and lived experiences captured through the Young Carer Panel have helped to shape the policy.

21. Through the Scottish Government’s 2018 consultation on YCG and the 2016 consultation on Social Security, stakeholders have had the opportunity to express views about additional support provision for young carers. Information from stakeholders has helped us to identify areas of particular challenge in relation to protected characteristic groups.

22. A total of 75 substantive responses were submitted to the consultation on YCG. Of these, 56 were submitted by individuals and 19 came from organisations. Some

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2 Carers Trust Scotland (2015) *Time to be Heard for Young Adult Carers*
4 Carers UK as part of the Jo Cox Loneliness Commission (2017) *The world shrinks: Carer loneliness*
521 formal written responses to the consultation on Social Security were submitted, of these 241 were from organisations including LGBT Youth Scotland and the Multi-Cultural Family Base, and 280 from individual respondents. Of the 241 organisations that responded to the consultation 81 were received from stakeholder groups relating to children/young people, equalities and human rights, disability and long term conditions, and carers. The independent analysis of the responses along with the Scottish Government response were published on 22 February 2017.\(^5\)

23. In addition to the formal consultation on Social Security, the Scottish Government held over 120 engagements carried out with partners across all 32 local authorities in Scotland between July and October 2016. These events provided stakeholders with the opportunity to communicate their views and contribute to the development of the new social security system in Scotland.

24. An initial framing exercise for the EQIA was carried out involving a range of internal Scottish Government stakeholders. The Young Carer Grant Working Group then considered the outcomes of these discussions and also participated in exercises to further inform the EQIA. In addition, the Carer Benefit Advisory Group considered an equalities paper developed by the Minority Ethnic Carers of Older People Project (MECOPP) about research and experiences of carers in protected groups.

25. These discussions have helped to identify the potential impact of YCG on other Scottish Government policy areas and on those in protected groups. It has also assisted in identifying available existing evidence about young carers generally and young carers in protected groups.

**The scope of the EQIA**

26. The scope of this EQIA is the impact of Young Carer Grant on unpaid young carers, and the people they provide care for, who have one or more protected characteristic.

**Data sources**

27. A variety of information sources were used in compiling this EQIA, including:

- Scotland’s Carers 2015\(^6\)
- Scottish Health Survey 2012/13\(^7\)

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• Scottish Health and Care Experience Survey 2013/14\(^8\)
• Scotland’s Census 2011.\(^9\)

Data

28. The Scottish Health Survey and Scotland’s Census provide robust survey data. However, it is important to highlight that it can be difficult to identify people who are young carers. Research with carers has shown reasons for this include:

- People often perceive themselves as firstly a relative or friend to the person they are providing care to and don’t recognise themselves as a carer - and as such young carers may be less likely to receive support for their caring role.\(^10\)
- Caring can start at a low level and often include ‘invisible tasks’ such as monitoring and emotional support which are less recognised than more tangible tasks.\(^11\) Carers may be more likely to identify as carers as the role becomes more intense.\(^12\)
- For an individual to accept their role as a carer, they need to acknowledge that the person they are supporting needs care – which can be difficult for one or both parties to do.\(^13\)

Key findings

29. A summary of the available evidence and data collected to help inform this EQIA is provided in the table below. YCG is new policy and there is limited data available on children and young people who will be affected by the policy. It is commonly understood that many traditional data sources underestimate what is understood to be the true level of young caring – for many reasons including (but not limited to): young people not self-identifying themselves as a carer; young carers deciding not to disclose caring status, perhaps due to perceived fear of repercussions; and data collection sources being collected at household levels and mostly by adults on behalf of the young person. Where young carer specific data has not been available, data examining carers of all ages has been utilised.

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<tr>
<th>Protected characteristic</th>
<th>Evidence gathered</th>
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\(^11\) Carduff, et al., 2014

\(^12\) Smyth, C., Blaxland, M. and Cass, B. (2011) So that’s how I found out I was a young carer and that I actually had been a carer most of my life’ Identifying and supporting hidden young carers. *Journal of Youth Studies*, 14(2).

\(^13\) Carduff, et al., 2014
<table>
<thead>
<tr>
<th>Age</th>
<th>Disability</th>
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<tr>
<td>• 44,000 young carers aged up to 18 and at least 11,000 young adult meet the age requirement for YCG and have a caring role in Scotland.&lt;sup&gt;14&lt;/sup&gt;</td>
<td>• 41% of carers of all ages have a long-term health condition&lt;sup&gt;19&lt;/sup&gt;</td>
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<td>• Young carers and young adult carers aged 0-24 are more likely to be caring below 35 hours than carers in other age categories.&lt;sup&gt;15&lt;/sup&gt;</td>
<td>• 16% of all carers are deaf or have partial hearing loss; 16% have a physical disability; 11% have a mental health condition; and 44% had another condition not listed.&lt;sup&gt;20&lt;/sup&gt;</td>
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<td>• An estimated average of 48 school days for young carers are affected because of caring each year; this includes absence, lateness or leaving school early.&lt;sup&gt;16&lt;/sup&gt;</td>
<td>• Nearly 6% of carers of all ages report having a long-term mental health condition compared with 4% of non-carers.&lt;sup&gt;21&lt;/sup&gt;</td>
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<td>• Young carers and young adult carers aged under 25 are four times more likely to drop out of college or university than students who are not carers.&lt;sup&gt;17&lt;/sup&gt;</td>
<td>• Research undertaken by Carers Trust reports that 45% of young carers and young adult carers aged 14-25 surveyed stated that they have or have had mental health problems.&lt;sup&gt;22&lt;/sup&gt;</td>
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<tr>
<td>• Young carers and young adult carers in work missed an average of 17 days per year and had a further 79 days affected because of their caring responsibilities.&lt;sup&gt;18&lt;/sup&gt;</td>
<td>• The percentage of carers of all ages with one or more long-term health condition increases with</td>
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<sup>14</sup> Scottish Health Survey (2012/13) <http://www.gov.scot/Publications/2016/09/2408>

<sup>15</sup> ibid

<sup>16</sup> Carers Trust Scotland (2015) Time to be Heard for Young Adult Carers

<sup>17</sup> ibid

<sup>18</sup> ibid

<sup>19</sup> Scotland’s Census (2011) <http://www.scotlandscensus.gov.uk/>

<sup>20</sup> ibid

<sup>21</sup> ibid

<sup>22</sup> Carers Trust Scotland (2015) Time to be Heard for Young Adult Carers
the number of hours caring – from 36% of those caring for 1-19 hours to 50% of those caring for 35+ hours.\textsuperscript{23}

- One of the eligibility requirements for YCG is based on the young person providing care for a person who is normally paid a disability benefit, therefore the cared for person will usually be a disabled person or have a long term health condition.

### Gender reassignment

- One respondent to the consultation on YCG emphasised that the application form had to include options for gender non-binary young people.

### Marriage and civil partnership

No data is available about young carers or adult carers under this protected characteristic grouping. There were no comments during the consultation on marriage and civil partnership.

### Pregnancy and maternity

No data is available about young carers or adult carers under this protected characteristic grouping. There were no comments during the consultation on pregnancy and maternity.

### Race

- People from older ethnic groups such as “White: Scottish” and “White: Other British” were the most likely to report providing unpaid care. People from ethnic groups with younger age profiles, such as the “Arab” and “White: Polish” groups, were least likely to report providing unpaid care.\textsuperscript{24}

- According to census data, 96% of carers are of a “White Scottish / British / Irish” ethnicity, while 4% are of “Other” ethnic backgrounds.\textsuperscript{25}

- 8.7% of the Pakistani population in Scotland provide some form of unpaid caring. The Pakistani community make up 0.9% of Scotland’s population is the largest minority group.

\textsuperscript{23} Scotland’s Census (2011) \url{http://www.scotlandscensus.gov.uk/}

\textsuperscript{24} Analysis of Equality Results from Scotland’s Census (2011) \url{http://www.gov.scot/Publications/2014/10/8378}

\textsuperscript{25} ibid
cultural and ethnic group. This compares with 4.3% of the Chinese population, Scotland’s second largest minority community and 5.5% of the Indian community.\textsuperscript{26}

- There is evidence that Gypsy/Travellers experience significant health inequalities, high infant mortality rates, premature deaths and higher than average rates of major long-term conditions such as diabetes and cardiovascular disease.\textsuperscript{27}
- Evidence found that gypsy/travellers are less likely to identify as carers or to access support services for carers, including benefits, with low levels of knowledge in communities about carer entitlements. Research also found high levels of illiteracy impacted significantly on carers’ ability to search for support.\textsuperscript{28}
- Many young people who provide support and help to family members who need it often do not recognise this as a ‘caring’ role. Australian and UK studies have suggested that this is especially common among some minority cultural and ethnic communities.\textsuperscript{29}

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<thead>
<tr>
<th>Religion and belief</th>
<th>No data is available about young carers or adult carers under this protected characteristic grouping. There were no comments during the consultation on religion and belief.</th>
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<tr>
<td>Sex</td>
<td>• 55% of carers under 25 years old identify as women and 45% of carers under 25 years old as men.\textsuperscript{30}</td>
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\textsuperscript{27} Hidden Carers – Unheard Voices – Informal caring within the Gypsy/Traveller Community in Scotland [http://www.scottish.parliament.uk/S4_EqualOpportunitiesCommittee/Inquiries/MECOPP.pdf](http://www.scottish.parliament.uk/S4_EqualOpportunitiesCommittee/Inquiries/MECOPP.pdf)

\textsuperscript{28} MECOPP (2012) Hidden Carers, Unheard Voices. Informal caring within the Gypsy/Traveller community in Scotland

\textsuperscript{29} Children and Young People’s Commissioner Scotland (February 2017) “Coping is difficult, but I feel proud” - Perspectives on mental health and wellbeing of young carers

\textsuperscript{30} Scottish Government (2015) Scotland's Carers
Women of all ages working full time were more likely than men working full time to provide unpaid regular care (17% of women, compared with 12% of men).\(^{31}\)

Over half of all male carers feel their needs as carers are different to those of female carers and many struggle to ask for help and support.\(^{32}\)

### Sexual orientation

Research from Carers Trust Scotland in 2016 highlights that lesbian, gay bisexual and transgender (LGBT) younger adult carers aged 16-25 years old face barriers in having both their LGBT and carer identities recognised by support services and further found that 83% respondents had personally experienced bullying in school, 40% in college and 27% at university.\(^{33}\)

A study published in 2007 by the Lesbian, Gay, Bisexual Transgender and Intersex (LGBTI) Centre for Health and Wellbeing reported that 0.8% of respondents from Edinburgh, the Lothians and the Borders provided full-time caring.\(^{34}\)

LGBT Youth Scotland’s written response to the Carers (Scotland) Act 2016\(^{35}\) consultation provided further evidence of issues affecting LGBT carers:

- Many LGBT carers or the LGBT people they are caring for may have reduced social networks due to a lack of acceptance of their sexual orientation or gender identity. This can result in accessing less support than other carers.
- Many LGBT people fear potentially experiencing homophobia, biphobia and transphobia from services or have previous experience of discrimination from a service.

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\(^{31}\) Scottish Government (2017) *Scottish Health Survey 2016*

\(^{32}\) Carers Trust (2014) *Husband, Partner, Dad, Son, Carer? A survey of the experiences and needs of male carers*

\(^{33}\) Carers Trust Scotland (2016) *Young People Caring OUT There: Experiences of LGBT young adult carers in Scotland*

\(^{34}\) Arskey H Hirst, M (2005) Unpaid Carers Access to and Use of Primary Care Services, Primary Health Care Research and Development [http://php.york.ac.uk/inst/spru/pubs/2/](http://php.york.ac.uk/inst/spru/pubs/2/)

There is often a lack of visibility of LGBT identities within services which are necessary to counter LGBT people’s expectations of discrimination, or a lack of confidence that services are able to meet their needs.  

Impact of YCG to those in protected groups and further considerations

30. We have not identified evidence of potentially negative impacts of the policy to people who have one or more protected characteristics.

31. Through the Young Carer Panel and wider Experience Panels, we are gathering information on the barriers that users experience and seeking to design a system which meets their needs, offering a range of methods for application and contact.

32. We recognise that there is limited data about young carers from protected characteristic groups, as well as carers more generally, and limited research on their experiences – in particular in relation to gender reassignment, marriage and civil partnership, pregnancy and maternity and religion and belief. Therefore we will monitor and review take up of YCG and we will provide clear signposting to other financial and support services where appropriate.

Disability

33. We are in the process of building a system which meets accessibility standards. The Scottish Government needs to adhere to Digital First Service Standards. To progress to each new stage of development, the system must pass a Digital First Assessment. These assessments ensure that the system will meet accessibility standards for people who need extra support to use our service. Accessible formats, adaptations and support will be available to ensure all eligible young carers have the opportunity to apply for the grant and the process is underpinned by dignity, fairness and respect.

34. It is also anticipated that YCG will have an indirect positive impact on disabled people being cared for by a young person that receives the grant. It will also have a direct positive impact to young carer recipients who also have a disability.

35. As set out in the Scottish Government’s consultation on Disability Assistance, inclusive communication will be considered in all that we do.

Sex

36. As young women are more likely to be carers we would expect a disproportionate positive impact on them. It has also been identified that a concerted

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36 LGBT Youth Scotland’s response to the Consultation on Proposals for Carers Legislation (2014)  
effort is required to encourage applications from young carers who are men as they are often less likely to come forward for support that they are entitled to.

37. During the consultation, it was raised that young female carers were less likely to be in education as male carers therefore the previous requirement for 18 year olds to be in education would have had a disproportionately negative impact on female young carers. The eligibility criteria was extended to include 18 year old carers not in education in response to the consultation.

Gender Re-assignment

38. There are additional considerations required for transgender young carer applicants to ensure they have an equal opportunity to apply, including gender non-binary young people, for example in avoiding applicants to have to tick a box saying they are male or female. This will be addressed in the development and delivery plans of the grant.

Sexual Orientation

39. There may be other factors affecting those in protected groups which although not a consequence of the grant may impact on uptake by eligible young people. For example LGBTI young people may be experiencing or fear experiencing homophobia or discrimination and these may be an additional barrier to accessing the support that they are entitled to. This may include, but not limited to, a young person providing care to a same-sex partner who has a disability.

Age

40. Young carers aged 16 to 18 who meet all of the eligibility criteria will directly benefit from the additional support.

Race

41. Strategies on how to reach eligible minority ethnic young carers, including gypsy/traveller young carers, will be explored in the development of communication, engagement and delivery plans for the grant. It is hoped that the promotion of the grant will help to raise awareness of carers generally in society and may help to improve the identification of minority ethnic young people with significant caring responsibilities. This can also provide an opportunity to signpost these young people and communities to additional carer and social security support that they may be entitled to.

42. Asylum Seekers cannot claim most benefits. If they are destitute they can apply to the Home Office for assistance but they have no recourse to public funds but the Scottish Government is in discussion with the Home Office to include young carers without recourse to public funds in the eligibility criteria. Those who are granted refugee or humanitarian protection status (after 5 years, they can apply for indefinite leave to remain) can claim benefits and therefore would be eligible for YCG

43. There can be a gap between refugee status being granted and people accessing benefits. Social Security Scotland will consider evidence requirements during this period, for example on National Insurance numbers.
44. Attention will be given in the promotion of the grant to endeavour to manage expectations of those who are not eligible for the support, for example by linking to other support available.

Pregnancy and Maternity

45. When young parent carers or young pregnant carers come into contact with the Scottish social security system, we are committed to signposting to other financial and wider support, including to signpost to Best Start Grant support.

46. Young carers are more likely to live in an area of multiple deprivation – 3.1% of young people aged under 25 living in the 20% most deprived areas in Scotland are carers, compared with 1.7% in the least deprived areas. 28% of young carers living in the most deprived areas care for 35 hours per week or more; compared with 17% of carers living in the least deprived areas.37

Monitoring and review

47. Monitoring the impact of YCG to protected characteristic groups will be a continuous process and where any unintended consequences are identified steps will be taken to rectify them. The Scottish Government will put in place a monitoring and evaluation plan for YCG prior to implementation which takes account of the issues identified within this impact assessment.

48. The Scottish Government has established the independent Scottish Commission on Social Security (SCoSS). The Young Carer Grant was the first benefit to be scrutinised by SCoSS. In total, SCoSS have made 17 recommendations on Young Carer Grant detailed in their report on 17 May 2019. The Scottish Government will publish a response to the report and each recommendation alongside this Impact Assessment.

49. On-going stakeholder engagement with key organisations – such as Carers Trust Scotland, CBAG, Scottish Young Carers Services Alliance, Scottish Youth Parliament, Shared Care Scotland and Young Scot – will also provide the Scottish Government with an opportunity to monitor the impact of the policy.

50. The Social Security (Scotland) Act 2018 also places a duty on the Scottish Ministers to report annually to the Scottish Parliament on the performance of the Scottish social security system during the previous financial year. The report is to describe what the Scottish Ministers have done in that year to meet the expectations on them set out in the charter.

Recommendations and conclusion

51. Through this EQIA, the Scottish Government could not identify evidence that YCG will directly or indirectly discriminate on the basis of, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation. The policy applies equally to those affected by its provisions.

52. YCG discriminates on the basis of age as it is available to 16, 17 and 18 year olds. This is necessary as YCG is targeted at young adults at a transition point in their lives. There was a firm consensus among stakeholders that it would be inappropriate to pay benefits to people under the age of 16.

53. YCG does not only comply with equality requirements but has the potential to advance the realisation of support available to protected groups. This EQIA has reinforced the robust case to provide financial assistance and further support to young carers.

54. It is likely that YCG will promote economic equality because a disproportionate number of young carers are from areas of multiple deprivation.

55. YCG has been co-designed with stakeholders at the core. There will be a continuous review of YCG and the impact it has to ensure it meets the needs of all the younger adult carers with significant caring responsibilities that it is designed to support.

56. The Scottish Government has concluded that no changes to YCG are necessary as a result of the EQIA.

**Authorisation**

I confirm that the impact of the Young Carer Grant has been sufficiently assessed against the needs of the equality duty:

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<thead>
<tr>
<th>Name and job title of policy lead:</th>
<th>Date this version authorised:</th>
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<tbody>
<tr>
<td>Nicola Davidson, Young Carer Grant Policy Lead, Social Security</td>
<td>19 June 2019</td>
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<table>
<thead>
<tr>
<th>Name and job title of a Deputy Director or equivalent:</th>
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</table>
| Ann McVie
Deputy Director
Social Security Policy Division |