

# Response: Right to breaks for unpaid carers

May 2026

## Introduction

In our response to this consultation, we provide some high-level insights to support the protection of unpaid carer health and wellbeing through the provision of short breaks. Whilst it is vital that we take time to ensure that the definition of ‘short breaks’ reflects the diversity of unpaid carer preferences and needs, this cannot hold up the implementation of the right to short breaks in practice.

Our insights are based on engagement with our members and stakeholders, as well as our wider understanding of the health landscape in Scotland. However, we defer to the expertise of our member organisations that operate in this space, including Carers Scotland, Shared Care Scotland, Family Fund, and Carers Trust regarding some of the more detailed questions.

We have opted to answer questions 1, 2, 3, 4, 6, 7, 8, and 15

## About Us

We are a movement for health creation working to reduce health inequalities to enable the people of Scotland to live well. We believe that health is more than the absence of illness, and together with our members and partners we champion this belief. We collaborate to provide the national voice for third sector health organisations in Scotland, and facilitate the Scottish Community Link Worker Network.

Through our policy work, Voluntary Health Scotland (VHS) seeks to ensure that the experiences, knowledge, and interests of our 300+ members and stakeholders are reflected in national decision-making about health inequalities and health creation. We regularly consult with our members to ensure that our policy voice and priorities are reflective of their views and interests.

## Our Response

### Definition of “Sufficient Breaks”

Proposed Definition:

“Sufficient breaks” means “breaks from caring which enable a carer to have enough rest, leisure and time to:

- a. avoid negative impacts from their caring role on their health and wellbeing; relationships with others; and life balance; and
- b. help them to achieve their personal outcomes in these same areas”.

### **1. Is this definition clear enough to make decisions about a carer’s eligibility for a break from caring?**

No

**If you answered “no”, how could it be made clearer?**

We welcome the fact that health and wellbeing is a central priority within the definition of sufficient breaks for unpaid carers. Unpaid carers often struggle to prioritise activity which will help them to maintain their health and wellbeing. The Carers Scotland [2025 State of Caring Survey](#) found that 30% of unpaid carers reported that they had bad or very bad physical health, and 34% reported that their mental health was bad or very bad. These rates increase significantly - 40% and 52% respectively - for unpaid carers who are struggling financially. It is vital that the health and wellbeing of unpaid carers is a central consideration when defining short breaks.

However, we do not believe that the words ‘rest, leisure, and time’ are adequate measures of a ‘sufficient break’. Activity to prioritise health and wellbeing does not always equate to ‘rest’ or ‘leisure’ and the inclusion of these words specifically could serve to limit eligibility or access.

The use of ‘time’ as a potential measure for sufficient breaks also does not adequately reflect the diversity of unpaid carer experiences. Indeed, there is a risk that the use of time as a measure will lead to the introduction of universal or fixed offers in the application of short breaks.

Each individual unpaid carer’s specific circumstances and preferences need to be considered when identifying the time they require to prioritise their health and wellbeing. This includes their employment status, wider caring responsibilities, support networks, their own health needs, and their preferred ‘break’ activities. What constitutes as a ‘sufficient break’ in terms of time is also likely to change depending on the health needs of the person or people that an individual is caring for, particularly if their condition or conditions are progressive.

In addition, the definition should further acknowledge the common barriers unpaid carers currently experience when seeking support or accessing breaks from caring, particularly if it is used to make decisions about a carer’s eligibility for short breaks. The [2025 State of Caring Survey for Scotland](#) found that only 13% of unpaid carers report being able to access breaks

using formal services, despite the fact that 52% of unpaid carers said that a break or time off from the caring role was one of their main needs. This perhaps reflects the lack of formal recognition of many unpaid carers. Just 24% of unpaid carers who responded to the 2025 survey had received an Adult Carer Support Plan in the last 12 months. It is vital that the definition of ‘sufficient breaks’ is reinforced alongside a more robust and inclusive definition of ‘unpaid carers’.

## **2. Does this definition cover the appropriate aspects of the caring role to help make this decision?**

No

### **If you answered “no”, what aspects of the caring role should the definition cover?**

As stated in our answer to question 1, the definition needs to better reflect the many variables that determine unpaid carers’ need for short breaks. This includes their employment status, wider caring responsibilities, support networks, and the impact of the cared-for person’s needs. It also needs to better recognise the barriers that many carers currently experience when accessing support or formal breaks or indeed gaining recognition that they are an unpaid carer at all.

## **Types of Breaks**

Proposed Lists of the types of activities that are acceptable:

List One (carers are currently more likely to have difficulty accessing this type of break)

- Group based breaks / carer peer support activities (e.g. carers’ craft group, choir, exercise classes)
- Targeted breaks for young carers - including breaks with other young carers (e.g. young carer vouchers for cinema, zoo etc, as well as young carer group activities such as residentials, days out, movie nights)
- Funding support for young carers to join activity-group based breaks (e.g. Scouts, Guides)
- One-off family breaks at or immediately following transition periods/periods of significant change (e.g. during / after periods of significant illness, transition from children to adult services)
- Culturally appropriate / culturally diverse breaks - including measures to address potential language barriers (e.g. linking with ethnic minority community groups to deliver targeted breaks for ethnic minority carers, ensuring diversity of short breaks under regulations, translating information about right to breaks)
- Replacement care within the home, allowing the carer and cared-for person to enjoy activities without the need for the carer to provide care

- Giving carers more time for themselves by providing support with regular tasks (e.g. housework, gardening etc.)

List Two (carers are currently less likely to have difficulty accessing this type of break where suitable facilities are available)

- Building-based day care for the cared-for person - allowing the carer to have a break whilst the cared-for person is away from home (e.g. day services for older adults or people with learning disabilities or dementia)
- Overnight short break stays for the cared-for person
- Overnight short break stays for the carer, with replacement care for the cared-for person
- Longer-term holiday breaks (e.g. hotel stay, holiday park, caravan etc) for the carer (with or without the cared-for person and/or wider family) with or without replacement care
- Day trips and activities for the carer with or without the cared-for person (spa day, zoo, sporting event etc)
- Subscription-based or item-based grants to enable the carer to try new activities/undertake hobbies etc

### 3. Do you agree that it would be helpful to specify some of the types of support or activities which provide a break from caring?

No

#### If not, why not?

There is a risk with such an approach that specifying some of the types of support or activities which provide a break from caring could preclude certain forms of activity that support health and wellbeing. As stated previously, it is vital that the overall approach to implementing the right to breaks for unpaid carers takes a flexible and person-centred approach that is reflective of carer needs and preferences. With this in mind, a list could prove to be overly prescriptive.

### 4. List One: (Carers are more likely to have difficulty accessing this type of break)

#### a. Are there any types of breaks you think are missing from this list?

If a list of short break activities is progressed, we would like to see participation in regular volunteering explicitly recognised as an activity that promotes unpaid carer health and wellbeing. VHS member Volunteer Scotland have produced [clear evidence](#) that participation in volunteering has quantifiable benefits for improving wellbeing. In cross-sectional analysis of the Scottish Household Survey Results for 2022, Volunteer Scotland also identified that adults with caring responsibilities have higher participation rates, but that this drops when caring responsibilities reach 50 hours a week or more. Similarly, a [Shared Care Scotland short](#)

[breaks and respite survey from 2024](#) found that only 6% of surveyed unpaid carers spent their time away from caring doing community involvement or volunteering activity, despite the fact that community involvement or volunteering was ranked in the top half of how carers would prefer to spend their time (with an average score of 5.1 out of 10).

We would also like to see specific reference to participating in physical activity or spending time outdoors given the clear benefits for physical and mental wellbeing. This is not always undertaken as a group activity. Similarly, the list does not adequately reflect the breadth of activities for social interaction, which can be informal and ad hoc in nature.

**6. Do you have any concerns that providing a detailed list would have any unintended consequences?**

Yes

**7. Would it be valuable to specify a list of circumstances (as above) that should not be viewed as a break from caring?**

Yes

**8. List of circumstances (as above) that should not be viewed as a break from caring:**

Proposed list:

- the carer going to work
- the carer attending medical appointments
- the cared for person attending education.

**a. Are there any circumstances you think are missing from this list?**

Whilst we will not comment on specific circumstances that are missing from this list, we believe that a list defining what *would not* be viewed as a break from caring is far more important than a list of the types of activities that *would* constitute a break. What constitutes a break is subjective and depends on a range of preferences and factors. However, it is important to ensure that the right to a break is explicitly for activity that is above and beyond the time required to undertake paid work, education, housework or errands, or to attend health appointments.

In our [\(IN\)VISIBLE Research report](#), published in May 2026, we found that over 70% of unpaid carers are women, largely because there is a societal stigma that they will undertake such roles. Many women undertake unpaid carer roles in addition to often assuming primary responsibility for wider parental caring responsibilities amongst other competing pressures on their time. The presence of an explicit list of what should not be viewed as a break from

caring will help to break down systemic pressures experienced by many unpaid carers, particularly women.

## Prioritising Carers in Greatest Need

**15. Do you agree with using an interim definition of “sufficient breaks” as proposed above, to prioritise carers in the greatest need while the new right is bedding in?**

Yes

**Please explain the reasons for your answer.**

Whilst it is vital to get the definition of ‘sufficient breaks’ right, this cannot delay the implementation of the right to short breaks. As detailed in our answer to question 1, too many unpaid carers are unable to take a sufficient break currently and this is having a serious impact on their health outcomes.

## Recommendations Summary

In our response, we make the following recommendations:

- Ensure that the definition of ‘short breaks’ reflects the diversity of carer needs and preferences, avoiding words like ‘time’ which could lead to universal or fixed short break offers.
- Remove the list of types of activities that would qualify as short breaks to maintain a flexible and person-centred approach, whilst maintaining a list of activities that would not qualify to ensure that breaks are not inadvertently used for essential activities.
- If a list of qualifying activities is progressed, add volunteering to List One as an activity that greatly benefits wellbeing.
- Prioritise carers in greatest need by proceeding with implementation using the interim definition.

## Further Information

If you require additional information about any of the points made in this briefing or if you would like to discuss them further, you can contact our Policy and Public Affairs Lead, Sarah Latto, by emailing [sarah.latto@vhscotland.org.uk](mailto:sarah.latto@vhscotland.org.uk).