**Only use this letter if** your client:

* **Received legacy benefits with their partner, was their partner’s carer and received CA.**
* **Their partner died, the 8-week CA run on was received.**
* **New UC claim, no carer element.**
* **Has children and benefit cap imposed as soon as CA stopped – this issue is likely to need to be litigated – Please send your letter for review to** [**jrproject@cpag.org.uk**](mailto:jrproject@cpag.org.uk) **before sending it to DWP.**
* **Attach ‘DWP letter confirming…’ available on the same webpage as this letter.**

DELETE BOX BEFORE POSTING

**This letter challenges:**

##### **DWP failure to award the carer element in line with the award of carers allowance,**

##### **Non-application of the UC run-on after a death following the death of their partner because is a new claim for UC.**

Pleaseverify then include **all relevant dates** in your letter.

**Read whole letter** carefully and edit all text in red and/or [square brackets]. **Delete all comments**, return text to black (and not bold), and put on headed paper.

DELETE BOX BEFORE POSTING

**IMPORTANT:** The address for service changed in February 2024, as below.

Please send your letter by post to DWP and by email to the Treasury Solicitor.

Please seek advice from [JRProject@CPAG.org.uk](mailto:JRProject@CPAG.org.uk) if no response is received within 14 days, or consider referring to a solicitor to issue judicial review proceedings, see [this CPAG page](https://cpag.org.uk/welfare-rights/support-advisers/support-advisers-england-and-wales/support-judicial-review-process/pursuing-court-and) for more information.

Delete Box before Posting

[address your letter to either the:

address on your client’s decision letter,

address your client sent their claim to, or

address on relevant DWP correspondence; or

request an upload link to post it to your client’s online UC account]

**And by email to:** [thetreasurysolicitor@governmentlegal.gov.uk](mailto:thetreasurysolicitor@governmentlegal.gov.uk)

**Our Ref:**

**[date]**

**Judicial Review Pre-Action Protocol Letter Before Claim**

**Dear Sir or Madam,**

**Re: Proposed claim for judicial review against the Secretary of State for Work and Pensions by [full name]**

##### We are instructed by [full name] **in relation to [her/his] universal credit (“**UC**”) award and the failure to award the carer element in line with [her/his] award of carers allowance (“**CA**”), and non-application of the UC run-on after a death following the death of [her/his] partner.**

##### **We write in accordance with the Pre-action Protocol for judicial review. Due to the urgency of this matter because of the financial burden put on our client, we are requesting your response as soon as possible and in any event no later than [date] (14 days).**

**Proposed Defendant: Secretary of State for Work and Pensions (“D”)(“SSWP”)**

**Claimant:** [full name] (“**C**”)

**NINo:** [xxxx]

**Address:** [xxxx]

**Date of Birth:** [xxxx]

**Note on the address for Pre-action Protocol correspondence**

1. This letter is sent to you because in February 2024 a Senior Lawyer at Decision Making and Debt DWP Legal Advisers, Government Legal Department, Ground Floor Caxton House, Tothill Street, London, SW1H 9NA advised that:

*Pre-action correspondence should now be sent directly to DWP, not to DWP Legal Advisers. DWP Legal Advisers is part of the Government Legal Department, not DWP itself. Pre-action correspondence should be sent to the relevant section of DWP. This will normally be the section of DWP responsible for the decision which is the subject of the pre-action correspondence via their usual communication methods. For example if it relates to a particular benefit decision then the pre-action letter should be sent to the address at the top of that letter.*

1. **This letter is also sent by email to the Treasury Solicitor as** Cabinet Office practice direction ‘Crown Proceedings Act 1947’ (December 2023)[[1]](#footnote-1) requires:

*“****All documents*** *required to be served on the Crown for the purpose of or in connection with any civil proceedings by or against the Crown shall, if those proceedings are by or**against an authorised Government department,* ***be served on the solicitor****, if any, for that department”*

(Emphasis added)

1. The practice direction provides that the solicitor for service in connection with civil proceedings against the Department for Work and Pensions is “The Treasury Solicitor”.
2. **The Government Legal Department webpage**[[2]](#footnote-2) **further instructs:**

***[…]***

*The email addresses above are for the service of new proceedings only.  
They should not be used for letters before action, or pre action protocol correspondence. If sending such documents to GLD please email these to*[*thetreasurysolicitor@governmentlegal.gov.uk*](mailto:thetreasurysolicitor@governmentlegal.gov.uk)*.*

**The details of the matter being challenged**

1. **C challenges the failure of the D to:**

* **Include the carer element in [her/his] UC award in line with the conditions for entitlement to CA.**
* **Apply ‘run-on after a death’ in respect of [her/his] UC award.**

***Background facts***

1. **C and [full name of person cared for and NINo] (“INITIALS”) received Income Support (“IS”) as a couple as [initials] was severely disabled [details] and C was [her/his] full-time carer.**
2. **[initials] received the enhanced rates of both the daily living and mobility components of Personal independent Payments. C received CA.**
3. **C and [initials] had [4] children (names and DOB’s).**
4. **On [date], [initials] died.**
5. **Following [her/his] partner’s death, C is now a lone parent with [4] children.**
6. **C received an 8-week run on of CA from the Sunday following [her/his] partner’s death, which ran from Sunday the [date].**
7. **On [date], [initials]’s CA award ended.**
8. **On [date], C and [initials]’s claim to IS ended.**
9. **C is working age and was not therefore able to make a new claim to legacy benefits.**
10. **On [date], C had to make a new claim for UC as a lone parent and gave details of [her/his] [4] children. [Details of when notified DWP of bereavement]**
11. On [date], C was notified by way of [her/his] UC journal the amount of UC awarded. This amount did not include an element for ‘caring’ while at the same time the amount of [her/his] UC award was reduced by the amount of [her/his] CA in full.
12. C queried this via [her/his] UC journal on [date] and a response was posted on [date] to explain [she/he] was not entitled to the carer element as [she/he] was not providing ‘regular and substantial care’.
13. C’s CA exempted [her/him] from the benefit cap.
14. When C’S CA ended on [date], this exemption ended and [her/his] UC was further reduced by [amount].
15. C is experiencing significant financial hardship at a time when [she/he] is also dealing with the loss of [her/his] partner. C and [initials]’s weekly income was £738.37 per week (made up of £157.60 IS, £145.35 PIP, £64.60 CA, £61.80 child benefit and £138.50 child benefit) until[initials]’s s death and C now has an income of only £384.62 (when calculated weekly). A reduction of £353.75 per week or £1,532.92 per month. [edit as appropriate]

**Note on D’s duty of candour**

1. As D will be aware, the duty of candour arises as soon as a public authority becomes aware that someone is likely to test or challenge a decision or action. The duty is engaged at every stage of the proceedings, including the pre-action stage, as confirmed in *R (HM, KH and MA) v Secretary of State for the Home Department* 3 [2022] EWHC 2729 (Admin).
2. If any guidance, policy or guidelines exists concerning any of the matters raised in the Background section above, we consider that compliance with the pre-action protocol and the duty of candour requires that it be i) disclosed and ii) provided in full for inspection, as part of the response to this letter.

**Issue 1: Award of UC Carers Element in line with Carers Allowance Award**

**Secretary of State’s position**

1. **SSWP has accepted the legal position below in letters dated 13th March 2019, reference JC/1031 (redacted copy attached) and 23rd May 2019 to Child Poverty Action Group (reference 1114) as well as more recently to** Tameside Welfare Rights Service**. SSWP has agreed unequivocally that:**

***“Entitlement to Carer’s Allowance satisfies the condition for the carer element”[[3]](#footnote-3).***

1. **D further agreed to review its guidance in this area at para 9 of your letter dated 13th March 2019.**
2. **It would therefore appear that while some guidance may have been amended, other guidance has not, and no adequate updated training has been given to DWP decision makers on the issue and is resulting in unlawful decision making by Decision Makers not only for our immediate client but also for others.**
3. **In this case, C has also sought a mandatory reconsideration of the decision not to award the carer element in line with the carer’s allowance run-on, however the First-tier Tribunal has no power to direct D to amend guidance, and C is therefore also seeking judicial review so that this issue will not arise for others in the future.**

**Legal background**

1. The r**elevant legislative provisions are set out again for ease of reference.**
2. Universal Credit Regulations 2013 SI 2013/376 (“**UC Regs**”) provide that an award should include a carer element where a claimant is providing 'regular and substantial care'.

***29****.—(1) An award of universal credit is to include an amount (“the carer element”)... where a claimant has regular and substantial caring responsibilities for a severely disabled person...*

1. The meaning of 'regular and substantial caring' is then defined:

***30****.—(1) For the purposes of Part 1 of the Act and these Regulations, a person has regular and substantial caring responsibilities for a severely disabled person* ***if they satisfy the conditions for entitlement to a carer’s allowance*** [...]

(Emphasis added)

1. Conditions for entitlement to CA are met where a person is providing regular and substantial caring **AND** for 8 weeks after the death of the person cared for under s.70 Social Security Contributions and Benefits Act 1992 (c. 4) (**SSCBA**):

***s.70*** *1 (1A) A person who was entitled to an allowance under this section immediately before the death of the severely disabled person referred to in subsection (1)* ***shall continue to be entitled to it****, even though he is no longer engaged in caring for a severely disabled person (and the requirements of subsection (1)(a) and (c) are not satisfied),* ***until–***

*(a) the end of the week in which he ceases to satisfy any other requirement as to entitlement to the allowance; or*

*(b)* ***the expiry of the period of eight weeks beginning with the Sunday following the death*** *(or beginning with the date of death if the death occurred on Sunday), whichever occurs first.]*

(Emphasis added)

1. C continued to satisfy the conditions for entitlement to CA as set out in s.70 1 (1A) SSCBA until [date]. Accordingly, [she/he] satisfied the definition of having regular and substantial caring responsibilities in reg 30 UC Regs and so was entitled the carer element as provided for in reg 29 UC Regs (set out above) until the beginning of the Assessment Period in which [her/his] CA ended.
2. The UC Regs provide:

***22****.—(1) The amounts to be deducted from the maximum amount in accordance with section 8(3) of the Act to determine the amount of an award of universal credit are–*

*(a) all of the claimant’s unearned income (or in the case of joint claimants all of their combined unearned income) in respect of the assessment period…*

***66****.—(1) A person’s unearned income is any of their income, including income the person is treated as having by virtue of regulation 74 (notional unearned income), falling within the following descriptions–*

*[…]*

*(b) any of the following benefits to which the person is entitled, subject to any adjustment to the amount payable in accordance with regulations under section 73 of the Social Security Administration Act 1992(a) (overlapping benefits)-*

*[...]*

*(iii) carer’s allowance,*

1. The full amount received in CA [£81.90 per week] was deducted from C’s UC award as it was treated as ‘unearned income’, rendering the protection under s.70 (1) (1A) SSCBA meaningless.
2. An award of the carer element of UC for the duration of [her/his] CA run-on should have ameliorated in part this loss by offsetting against it the value of this element, [£198.31] per month. Instead, C has been left in a position where [she/he] has been treated as not entitled to CA for the purposes of the carer element in UC while having that same CA deducted in total from [her/his] UC award as unearned income.

**Grounds for Judicial Review**

**Ground 1: Failure to apply the law correctly**

1. **The legislation determining this matter, namely the relevant provisions of the UC Regs and SSCBA 1992, set out above, are clear. In failing to apply the regulations to** C**’s claim, the D is acting unlawfully.**

# ****Ground 2: Failure to follow own guidance****

# **D has published guidance, available to all DWP decision makers, specifying that a claimant will be entitled to the carer element where they meet the conditions as set out in s. 70 SSCBA in their Ad**vice for Decision Making: Staff Guide (ADM):[[4]](#footnote-4)

***Conditions for award of a carer element F6010 - F6040***

***Carer test***

*F6010 To qualify for an award of a carer element, the claimant must have regular and substantial caring responsibilities for a severely disabled person1.*

*1 WR Act, s 12(2)(c); UC Regs, reg 29(1)*

*F6011 A UC claimant will have regular and substantial caring responsibilities for a severely disabled person1 where they*

*1.* ***satisfy the conditions of entitlement to CA****2 (see F6013) or*

*2.would satisfy the conditions of entitlement to CA if their earnings did not exceed the prescribed limit for CA3. This means that a UC claimant will qualify for the carer element irrespective of their earnings, provided they satisfy the other conditions of entitlement for CA (see the Note to F6013).*

*1 UC Regs, reg 30; 2 SS CB Act 92, s 70; 3 s 70(1)(b)*

1. **In not awarding C the carer element even while he was in receipt of CA and therefore self-evidently satisfied the conditions of entitlement for CA, D has failed to comply with D’s own guidance.**

**Ground 3: Misleading and Incomplete Guidance**

# **The Ad**vice for Decision Making: Staff Guide (above) goes on to explain:

***No claim for CA necessary***

*F6012 … Where no claim for CA has been made, the UC DM will have to consider whether the claimant could satisfy the conditions of entitlement to CA.*

*...*

*F6013 The conditions for entitlement to CA are that*

***1****. the claimant is engaged in caring for a severely disabled person for any day (see DMG 60033 - 60042). A severely disabled person is a person to whom one of the benefts listed in DMG 60033 is payable and*

***2****. the claimant is regularly and substantially engaged in caring for that person for at least 35 hours a week (see DMG 60035 - 60042) and*

***3****. the claimant is not gainfully employed (see DMG 60051 - 60052) - but see the Note below for the UC carer element and*

***4.*** *the claimant is aged 16 or over (see DMG 60058) and*

***5****. the claimant is not in FTE (see DMG 60068 - 60081) and*

***6****. the claimant satisfes prescribed conditions of residence or presence in GB (see DMG Chapter 07 Part 2) and*

***7****. no one else is already entitled to CA for that severely disabled person.*

1. This guidance is misleading.
2. It is easy to read F6011 to mean F6013 is relevant regardless of whether there is an award of CA, [as the DM has done in this case], as F6011 directs the decision maker to consider F6013 without first considering F6012:

***F6011*** *A UC claimant will have regular and substantial caring responsibilities for a severely disabled person1 where they*

1. *satisfy the conditions of entitlement to CA2* ***(see F6013)***

(Emphasis added)

1. This is problematic because the conditions for entitlement listed in F6013 then incorrectly fail to include the condition for entitlement contained in s.70(1A) SSCBA, ie, that a claimant “*shall continue to be entitled to [CA], even though he is no longer engaged in caring for a severely disabled person”* for 8 weeks following the death of the person cared for.
2. A UC decision reached on the basis of F6011 and F6013 to not include the carer element in a claimant’s award where they meet the conditions of entitlement for CA under s.70(1)(1A) SSCBA (8 week CA run on after death) rather than one of the conditions currently listed under F6013, will be unlawful.
3. This risk could simply be resolved by including the run-on provision under s.70(1)(1A) SSCBA in the list provided at ADM F6013.
4. We are pleased to note that the Defendant’s current operational guidance ‘Carers(V21)’[[5]](#footnote-5) states:

“*When a new claim to Universal Credit is made by a carer (when the person they cared for has died) and Carers Allowance is still in payment (the Carer’s Allowance run-on lasts up to 8 weeks) - they are entitled to the additional amount for a carer in any full assessment period where Carers Allowance continues to be in payment for the whole of and including the last day of that assessment period.”*

1. However, the ADM remains as of 18/04/24 (edit to when last checked) misleading as set out above. Further to correspondence previously sent by CPAG, we continue to ask that the ADM be revised to reflect the position under law.

**Issue 2: ‘Run-on after a death’**

**Legal background**

1. Regulation 37 of the UC Regs allows UC entitlement to continue at the same rate as entitlement in the assessment period prior to death in the assessment period in which the death occurs and in the following two assessment periods:

***Run-on after a death***

***37****.  In calculating the maximum amount of an award where any of the following persons has died—*

*(a) in the case of a joint award, one member of the couple;*

*(b) a child or qualifying young person for whom a claimant was responsible; or*

*(c) in the case of a claimant who had regular and substantial caring responsibilities for a severely disabled person, that person; or*

*(d) a person who was non-dependent within the meaning of paragraph 9(2) of Schedule 4,*

*the award is to continue to be calculated as if the person had not died for the assessment period in which the death occurs and the following two assessment periods.*

1. C is deprived of this protection as he had to make a new claim to UC because of the death of his partner.
2. [Initials] died prior to the UC claim and therefore C was applying as a lone parent and there was no existing joint UC award to continue in place.

**Grounds for Judicial Review**

**Ground 4: Unreasonable absence of protection for those required to claim UC following the death of their partner rather than continuing on legacy benefits**

1. **Where a claimant who was receiving legacy benefits has to make a new claim for benefits due to the death of their partner, they can only do so by making a new claim for UC. It would appear in such circumstances that they do not benefit from the protection available in respect of the run-on after a death available in relation to UC as there is no existing UC award to continue in place.**
2. **The complete absence of protection to people who were in receipt of legacy benefits and who are required to make a new claim to UC on the death of their partner in contrast to those already in receipt of UC as a couple who receive protection for up to 3 months after their partner’s death (**reg 37 UC Regs) **is irrational.**
3. **It is recognised that those who have recently suffered bereavement should not be expected immediately to adjust to life as a single claimant but should instead be given a period of grace with their UC award continuing in place as if they were still a couple and their circumstances had not changed. There is no rational basis why somebody who has had to move from legacy benefits onto UC as a result of a death should not benefit from the protection enjoyed by those already in receipt of UC on the date their partner dies.**

**Ground 5: Unlawful discrimination**

***Introduction***

1. Article 14 of the European Convention on Human Rights (“**ECHR**”) provides as follows:

***ARTICLE 14***

***Prohibition of discrimination***

*The enjoyment of the rights and freedoms set forth in this Convention shall be secured without discrimination on any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status.*

1. To determine whether not providing protection on death/run-on after a death for C is incompatible with Article 14, three questions need to be answered:
   1. The first is whether the difference in treatment of which C complains concerns the enjoyment of a right set forth in the Convention – the test for this purpose being whether the facts of the case fall "within the ambit" of a Convention right.
   2. The second question is whether the difference in treatment is on the ground of a "status" which falls within article 14.
   3. The third question is whether the difference in treatment amounts to unlawful "discrimination" prohibited by article 14. Where the claimant has been treated differently from a class of persons whose situation is relevantly similar, this depends on whether there is an objective and reasonable justification for the difference in treatment.

(see *JT v First-tier Tribunal and Others* [2018] EWCA Civ 1735 at §§39-40)

*Ambit*

1. Welfare benefits (universal credit) are a possession for the purposes of Article 1, Protocol 1 ECHR.
2. The provision of bereavement protection/run on after a death in respect of welfare benefits is also a modality through which the state chooses to exercise its respect for the Article 8 right to family life of a claimant under the Convention (see in similar vein the discussion in relation to widowed parent’s allowance *in the matter of an application for judicial review by McLauhglin* [2018] UKSC 48 and the child element of child tax credit (directly equivalent to the child element in UC) in *SC and others v SSWP* [2019] EWCA 615).

*Status*

1. Those who, as a result of the death of their partner, have their legacy benefit awards terminated and have to claim UC have an “other status” under Article 14. See the broad approach taken by the domestic courts and Strasbourg to what constitutes a ‘status’: see *R (RJM) v Secretary of State for Work and Pensions* [2008] UKHL 63, [2009] 1 AC 311, §§42-43 and *Stevenson v Secretary of State for Work and Pensions* [2017] EWCA Civ 2123 (15 December 2017), §§36-41 and §50.

*Discrimination*

1. C is treated differently from those who were already claiming UC as a couple before the death of their partner and who benefit from the 3 month protection in reg 37 Universal Credit Regulations 2013. Both C and those in the comparator group are in the same position in that they have recently suffered a bereavement while on benefits and need some protection of those benefits while they adjust to their new reality. However, they are treated differently with C receiving no such protection whatsoever.
2. We are not aware of any justification put forward by the State for this difference in treatment. It is submitted that it is manifestly without reasonable foundation for the State to treat C differently to another benefit claimant whose partner has recently died purely because of the fact that [she/he] has had to move from legacy benefits to UC rather than remaining on UC throughout.
3. In SC & Ors v Secretary of State for Work And Pensions &Ors [2018] EWHC 864 (Admin) (the “two child rule” judicial review) it was held that it was irrational for the State to grant a third child element to a family which already had two biological children and then took on a child under kinship care arrangements but to refuse to give a third child element to a family which had two children, at least one of whom was looked after under kinship care who then had a biological child. It is submitted that the situation of C and the ordering requirement of when C claims UC to benefit from the bereavement protection is equally irrational - if [she/he] and [her/his] partner had already been receiving UC rather than legacy benefits he and [her/his] children would have benefited from the run on under reg 37. However, as [she/he] had to move from legacy benefits to UC as a result of [her/his] partner’s death [she/he] and [her/his] children fail to qualify for any protection whatsoever.

**Alternative Remedy**

1. **The amount of an award is a matter open to appeal under Schedule 3 of the** Social Security Act 1998 (c. 14). However, **Child Poverty Action Group is aware that both of these issues have been raised on multiple occasions by advisers as a result of decisions by multiple decision makers. C’s claim therefore represents a wider issue than** [her/his] **individual experience.**[[6]](#footnote-6) **Given this and the fact that in relation to the second issue, we are challenging not a failure to correctly apply the law but the law itself and lack of bereavement protection for C and those like him moving from legacy benefits to UC after the death of a family member, judicial review is the appropriate remedy.**
2. **Furthermore, since the death of [initials], C has seen a profound reduction in [her/his] income and, together with [her/his] children, is suffering significant financial hardship at a time when [she/he] is recently bereaved and struggling to cope with day to day life and the realities of being a lone parent with [4] children. The mandatory reconsideration process is not bound by any strict timescales, and** it can take many months to receive a response, particularly when there is a backlog of cases. **Given the clear unlawfulness of the decision not to pay C the carer’s element** (already accepted by you in previous pre-action correspondence on the first issue) as well as the continuing clearly misleading and incomplete guidance on the correct approach to payment of the carer’s element, **judicial review is the appropriate remedy to provide a speedy resolution.**

**The details of the action the defendant is expected to take**

1. **The Defendant is requested to:**

* **award the ‘carer element’ in C’s UC award in each of the full assessment periods in which [her/his] CA was paid.**
* **amend the guidance available to decision makers on this issue to make it clear that a person is entitled to CA for a period even after the person being cared for has died.**
* **Read the provision in Reg 37 UC Regs to mean:**

***Run-on after a death***

*37.****Run-on after a death***

***37.****In calculating the maximum amount of an award where any of the following persons has died—*

*(a) in the case of a joint award, one member of the couple;*

*(b) a child or qualifying young person for whom a claimant was responsible; [1…]*

*(c) in the case of a claimant who had regular and substantial caring responsibilities for a severely disabled person, that person, [1; or*

*(d) a person who was a non-dependant within the meaning of paragraph 9 (2) of schedule 4,]*

*the award is to continue to be calculated as if the person had not died for the ‘****Assessment period’*** *in which the death occurs and the following two assessment periods.*

* **In the alternative, extend the 3 month ‘Run-on after a death’ UC provision to include C and other people making a claim to UC as a direct result of a bereavement and the resulting end of a claim to legacy benefits.**
* **Pay C the difference between [her/his] current UC award as a lone parent and what [she/he] would have received if he had already made a joint claim to UC before [her/his] partner died and benefited from the run-on after a death protection, which would have protected [her/his] income to allow a period of adjustment until [date] (the end of the second assessment period following [her/his] partner’s death).**
* **Accept that C and [her/his] children have been unlawfully discriminated against contrary to the ECHR/HRA and agree to pay [her/him] HRA damages for the financial and non-financial loss suffered by them as a result.**

**The details of documents that are considered relevant and necessary**

* **[initials]’s death certificate**
* **C and [initials]’s IS termination of award letter**
* **Documents available to the DWP on C’s UC journal**
* **C’s signed authority**

**ADR proposals**

**Please confirm in your reply whether the Defendant is willing to consider alternative dispute resolution.**

**The address for reply and service of court documents**

[advice agency name, address and email here]

**Email:**

**Fax:**

**Proposed reply date**

**Due to the urgency of this matter we expect a reply promptly and in any event no later than [date]. Should we not have received a reply by this time we will issue proceedings for judicial review without further notice to you.**

Yours faithfully,

Enc.

1. assets.publishing.service.gov.uk/media/657c891d83ba380013e1b66c/List-of-Authorised-Government-Departments-under-s.17-Crown-Proceedings-Act-1947-15.12.2023.pdf [↑](#footnote-ref-1)
2. gov.uk/government/organisations/government-legal-department [↑](#footnote-ref-2)
3. Para 13 of letter dated 23/05/19 [↑](#footnote-ref-3)
4. [assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/1015113/admf6.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1015113/admf6.pdf) [↑](#footnote-ref-4)
5. data.parliament.uk/DepositedPapers/Files/DEP2023-0791/027.\_Carers\_V21.0.pdf [↑](#footnote-ref-5)
6. A discussion of an identical issue can also be seen here: [www.rightsnet.org.uk/forums/viewthread/13614/](http://www.rightsnet.org.uk/forums/viewthread/13614/) [↑](#footnote-ref-6)