Unite the Union Response to Department Work & Pensions:

Make Work Pay Consultation on Employment Rights for Unpaid Carers and Parents of Seriously Ill Children

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September 2026

About You

Unite is the UK's largest trade union with over 1.2 million members across all sectors of the economy, including health, transport, manufacturing, financial services, food and agriculture, information technology, service industries, construction, energy and utilities, local government and the not-for-profit sector. Unite also organises in the community, enabling those not in employment to be part of our union.

Equality is a pivotal element of Unite's comprehensive agenda, which encompasses job security, equitable pay, and favourable working conditions. To ensure these values are actively promoted and upheld, we have established a dedicated equality department. This department oversees multiple Equality Committees, each designed to address the specific needs and challenges faced by various groups, including women, individuals with disabilities, members of the LGBT+ committee, Black and Asian Ethnic Minorities (BAEM) groups, and young workers. These committees play an essential role in advocating for inclusive practices and fostering an environment where every member can thrive, thereby enhancing the overall integrity and fairness of our organisation.

Unite has consistently championed equal opportunities, striving to eliminate barriers in the workplace and across all facets of society. **As part of our commitment to this mission, we have conducted a thorough consultation process to gather comprehensive insights and concerns from our members who have caring responsibilities**. Through this effort, we aim to amplify the voices and intersectional concerns of this group and ensure their experiences shape our advocacy in this call for evidence.

Unite's response to this consultation has drawn together comprehensive insights and is grounded in policies passed at previous conferences. Our submission examines current challenges, best practices, and recommendations to better support unpaid carers at work .

Contact

This document is submitted on behalf of Unite the Union.

For further information about this response, please contact Irina Do Carmo (Equality Research Officer)

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Executive Summary

Unite welcomes the Government's review of employment rights for unpaid carers and parents of seriously ill children. Caring is a fundamental part of millions of workers' lives, yet the evidence gathered through Unite's consultation with members demonstrates that the current employment framework does not provide sufficient practical or financial protection for many working carers. Too often, workers are left attempting to reconcile essential caring responsibilities with employment through annual leave, reduced working hours, unpaid absence or, ultimately, leaving employment altogether.

Unite recognises the introduction of statutory carer's leave as an important step forward. However, **a statutory right is only meaningful if workers know it exists, can afford to exercise it and feel secure in doing so**. Unite's member survey identified significant problems with awareness, accessibility and implementation of existing rights. Members reported difficulty locating information, inconsistent workplace policies, poor management knowledge and concerns about the treatment of caring-related absence. Significantly, some carers remain completely unaware that they have a statutory entitlement to carer's leave.

The fundamental weakness of the current entitlement is that it remains **unpaid**. This creates an inherent inequality in access: workers with sufficient financial resources may be able to exercise the right, while lower-paid and financially insecure workers may be unable to afford the loss of earnings. Unite therefore believes that the Government should move beyond simply extending the existing unpaid framework and establish a **statutory right to paid carer's leave**.

Unite recommends a minimum entitlement of **10 days' paid Carer's Leave per year, paid at 90% of the rate of pay**, with flexibility over how that leave can be taken. This should represent a statutory floor rather than a ceiling, preserving the ability of trade unions and employers to negotiate enhanced provisions through collective bargaining. Eligibility should remain broad and recognise the diversity of modern caring relationships, including those involving disabled dependants, people with complex or fluctuating conditions, multiple caring responsibilities and long-distance or transnational care.

For carers experiencing periods of intensive or prolonged caring, Unite supports an additional **statutory right to extended leave with a protected right to return to work for up to 10–12 months**. A temporary period in which work and care cannot reasonably be combined should not result in permanent labour-market exit. Workers should retain continuity of employment and have the right to return to the same job or, where genuinely not practicable, a suitable equivalent role on no less favourable terms and conditions.

There is also a strong **equality case for reform**. Women continue to undertake a disproportionate share of unpaid care and can consequently experience reduced working hours, interrupted employment, lower earnings, restricted career progression and poorer pension outcomes. Financially inaccessible caring rights risk reinforcing these inequalities. Paid carer's leave should therefore be understood not only as an

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employment right, but as an important measure supporting gender equality and the labour-market participation of groups already experiencing economic disadvantage.

Parents of seriously ill children

Unite strongly supports the creation of specific paid employment protection for parents and primary caregivers of seriously ill children (even when they have reached adult age). No parent should face the impossible choice between being present for a child experiencing serious illness and maintaining the income and employment upon which their family depends.

Unite believes eligibility must be **inclusive and needs-based rather than diagnosis-based**. "Serious illness" should encompass physical and mental health conditions, serious injury, disability and circumstances involving substantial or intensive care and support needs. This should include situations where disability or neurodivergence significantly affects a child's day-to-day functioning and requires substantial parental support, without incorrectly characterising neurodivergence itself as an illness. Families awaiting assessment or diagnosis should not automatically be excluded.

Eligibility should similarly reflect the reality of modern families. Protection should extend beyond biological parents to adoptive parents, step-parents, foster and kinship carers, guardians and others who have assumed substantive parental or primary caring responsibility. Where more than one eligible parent or caregiver is involved, each should have an individual entitlement.

For this specific entitlement, Unite supports **more than 12 weeks of paid leave per child, remunerated at 90% of normal pay**, with flexibility for the leave to be taken continuously or in blocks or individual days where appropriate. This should complement, rather than replace, general paid Carer's Leave: the latter provides an annual statutory floor for ongoing caring responsibilities, while extended paid leave provides additional protection during exceptional periods of serious or intensive care. It should be accompanied by a protected right to return to work.

Unite's priorities for reform

Unite believes the Government should adopt an integrated approach rather than relying on any single intervention. Our key recommendations are:

- **Introduce a statutory minimum of 10 days' paid carer's leave annually**, paid at 90% of normal earnings and capable of being taken flexibly.
- **Introduce an extended period of protected caring leave with a statutory right to return**, of up to 10–12 months, for workers who temporarily cannot combine employment with intensive caring responsibilities.
- **Introduce more than 12 weeks' paid leave for parents and primary caregivers of seriously ill children**, paid at 90% of normal earnings and accompanied by employment protection and a right to return.

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- Adopt **broad, inclusive and needs-based eligibility criteria**, recognising diverse families, caring relationships, disability, substantial support needs and long-distance or transnational care.
- Retain **self-certification and a presumption of trust** as the default approach to demonstrating eligibility, avoiding unnecessary bureaucracy and the routine collection of sensitive third-party medical information.
- Strengthen protections against **detriment, inappropriate attendance management, dismissal or other disadvantage** arising from caring responsibilities or the exercise of statutory rights.
- Establish a **single, clear and accessible source of information** on employment rights for carers and require employers to communicate those rights proactively.
- Improve **line-manager and HR training**, ensuring that statutory and workplace rights are understood and consistently applied.
- Ensure that guidance and employment protections recognise the **equality and intersectional impacts of caring**, including the disproportionate impact on women and the particular barriers experienced by low-paid, disabled, migrant and other workers facing labour-market disadvantage.
- Promote **collective bargaining and meaningful consultation with recognised trade unions**, enabling statutory minimum rights to be strengthened through workplace agreements.

The Government's immediate focus should be both **reducing the risk of carers being forced out of employment and ensuring employers are equipped and required to support workers with caring responsibilities**. These objectives are mutually reinforcing. Government must establish a strong statutory floor; employers must translate those rights into supportive workplace practice; and trade unions must have a meaningful role in negotiating improvements that respond to the needs of their workforce.

There is also a wider economic case for action. Supporting carers to remain connected to employment can help retain skills and experience, protect household incomes and pensions, reduce avoidable recruitment and replacement costs and prevent temporary caring responsibilities becoming permanent labour-market exit. Reform should therefore be understood not simply as an additional employment cost, but as an **investment in workforce participation, retention, equality and economic security**.

Unite believes this review provides an opportunity to establish a coherent new settlement for working carers: one in which workers are **not forced to choose between work, income and the people who depend upon their care**. Information and guidance are necessary, but they cannot substitute for meaningful statutory rights. Paid leave, employment security, flexibility, strong protection from detriment and effective workplace implementation must sit together if the Government is to deliver employment rights that work for carers in practice.

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Chapter 1 – Information on unpaid carers

Question 8 – How easy is it for employees to access information on their rights that support their caring responsibilities in the workplace?

Unite carried out a survey of our members who are also carers, in the survey we asked members about their experiences of accessing workplace rights as carers. The majority, **41% stated that it was fairly difficult** to access these rights in the workplace.

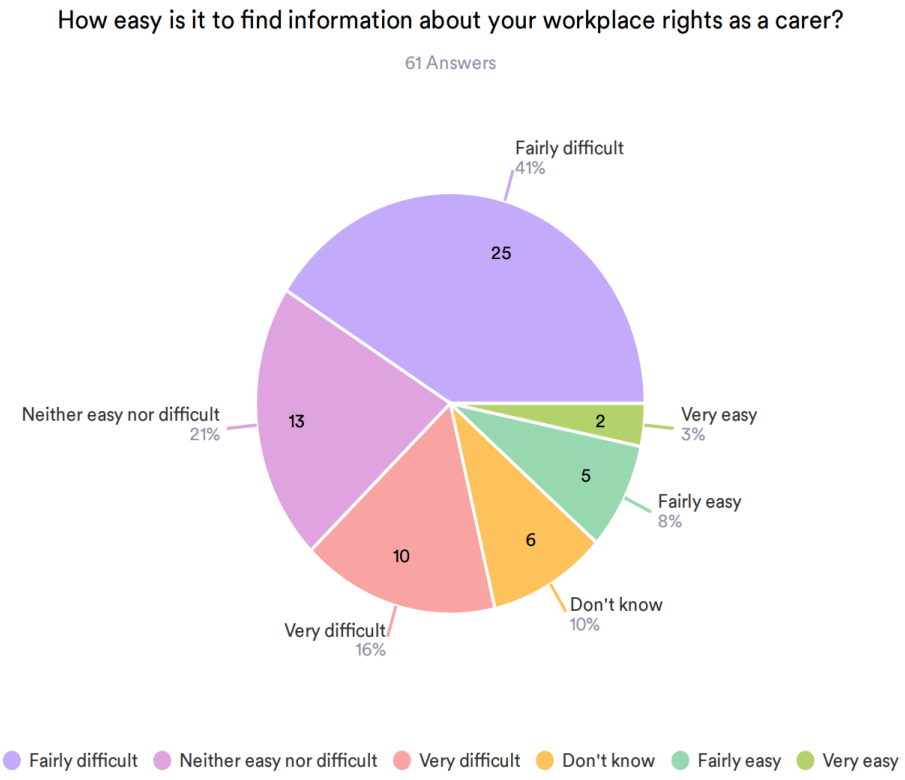


Figure 1 Unite Carers Leave Survey August 2026

Question 9 – In your view, are there any factors that prevent employees accessing information on the rights that support their caring responsibilities in the workplace?

Evidence from Unite's carer's leave survey indicates that significant barriers remain to employees accessing, understanding and confidently exercising workplace rights associated with their caring responsibilities.

A recurring theme in responses was **poor visibility and accessibility of information**. Members reported not knowing where information was held, having to actively search for policies, and finding that caring responsibilities were not routinely addressed through workplace policies, induction or training. Some respondents were simply unaware that they had any specific employment rights as carers:

"I don't know where to look. My senior managers don't care."

"Lack of public knowledge about these things. Nothing is advertised without having to dig for information."

"No specific place to access info."

"It's not mentioned in training etc."

"I wasn't aware I had any."

This suggests that simply making information technically available is insufficient. Rights are of limited practical value if workers do not know that they exist, cannot easily locate the relevant policy, or cannot understand how the statutory entitlement interacts with their employer's own policies and procedures.

A second significant barrier identified by Unite members in the survey was inadequate management knowledge and training. Respondents described managers being unfamiliar with carers' rights and workers receiving inconsistent advice depending on whom they approached:

"Finding the documentation about what is allowed, also management not actually knowing about the policies."

"It doesn't seem to be any clear guidance. You could ask 3 people for advice and get 3 different answers."

"Not enough information... I think training should be given to managers; staff already have it difficult and don't need the additional stress."

This is particularly concerning because line managers are frequently the first point of contact for workers seeking to exercise employment rights. A statutory entitlement can

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therefore be undermined in practice where the manager responsible for implementing it does not understand the entitlement or the employer's obligations.

Members also identified a gap between formal policy and workplace practice. One respondent stated:

"The business is inconsistent in its delivery of help for carers and so regardless of policy it is hard to get time off."

This distinction is important. Improving access to information cannot be considered separately from workers' confidence that the right will be respected. Some respondents expressed concern about scrutiny or negative repercussions arising from taking time away from work because of caring responsibilities. Where workers believe that requesting leave may damage their relationship with management, affect attendance records or lead to greater scrutiny, awareness of the right alone will not ensure that they feel able to exercise it.

There is also an important financial accessibility barrier. One respondent explained that although government information itself could be found, understanding the interaction between employment status, available rights and the financial consequences of taking unpaid time away from work was difficult:

"Whilst the government website is easy to access, mixing that in employment status is confusing and how we would afford rent/bills etc."

This illustrates a fundamental limitation of the current entitlement. Information about an entitlement to unpaid leave does not necessarily translate into meaningful access where workers cannot afford to exercise that right. Information and guidance should therefore clearly explain eligibility, employment protections and the interaction between Carer's Leave and other relevant workplace rights and sources of financial support.

Particular barriers affecting migrant workers and transnational carers - Unite believes that government policy and guidance must also recognise that caring responsibilities increasingly extend across national borders. Migrant workers caring for relatives overseas can face particularly complex circumstances that do not fit conventional assumptions about caring taking place within the worker's household or immediate geographical area. Unite believes migrant workers with care responsibility for relatives have unique barriers which should also be considered in future policy:

One Unite member described simultaneously supporting family members in the Philippines and the United States:

"I am a long-distance carer to a father in the Philippines with cancer, a mother in the US with deteriorating health who depends on me for coordinating her care ... and a sister who depends on my mother for care but my mother isn't able to care because she needs care ... The UK Home Office makes it difficult (98% rejection rate) for adult dependents to join family in the UK. This means I work harder to keep my job and also

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provide long distance care to certain limits that are inadequate. My absences/sicknesses are scrutinised for my unique situation."

The respondent-reported 98% rejection rate illustrates the perception among some migrant carers that immigration restrictions can make family reunification exceptionally difficult, leaving workers to manage substantial caring responsibilities across borders. The testimony also demonstrates how immigration status, family separation and employment pressures can intersect: workers may simultaneously need to maintain employment and income, coordinate care internationally and manage workplace scrutiny of absence.

"I don't know where to look. My senior managers don't care"

"Finding the documentation about what is allowed. also management not actually knowing about the policies"

"The business is inconsistent in it's delivery of help for carers and so regardless of policy it is hard to get time off?"

"Lack of public knowledge about these things. Nothing is advertised without having to dig for information."

"It's not mentioned in training etc"

"No specific place to access info"

"Not always explicitly addressed in policies"

"Not enough information are about abs I think training should be given to managers that staff already have it difficult and don't need the additional stress"

"Whilst the government website is easy to access, mixing that in employment status is confusing and how we would afford rent/bills etc"

"It doesn't seem to be any clear guidance. You could ask 3 people for advice and get 3 different answers"

"I wasn't aware I had any"

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Question 10 – What, if any, additional guidance or information would help carers understand and use their rights in the workplace?

Unite supports this Government's review of unpaid carer's leave and its aims to determine whether there are barriers to particular groups of unpaid carers understanding or using carer's leave. Unite's evidence suggests that there are. The problem is not simply a lack of information, rather it is a combination of poor communication, inconsistent implementation, inadequate management training, financial barriers and fear of workplace repercussions.

Any reforms should therefore address both workers' knowledge of their rights and their practical ability to exercise those rights without financial hardship or detriment.

Unite therefore recommends that the Government:

- develops a **single, clearly identifiable and accessible source of information** explaining employment rights for working carers;
- requires or strongly encourages employers to **proactively communicate carers' rights**, rather than placing the burden on individual workers to discover them;
- ensures information is routinely incorporated into **induction, staff handbooks, intranets and workplace training**;
- provides **clear guidance and training for line managers and HR professionals**, including **practical examples and case studies**;
- makes information **available in accessible formats and appropriate languages**;
- explicitly **recognises long-distance and transnational caring responsibilities** within guidance;
- makes clear that **workers should not be subjected to detrimental treatment, inappropriate attendance management or additional scrutiny because they seek to exercise their statutory rights**; and
- recognises that **the unpaid nature of the current entitlement is itself a major barrier to meaningful access, particularly for low-paid and financially insecure workers.**

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Question 11 – Would specific guidance on support for carers in particularly challenging situations help employers and carers in the workplace? (e.g. – parents of seriously ill children, those providing end-of-life care)

Yes.

Unite strongly supports the development of specific guidance for employers and workers on supporting unpaid carers experiencing particularly challenging circumstances. Such guidance would help address the lack of management knowledge, inconsistent application of workplace policies and difficulties accessing clear information identified through Unite's carer's leave survey.

As highlighted in our response to Question 9, members reported receiving different information depending on which manager they approached, managers not understanding existing policies, and significant inconsistencies between formal workplace policies and how support was provided in practice. In particularly difficult or rapidly changing caring situations, this uncertainty can add considerable stress to workers who are already under significant emotional, practical and financial pressure.

Specific guidance would therefore be valuable both in helping **carers understand their rights** and in giving **managers the confidence and knowledge to respond appropriately and consistently**.

Question 12 – If yes, what challenging situations should this guidance cover?

Unite believes such guidance should go beyond explaining the statutory carer's leave entitlement. Particularly challenging caring circumstances will rarely fit neatly within a single employment right. Guidance should therefore explain how carer's leave interacts with other relevant workplace rights and provisions, including time off for dependants, flexible working, annual leave, compassionate or bereavement leave, sickness absence where appropriate, reasonable adjustments and any enhanced contractual or collectively agreed provisions.

The guidance should also make clear that employers should adopt a **compassionate, flexible and individualised approach**, rather than requiring workers experiencing a crisis to navigate multiple policies or repeatedly explain highly personal circumstances to different managers.

For example, a parent caring for a seriously or terminally ill child, or an employee providing end-of-life care, may experience sudden and unpredictable changes in caring responsibilities. Rigid attendance requirements, inflexible working arrangements or inappropriate scrutiny of absence can compound the distress experienced by the worker.

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Managers should therefore be encouraged to consider the worker's circumstances as a whole and discuss appropriate adjustments and forms of leave with them.

Unite would also caution against guidance being limited to a narrow definition of what constitutes a "particularly challenging" caring situation. Caring arrangements are diverse, and the severity of the impact on the worker cannot always be determined simply by the diagnosis or relationship involved.

Guidance should therefore recognise circumstances including, but not limited to:

- parents and guardians of seriously or terminally ill children;
- workers providing palliative or end-of-life care;
- carers supporting someone following a serious or life-changing diagnosis;
- carers of people with significant physical disabilities, learning disabilities or complex needs;
- carers supporting someone experiencing serious mental ill-health;
- carers supporting people with progressive or fluctuating conditions, including dementia;
- workers with multiple caring responsibilities, sometimes referred to as "sandwich carers";
- single carers or those with little or no wider family or support network;
- migrant workers and **transnational or long-distance carers** supporting relatives overseas;
- workers experiencing sudden deterioration or significant changes in the needs of the person they care for; and
- workers whose caring responsibilities arise alongside bereavement or other major family crises.

As highlighted by Unite's survey evidence, transnational caring deserves particular recognition. Migrant workers may be responsible for coordinating or providing care to relatives living overseas while simultaneously maintaining their employment in the UK. Guidance should avoid assumptions that a dependant necessarily lives with, or geographically close to, the employee.

Unite also believes that specific guidance should address **confidentiality and dignity**. Workers should not be expected to repeatedly disclose sensitive medical or family information to justify their caring responsibilities, and managers should be trained to handle such conversations sensitively and confidentially.

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Crucially, guidance should make clear that employees should not experience **detriment, inappropriate attendance management, disciplinary action or additional scrutiny** because they have caring responsibilities or because they seek to exercise their statutory rights. This is particularly important in circumstances where caring responsibilities are unpredictable or intensive.

Finally, Unite believes guidance must acknowledge that **unpaid leave will remain inaccessible to many workers regardless of how comprehensive the guidance is**. Those experiencing the most intensive caring responsibilities may also face the greatest financial pressures. Workers should not be placed in the position of having to choose between providing essential care to a loved one and being able to pay their rent, mortgage or household bills.

Specific guidance would therefore be a welcome and necessary measure, but it should complement rather than substitute for stronger employment rights. Unite believes the Government should ultimately provide a **statutory entitlement to paid Carer's Leave**, alongside clear guidance, effective management training and protection against detriment, so that carers can exercise their rights in practice regardless of their income.

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Chapter 2 – Employment rights for unpaid carers

Question 13 – How aware are you of the employment rights currently available to unpaid carers?

As a trade union, Unite is very aware of the employment rights currently available to unpaid carers. We have actively contributed to trade union liaison group discussions and wider stakeholder engagement on employment rights, including the Government's Make Work Pay consultations.

However, Unite's survey evidence demonstrates a significant gap between awareness at an organisational and policy level and awareness among workers on the shopfloor.

Throughout our survey, members reported uncertainty about what rights were available to them, difficulty locating relevant workplace policies, inconsistent advice from managers and, in some cases, being completely unaware that they had any specific rights as carers. As one respondent stated:

"I wasn't aware I had any."

This reflects a wider concern identified in our response to Question 9: **a statutory right is only meaningful if workers know that it exists, understand how to access it and feel confident that it will be respected in practice.**

Unite is therefore concerned that awareness of carers' employment rights remains uneven and, for many workers, insufficient. The responsibility for understanding these rights should not fall solely on individual employees. Employers should be expected to communicate carers' rights proactively and clearly through induction, workplace policies, staff handbooks, intranets and regular training.

Particular attention should also be given to **line-manager training**, as managers are often the first point of contact for workers seeking support. Our survey indicates that inadequate management knowledge can itself become a barrier, with workers receiving inconsistent or incorrect information depending on whom they approach.

Unite is clear that trade unions play a crucial role in advising, representing and supporting workers to understand and exercise their employment rights. However, trade union density and collective bargaining coverage remain particularly limited in many low-paid and precarious sectors, including hospitality, social care, food production and agriculture, as well as across many small and medium-sized enterprises (SMEs). Consequently, many workers, particularly those in non-unionised workplaces, do not have access to the advice, representation and practical support that trade unions provide.

While unions will continue to play an essential role in raising awareness and negotiating enhanced provisions for carers, the existence of trade union support cannot substitute for employers' responsibility to ensure that all workers are informed of their statutory rights. Government and employers must therefore ensure that information on Carer's Leave is proactively communicated, easily accessible and understood by all workers, regardless of whether they are a trade union member or work in an organised workplace.

Unite therefore recommends that the Government supports a much stronger programme of awareness-raising, alongside clear and accessible statutory guidance for workers, employers and managers. Information should be available in accessible formats and appropriate languages, and employers should be encouraged to work with recognised trade unions to ensure that workers understand both their statutory rights and any enhanced contractual or collectively bargained provisions available to them.

Ultimately, Unite's experience suggests that there is currently a substantial awareness and implementation gap between rights on paper and workers' knowledge and experience of those rights in the workplace. Closing that gap must form a central part of any reform to employment rights for unpaid carers.

Question 14 – From your perspective, how effective are existing employment rights at helping unpaid carers balance work and care?

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Quite ineffective - Unite recognises that the introduction of a statutory right to carer's leave was an important and welcome step in formally recognising the needs of unpaid carers in the workplace. However, our evidence suggests that the existing framework remains quite ineffective in enabling many unpaid carers to genuinely balance their employment with their caring responsibilities.

A fundamental weakness is that carer's leave is unpaid. For many workers, particularly those on low incomes, an entitlement to take leave without pay is not an entitlement they can realistically afford to exercise. Carers may already face additional costs associated with their caring responsibilities, making the loss of even a day's wages particularly difficult. The workers who may have the greatest need for Carer's Leave can therefore be among those least able to use it.

The current entitlement of one week of unpaid carer's leave per year is also unlikely to reflect the reality of many caring relationships. Caring responsibilities can be ongoing, unpredictable and intensive. A deterioration in a dependant's health, a hospital admission, changes to care arrangements or a serious diagnosis can generate significant demands that cannot reasonably be accommodated within five working days per year.

As highlighted throughout Unite's response to this consultation, there is also a substantial gap between having a statutory right and being able to exercise that right in practice.

Our carer's leave survey identified workers who were unaware of their rights, struggled to locate relevant policies, encountered managers who did not understand the available provisions, or received inconsistent information depending on whom they approached. Some members also expressed concern about the scrutiny of absence or potential repercussions associated with taking time away from work because of their caring responsibilities.

Our survey also interrogated the impact of caring responsibilities and the current legal provisions for unpaid carers leave had on carers working lives;

- 21% couldn't afford unpaid leave;
- 19% experienced stress or poor mental health;
- 17% typically used their annual leave to provide care;
- 12% had to take unpaid leave;
- 12% experienced financial hardship due to their unpaid caring responsibilities, and;
- 10% had to reduce their working hours due to their caring responsibilities.

Significantly, 28% of carers who responded to our survey have never taken carer's leave and a further 16% weren't aware they were entitled to carer's leave.

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These problems are compounded for workers in low-paid, insecure and precarious employment, where the financial consequences of unpaid leave may be particularly acute, and workers may feel less able to challenge management decisions or request flexibility. Workers in non-unionised workplaces may also lack access to independent advice and representation to help them understand and enforce their rights.

Existing rights may also be insufficient for carers experiencing particularly challenging circumstances, including parents of seriously ill children, those providing end-of-life care, carers supporting people with complex or fluctuating conditions, workers with multiple caring responsibilities, and migrant workers providing long-distance or transnational care. These circumstances require considerably greater flexibility than the existing minimum entitlement can provide.

Unite therefore believes that improving the effectiveness of employment rights for carers requires action on several fronts. In particular, the Government should:

- introduce a **statutory entitlement to paid carer's leave**, ensuring that workers are not forced to choose between providing necessary care and maintaining their income;
- review whether the existing **one-week annual entitlement is sufficient** to reflect the reality and diversity of caring responsibilities;
- ensure that carers have access to **meaningful flexibility at work**, including through stronger flexible-working rights;
- strengthen protection against **detriment, inappropriate attendance management or other negative treatment** associated with caring responsibilities or the exercise of carers' rights;
- provide clear guidance explaining how carer's leave interacts with other relevant rights and workplace provisions; and
- ensure guidance recognises the diversity of caring relationships, including **long-distance and transnational caring responsibilities**.

Trade unions also have an important role in negotiating workplace arrangements that go beyond statutory minimums. However, as outlined in our response to Question 13, access to collectively bargained improvements is uneven. Statutory rights must therefore provide an effective minimum floor of protection for all workers, regardless of whether their workplace is unionised.

Ultimately, while existing employment rights provide an important foundation, a right that workers cannot afford to exercise, do not know exists, or do not feel secure using cannot be considered fully effective. For carer's leave to genuinely enable workers to balance employment and caring responsibilities, it must be accessible, adequately resourced,

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understood by employers and workers, and accompanied by meaningful protection against detriment.

Question 15 – In what circumstances should unpaid carers be able to take carer's leave entitlements? (tick all that apply)

- ✓ To provide personal and emotional support
- ✓ To provide practical support (for example cleaning, gardening, paying bills)
- ✓ To help with official or financial matters
- ✓ To provide personal and/or medical care (for example washing, dressing, administering medicine)
- ✓ To make arrangements for the provision of care
- ✓ To accompany people to appointments
- ✓ To allow the carer to rest and recuperate, take up carer support, and/or maintain their health and wellbeing
- ✓ Other (please specify) - Caring responsibilities are complex and vary greatly from person to person, therefore Unite believes that a holistic approach should be applied when considering the circumstances for carer's leave entitlement.

Question 16 – From your perspective, who should a carer be able to take carer's leave entitlements to support? (tick all that apply)

- ✓ A spouse or civil partner
- ✓ A child
- ✓ A parent
- ✓ Any person who lives in the same household as the employee (otherwise than by reason of being their employee, tenant, lodger, or boarder)
- ✓ Any person who reasonably relies on the employee for care, regardless of familial
- ✓ relationship or cohabitation.
- ✓ Other (please specify) – As above, Unite supports a holistic approach that does not limit those who 'tick outside the box' from accessing carer's leave. Modern families and relationships are complex and should not be defined by stringent examples. Therefore, carer entitlement categories must be broad.

Question 17 – Would extending the existing unpaid carer's leave entitlement be helpful for carers balancing work and care?

Very helpful

Unite supports extending the existing carer's leave entitlement. Our survey evidence demonstrates that the current framework is not meeting the needs of many working carers: 58% of carers responding to Unite's survey said that existing employment rights are ineffective at helping them balance work and caring responsibilities.

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The current entitlement of one week per year does not adequately reflect the reality of caring, which can be ongoing, intensive and unpredictable. Hospital appointments, changes in care arrangements, periods of deteriorating health and unexpected emergencies can quickly exhaust the existing entitlement.

An extended entitlement would provide carers with greater flexibility and reduce the pressure to use annual leave, sickness absence, or other forms of leave to meet essential caring responsibilities. This is particularly important for workers providing end-of-life care, supporting someone with a serious or fluctuating condition, caring for disabled dependants or managing multiple or long-distance caring responsibilities. Greater flexibility over how an extended entitlement can be taken, would also help workers respond to the realities of caring while remaining in employment.

However, extending an entitlement that remains unpaid will only go so far. For many low-paid workers, taking additional unpaid leave is simply not financially viable. According to our survey 21% of respondents cannot afford unpaid leave, and 39% have had to use other forms of leave, including; sick leave, annual leave and flexible working to meet their caring responsibilities. An extended unpaid entitlement may therefore provide greater flexibility on paper while remaining inaccessible to those who cannot afford to lose wages. Unite believes that extension should be accompanied by the introduction of paid carer's Leave, so that the ability to provide essential care is not determined by a worker's income. **No worker should have to choose between caring for someone who depends on them and being able to pay their household bills**.

Question 18 – If the current entitlement of up to 5 days unpaid leave was to be extended, how many days of unpaid leave a year would be appropriate?

10 days

Unite believes that 10 days per year should be the minimum statutory entitlement to carer's leave.

The existing entitlement of up to five days per year is insufficient to reflect the reality of many caring responsibilities, which are often ongoing, unpredictable and cannot be confined to a small number of planned occasions. Medical appointments, hospital admissions and discharge, changes to care arrangements, deterioration in a dependant's condition and unexpected emergencies can quickly exhaust the current entitlement. Increasing the minimum to 10 days would effectively provide two working weeks of carer's leave, giving carers greater capacity to respond to these circumstances while remaining in employment.

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Question 19 – From your perspective, what would be the impact of extending unpaid carer's leave on employees with caring responsibilities?

10 days minimum

A 10-day minimum would also reduce the pressure on carers to use their annual leave, take inappropriate sickness absence, reduce their working hours or ultimately leave employment when caring demands become difficult to reconcile with work. Importantly, the entitlement should remain flexible and capable of being taken in individual days or part-days where necessary, recognising that caring needs do not always require a full day away from work. Employers should also be encouraged, through collective bargaining and good employment practice, to provide enhanced entitlements where workers require additional support.

However, Unite considers 10 days to be a minimum floor, not a ceiling on support, and extending the duration of leave does not resolve the fundamental problem identified in our survey evidence: **many workers cannot afford to take unpaid leave**. Unite therefore believes that increasing the entitlement to at least 10 days should form part of a wider move towards **paid carer's leave**. Without pay, extending the entitlement risks providing additional days to which workers have a legal right but which the lowest-paid carers cannot financially afford to use.

Unite also recommends independent Government-commissioned research to demonstrate the economic viability and wider economic benefits of extending and ultimately paying carer's leave. There is already a strong economic case for supporting carers to remain in, and return to, employment, research commissioned by Carers Trust found that helping just the 524,000 unpaid carers closest to the labour market into full-time employment could generate **up to £16.9 billion a year in benefits to the economy and carers' household incomes**, including up to **£4 billion in additional Income Tax and National Insurance receipts and £2.8 billion in reduced welfare payments**[1]. This demonstrates that investment in employment rights, which enable carers to remain economically active, should be viewed not simply as a cost to employers, but as an investment in labour-market participation, household incomes and economic growth.

[1] Carers Trust: ***Lost labour of unpaid carers costs carers and the economy up to £47.7bn, study finds.*** 15th October 2025. Link: https://carers.org/news-and-media/news/post/549-lost-labour-of-unpaid-carers-costs-the-uk-up-to-47-billion-study-finds?utm_source=chatgpt.com

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Question 21 –Would a longer period away from work with a "right to return" be helpful in supporting carers to balance work and care?

Very helpful

Unite strongly supports the introduction of a longer period of leave accompanied by a statutory right to return to work. Our unpaid carer's leave survey results reveal **73% of respondents believe carers should be entitled to a longer period of leave with the right to return to work**.

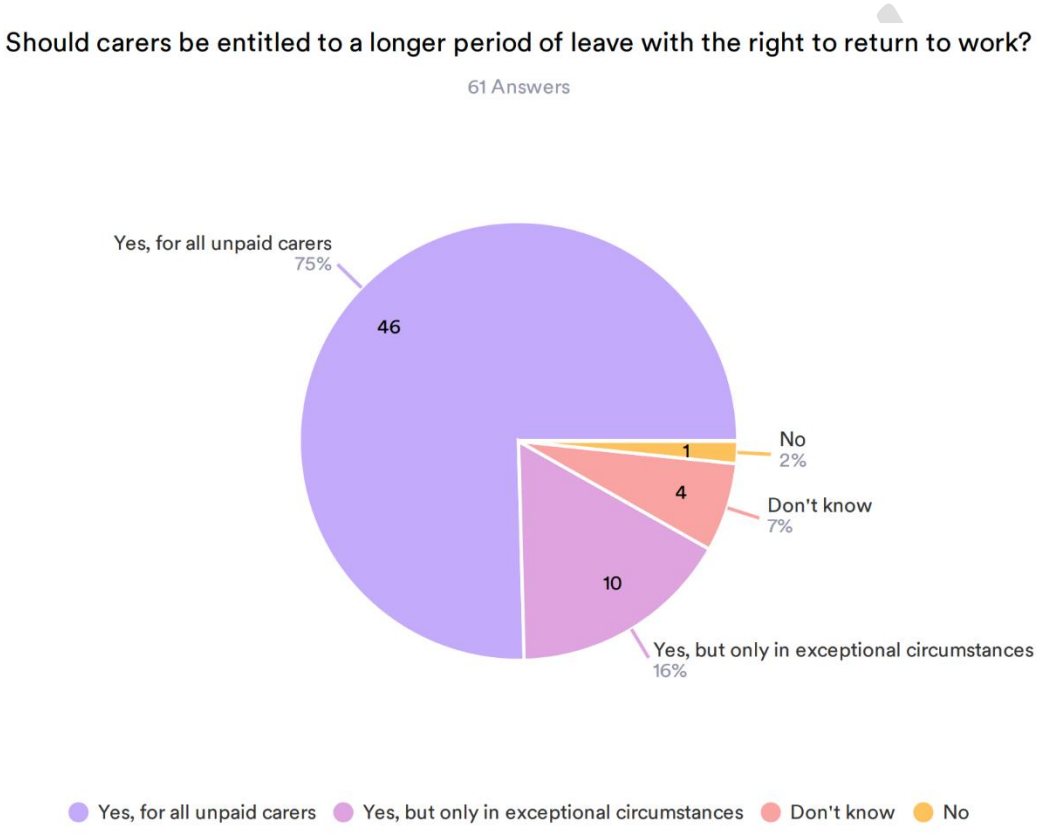


Figure 2: Unite Unpaid Carer's Leave Survey - Right to return to work

For some carers, particularly those providing intensive care, supporting somebody through a serious or terminal illness, or responding to a significant deterioration in a dependant's condition, short periods of carer's leave or flexible working will simply not be sufficient. In these circumstances, workers should not be forced into an impossible choice between continuing in employment and providing essential care to someone who depends upon them.

A statutory right to return would provide carers with the security to step away from employment for a defined period without permanently severing their relationship with the labour market. Crucially, this should include a right to return to the same job, or where genuinely not practicable following a longer absence, a suitable equivalent role on pay

and terms and conditions no less favourable, alongside protection of continuity of employment, seniority, pension and other contractual rights. Strong protection against dismissal, redundancy selection or other detriment connected with taking the leave would also be essential. The principle is already established within the existing carer's leave framework, under which workers taking statutory carer's leave have protection against detriment and a right to return to the same job. Extending appropriate protections to a longer period of caring leave would therefore build upon, rather than depart from, the existing framework.

There is also a compelling economic and workforce-retention case for a statutory right to return. Supporting an experienced employee to maintain their connection with the workplace is likely to be considerably more cost-effective than losing that worker and recruiting and training a replacement. CIPD estimates cited in recruitment research put the average cost of filling a vacancy, including associated labour costs, at approximately **£6,125, rising to £19,000 for a manager-level role**; these figures do not fully capture the wider costs associated with lost skills and experience, reduced productivity, induction and the time required for a new employee to become fully effective. A right to return should therefore be viewed not simply as an employment protection for carers, but as a practical retention measure that can help employers preserve skills, experience and institutional knowledge while avoiding unnecessary recruitment and replacement costs.

Unite therefore agrees with the principle advanced by carers' organisations that employment policy must not only help carers stay in work, but also provide an effective route back into work when intensive caring temporarily makes continued employment impossible. A worker should not have to sacrifice their job, career and long-term financial security because, for a period of their working life, somebody they love depends upon their care.

Question 22 – If a "right to return" were to be introduced, who should be eligible? (Choose all that apply if not selecting "all unpaid carers")

• All unpaid carers

Unite believes that **all unpaid carers should be eligible for a statutory right to return**. Protection should be based on the fact that a worker has a genuine caring responsibility and needs an extended period away from work, rather than being restricted to particular categories of carers. A universal entitlement would support the Government's *Make Work Pay* commitment to strengthen employment security and ensure that improved employment rights are available to all workers who need them.

While Unite recognises that parents of seriously ill children and those providing end-of-life care can face exceptionally difficult circumstances, restricting eligibility to particular groups, diagnoses or caring circumstances risks creating an arbitrary **hierarchy of carers**, where some caring responsibilities are considered more deserving of

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employment protection than others. Other carers may experience equally intensive and prolonged demands, including those caring for a disabled adult, someone with dementia or a progressive condition, a person experiencing serious mental ill-health, or someone whose condition fluctuates or deteriorates unexpectedly. Workers may also have multiple caring responsibilities or provide long-distance or transnational care. Evidently, caring needs are diverse and can change rapidly, eligibility should therefore be determined by the existence of a genuine caring responsibility rather than the particular condition, age or relationship of the person receiving care.

A universal right would also provide greater **clarity, fairness and consistency**, avoiding unnecessarily complex eligibility tests for workers and employers. For Unite, the principle should be that no worker should be forced to permanently give up their employment simply because they need a temporary period away from work to provide essential unpaid care.

Question 23 – If a "right to return" were to be introduced, what form of evidence should employees have to provide to prove their eligibility?

• Self-certification (e.g. – written statement from employee)

Unite supports **self-certification** as the most appropriate and proportionate approach. Employees should be trusted to provide a written declaration confirming that they meet the eligibility requirements, without routinely being required to obtain medical or other professional evidence about the person for whom they provide care.

This would be consistent with the existing statutory carer's leave entitlement, under which employers cannot require an employee to provide evidence of their dependant's care needs before granting leave. There are also important considerations regarding data protection and privacy. Requiring medical or other evidence could result in employers routinely collecting and processing sensitive personal information, including health information about a third party who is not their employee. Indeed, when introducing the existing carer's leave Regulations, the Government specifically recognised the challenges associated with employers requesting and managing sensitive personal or medical information relating to a third party and consequently decided not to introduce an evidence requirement. Unite sees no compelling justification for departing from this principle for a right to return.

Requiring evidence from a doctor, social worker or other professional could also create unnecessary administrative burdens, costs and delays, and may disadvantage workers whose caring arrangements are informal, long-distance or transnational, or where the person receiving care has limited engagement with formal health or social care services. Unite therefore recommends a **simple and standardised self-certification process based on a presumption of trust**, with further evidence sought only in exceptional circumstances where there are reasonable grounds to question eligibility. False

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declarations could be addressed through normal workplace procedures, as is the case with other forms of self-certification.

Question 24 – How long would be appropriate for an extended period of leave with a "right to return"?

• 10 – 12 months

Unite believes that a period of **10–12 months** would provide a meaningful level of employment security for carers who need to step away from work because of intensive or prolonged caring responsibilities. A shorter period may not be sufficient where someone is providing end-of-life care, supporting a person through serious illness or treatment, or responding to a substantial and potentially unpredictable change in caring needs.

A period of up to 12 months would also provide employers with greater certainty, and allow the absence to be managed through established temporary cover arrangements, rather than treating the worker's departure as permanent. Longer-term temporary cover, secondments or fixed-term arrangements are familiar workforce-planning mechanisms and could enable employers to maintain operational continuity while preserving the employee's connection to the workplace. This supports the Government's own *Make Work Pay* objectives of improving job security, reducing unplanned employee turnover and helping employers retain experienced workers.

Importantly, Unite does not envisage that every carer taking extended leave would need or wish to remain away from work for the full period. The entitlement should provide **up to 10–12 months**, with carers able to return earlier where their circumstances permit. This would create a protected bridge back into employment rather than forcing workers to resign when they experience a temporary period in which work and intensive caring cannot reasonably be combined.

Question 25 – In your view, what would be the impact of having access to a "right to return" on employees with caring responsibilities?

A statutory right to return would provide carers with greater **employment and financial security**, allowing them to step away from work during periods of intensive caring without being forced to permanently sacrifice their job or sever their connection with the labour market. This is particularly important because evidence shows that many carers who leave employment do not return once their period of caring ends, with potentially significant consequences for their immediate and longer-term earnings, pension savings, career progression and financial independence.

A right to return could therefore help prevent a temporary period of intensive caring from becoming **permanent labour-market exit**. This would benefit not only carers but

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employers and the wider economy by retaining experienced and skilled workers and reducing avoidable recruitment and replacement costs. The economic consequences of carers being unable to participate in employment are already substantial: Department for Work and Pensions analysis estimates that lost economic output associated with working-age unpaid carers whose caring responsibilities prevent them from working is approximately **£37 billion a year[2].** The Government has itself cited this figure in the current consultation when making the case for improving employment support for unpaid carers.

A statutory right to return would provide a practical bridge between caring and employment, giving workers greater confidence that taking time away to provide essential care does not mean giving up their career altogether. It would also support the wider *Make Work Pay* objective of increasing employment security and helping people remain connected to good, sustainable work. For Unite, the objective should be to ensure that caring responsibilities result in a temporary and protected absence from work where necessary, rather than an avoidable and permanent exit from employment.

Question 27 – Would the introduction of a statutory paid carer's leave entitlement be helpful in supporting carers to balance work and care?

- Very helpful

Unite strongly supports the introduction of a statutory entitlement to paid carer's leave. While the existing right to unpaid carer's leave was an important step forward, its effectiveness is fundamentally limited where workers cannot afford to exercise it. This is strongly reflected in Unite's survey: **21% of carers who responded said they cannot afford to take unpaid carer's leave,** while **93% agreed that paid carer's leave should be introduced.**

Paid carer's leave would help remove the financial penalty associated with providing essential care, particularly for low-paid workers who may have little capacity to absorb a loss of earnings. It would enable more carers to use their statutory entitlement as intended, rather than having to use annual leave, reduce their hours or attempt to balance work and care without taking necessary time away. Paid leave would help

[2] The DWP analysis estimates that **544,000 working-age unpaid carers** were out of work because their caring responsibilities prevented them from working. DWP multiplied this population by mean **Gross Value Added (GVA) output per worker**, producing an estimated **£37 billion per year in lost economic output from informal caring**. Department for Work and Pensions (2025), *The cost of working age ill-health and disability that prevents work*, 18 March 2025.Link: https://www.gov.uk/government/statistics/the-cost-of-working-age-ill-health-and-disability-that-prevents-work/the-cost-of-working-age-ill-health-and-disability-that-prevents-work?utm_source=chatgpt.com

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remove this financial barrier, enabling carers to balance work and care without being forced to choose between their caring responsibilities and their financial security.

Unite therefore believes that moving from an unpaid to a paid entitlement is essential to making carer's leave a genuinely accessible employment right, rather than one whose practical value depends on a worker's ability to afford it.

Question 28 – If paid carer's leave was introduced, what evidence should employees have to provide to prove their eligibility for it?

- Self-certification (e.g. – written statement from employee)

Unite supports **self-certification** as the most appropriate and proportionate approach, consistent with our response to Question 23 and the principles underpinning the existing statutory carer's leave entitlement. Employees should be trusted to provide a written declaration confirming that they meet the eligibility requirements, without routinely being required to obtain medical or other professional evidence about the person for whom they provide care.

The introduction of payment should not, in itself, justify imposing a more burdensome evidential requirement. Requiring medical certificates or other third-party evidence could create unnecessary costs, delays and administrative barriers which may deter workers from exercising the right. It could also require employers to routinely collect sensitive health information about a third party who is not their employee, raising important privacy, data-minimisation and UK GDPR considerations. The Government recognised similar concerns when designing the existing carer's leave framework and chose not to require evidence of a dependant's care needs.

Unite therefore recommends a simple and standardised self-certification process based on a presumption of trust. This would ensure that paid carer's leave is accessible when it is needed while avoiding unnecessary bureaucracy for both workers and employers. Any deliberate misuse of the entitlement could be addressed through existing workplace procedures rather than imposing disproportionate evidential requirements on all carers.

Question 29 - How long would be appropriate and reasonable for a potential paid leave entitlement? (per year, pro-rata depending on working hours)

• Over 5 days

Unite believes that a paid carer's leave entitlement should be **more than five days per year**, consistent with our response to Question 18 that **10 days should be the minimum annual Carer's Leave entitlement**. Limiting paid leave to five days or fewer would not adequately reflect the ongoing, unpredictable and often intensive nature of caring

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responsibilities, where medical appointments, hospital admissions, changes in care arrangements or periods of deteriorating health can quickly exhaust a short entitlement.

Unite's survey evidence reinforces the need for a meaningful entitlement: **21% of carers responding said they cannot afford to take unpaid Carer's Leave, while 93% supported the introduction of paid carer's leave**. Providing only a small number of paid days, followed by an extended period of unpaid leave, would therefore retain the affordability barrier already preventing carers from accessing their rights.

Unite consequently supports **a minimum of 10 days' paid carer's leave per year, pro-rated appropriately for working hours**. This would provide a more realistic level of support while helping carers remain in employment and reducing reliance on annual leave or inappropriate use of sickness absence. Ten days should represent a **statutory minimum rather than a ceiling**, allowing employers and trade unions to negotiate enhanced provisions through collective bargaining.

Question 30 – If paid carer's leave was introduced, what baseline level of remuneration would be appropriate for those taking it?

• 90% of pay

Unite believes that the baseline level of remuneration should be **90% of normal pay**. As outlined in our previous responses, for paid carer's leave to be meaningful it must address the financial barrier that currently prevents workers from taking leave. Unite is clear that loss of income is already restricting access to the existing entitlement.

Setting payment substantially below normal earnings risks simply replacing one financial barrier with another, particularly for low-paid workers and those already facing additional costs associated with caring. A payment linked to 90% of normal earnings would provide meaningful income protection and enable workers to take necessary time away from work without experiencing a significant and potentially unaffordable reduction in household income.

Unite therefore believes the objective should be to ensure that carer's leave is a genuinely accessible employment right regardless of income. Workers should not be financially penalised for providing essential unpaid care which, in itself, delivers substantial social and economic value and reduces pressure on public services.

Question 31 – From your perspective, what would be the impact of introducing paid carer's leave on employees with caring responsibilities?

Introducing paid carer's leave would significantly improve carers' ability to balance work and care without experiencing financial hardship or jeopardising their employment. It would give workers the security to respond to essential caring needs without having to

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sacrifice income, use annual leave, reduce their working hours or leave employment altogether. Importantly, it would make the entitlement more equitable: access to carers leave should not depend on whether an individual worker has sufficient income or savings to absorb a loss of wages.

There is also a compelling gender equality case for paid carers leave. Caring responsibilities are not shared equally between women and men. Office of National Statistics Census 2021 data show that in England 10.3% of women provided unpaid care compared with 7.6% of men[3]. Women's disproportionate responsibility for unpaid care can contribute to reduced working hours, periods outside employment and consequent inequalities in earnings, career progression and pension outcomes. An unpaid entitlement risks reinforcing these inequalities, particularly for low-paid women who are least able to absorb a loss of earnings. Paid carer's leave should therefore be viewed as an important measure for supporting women's labour-market participation and tackling persistent gender inequalities.

More broadly, paid carer's leave represents an investment in workforce participation and retention. Enabling carers to manage periods of increased caring responsibility while maintaining their employment relationship can help prevent temporary caring pressures becoming permanent labour-market exit, protecting workers' earnings, skills, pensions and career progression while enabling employers to retain experienced staff. It would support the Government's wider *Make Work Pay* ambition to create a labour market in which workers can remain in secure and sustainable employment throughout different stages of their working lives.

Paid carer's leave should therefore be understood not simply as a benefit for individual carers, but as an employment, equality and economic measure.

Question 33 – In your view, what should the main government focus be for any immediate action following the review?

- **Reducing the risk of carers leaving work due to caring responsibilities**
- **Helping employers to support employees who are carers**

Unite believes these priorities should be pursued together. The immediate objective must be to **prevent workers being forced to reduce their hours or leave employment because of their caring responsibilities**, but this cannot be achieved by placing responsibility on carers alone. Government must also ensure that employers have clear duties, guidance and practical support to create workplaces in which carers can remain

[3] ONS: Unpaid care and protected characteristics, England and Wales: Census 2021. Link: https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/socialcare/articles/unpaidcareandprotectedcharacteristicsenglandandwales/latest?utm_source=chatgpt.com

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in employment, and also be encouraged to work alongside trade unions to develop robust workplace policies to meet these objectives.

Immediate action should therefore combine **stronger statutory rights for carers with improved employer practice and accountability**. This should include introducing paid carer's leave, strengthening protection from detriment, providing a meaningful right to return following periods of intensive caring, and ensuring employers and line managers understand carers' rights and apply them consistently. Government should also promote collective bargaining and consultation with recognised trade unions when employers develop or review workplace policies for carers.

This should be approached as a **shared responsibility between Government, employers and workers and their trade unions**. Government must establish a strong statutory floor, employers must translate those rights into supportive workplace practice, and trade unions must have a meaningful role in negotiating provisions that reflect the needs of their workforce. Taken together, these measures would help retain experienced workers, reduce avoidable labour-market exit and ensure that caring responsibilities do not become a barrier to secure and sustainable employment.

Question 34 – In your view, which, if any, of the approaches discussed in Chapters 1 and 2 would best address this focus and why?

Unite believes that **no single intervention will be sufficient**. The most effective approach would combine stronger statutory employment rights with improved awareness, guidance and employer practice. Rights must be both strong enough to meet carers' needs and understood and consistently implemented in the workplace.

From **Chapter 1**, Government should prioritise clear, accessible and comprehensive information on carers' employment rights, alongside practical guidance for employers and mandatory training for managers responsible for implementing those rights. Employers should proactively communicate available rights and workplace policies rather than placing the burden on carers to find information themselves. Trade unions should also be involved in developing workplace approaches and negotiating enhanced provision through collective bargaining.

However, information and guidance alone cannot overcome weaknesses in the underlying statutory framework. The measures considered in Chapter 2 therefore provide the most important mechanisms for preventing carers from being pushed out of employment. Unite particularly supports the introduction of **paid carer's leave, an extension of the existing leave entitlement and a statutory right to return following longer periods of intensive caring responsibility**. These measures would give workers a realistic alternative to reducing their hours or leaving employment when caring responsibilities temporarily become incompatible with work.

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The strongest outcome would therefore be an integrated approach: **Government establishes meaningful statutory rights and clear minimum standards; employers are equipped and required to implement them effectively; and trade unions are able to negotiate improvements that reflect the needs of individual workplaces.** This would move policy beyond simply helping individual carers to "balance" competing responsibilities and instead address the structural reasons why caring responsibilities can lead to financial hardship, reduced working hours and ultimately labour-market exit.

Chapter 3 – Employment rights for parents of seriously ill children (Hugh's Law)

Question 38 – If paid leave for parents of seriously ill children was introduced, how should we define "serious illness"?

Unite believes that "serious illness" should be defined **broadly and according to the impact of a child's condition and their resulting need for parental care and support, rather than through a restrictive list of qualifying diagnoses**. Eligibility should encompass physical and mental health conditions, serious injury, disability and other conditions which create substantial or intensive care, supervision or support needs.

The definition should include acute and chronic illness, serious injury, mental ill-health, progressive and life-limiting conditions, periods of hospitalisation, significant treatment and recovery, and substantial deterioration in an existing condition. It should also recognise circumstances where **disability or neurodivergence substantially affects a child's ability to carry out day-to-day activities or results in significant or intensive support needs**, including during periods of crisis or significant change. Neurodivergence should not itself be characterised as an illness; rather, the entitlement should recognise the practical impact of a child's individual needs and the level of parental care required.

Eligibility should not depend upon a final diagnosis. Families can experience substantial caring responsibilities while a child is undergoing assessment or investigation, awaiting diagnosis, or where the nature or severity of their needs fluctuates. Unite would therefore oppose a definition limited to particular diagnoses, hospitalisation, terminal illness or life-threatening conditions, as this risks creating arbitrary exclusions.

The central test should be whether the child's condition or circumstances **result in a substantial need for parental care, presence, supervision or support which reasonably requires the parent to take time away from work**. This needs-based approach would be more inclusive of the diverse circumstances faced by families while ensuring the entitlement remains focused on those with significant caring responsibilities.

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Question 39 – If paid leave for parents of seriously ill children was introduced, who should be eligible to use this entitlement?

Unite believes eligibility should be **broad, inclusive and based on the reality of the caring relationship**, rather than narrowly defined by biological or legal parenthood. The entitlement should be available to any employee who has parental responsibility for, or is a primary caregiver to, a child who meets the criteria outlined in our response to Question 38.

This should include biological and adoptive parents, step-parents, foster and kinship carers, guardians and others who have assumed substantive responsibility for the child's care. It should also recognise diverse family structures, including LGBT+ families and circumstances where a person may fulfil a parental or primary caring role without holding formal legal parental status.

Eligibility should reflect the principle established in Question 38 that **the child's needs and the employee's substantive caring responsibilities should be the determining factors**, rather than a restrictive definition of family relationship or medical diagnosis. Government should avoid creating unnecessary eligibility tests that could exclude workers who are, in practice, responsible for providing essential care to a seriously ill, disabled or neurodivergent child with substantial support needs.

Where more than one parent or caregiver is involved, each eligible worker should have an **individual entitlement** to paid leave. Families should not be required to divide a single entitlement between them, recognising that serious illness and substantial care needs can require the involvement of more than one parent or caregiver.

Question 40 – If paid leave for parents of seriously ill children was introduced, what form of evidence should employees have to provide to prove their eligibility?

• Self-certification (e.g. – written statement from employee)

This is consistent with Unite's response to **Question 28 on paid Carer's Leave**, where we similarly support self-certification as the most proportionate and accessible approach. Parents and caregivers should be trusted to provide a written declaration confirming their eligibility and need for leave without routinely being required to obtain medical or other professional evidence.

Requiring formal medical certification could create unnecessary cost, delay and administrative barriers at precisely the point when a family is dealing with a serious or rapidly developing situation. It could also require employers to process sensitive health information relating to a child and disadvantage families awaiting diagnosis or

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assessment, including where disability or neurodivergence results in substantial support needs but is not easily evidenced through a single medical document.

A standardised self-certification process would provide employers with a clear record while maintaining a presumption of trust. Where there are genuine and reasonable grounds to suspect misuse, this should be addressed through established workplace procedures rather than imposing intrusive evidential requirements on every family seeking to exercise the right.

Question 41 – If it were introduced, how long would be appropriate and reasonable for a one-off paid leave entitlement per child?

• More than 12 weeks

Unite supports an entitlement of **more than 12 weeks**. This should be distinguished from, but operate alongside, the general entitlement to paid carer's leave proposed elsewhere in this consultation. Unite has supported a **minimum of 10 days paid Carer's Leave annually** to enable workers to manage ongoing and everyday caring responsibilities. Paid leave for parents of seriously ill children serves a different purpose: it must provide extended employment and income protection during an exceptional period of serious or intensive caring.

Serious illness, treatment, hospitalisation, rehabilitation and recovery can extend over many months, while progressive, fluctuating or complex conditions may involve periods of intensive parental involvement over a prolonged timeframe. Consistent with our response to **Question 38**, this should also recognise substantial caring needs arising from serious physical or mental health conditions, disability or neurodivergence where these significantly affect a child's day-to-day functioning and require intensive parental support.

The longer entitlement is therefore complementary rather than inconsistent with general paid carer's leave: the general entitlement provides an annual statutory floor for ongoing caring responsibilities, while this entitlement provides additional protection when a child's circumstances require a parent or primary caregiver to step away from work for a significantly longer period.

The entitlement should also be flexible in how it can be taken, including continuously, in separate blocks or individual days where appropriate. A period exceeding 12 weeks, combined with a protected right to return, would provide meaningful security and reduce the risk of parents exhausting annual leave, reducing their working hours or being forced to leave employment altogether.

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Question 42 – If paid leave for parents of seriously ill children was introduced, what should be the baseline level of remuneration for those taking it?

• 90% of pay

Consistent with our response to **Question 30**, Unite supports **90% of normal pay as the appropriate baseline**, reflecting the principle that statutory caring rights must be financially accessible in practice. A statutory entitlement is of limited value if the level of payment means that workers cannot afford to exercise it.

This principle is particularly important for parents of seriously ill children, who may simultaneously face additional costs associated with treatment, hospital attendance, travel, specialist equipment or other care and support while experiencing an extended period away from work. Setting payment substantially below normal earnings could therefore undermine the purpose of the entitlement and disproportionately disadvantage lower-paid households.

A baseline of 90% of normal pay would provide meaningful income protection and ensure consistency across the wider framework of paid caring rights proposed in this consultation. Parents should not face a substantial financial penalty because their child becomes seriously ill or develops significant care and support needs, and access to this protection should not depend upon a family's ability to absorb a prolonged loss of earnings.

Question 43 – Which of the following approaches to support parents of seriously ill children would be most helpful to parents, their families and employers?

Other (please specify)

Other – a longer period of paid leave, with a statutory right to return, supported by flexible working and clear employer guidance.

Unite does not believe parents of seriously ill children should be required to choose between **a longer period of leave without financial protection and a shorter period of leave with pay**. As outlined in our responses to Questions 38–42, serious illness and substantial caring needs can persist for many months, while the financial implications for families can be substantial. The most effective approach would therefore combine a **meaningful period of paid leave with a protected right to return to the same or a suitable equivalent role**.

This should be complemented by access to flexible working and clear guidance for employers. Flexible working may enable some parents to remain in work during periods when their child's needs can be accommodated alongside employment, while extended

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paid leave should be available when those needs become sufficiently intensive that continuing to work is not realistic. Employer guidance is also important to ensure that these rights are understood and applied consistently, but guidance should support rather than substitute for enforceable statutory rights.

This combined approach would provide a continuum of support according to the family's circumstances: flexibility where work and care can reasonably be combined; paid leave where a parent needs to step away from work; and a protected right to return where the caring period is prolonged. It would provide families with financial and employment security while giving employers a clearer framework within which to plan and manage periods of absence. Unite therefore believes this would be more effective than requiring families to choose between sufficient time and sufficient financial support.

Question 44 – From your perspective, what would be the impact of introducing paid leave for parents of seriously ill children on parents in this situation?

Unite believes introducing paid leave for parents of seriously ill children would have a profoundly positive impact on families at one of the most difficult and distressing periods of their lives. Parents should be able to focus on the care, treatment and wellbeing of their child without simultaneously facing the prospect of losing their income or employment.

A serious illness or substantial change in a child's health or support needs can require parents to attend hospital appointments, participate in treatment and care, provide intensive support at home, manage other family responsibilities and navigate health, education and care services. Paid leave would provide parents with the time and financial security to meet these responsibilities, rather than forcing them to exhaust annual leave, reduce their working hours, take inappropriate sickness absence or leave employment altogether.

Importantly, the entitlement would recognise that a child's need for parental care does not end after the immediate diagnosis or crisis. As outlined throughout our response, treatment, recovery and substantial caring needs can continue for an extended period. Paid leave, combined with flexibility and a protected right to return, would provide families with a bridge through that period while maintaining the parent's connection to employment.

Ultimately, this is about giving parents **security, dignity and genuine choice at a time of exceptional family need**. No parent should have to choose between being present for a seriously ill child and maintaining the income on which their family depends. A meaningful paid leave entitlement would recognise both the essential role parents play in supporting their children and the importance of protecting their longer-term financial and employment security.

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