

Implementing the Care Act 2014

A COMMITMENT TO WEST MIDLANDS CARERS

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Foreword



It has already been well established that most people are likely to be affected by, or have, caring responsibilities at some stage in their lives.

In my capacity as chair of the ADASS regional Carers Leads Network I am delighted to introduce this regional report to implement the provisions of the Care Act for carers across the West Midlands.

For the very first time enacted legislation gives carers the same rights to support as the adults for whom they care.

This report sits within the wider context of the Care Act and summarises those rights; it includes links to guidance and protocols which provide more detail on how local authorities and their partners should meet their new responsibilities.

In addition, as part of the wider Regional Care Act implementation work, the 14 West Midlands authorities have worked collectively to put together a set of regional commitments to carers which we believe builds on and supports existing work across the region. These commitments relate to the Care Act's provisions for carers and to the priorities identified in Think Local Act Personal's guidance *Making it Real for Carers*.¹

The report is aimed at local authorities and those with lead responsibility for carers in other organisations, as well as at anyone with an interest or a role in supporting carers – and of course – it is a resource for carers themselves.

We envisage that those responsible for supporting carers will use this report to aid and develop their own support for carers both individually and in partnerships. I also hope that it will enable carers to evaluate the progress that is being made and to access the support which they need and deserve.

As a network we will continue to work in partnership across the region with the 14 local authorities to support and drive the wider work to support carers.

Safina Mistry,

**Strategic Partnership, Prevention and Carers Lead, Birmingham City Council,
Chair, West Midlands Carers Leads Network**

¹ <http://www.thinklocalactpersonal.org.uk/BCC/Latest/resourceOverview/?cid=9483>

West Midlands commitment to carers

Commitment 1: West Midlands authorities will endeavour to adopt the Care Act and Whole Family approach when carrying out their assessment and care planning functions.

Commitment 2: West Midlands authorities will endeavour to ensure that their practices and procedures are developed in line with the principles set out in *Making it Real for Carers* and the associated checklist.

Commitment 3: West Midlands authorities will endeavour to ensure that the impact on a carer's wellbeing is considered equally with that of the person they care for when carrying out its functions.

Commitment 4: West Midlands authorities will ensure that all providers of advice and information have good access to up to date and accessible information to promote consistency in advice giving.

Commitment 5: West Midlands authorities are committed to involving carers in the production and implementation of their plans and strategies.

Commitment 6: West Midlands authorities are committed to supporting a range of preventative services to support carers and those for whom they care.

Commitment 7: West Midlands authorities are committed to improving carers' access to training, knowledge and skills.

Commitment 8: West Midlands authorities will ensure that Independent Advocates, when required, are available equally to carers and the adults they care for.

Commitment 9: West Midlands authorities will follow Care Act recommendations to support carers where there are any safeguarding concerns in respect of the carer or of the person they care for.

Commitment 10: Within each West Midlands authority all teams and agencies commissioned to carry out carer's assessments will work from the same assessment template, however they are carrying out the assessment, to ensure a consistent approach and enable quality assurance.

Commitment 11: West Midlands authorities are committed to the principle of ensuring that, if assessments of the carer and cared for person are carried out by different agencies, these are brought together to inform the care planning process.

Commitment 12: West Midlands authorities are committed to developing flexible and proportionate support planning and personal budget monitoring processes for carers

Commitment 13: West Midlands authorities are committed to developing and implementing a local memorandum of understanding based on *No Wrong Doors* to raise awareness of, identify and support young carers.

Commitment 14: West Midlands authorities will adopt and implement the national protocol on cross border assessments.

Commitment 15: West Midlands authorities will work with all Health partners across the region to promote and encourage implementation of the NHS England commitment to carers.

Commitment 16: ADASS West Midlands is committed to ensuring the continuation of the Carers Leads Network to enable and enhance co-operation and collaborative working to support carers across the region.

Care Act 2014²

The Care Act 2014 gives carers the same rights to assessment and support in respect of social care needs as adults requiring care and support. Where it appears that a carer may have needs for support (whether currently or in the future) their local authority has a duty to assess those needs.³ For the first time, local authorities also have a duty to meet the eligible assessed needs of carers.⁴

The Act relates mainly to adult carers of adults although there are provisions for the assessment of young carers approaching transition and for the assessment of adult carers of young people with disabilities who are approaching transition.

Although it is an immense step forward for carers to have these comparable rights, there is a need to be cautious in considering how much practical difference these rights will make, particularly for those carers already being supported by their local authority either directly or through commissioned external services.

The criterion for entitlement to assessment has widened immeasurably from the old one of 'must be providing regular and substantial care' to just having the 'appearance of need for support'. However, in practice authorities across the West Midlands have, by the provision of advice and information, or access to local support services, met the needs of a much wider group of carers for many years.

In the same way, since the 2004 Carers and Disabled Children Act came into force, all West Midlands authorities have been using the power to provide services to carers to allocate carers payments. These were in effect the precursors of the carer's personal budget.

In addition, many carers needs have been met for some time by the provision of support to the person they care for. This is not expected to change to any large degree.

² <http://www.legislation.gov.uk/ukpga/2014/23/contents/enacted>

³ Care act S10 (1)

⁴ Care Act S20 (1)

Care Act Guidance⁵

The Care Act Guidance emphasises throughout that all provisions of the Act, including those relating to wellbeing, information, safeguarding, advocacy and every step of the ‘customer journey’, apply equally to carers. The Local Government Association working with the Department of Health, Carers Trust and the Children’s Society has produced additional guidance, *The Care Act and Whole-Family Approaches*⁶, which offers practical guidance on working with the whole family throughout the assessment and care planning process.

A Guide to Efficient and Effective Interventions for Implementing the Care Act as it applies to Carers⁷

The ADASS carers policy network has led on developing a guide to efficient and effective interventions to fulfil the new duties around carers enshrined in the Care Act. The document summarises the key elements of the statutory guidance that applies to carers and sets out relevant good practice in each case.

Making it Real for Carers⁸

In 2013 Think Local Act Personal, working in partnership with carers and carers groups, produced this document which sets out what is important to carers and how they want support to be provided to them and the people they care for. The document is divided into six themes. There is also a checklist to help local authorities ensure that services meet carers’ needs in an appropriate way.

1. Information and advice: having the information I need, when I need it

“Carers want clear, consistent, coordinated information that is easy to access and information giving to be a two-way process, where their voice is heard”.

2. Active and supportive communities: keeping friends, family and place

“Carers want the space to be someone other than a carer and to engage in activities in their community”.

⁵ <https://www.gov.uk/government/publications/care-act-2014-statutory-guidance-for-implementation>

⁶ http://www.local.gov.uk/care-support-reform/-/journal_content/56/10180/6522308/ARTICLE#carers

⁷ http://www.local.gov.uk/care-support-reform/-/journal_content/56/10180/7115304/ARTICLE

⁸ <http://www.thinklocalactpersonal.org.uk/BCC/Latest/resourceOverview/?cid=9483>

3. Flexible and integrated support: my support, my own way

“Carers want services that talk to each other and are coordinated”.

4. Workforce: my support staff

“Carers want care workers they can trust and who are appropriately skilled for the particular needs of the person they support. They also want access to a good range of support services”.

5. Risk enablement: feeling in control and safe

“Carers want to know there is help available if things go wrong and that they can access the support they need to get on with their lives without worrying”.

6. Personal Budgets and self-funding: my money

“Carers want to be sure that the money available for support can be used in ways that work well for the person they care for and for the whole family. They want to make decisions about how this money is used. They want good value, safe and high quality support to be available”.

Provisions of the Care Act

Promoting Wellbeing – an overarching principle

Local authorities must promote wellbeing when carrying out all of its care and support functions. Wellbeing is a broad concept relating to personal dignity, physical, mental and emotional wellbeing, protection from abuse and neglect, control over everyday life, participation in work, education, training or recreation, social and economic wellbeing, domestic family and personal, suitability of accommodation and making a contribution to society.

*“The wellbeing principle [...] applies equally to adults with care and support needs and their carers.[...] In some specific circumstances, it also applies to children, their carers and to young carers when they are subject to transition assessments”.*⁹

The Customer Journey

Advice and Information

“Groups likely to need information and advice include “family members and carers of adults with care and support needs, (or those who are likely to develop care and support needs). [...] local authorities are expected to have regard to the importance of identifying carers and take action to reduce their needs for support”.

*In providing information and advice, local authorities must recognise and respond to the specific requirements that carers have for both general and personal information and advice. A carer’s need for information and advice may be separate and distinct from information and advice for the person they are caring for”.*¹⁰

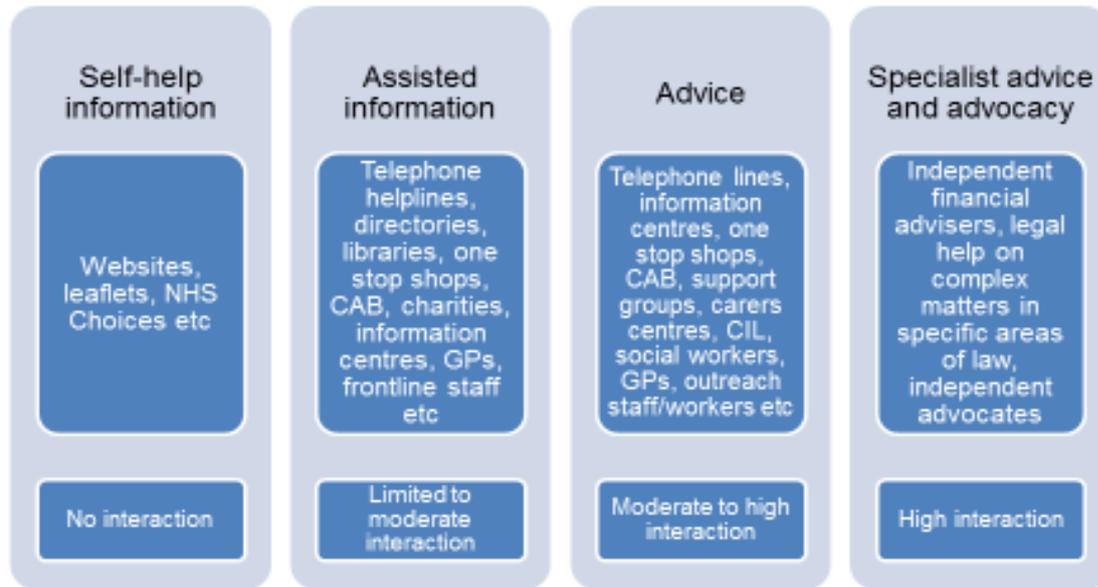
The Care Act emphasises that the duty to maintain an information service is a corporate one and that the duty is to the whole population, not just people who already have care and support needs. The Act says that advice and information should be provided by a wide range of organisations outside adult care services.

⁹ 1.3 and 1.4. Care and Support Statutory Guidance October 2014

¹⁰ 3.16 and 3.17. Care and support Statutory Guidance October 2014

What is information and advice?

Care Act learning and development materials



THE COLLEGE OF
SOCIALWORK
The world of workers in England

The National
Skills Academy
SOCIAL CARE

skillsforcare

4

A good advice and information service can help prevent or delay the need for more intensive support and improve the wellbeing of both carer and anyone they care for by telling people about, and referring them to, a wide range of services and support outside the remit of adult social care. At the same time, it can ensure that those people who do need social care services, know how to access them.

Involving carers

The concept of 'involvement' in the Act relates almost entirely to the involvement of a person in their own individual assessment and support planning, to person centred planning and to recognising that people are the best judges of their own needs. There is little discussion of more general involvement. The exception to this is in the development of

information and advice plans where engagement and co-production with adults, carers and user and groups that support them should be undertaken.¹¹

Carer Aware

A number of West Midlands authorities have purchased the online Carer Aware course which may be accessed by anyone who wishes to know more about how to identify a carer and what their role and needs may be. The Dudley version can be found [here](#).¹² For other versions, check the relevant local authority.

Preventative Services

This umbrella term includes any measure that helps prevent, reduce or delay the need for longer term support. Preventative activity can range from whole population measures designed to improve health to support for individuals to improve skills or functioning, or to lessen the impact of caring.

This can encompass a range of measures including good advice and information, support groups, access to social and leisure activities, healthy and active lifestyles, falls prevention, aids adaptations and telecare. Carers can benefit from support to help them develop knowledge and skills to enable them to care effectively and look after themselves at the same time. The Act makes a particular point in respect of carers caring for people in another authority:

*“Local authorities should encourage flexible services to be developed and made available that support people who need care and support, and carers who need support, to take part in work, education or training. Services should be encouraged that allow carers who live in one local authority area but care for someone in another local authority area to access services easily, bearing in mind guidance on ordinary residence”.*¹³

See below for the cross border protocol on assessing carers in such circumstances.

¹¹ 3.59 Care and Support Statutory Guidance October 2014

¹² <http://www.dudley.gov.uk/resident/care-health/dudley-social-services/essential-guides-to-adult-social-care/carers-aware/>

¹³ 4.49. Care And Support Statutory Guidance October 2014

Good preventative services recognise the need to look at the impact and needs of both carer and cared for person so that both will benefit. This may mean putting additional support in for a carer while a preventative measure is explored with the adult they care for.

Good Practice Guidance

In 2014 the West Midlands Carers Leads Network commissioned a report on the training needs of carers across the region. This report, *Improving access to training, knowledge and skills to support carers in their caring role*¹⁴, has been signed off by West Midland directors of adult social care. It includes proposals to work together on developing and promoting training and learning opportunities for carers across the region. The report recognises the social and peer support benefits of such opportunities. It has a particular commitment to working to ensure that any training that is considered necessary for paid care workers should be offered to carers where appropriate.

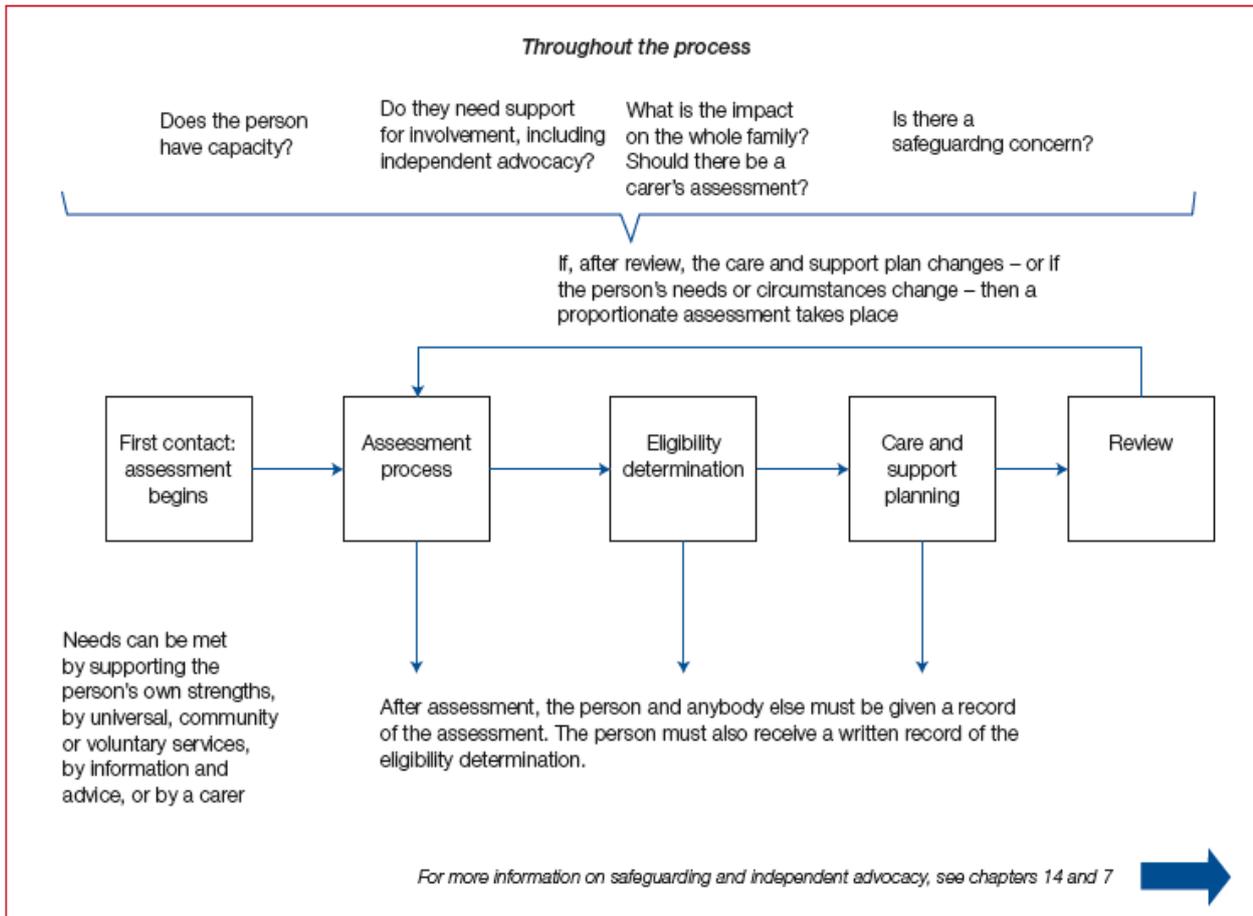
'First contact' with adult social care

The Act says that the assessment process begins as soon as the local authority begins to collect information about a person¹⁵. There is some ambiguity about this as many authorities have central contact points but the guidance which follows indicates that they are referring mostly to the first contact with adult social care, or with any organisation, such as a Carers organisation, which has been delegated to carry out 'first contact' functions i.e., do more than just provide advice and information. The following graphic¹⁶ shows a number of responsibilities which begin at this point and continue throughout the assessment and support process. This includes the responsibility to determine if there is a duty to provide a carer's assessment which is discussed below.

¹⁴ http://adasswm.com/wp-content/uploads/2013/07/ADASS_Carers_and_Training_report-final.print_.pdf

¹⁵ 6.2 Care and Support Statutory Guidance October 2014

¹⁶ 6.12 Care and Support Statutory Guidance



A good first contact service will have well trained and knowledgeable staff who are able to ask the right questions and provide the right information to enable carers and those they care for to make appropriate decisions about accessing other services or proceeding to assessment.

They will also be able to make judgements as to whether further support is needed to access social care functions or whether there is a safeguarding issue.

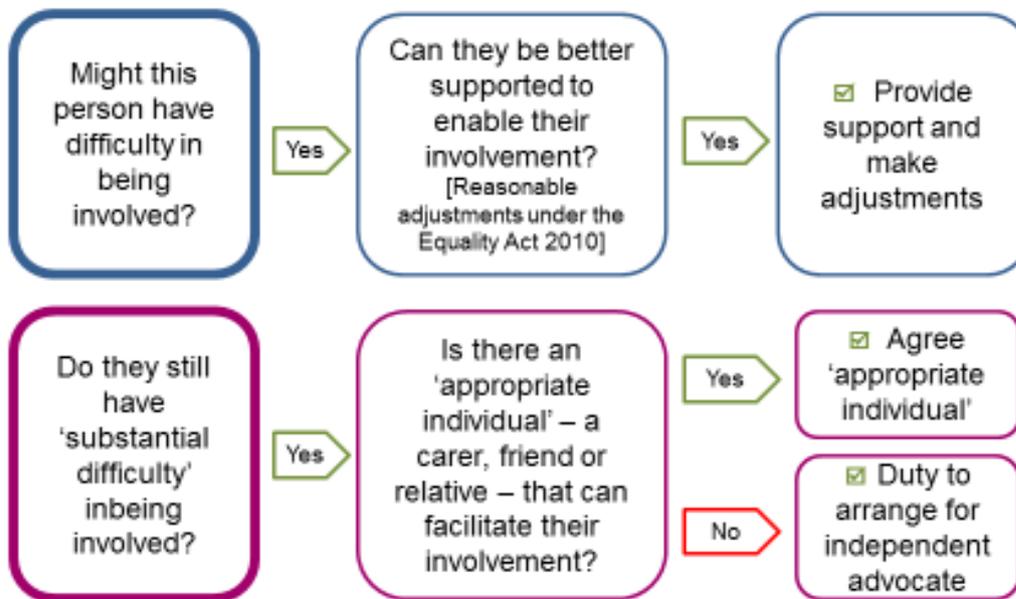
Support with understanding processes and advocacy

Local authorities have a new duty to arrange for an independent advocate for adults and for carers if the person would have substantial difficulty in being fully involved in the assessment and care and support planning process, and they do not have an appropriate person to support them. The Care Act defines four areas of potential difficulty: understanding relevant information, retaining information, using or weighing up information, or communicating their wishes and views. The graphic below explains the process. This is

not the same as the process for determining mental capacity. People who lack capacity have rights to advocacy under the Mental Health Act.

Supporting a person’s involvement

Care Act learning and development materials



Carers may be ‘appropriate individuals’ or they may themselves need a supporter or advocate. The person has to agree to someone being involved as an appropriate individual. There is provision in the Act for situations where family members are not in agreement or it is felt that the person proposed is not an ‘appropriate individual’.

A good involvement and advocacy service will have a clear pathway for determining a person’s needs for support or advocacy and for supplying appropriately trained advocate. For some people the need for support may be met by the provision of good clear information in an appropriate format or environment.

Safeguarding

The Care Act sets out what needs to be done to protect an adult’s right to live in safety and free from abuse or neglect. Protection from abuse is part of the Act’s definition of wellbeing. Abuse or neglect can take many forms: including physical, psychological, sexual, financial,

discriminatory, organisational or self-neglect. The Care Act sets out and explains the circumstances under which a carer could be involved in a situation which needs a safeguarding response. Carers can witness or speak up about abuse or neglect, they may cause abuse or harm, or experience it from others.

“If a carer experiences intentional or unintentional harm from the adult they are supporting, or if a carer unintentionally or intentionally harms or neglects the adult they support, consideration should be given to: whether, as part of the assessment and support planning process for the carer and, or, the adult they care for, support can be provided that removes or mitigates the risk of abuse. For example, the provision of training or information or other support that minimises the stress experienced by the carer. In some circumstances the carer may need to have independent representation or advocacy; in others, a carer may benefit from having such support if they are under great stress or similar¹⁷.”

Assessment and Eligibility

“Where it appears that carer may have needs for support (or is likely to do in the future) LA must assess whether carer has needs (or is likely to do in the future) and if so what those needs are or are likely to be in the future”¹⁸

“Carers’ assessments must seek to establish not only the carer’s needs for support, but also the sustainability of the caring role itself, which includes both the practical and emotional support the carer provides to the adult.[..] Factored into this must be a consideration of whether the carer is, and will continue to be, able and willing to care for the adult needing care. Some carers may need support in recognising issues around sustainability, and in recognising their own needs. [..]. Where appropriate these views should be sought in a separate conversation independent from the adult’s needs assessment.

“The carer’s assessment must also consider the outcomes that the carer wants to achieve in their daily life, their activities beyond their caring responsibilities, and the impact of caring upon those activities. This includes considering the impact of caring responsibilities on a carer’s desire and ability to work and to partake in education, training or recreational

¹⁷ 14.38. Care and support Statutory Guidance October 2014

¹⁸ Care Act S10 (1)

*activities, such as having time to themselves. This impact should be considered in both a short-term immediate sense but also the impact of caring responsibilities over a longer term, cumulative sense”.*¹⁹

The extension of the right to assessment, from people providing regular and substantial care to this far more broadly defined group, is one of the headline changes in the Act.

Local authorities are already meeting the needs of many of this wider group of carers by the provision of advice and information, and services which can be provided without the need for formal assessment by a local authority. In many cases other agencies have been commissioned to provide services on the basis of their own assessment.

However, with the new national eligibility criteria local authorities are moving to standardise assessment procedures to ensure consistency and equity, to prevent duplication and maximise use of resources. Nonetheless, it is important to remember that the assessment is not just about determining eligibility for support but to allow the carer a chance to talk about and evaluate their needs and wishes. A good assessment policy and processes will ensure that carers get the same quality of assessment, whoever is carrying it out. A good assessment is a service in itself.

This does not mean that all assessments must be carried out in the same way; the Act makes provision for proportionate assessments which can be carried out on the phone, online, face to face, jointly with other agencies, or combined with that of the cared for person. There is also a provision for a supported self-assessment which the carer completes with support from their local authority or an organisation which it has delegated to do this. There are a number of models in existence or being piloted across the Midlands.

Carers’ rights to be involved in the assessment of the person they care for

*“An assessment of an adult’s need for care and support must involve the adult and any carer that the adult has and any person who the adult asks the LA to involve or if adult lacks capacity, any person who appears to be interested in their welfare”*²⁰

¹⁹ 6.18 and 6.19 Care and support Statutory Guidance October 2014

²⁰ 9(5)(b) Care Act

*“The eligibility determination must be made based on the adult’s needs and how these impact on their wellbeing. Authorities must only take consideration of whether the adult has a carer, or what needs may be met by a carer after the eligibility determination when a care and support plan is prepared. The determination must be based solely on the adult’s needs and if an adult does have a carer, the care they are providing will be taken into account when considering whether the needs must be met. Local authorities are not required to meet any eligible needs which are being met by a carer, but those needs should be recognised and recorded as eligible during the assessment process. This is to ensure that should there be a breakdown in the caring relationship, the needs are already identified as eligible, and therefore local authorities must take steps to meet them without further assessment”.*²¹

Carers can provide valuable insight into the needs of the person they care for. The assessment must record everything that the cared for person is unable to do, even if there is someone willing and able to do it. It is only at the next stage that this willing and sustainable support can be ‘factored out’ to establish which needs a local authority has a duty to meet.

Co-caring

There is no mention of this in the Act or guidance but all local authorities are very well aware that there are situations where people with care needs support each other and are entitled to assessment in respect of their own needs, as well as those arising from their caring role.

Combining Assessments

The Act makes provision for combining assessments where both carer and cared for are being assessed. Local authorities also need to make provision for ensuring that they have information from both assessments to inform the care planning stage. This will be especially true when the carer’s assessment was carried out by an external assessor.

²¹ 6.119. Care and Support Statutory Guidance October 2014

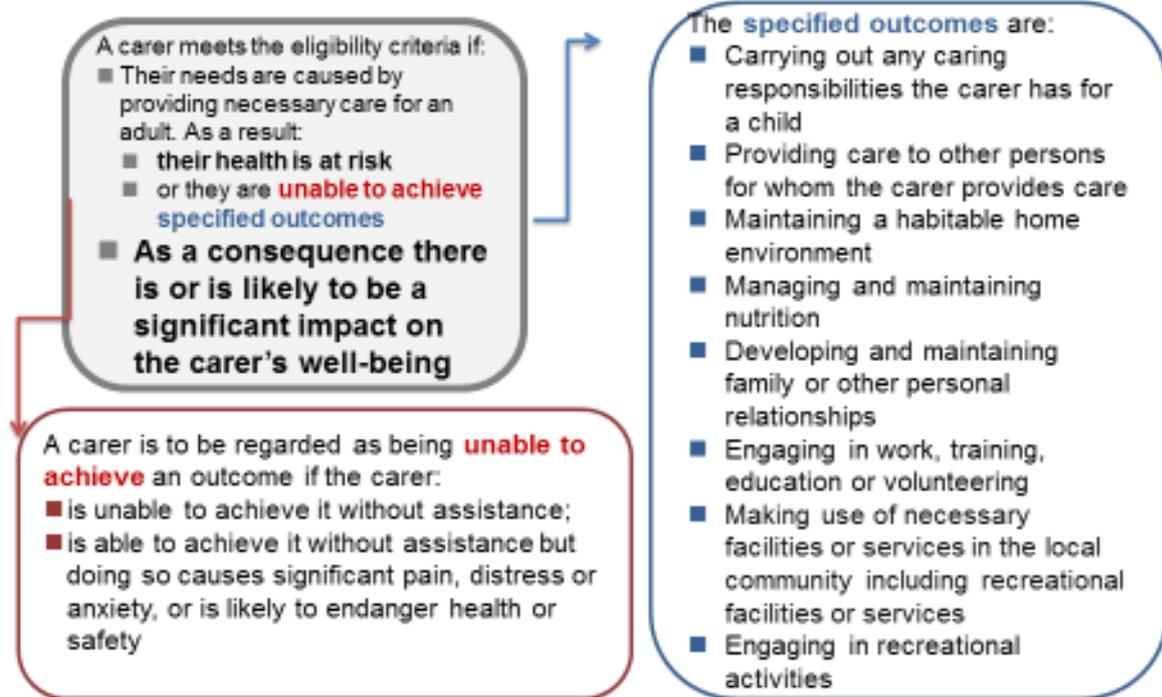
A good assessment policy and processes will ensure that carers get the same quality of assessment, whoever is carrying it out, and that assessments are combined when this is necessary to ensure appropriate care and support planning.

Eligibility for Support

For the first time carers have the right to services to meet assessed eligible unmet needs. Councils also have the power to meet non eligible needs if they choose to. There is a new 3 part national tool to determine eligibility.

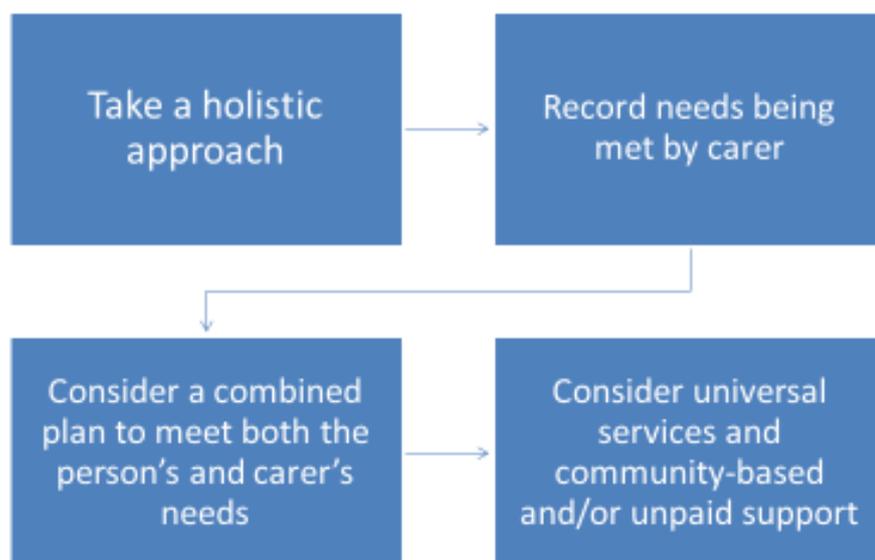
Carers' eligibility threshold

Care Act learning and development materials



There is likely to be much discussion around the concepts of 'necessary' and 'significant impact'. It should also be noted that the provision of a budget for carers to meet eligible needs may not be the only outcome of an assessment. The assessment could result in support to the cared for person or in the provision of advice, information or preventative, or other services.

Context



This is the stage where it is decided how support to meet eligible (and non-eligible) needs can be met and which outcomes are important to adults and carers. Care and support plans for adults and support plans for carers should be appropriate to the needs of the individual concerned.

Carers' needs may be met by the provision of support to the person they care for or they may be given a budget of their own. Everyone who is eligible is entitled to be told the amount of their personal budget. People then have options as to how they want this to be used; they may want their council to manage it for them or they may want to request a Direct Payment to buy their own care or support. It is expected that most carers will request a Direct Payment however there may be some managed services that they might wish to access. Generally speaking, a Direct Payment may be used for anything legal which also meets the eligible needs and outcomes identified in the assessment and care planning process. Few carers will use Direct Payments to buy 'social care' goods or services. A light

touch agreement, review and audit process may be appropriate for what, in many cases, will be relatively small amounts.

Charging for services

The Care Act retains the provision that local authorities have the power to charge for services provided directly to carers. However, a local authority must not under any circumstances charge a carer for care and support provided directly to the person they care for. Most West Midlands authorities have not in the past used this power to charge carers for direct services. However, most have charged for some, if not all, services provided to the adult with the intention of supporting carers.

*“When deciding whether to charge, and in determining what an appropriate charge is, a local authority should consider how it wishes to express the way it values carers within its local community as partners in care, and recognise the significant contribution carers make.[...] Local authorities should consider carefully the likely impact of any charges on carers, particularly in terms of their willingness and ability to continue their caring responsibilities. It may be that there are circumstances where a nominal charge may be appropriate, for example to provide for a service which is subsidised but for which the carer may still pay a small charge, such as a gym class. Ultimately, a local authority should ensure that any charges do not negatively impact on a carer’s ability to look after their own health and wellbeing and to care effectively and safely.”*²²

Good Practice Guidance

The Local Government Association, Department of Health, Carers Trust and Carers UK have produced the *Economic Case for Local Investment in Carer Support*²³ which provides information and advice for councils on the likely adverse impact of charging carers for services provided directly to them.

²² 8.50 Care and Support Statutory Guidance

²³ http://www.local.gov.uk/care-support-reform/-/journal_content/56/10180/6522308/ARTICLE#carers

Young Carers

The Care Act and guidance have extensive sections on supporting the transition from children to adult services for young carers approaching adulthood and for carers of young people with disabilities who are approaching adulthood. In addition, there is a requirement for adult services to be active in identifying and referring younger carers for support when these are identified during an adult or adult carer assessment. Younger carers have their own rights to assessment set out in the Children and Families Act.

Good Practice Guidance

*No wrong doors: working together to support young carers and their families.*²⁴ The Directors of Children's Services and Adult Social Services, and other partners have produced this template for a local memorandum of understanding between statutory agencies setting out how they will support young carers and implement the provisions of the Care Act and the Children and Families Act.

Young Carer Aware

Several authorities in the West Midlands have purchased the Young Carer Aware e-learning course which is designed to help people identify young carers and understand their role and needs. For example, Solihull's version can be found [here](#).²⁵

Cross Border assessment of carers

If a carer lives in a different local authority to that of the person they care for, the local authority where the person they care for lives has the duty to meet any eligible needs. The Act says that this should be determined after assessment of needs so a carer has a perfect right to ask their own authority to assess them. The reason for this is so that discussions about who should be providing support do not get in the way of a person being assessed. However, the guidance also says that a good information service will advise carers of the

²⁴ <http://www.local.gov.uk/documents/10180/11431/No+wrong+doors+-+working+together+to+support+young+carers+and+their+families/d210a4a6-b352-4776-b858-f3adf06e4b66>

²⁵ <http://www.solihull.gov.uk/Resident/socialservicesandhealth/childrenfamilies/youngcarers>

limits of what such an assessment could achieve. This will mean that the carer has enough information to make their own decision.

Good Practice Guidance

The Association of Directors of Adult Social Services (ADASS) executive has produced an updated protocol for the assessment of adult carers who live in a different local authority area to that of the adult with care and support needs they care for (link to be provided).

Promoting Co-operation and Integration

Local authorities have a responsibility to promote co-operation and integration in carrying out care and support functions internally, this includes preventative services, such as those provided by leisure or lifelong learning teams or care. It also includes the provision of appropriate accommodation. Local authorities also have a duty to promote integration with the NHS and other health or health related services.

West Midlands Carers Leads Network

ADASS West Midlands has supported a number of thematic regional networks for many years. The Carers Leads Network is an effective and well supported group which meets regularly to share good practice, learn from each other and which carries out small programmes of work to enhance the delivery of carers support across the region, most recently in respect of Care Act implementation.

The NHS and Carers

In 2014 NHS England published its Commitment to carers ²⁶ which set out what it considered to be its responsibilities and priorities in supporting carers. There are 37 priorities under eight headings:

Raising the profile of carers

Education, training and information

Service development

Person centred well-coordinated care

Primary care

Commissioning support

Partnership links

NHS England as an employer

²⁶ <http://www.england.nhs.uk/wp-content/uploads/2014/05/commitment-to-carers-may14.pdf>