



Kinship carers employment leave – final report

Prepared for Family Rights Group

Alma Economics

October 2024

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About the authors



Alma Economics combines unparalleled analytical expertise with the ability to communicate complex ideas clearly.

www.almaeconomics.com

About the commissioning organisation



Family Rights Group is the leading specialist child welfare charity working to ensure that every child lives safely and thrives with their family.

www.frg.org.uk

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Introduction

Background

Kinship carers are a vital part of our society and the children's social care sector. In 2021, more than 141,000 children in England and Wales were living in households without a parent but with other adult relatives (Office for National Statistics 2023b). The Government recognised the need for a definition of kinship care following Family Rights Group's (FRG's) Time to Define Campaign and published the national kinship care strategy (Family Rights Group, 2023; Department for Education, 2023a). The strategy defines kinship care as: *"any situation in which a child is being raised in the care of a friend or family member who is not their parent. The arrangement may be temporary or longer term"* (Department for Education, 2023a).

This definition includes a wide range of care arrangements, namely:

- Private family arrangements
- Private fostering
- Child Arrangement Orders (CAOs) or Residence Orders
- Special Guardianship Orders (SGOs)
- Kinship foster care
- Adoption¹

Research suggests that kinship care often leads to better outcomes for children compared to other care arrangements. For instance, Selwyn and Nandy (2012) found that 11% of the children and young people in kinship care had a possible depressive disorder, compared to 28% in unrelated foster care. Another study by Selwyn et al. (2013) found that 43% of children in kinship care achieved GCSE scores of 5 A*- C, compared to 35% of children in receipt of free school meals, who were chosen as a comparison due to the similarly low income of their households. Similarly, the proportion of those aged 18 and above who went to university (16%) is higher than that for care leavers (6%).

However, kinship carers, have few if any employment rights that reflect their caring responsibilities. Kinship carers are entitled to up to 18 weeks off work if they have (or expect to have) parental responsibility for a child and have been working for their employer for at least a year. However, this time off work is not paid and only applies to kinship carers (with or who expect to have) parental responsibility, namely kinship carers with SGOs and CAOs (UK Government, 1999). This excludes the kinship carers of approximately 70,000 children in informal² or private fostering arrangements and the 13,000 kinship foster carers (Department for Education, 2023b; Alma Economics, 2022).

The lack of paid parental leave may force kinship carers to stop working to take care of their child. An unpublished 2024 survey carried out by FRG found that almost 41% of kinship carers had to give up work, and a further 23% reduced working hours when starting their caring responsibilities. The same survey found that a significant share of kinship carers rely on state benefits, as 37% of respondents were claiming Universal Credit at the time. Another report also found that carers who leave work to care for their children struggle to return. The authors found that only 13% of kinship carers who left work were able to re-enter the job market, despite 83% of those who left employment wanting to stay in work (Gautier and Wellard, 2012).

¹ Where an adoption order has been granted in respect of a child and prior to the making of the order the adopter was a friend or family member. Adoption is unusual in kinship care arrangements.

² Informal carers are people providing unpaid help to a friend or family member needing support, perhaps due to illness, older age, disability, a mental health condition or an addiction (Department of Health & Social Care, 2018).

Purpose of the project

To address the aforementioned challenges, Alma Economics was commissioned by FRG to explore the costs and benefits of introducing changes to employment rights for kinship carers, particularly employment leave.

There is some evidence that paid employment leave and flexible working arrangements could have positive impacts on carers and children. For instance, Gautier and Wellard (2012) conclude that lack of entitlement to paid leave (such as that available to adopters) is one of the main reasons for the high proportion of kinship carers who leave employment. Without paid parental leave, carers have to quit to take care of their child, if they do not have other types of leave available. This means that it will take them more time to return to work, and they might not find the same hours and pay conditions. In contrast, those with access to paid employment leave can return to their former work immediately after their leave with the same conditions. This might be one of the reasons that paid leave seems to be highly desired by kinship carers. In particular, it was the most commonly cited request to their employers (39%) (Turner, 2023).

This document is structured as follows:

- The second chapter outlines existing employment leave policies in the UK and abroad, as well as the associated impacts where available. It concludes with a summary of the policy options that will be examined in this document.
- The third chapter details our methodology for calculating the costs and benefits of each policy option and targeted group.
- The fourth chapter presents the main findings of our analysis.
- The fifth and final chapter summarises the purpose, methodology, and findings of the project.

Policy context

This chapter presents existing employment leave policies. For each policy option, we explain the duration of leave and the amount of pay offered, as well as the eligibility criteria. Where applicable, we also present evidence of positive impacts on carers or their children.

Policy options from the UK

This section presents the paid employment leave entitlements for birth and adoptive parents in the UK.

Parental leave

Maternity leave

Employed mothers giving birth are eligible for Statutory Maternity Leave (SML) and Statutory Maternity Pay (SMP). While there may be some overlap between SML and SMP, the provisions for each vary. SML is available for up to 52 weeks for all employees with an employment contract, while SMP is provided for up to 39 weeks by the employer to mothers continuously employed for at least 26 weeks and earning at least £263 per week (UK Government, n.d.-b; n.d.-d). SMP provision varies over time. For the first six weeks, SMP is equal to 90% of the mother's weekly earnings, while for the remaining 33 weeks it is the lower of either £184.03 per week or 90% of weekly earnings (UK Government, n.d.-b). It is worth noting that if a mother decides to take the full 52 weeks of SML, she has no entitlement to paid leave for the last 13 weeks.

Access to maternity pay has been associated with significant impacts on return-to-work patterns. A 2008 study in the UK found that more than half of mothers with paid leave returned to work within 7 months after the birth of their child (Burgess et al., 2008). In contrast, 60% of mothers without access to paid leave had not returned to work by the end of the study (i.e. 35 months after the birth of their child).

Paternity leave

Partners of mothers who give birth and the father of the child are eligible for Paternity Leave, Paternity Pay, and potentially Shared Parental Leave and Pay. Paternity Leave is one or two weeks, is available only to employees, and commences after the birth of the child³. During this time, individuals can also receive Paternity Pay from the employer, which is either £184.03 per week or 90% of weekly earnings (whichever is lower). Individuals eligible for Paternity Leave and Paternity Pay, are also entitled to unpaid leave for 2 antenatal appointments (UK Government, n.d.-e).

In addition to Paternity Leave and Paternity Pay, individuals may also be entitled to Shared Parental Leave (SPL) and Shared Parental Pay (ShPP). SPL and ShPP allow a couple to share part of the mother's SML and SMP entitlements respectively. This means that if a mother takes less than 52 weeks of SML, SPL allows their partner to claim up to 50 weeks of the remaining days of leave. Similarly, ShPP allows a partner to receive up to 37 weeks of pay, if the mother claims less than 39 weeks of SMP (UK Government, n.d.-c).

A 2024 study explored the impact of the introduction of Shared Parental Leave in 2015 in the UK. The authors surveyed 16 fathers taking SPL and found significant positive effects on their psychological wellbeing (Hobbs, 2024).

³ Similar eligibility applies as with SML and SMP (UK Government).

Adoption leave

In the UK, parents adopting a child are entitled to Statutory Adoption Leave and Statutory Adoption Pay, in line with birth parents. In particular, Statutory Adoption Leave is a total of 52 weeks, in line with SML, while Statutory Adoption Pay is equal to SMP in pay, duration, and structure (UK Government, n.d.-a).

It should be noted that this is available only to employees and can be taken by only one person in a couple. The other parent in the couple can instead claim Paternity Leave or SPL/ShPP under slightly different criteria. Namely, to be eligible for SPL and ShPP, both parents must share the responsibility of the child, and also meet the employment and earnings criteria (i.e. earning above £123 per week) (UK Government, n.d.-c).

Introducing paid leave for kinship carers in line with adoption could have a positive impact on the employment outcomes of carers. For instance, Turner (2023) highlights that 53% of kinship carers surveyed would have remained in employment if they had access to paid leave on par with adoptive parents.

International policy options

This section presents additional policy options based on employment leave policies internationally. We prioritised comparable countries and focused on kinship care, adoption, and birth parents as potential benchmarks for kinship care in the UK.

Kinship care and adoption

Australia

Kinship carers in Australia can receive leave and pay in line with birth and adoptive parents. In particular, kinship carers meeting the following conditions are entitled to the full amount of parental leave pay (915.80 AUD or £482) per week before tax, for up to 18 weeks. The conditions at the time of writing are: (i) having a kinship arrangement recognised by the court; (ii) earning less than 168,865 AUD in 2022-23; and (iii) working at least 330 hours in 10 out of the 13 months before taking on caring responsibilities (Australian Government, 2023).

The Australian Government published an evaluation of the Paid Parental Leave scheme in 2014 (Department of Social Services, 2014). The authors identified positive effects in return-to-work patterns for mothers, pay conditions, retention rates, and infant health. Regarding employment outcomes of mothers, a year later, 27% of mothers with paid leave had not returned to work, compared to 31% of mothers without paid employment leave. Paid leave also helped more mothers return to the same job (77% compared to 73% before the introduction of paid leave) with the same pay and hours (33% compared to 28% before). Regarding infant health, the share of mothers reporting that their infant was ill for at least one week during their first year fell from 45% to 41%.

New Zealand

Kinship carers in New Zealand can receive employment leave in line with birth and adoptive parents. This applies to kinship carers who are going to be the primary carer⁴ of a child under 6 years old and have been employed for at least an average of 10 hours per week over 26 of the 52 weeks before becoming the primary caregiver (Parliamentary Counsel Office, 2023). Eligible kinship carers

⁴ Defined as: (i) a female (the biological mother) who is pregnant or has given birth to a child; (ii) the spouse or partner of the biological mother (conditional); or (iii) a person, other than the biological mother or her spouse or partner, who takes permanent primary responsibility for the care, development, and upbringing of a child who is under the age of 6 years (Parliamentary Counsel Office, 2023).

can receive 26 weeks of parental leave paid at the individual's average weekly pay (up to \$754.87 gross per week). If the carer has been working for the same employer for at least a year, they may receive an additional 26 weeks of parental leave (Parliamentary Counsel Office, 2023).

An evaluation of New Zealand's parental paid leave offering was carried out in 2005 (Department of Labour, 2005). The authors found that both parents and employers were in favour of the policy and recognised its importance. Furthermore, the employment leave allowed beneficiaries to spend more time with their children and had a small positive impact on return-to-work patterns. In particular, 80% of mothers who took paid leave returned to work to the same employer, with the same terms and conditions, compared to 75% of those taking annual or unpaid leave, and 55% of those taking no leave (e.g. resigned).

Parental leave

United States

There is no paid parental leave across the United States. However, some states have introduced statutory paid parental leave, and individual employers can voluntarily offer paid leave. The first subsection below presents the impact of voluntary paid maternity leave offered by employers across the US, while the second subsection presents the impacts of a paid leave scheme in California.

Voluntary paid maternity leave

Jou et al. (2018) used a national survey of women 18-45 who gave birth between 2011-2012 to explore the impact of employers offering paid maternity leave. Approximately half of the respondents received partially or fully funded paid leave, 30% did not receive any leave, and 20% received unpaid leave.

The authors found that paid maternity leave is associated with positive impacts on maternal and infant health. In particular, it was found that for women who took partially or fully paid leave, there was a nearly 50% reduction in the odds of them having had their infants hospitalised, having been hospitalised themselves, and having seen a mental health care provider since childbirth, compared to women who did not take paid maternity leave.

California's Paid Family Leave (PFL) programme

California offers partially paid leave to birth parents and kinship carers for up to 8 weeks, introduced in 2004. The programme provided 6 weeks of leave at 60-70% of weekly earnings (capped at \$1,216 per week) to all private sector employees. The average weekly pay through PFL was \$674 in 2018. The programme was expanded in 2011 to include kinship foster carers (e.g. parent-in-law, grandparent, grandchild, or sibling) and again in 2019 to offer paid leave for an additional 2 weeks. To be eligible, an individual must be taking time off work for: (i) the birth and care of a new child; (ii) bonding with an adopted or fostered child; or (iii) caring for a family member with health conditions (including children, siblings, or grandchildren) (Franchise Tax Board, 2023).

A study by Bullinger (2019), found that the programme led to improvements in mothers' mental health outcomes as well as in parent-reported infant health. In particular, the results suggest an increase of 7-17 percentage points in the likelihood of very good or excellent maternal mental health status compared to neighbouring states, parents in other large states, and parents across the country. Furthermore, the study identified a 5-9 percentage point increase in the likelihood of a parent reporting very good or excellent overall health condition of their infant relative to infants in neighbouring or large states, and across the country. Low-income households appear to benefit even more from paid parental leave, as parents with lower earnings were more likely to report improvements in maternal mental health and the ability to cope with the day-to-day demands of parenting.

Germany

Birth and adoptive parents in Germany are entitled to employment leave for up to three years.

Each of the parents can claim this leave, and up to 12 months can be transferred to a grandparent if the parent is seriously ill or disabled, or if the parent dies. A grandparent can also take the leave if the parent is a teenager or still in full-time education and the parent does not take the leave themselves. As a result, grandparents in Germany can get paid employment leave of up to 12 months (Glaser et al. 2010; German Government, 2024). This is particularly relevant to England and Wales, where 59.2% of all kinship children live with at least one grandparent (Office for National Statistics, 2023b).

Employees and self-employed individuals on parental leave are also entitled to parental allowance. To claim parental allowance, the parents' combined income has to be at most €200,000 (planned to be reduced to €175,000 by April 2025) or €150,000 for single parents. Eligible parents have two pay options: (i) compensation of 60-67% of the average earnings of the last 12 months before birth (capped at €2,100 per month) for 12 months, or (ii) half of the amount under option (i) for a maximum of 32 work hours per week, for 24 months (European Institute for Gender Equality, 2021). There is also a Partnership Bonus, offering 4 additional months of pay for parents who are both in employment for 24 - 32 hours per week for 2-4 consecutive months (German Government, 2024).

There is a lack of evidence on the impact of paid employment leave in Germany alone. However, Ruhm (1998) explored the impact of rights to paid child-related leave on employment outcomes across nine European countries, including Germany. The author found that paid leave legislation raises the female employment-to-population ratio by 3%-4%.

Examined policy options

Following the review of the aforementioned policies in the UK and abroad, we selected adoption leave in the UK as the best target for the introduction of paid employment leave rights for kinship carers. Furthermore, we explored the impacts of reducing the duration of paid leave by two weeks, in line with the duration of shared parental leave and pay in the UK. The table below summarises alternative design options explored in this report.

It is worth noting that we do not explicitly account for transitions of carers or children between different care arrangements. However, the growth rates we are using reflect both inflows and outflows of children and carers, including those moving across care types and those starting new care arrangements for the first time.

Table 1. Proposed policy options

Policy target	Eligibility	Duration of leave	Amount paid
i. Adoption Leave (UK)	All new SGO and CAO kinship carers	52 weeks	<ul style="list-style-type: none"> • 90% of the carer's weekly earnings, for the first six weeks • the lower of £184.03 per week or 90% of weekly earnings for the remaining 33 weeks
	All new and existing SGO and CAO kinship carers		
	All new and existing SGO, CAO, and kinship foster carers		
ii. Adoption Leave +	All new and existing SGO, CAO, kinship foster, and informal carers	As above	As above
iii. Adoption leave minus 2 weeks	All new SGO and CAO kinship carers	50 weeks	<ul style="list-style-type: none"> • 90% of the carer's weekly earnings, for the first six weeks • the lower of £184.03 per week or 90% of weekly earnings for the remaining 31 weeks
	All new and existing SGO and CAO kinship carers		
	All new and existing SGO, CAO, and kinship foster carers		
iv. Adoption leave minus 2 weeks+	All new and existing SGO, CAO, kinship foster, and informal carers	As above	As above

Methodology

This chapter outlines our approach to quantifying and monetising the costs and benefits of introducing paid employment leave for kinship carers in line with adoption leave or at a decreased duration (minus two weeks; in line with shared parental leave).

Our methodology is in line with HM Treasury Green Book guidance (2022) and includes labour market impacts, wellbeing impacts for children, as well as GDP gains.

Affected populations

As described in the previous chapter, we examined the impacts of offering the equivalent of adoption leave in pay and either the same in duration or 2 weeks fewer. The analysis was carried out for four levels, each including one additional group of kinship carers, as presented below:

- **Group 1:** Kinship carers with an SGO or CAO
 - A. New carers only
 - B. New and existing carers
- **Group 2:** Kinship carers with an SGO or CAO and kinship foster carers
 - B. New and existing carers
- **Group 3:** Kinship carers with an SGO or CAO, kinship foster carers, and informal carers
 - A. New carers only
 - B. New and existing carers
- **Group 4:** Kinship carers with an SGO or CAO and informal carers
 - B. New and existing carers

This subsection details our calculations to estimate the size of each of these groups.

Group 1: Kinship carers with an SGO or CAO

Number of children

To estimate the **number of children who are newly the subject of an SGO**, we used data from the Ministry of Justice (2024) showing the number of children with Special Guardianship Orders made in England and Wales, in private and public law proceedings in 2023 and 2021 respectively. To project these numbers to 2024 and throughout our model, we calculated the average growth rate for the number of children who are newly the subjects of private and public law orders based on historical data from 2011 (Ministry of Justice, 2024). Finally, to calculate how many of these children are in England alone, we used evidence from the Office for National Statistics (2023) suggesting that 94% of all children in kinship care in England and Wales are in England.

To estimate the **number of children newly subject to a CAO**, we followed a similar approach, utilising data on CAOs made in private and public law proceedings in England and Wales from the Ministry of Justice (2024). As above, the available data extended up to 2023 for CAOs made in private law proceedings and to 2021 for CAOs made in public law proceedings. Thus, we again calculated the historical annual growth rate and then applied the average annual growth rate to get to 2024 estimates. Finally, we used the same Office for National Statistics (2023) evidence quoted above to split the total number of new CAO orders between England and Wales.

However, a significant number of CAOs are made to a parent in private law proceedings following a divorce or couple separation. Following the Independent Review of Children's Social Care, we assumed that this share is 90% and thus excluded these from our calculations to get only the CAO orders concerning kinship care (Alma Economics, 2022).

The **number of children in existing SGO and CAO** arrangements was calculated as the residual value after subtracting the number of children in kinship foster care and those in informal care arrangements (as calculated in Groups 2 and 3 in the following subsections) from the total number of kinship carers captured in the 2021 Census (Office for National Statistics, 2023b). To split the total residual value between SGOs and CAOs, we applied their respective shares of the total number of children newly subject to an SGO or CAO from the Ministry of Justice (2024).

Number of carers

We calculated the **number of new carers with an SGO or CAO for the children**, replicating our approach to children described above but using the number of orders instead of the number of children. This approach assumes that one order corresponds to one carer.

To calculate the **number of existing carers with an SGO or CAO**, we calculated the ratio of carers per child using the total number of new SGO and CAO orders and the total number of children with a new SGO and CAO from the Ministry of Justice (2024) data, as described above. This ratio was then applied to the existing number of children in SGO and CAO arrangements, as calculated above.

Group 2: Kinship carers with an SGO or CAO, and kinship foster carers

Group 2 expands on Group 1 by adding new and existing kinship foster carers.

Number of children

To calculate the **number of children in existing kinship foster care arrangements**, we used data from the Department for Education (2023) on the number of children with care orders and those under voluntary arrangements (S20). To project the number of children beyond 2023, we used the historical time series to calculate the annual growth rate from 2019 and then the average annual growth rate, which was applied to the 2023 estimate.

Similarly, the **number of children in new kinship foster care arrangements** was calculated using the number of children starting to be looked after by relatives or friends (Department for Education, 2023).

Number of carers

The **number of existing kinship foster carers** was calculated by applying the ratio of carers per child from the existing SGO population to the number of children in kinship foster care arrangements, calculated above. Similarly, the **number of new kinship foster carers** was calculated by applying the same ratio to the number of children in new kinship foster care arrangements, as calculated above.

Group 3: Kinship carers with an SGO or CAO, kinship foster carers, informal carers

Group 3 expands on Group 2 by adding new and existing informal carers.

Number of children

There is a lack of a commonly accepted estimate on the **number of children in existing informal kinship care arrangements** in England. As a result, we made an informed assumption based on

discussions with FRG and the Independent Review of Children's Social Care where an assumption informed by sector experts placed informal care at 50% of the total kinship population (Alma Economics, 2022). In this project, we assumed that informal carers represent 40% of all kinship carers. This share was applied to the total kinship care population as estimated by Family Rights Group (2023) and was then apportioned to England using the ONS estimate that 94% of all kinship children in England and Wales are in England (Office for National Statistics 2023a).

To calculate the **number of children in new informal kinship care arrangements**, we first calculated the share of children starting new kinship foster care arrangements each year compared to the previous year's total number of children in existing kinship foster care. This represents the annual increase of kinship foster care arrangements with respect to the previous year's total. We then calculated the average share that new arrangements represented in each year. Finally, we assumed that, on average, new informal kinship care arrangements would represent the same share of the previous year's existing informal kinship care arrangements. This means that the rate of change in informal kinship care arrangements is the same as that of kinship foster care.

Number of carers

The **number of existing informal kinship carers** was calculated using a data-informed assumption. More particularly, we used information from the Office for National Statistics (2023a) Census, showing the total number of kinship carers and cared-for children. We assumed that each child receiving informal kinship care has, on average, 1.6 carers. This ensures that the total number of kinship carers and the ratio of children per carer in our model align with Census estimates. The same rationale was applied to the **number of new informal kinship carers**.

Group 4: Kinship carers with an SGO or CAO and informal carers

Group 4 is a subset of Group 3, excluding kinship foster carers. As a result, all figures have been calculated as described above for Group 3.

Costs

There are two costs associated with providing paid employment leave to kinship carers, namely: (i) the amount paid during the leave, and (ii) the foregone tax revenue due to carers being on leave instead of working for the duration of the leave.⁵

Kinship leave paid

The main cost of the policy is covering part of the carers' earnings while they are on leave. To calculate the amount paid during the leave, we multiplied the **number of kinship carers in employment taking up the offer** by the **amount paid per carer, per year**.

Adoption leave

To calculate the **number of kinship carers in employment taking up the offer**, we multiplied the take-up rate of adoption leave in each type of care arrangement by the number of kinship carers in employment. The take-up rate was sourced from the unpublished FRG survey⁶, where carers were asked if they would take up 39 weeks of paid leave. The number of kinship carers in employment was

⁵ Please note that in the benefits and costs subsections, we do not differentiate between new or existing carers and we do not specify the type of care arrangement. This is because the methodological approach is the same for all groups of affected populations. For instance, if we are examining Group 1,a then all calculations below concern new SGO and CAO carers.

⁶ Due to the limited sample size for informal carers, we replaced the survey figures concerning informal carers with the averages of all other care arrangements in each question.

estimated by applying the share of kinship carers in part- or full-time employment from the FRG survey to the number of carers in each kinship care arrangement (calculated in the previous subsection).

The number of carers we used changed across the four affected groups outlined at the beginning of the section. For instance, to calculate the number of kinship carers in employment taking up the offer from Group 1, we apply the take-up rate and the share in employment to carers with new and existing SGO and CAO. Similarly, for Group 2 we also included new and existing kinship foster carers.

To estimate the **amount paid per carer per year**, we sum the payment for the first 6 weeks of leave and the payment for the remaining 33 weeks of paid leave. The payment for the first six weeks is 90% of the carer's weekly earnings, while for the remaining weeks, it is equal to the lower amount between 90% of the carer's weekly earnings and £184.03 per week.

Adoption leave minus 2 weeks

The methodology to calculate the costs for the decreased duration scenario is the same as above, apart from the duration of leave and the take-up rate. Kinship carers under this policy would get 37 weeks of paid leave. The pay for the first 6 weeks is calculated as above. However, in this policy, the second pay amount is applied to 31 weeks instead of 33 weeks.

Furthermore, we assume that the take-up rate of adoption leave minus 2 weeks is proportionate to the number of weeks offered. The take-up rate for adoption leave captured in the unpublished FRG survey suggests that each week of paid leave adds 2% in take-up. We then applied the 2% take-up rate per week to the 37 weeks of paid leave offered under this policy to estimate the total take-up rate of the decreased duration.

Foregone tax revenue

Carers taking up the offer will not be working for the duration of the leave. As a result, there is a loss of tax revenue that the Exchequer could be making without the proposed policy.

To calculate the foregone tax revenue, we multiplied the **number of kinship carers in employment taking up the offer** by the **foregone tax revenue due to take-up of leave per carer, per year**.

The **number of kinship carers in employment taking up the offer** is calculated as above and changes across groups 1, 2, 3, and 4.

The **foregone tax revenue due to take-up of leave** is calculated as the proportion of the year that carers are not working due to being on leave, multiplied by the annual tax revenue from kinship carers. The proportion of the year that carers are not working is calculated by dividing the number of weeks with paid employment leave (39 weeks for adoption leave and 37 weeks for the decreased duration option) by the total number of weeks in a year (52 weeks). The annual tax revenue from kinship carers is calculated by multiplying the income tax rate of kinship carers (20% - HM Revenue & Customs, 2024) and the NIC rate (8% - HM Revenue & Customs, 2024b) by the carers' annual gross earnings, calculated using net earnings from the Grandparents Plus (2017) survey, adjusted for inflation.

Benefits

There are four benefits associated with the introduction of paid leave, namely: (i) savings from reduced benefit claims; (ii) additional tax revenue due to kinship carers remaining in employment; (iii) improved children's health; and (iv) the GDP gain due to carers returning to work.

Reduced benefit claims

Offering paid employment leave will allow carers to remain in employment, which in turn will reduce future claims of Universal Credit. The savings due to reduced benefit claims are calculated by multiplying (i) the take-up rate of the leave; (ii) the number of kinship carers that would have left employment in the baseline scenario and would have claimed Universal Credit; and (iii) the weighted

average claims of Universal Credit.

The **take-up rate** of both adoption leave and adoption minus 2 weeks was calculated as described in the Costs subsection.

The **number of kinship carers that would have left employment in the baseline scenario and would be claiming benefits** was calculated by multiplying the share of kinship carers claiming Universal Credit by the number of kinship carers leaving employment due to caring responsibilities. The share of kinship carers claiming Universal Credit in each type of arrangement was taken from the unpublished FRG survey and adjusted for the increased incidence of benefit claims among unemployed carers. The number of kinship carers leaving employment due to caring responsibilities was estimated by multiplying the number of kinship carers in each care arrangement (as calculated in the first subsection) by the share leaving employment due to caring responsibilities (as captured in the FRG survey).

It is worth noting that some carers may remain in employment due to their partners taking care of their children. Thus, we also estimated the impact of carers' partners leaving employment to look after their children. We used evidence from the FRG survey showing the share of kinship carers' partners giving up work after taking on caring responsibilities. This share was then applied to the number of kinship carers in employment, using the share of carers in full- and part-time employment from the FRG survey.

The calculation was the same for both adoption leave and the decreased duration scenario.

The **weighted average claims of Universal Credit** were estimated by weighting each component of Universal Credit by the relevant demographics in each type of care arrangement. The Universal Credit components we included were: Universal Credit allowance, child allowance, disabled child allowance, childcare cost allowance, and limited capability for work allowance⁷. Each of these components has pay ranges or conditions based on demographic characteristics. For instance, the size of the Universal Credit allowance depends on whether the parent is single or not and on whether they are over or under 25 years old. We used the demographic characteristics from the FRG survey to weigh each Universal Credit component by its applicability to the carers in each type of care arrangement. In the previous example of the Universal Credit allowance, we multiplied the amount for single parents over 25 by the share of kinship carers with an SGO that are single and the share that are over 25 years old. After weighting appropriately all benefits, we summed them to calculate the weighted average claims of Universal Credit per person, per year by type of care arrangement.

The calculation was the same for both adoption leave and the decreased duration scenario.

Additional tax revenue

Kinship carers taking up the offer will be able to keep their jobs and return immediately after the end of their leave. In the baseline scenario, the carers would have to leave their jobs to care for their children and would then have to find a new job. As a result, the proposed policy allows carers to start working earlier, generating additional tax revenue.

To calculate the additional tax revenue from kinship carers remaining in employment, we multiplied: (i) the take-up rate of each policy option; (ii) the number of kinship carers leaving employment due to caring; and (iii) the annual tax revenue from kinship carers.

The take-up rate for adoption leave was taken from the FRG survey, while the take-up for the decreased duration was calculated as described in previous subsections. The number of kinship carers leaving employment due to caring responsibilities was calculated as in the previous subsection, while

⁷ We did not consider other benefits or allowances as they are not means tested. As a result, they would be claimed by carers both in the baseline scenario and in the examined policy options.

the annual tax revenue from kinship carers was estimated as described in the foregone tax revenue subsection.

It is worth noting that additional tax revenue is generated both in the year following the take-up of leave, as well as in the remaining months of the year when the leave was claimed. As a result, the second benefit is reduced as the duration of paid leave is increased.

Improved children's health

The last benefit we have identified concerns the health of the children receiving kinship care due to carers taking paid time off to care for them. While kinship carers are looking after children from all age groups, this benefit applies only to infants (0-1 years old), as caring is particularly important in the first years of the children's life. The policy would allow carers to look after their children without experiencing significant adverse employment or income effects, which would then decrease the wellbeing of carers and their children.

The benefits to children's health we identified are the benefits due to decreased mortality and the benefits due to reduced ADHD and hearing problems. These benefits were selected based on the availability of evidence, the robustness of the estimates, and the ease of monetisation and quantification. Furthermore, these two impacts allowed us to link the size of the benefits to the duration of leave and the size of pay.

To estimate the **benefits due to decreased mortality** we multiplied the number of infants starting new kinship care arrangements with carers taking up the offer by the monetary value of avoided mortalities. The number of infants was calculated by applying the share of all kinship children that are 0 and 1 years old to the number of children in new kinship care arrangements (Office for National Statistics, 2023a). We then multiplied this by the take-up rate for each care arrangement. We assume that these benefits apply only to new care arrangements and only for the first two years of an infant's development.

To estimate the monetary value of decreased mortality, we multiply the total decrease in mortality due to the policies by the value of infant mortalities. The total decrease in mortality was estimated using evidence from Khan (2020) suggesting that one week of paid employment leave to families in OECD countries is associated with a decrease in neonatal mortality of 0.89% and 1.09% in infant mortality. Thus, we multiplied these estimates by the number of weeks of paid employment leave (39 and 37 weeks for the two adoption leave durations). The value of infant mortalities was calculated by applying a Quality Adjusted Life Year⁸ value of 1 to the £70,000 monetary estimate of a QALY (Office for Health Improvements and Disparities, 2020; HM Treasury, 2022).

The benefits due to **reduced ADHD and hearing problems** were calculated by multiplying the number of infants starting kinship care arrangements with carers taking up the offer by the monetary value of reductions in ADHD and hearing problems. The number of infants in new kinship care arrangements was calculated as above. The monetary value of reductions in ADHD and hearing problems was calculated by applying the monetary value of ADHD and hearing problems to the total reductions in each condition. The monetary value was calculated by applying the relevant disability weights⁹ to the equivalence ratio between QALY and DALY and then to the monetary estimate of a QALY (mentioned above). The total reductions in the incidence of ADHD and hearing problems were estimated using evidence from Lichtman-Sadot and Bell (2017) showing that covering 60-70% of the carers' weekly earnings reduces the incidence of ADHD in children by 0.7 p.p. and in hearing problems by 2.4 p.p. We then calculated the relevant reductions per 1% of weekly earnings covered and applied

⁸ One Quality Adjusted Life Year (QALY) is equal to 1 year of life in perfect health. The QALY combines both longevity and level of health (HM Treasury, 2022).

⁹ Disability weights represent the health loss associated with specific health conditions (Institute for Health Metrics and Evaluation, 2021).

this to the amount paid to carers under the proposed policies.

GDP gain

The GDP gain reflects the societal benefit from increased employment due to carers remaining in work after returning from leave. This is estimated by multiplying the number of kinship carers and their partners that would have left employment due to caring responsibilities that are taking up the policy (calculated as in previous subsections) by the annual earnings of carers (as in previous subsections).

Findings

This section presents the main findings from our analysis of the introduction of paid employment leave for kinship carers. As detailed in the previous chapters, we explored the costs and benefits of introducing paid leave equal to or two weeks fewer than adoption leave for the following groups:

- **Group 1:** Kinship carers with an SGO or CAO
 - A. New carers only
 - B. New and existing carers
- **Group 2:** Kinship carers with an SGO or CAO and kinship foster carers
 - B. New and existing carers
- **Group 3:** Kinship carers with an SGO or CAO, kinship foster carers, and informal carers
 - A. New carers only
 - B. New and existing carers
- **Group 4:** Kinship carers with an SGO or CAO and informal carers
 - B. New and existing carers

The following subsections present the costs and benefits for each policy option and affected group. All figures presented below have been calculated in nominal terms (base prices of each year) and discounted to 2024. The impacts to the Exchequer have been discounted using the Social Time Preference Rate (STPR)¹⁰ to account for the fact that people prefer monetary benefits in the present rather than the future. The wider societal benefits (i.e. gains in children's wellbeing and GDP) have been discounted using the QALY discount rate, as per HM Treasury (2022) guidance. Finally, we recognise that some of our estimates are based on assumptions or surveys with limited sample sizes. As a result, in line with best practice outlined in the Green Book, we adjusted our estimates for optimism bias (HM Treasury, 2022). In particular, all benefits have been decreased by 10% and all costs have been increased by 10%. As a result, the estimates presented below can be considered conservative.

Adoption leave

Group 1: Kinship carers with an SGO or CAO

A. New carers

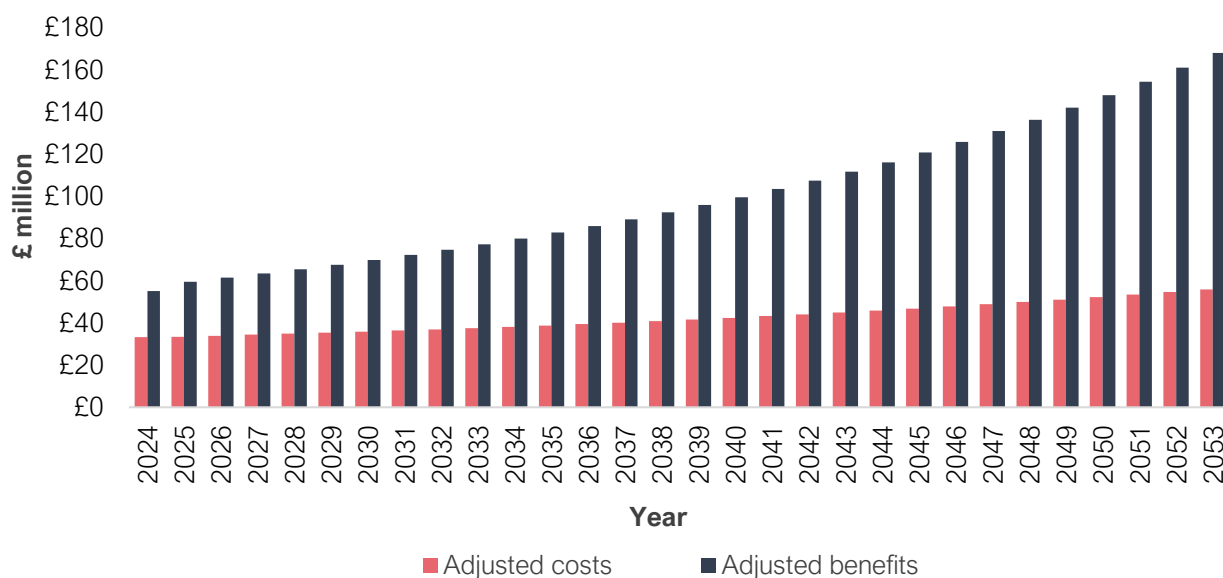
Introducing paid employment leave for new kinship carers with SGOs and CAOs leads to significant savings for the Exchequer and wider society. Our analysis suggests that even after discounting and adjusting for optimism bias, **each £1 spent on this policy would return £2.4** over the next 30 years. In particular, £0.7 of the £2.4 generated by the policy would be savings to the Exchequer, while the remaining £1.7 would be wider savings to society.

In total, introducing paid employment leave for kinship carers with new SGO or CAOs in line with adoption leave would require an investment of approximately £1.3bn and would return £3.0bn (of which £0.9bn to the Exchequer) over the next 30 years. On an annual basis, the average costs after adjustments are approximately £42.4m and the average savings are £100.6m (of which £30.9m to the Exchequer).

¹⁰ The STPR is the rate at which society values the present compared to the future (HM Treasury, 2022).

As shown in the figure below, the policy will be cost-efficient from the first year and will generate increasingly more benefits than costs. The benefits increase as the number of new children subject to an SGO or CAO and their carers increases each year.

Figure 1. Adjusted total costs and benefits of proposed policy per year (million £, 2024-2053)



B. New and existing carers

Expanding the policy to also include existing carers slightly reduces the BCR. Our analysis suggests that **each £1 spent on this policy would return £2.3** over the next 30 years. The majority of these savings (£1.6) apply to wider society, while the remaining savings (£0.7) apply to the Exchequer.

In total, introducing paid employment leave for new and existing special guardians and kinship carers with a CAO in line with adoption leave would require an investment of approximately £1.4bn and would return £3.3bn (of which £1.0bn to the Exchequer) over the next 30 years. On an annual basis, the average costs after adjustments are approximately £46.6m and the average savings are £108.6m (of which £33.3m to the Exchequer).

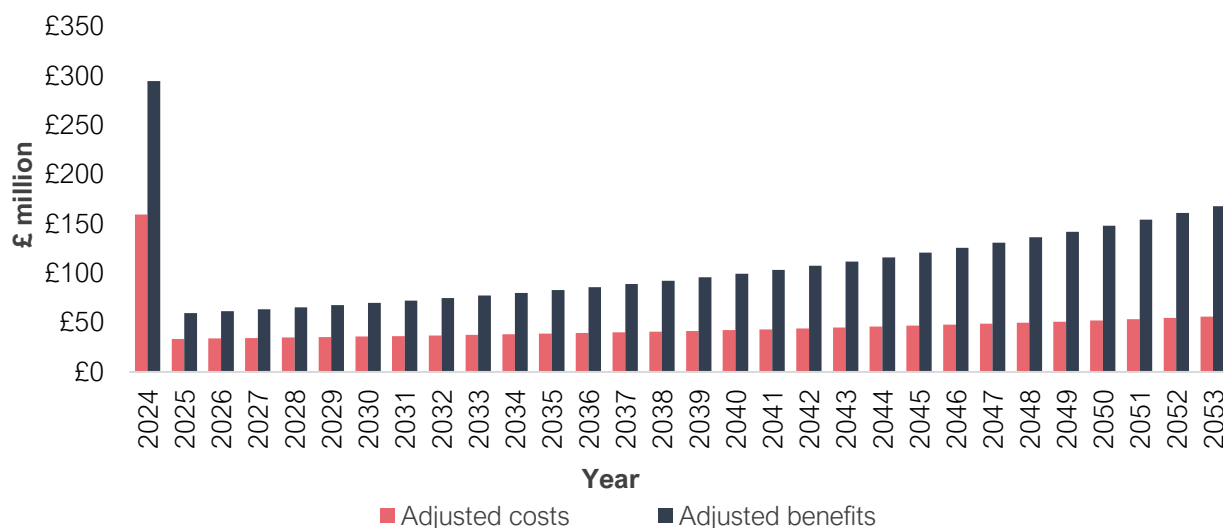
The figure below presents the evolution of adjusted costs and benefits over the examined period. In the first year, this policy would require an investment of approximately £159.4m and would return approximately £294.6m. The significant jump in the first year can be explained by the addition of existing carers in this scenario. We have assumed that the policy will be available to existing carers only in the first year of implementation. Any carers not taking up the offer will therefore be unable to claim it in a subsequent year.

This assumption was made to ensure that the policy meets its aims. As with adoption leave, the aim is to help both the child and the carer bond and settle safely in the first weeks that the care arrangement takes place. As a result, claiming employment leave years after the arrangement starts would be against this aim.

This assumption leads to a significant increase in costs and benefits in the first year due to a bigger targeted population. The costs and benefits for the subsequent years are identical to the Group 1,a scenario, as we assume that only new carers will be eligible for the offer post year 1.



Figure 2. Adjusted total costs and benefits of proposed policy per year (million £, 2024-2053)



Group 2: Kinship carers with an SGO or CAO, and kinship foster carers

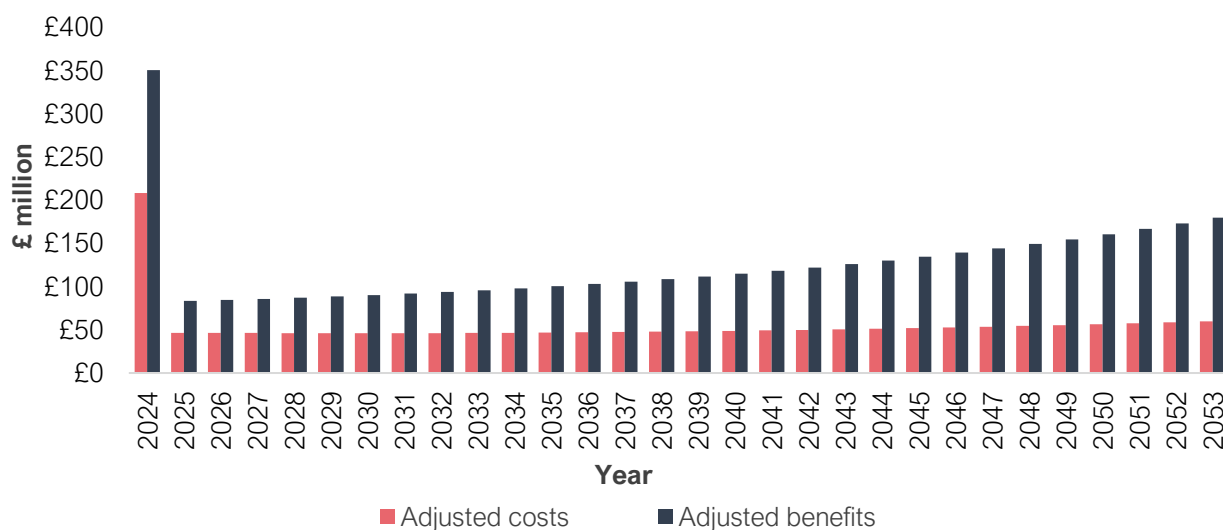
B. New and existing carers

Including new and existing kinship foster carers does not have a significant impact on the results. As with the previous policy, **each £1 spent on this policy would return £2.3** over the next 30 years. The Exchequer would receive £0.7 out of the £2.3, while the remaining £1.6 would be savings to the society.

In total, introducing paid employment leave for new and existing kinship carers with an SGO or CAO and kinship foster carers in line with adoption leave would require an investment of approximately £1.7bn and would return £3.8bn (of which £1.2bn to the Exchequer) over the next 30 years. The average annual costs after adjustments are approximately £55.3m and the average annual savings are £126.5m (of which £39.9m to the Exchequer).

As shown in the figure below, the policy will generate more benefits than costs each year, throughout the examined period. The dynamics are similar to Group 1,b. In the first year, the policy would require an investment of approximately £208.4m and would return almost £350.7m.

Figure 3. Adjusted total costs and benefits of proposed policy per year (million £, 2024-2053)



Adoption leave+

Group 3: Kinship carers with an SGO or CAO, kinship foster carers, and informal carers

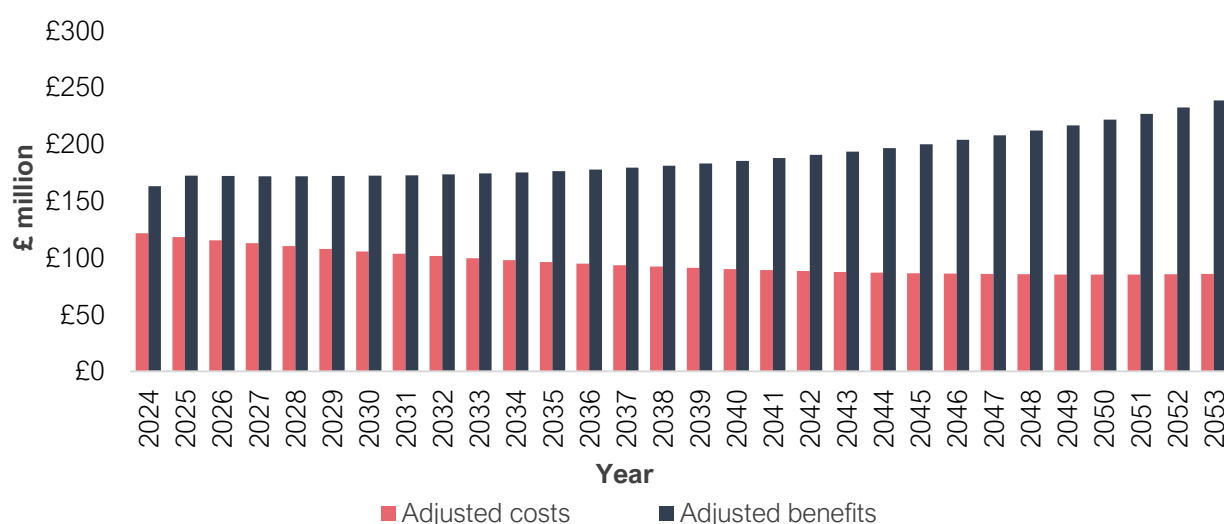
A. New carers

Giving paid employment leave equal to adoption leave for all new kinship carers, regardless of whether they have parental responsibility, would also be cost effective. According to our estimates, **each £1 spent on this policy would return £2.0** over the next 30 years (£0.4 to the Exchequer and £1.6 to wider society).

Overall, the introduction of this policy would require an investment of approximately £2.9bn and would return £5.7bn (of which £1.3bn to the Exchequer) over the next 30 years. The average annual costs after adjustments are approximately £95.9m and the average savings are £190.2m (of which £42.3m to the Exchequer).

Figure 4 presents the evolution of the adjusted costs and benefits over time. The figure shows that the policy will generate more benefits than costs each year throughout the examined period. It is worth noting that while costs might appear to be decreasing, this is not the case. While costs increase through time, they increase at a lower rate than the discount rate. As a result, the discount decreases costs more than they increase through time, making the total adjusted figure appear to be decreasing.

Figure 4. Adjusted total costs and benefits of proposed policy per year (million £, 2024-2053)

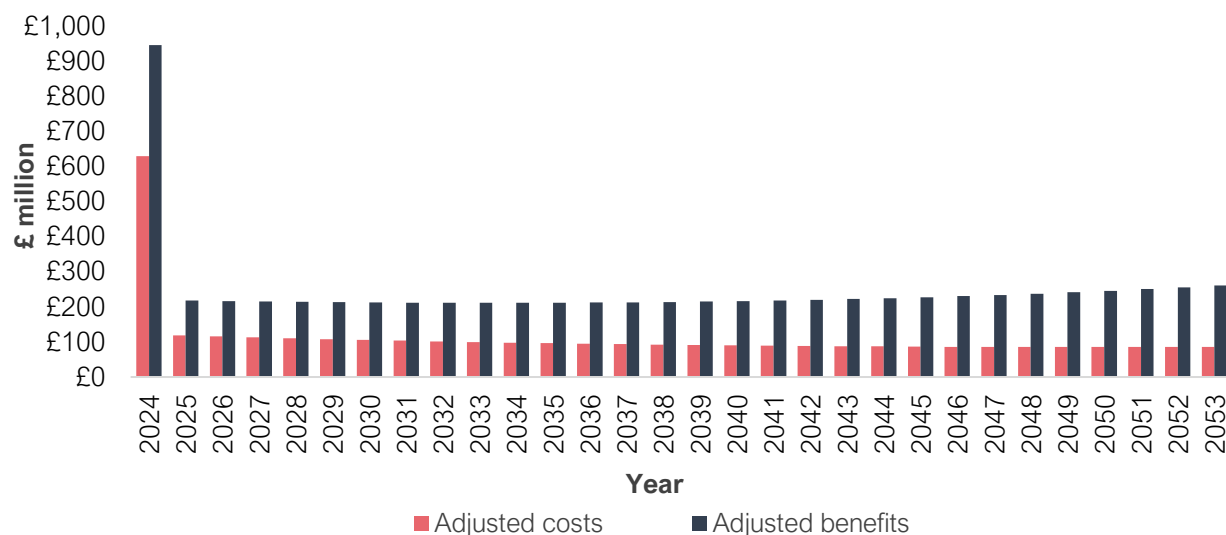


B. New and existing carers

Our analysis shows that introducing paid employment leave for all new and existing kinship carers under all legal statuses would also be cost-efficient. In particular, **each £1 spent on this policy would return £2.2** over the next 30 years. The Exchequer would receive £0.7, while the remaining £1.5 would be savings to wider society.

The proposed policy would require an investment of approximately £3.4bn and would return £7.4bn (of which £2.5bn to the Exchequer) over the next 30 years. The average annual costs are approximately £112.8m and the average annual savings are £247.5m (of which £83.6m to the Exchequer).

As shown in the figure below, the policy will generate more benefits than costs each year, throughout the examined period. The dynamics are similar to Group 2,b. In the first year, this policy would require an investment of almost £629.2m and would return approximately £945.3m.

Figure 5. Adjusted total costs and benefits of proposed policy per year (million £, 2024-2053)

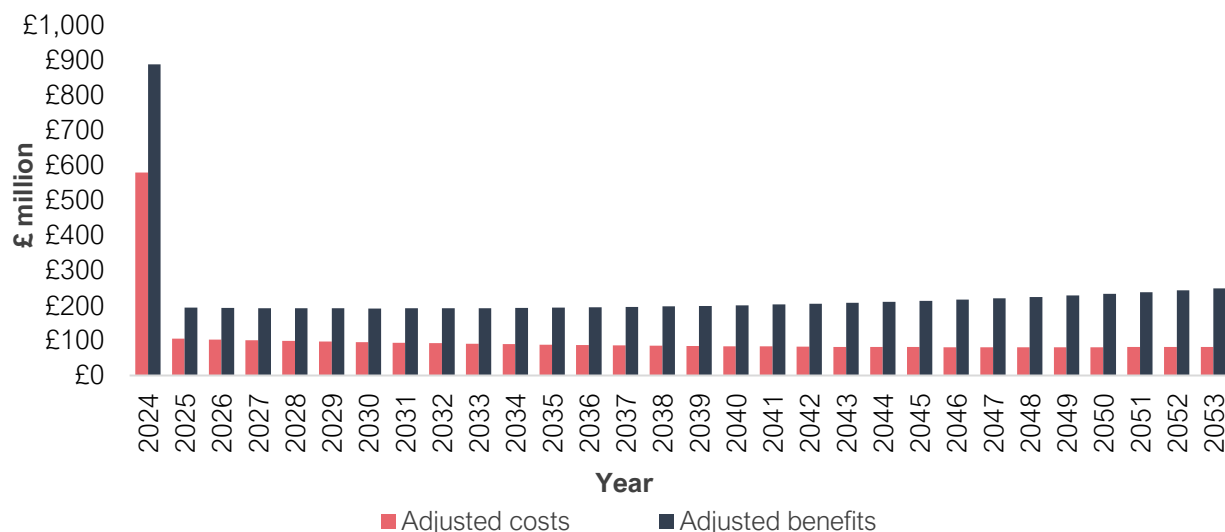
Group 4: Kinship carers with an SGO or CAO, and informal carers

B. New and existing carers

Excluding kinship foster carers would not significantly affect the costs and benefits of the proposed policy, compared to Group 3,b. According to our estimates, **each £1 spent on this policy would return £2.2** over the next 30 years (£0.7 to the Exchequer and £1.5 to wider society).

The introduction of this policy would require an investment of approximately £3.1bn and would return £6.9bn (of which £2.3bn to the Exchequer) over the next 30 years. The average annual costs after adjustments are approximately £104.1m and the average savings are £229.6m (of which £77.1m to the Exchequer).

Figure 6 presents the evolution of the adjusted costs and benefits over time. The policy will generate more benefits than costs each year, throughout the examined period. In the first year, the policy would require an investment of almost £580.2m and would return approximately £889.2m.

Figure 6. Adjusted total costs and benefits of proposed policy per year (million £, 2024-2053)

Adoption leave minus 2 weeks

Group 1: Kinship carers with an SGO or CAO

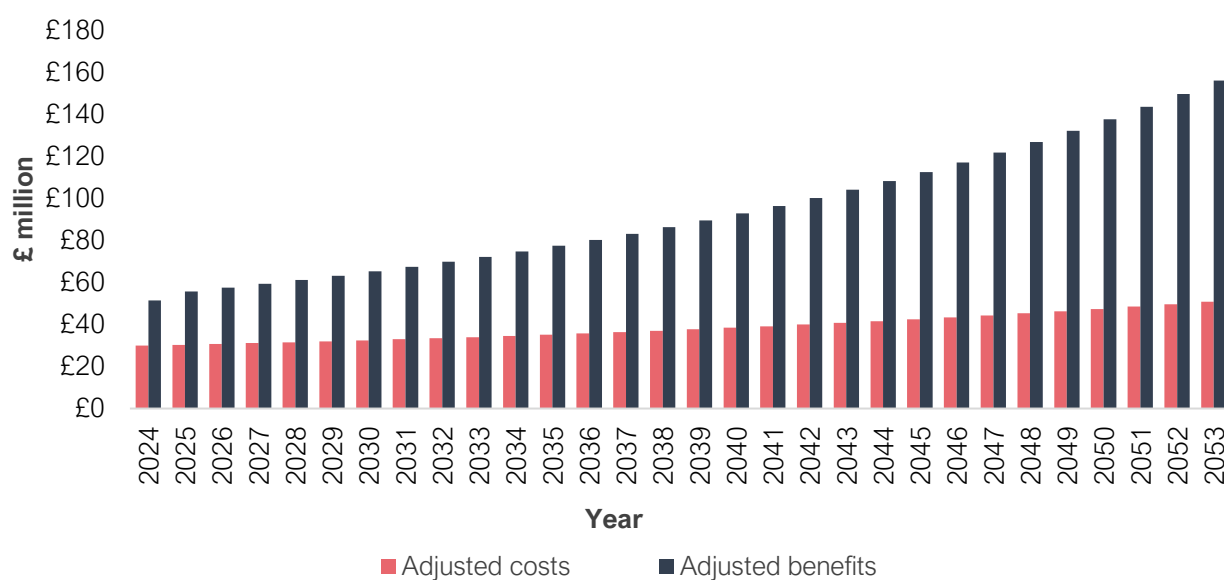
A. New carers

Introducing paid employment leave for new kinship carers with an SGO or CAO reduced by 2 weeks also leads to significant savings for the Exchequer and wider society. After discounting and adjusting for optimism bias, our estimates show that **each £1 spent on this policy would return £2.4** over the next 30 years. The majority of the savings (£1.6) apply to wider society, while £0.8 applies to the Exchequer.

The introduction of this policy would require an investment of approximately £1.1bn and would return £2.8bn (of which £0.9bn to the Exchequer) over the next 30 years. The average annual costs and benefits after adjustments are £38.4m and the average savings are £93.8m (of which £29.4m to the Exchequer).

As shown in the figure below, the policy will be cost-efficient from the first year and will generate increasingly more benefits than costs.

Figure 7. Adjusted total costs and benefits of proposed policy per year (million £, 2024-2053)

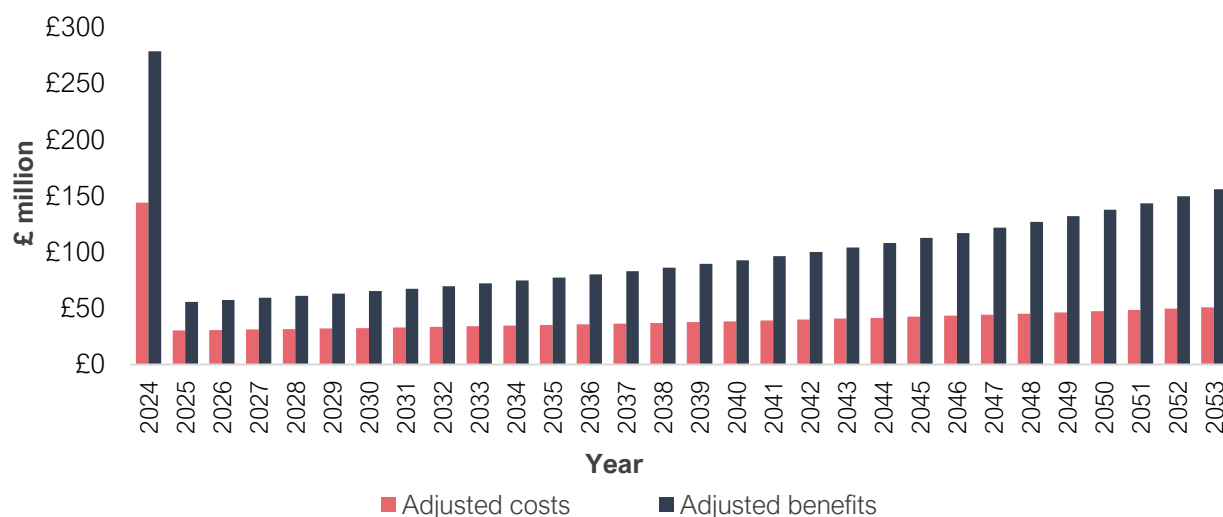


B. New and existing carers

Expanding the scope of the policy to include both new and existing kinship carers with an SGO or CAO does not significantly affect the BCR. In particular, our estimates show that **each £1 spent on this policy would return £2.4** over the next 30 years (£0.8 to the Exchequer and £1.6 to society).

The total investment needed for this policy is approximately £1.3bn over the next 30 years, while the total savings over the same period are £3.0bn (of which £0.9bn to the Exchequer). The average annual costs and benefits after adjustments are £42.2m, and the average savings are £101.3m (of which £83.6m to the Exchequer).

As shown in the figure below, the policy will create significantly more benefits than costs throughout the examined period. The evolution over time is similar to Groups 1,b, 2,b, and 3,b. In the first year, the policy would require an investment of approximately £144m and would return almost £278.8m.

Figure 8. Adjusted total costs and benefits of proposed policy per year (million £, 2024-2053)

Group 2: Kinship carers with an SGO or CAO, and kinship foster carers

B. New and existing carers

As in adoption leave equivalent policies, expanding the policy to include kinship foster carers does not significantly affect our findings due to their comparatively small population size. In particular, our estimates show that **each £1 spent on this policy would return £2.4** over the next 30 years. The return to the Exchequer would be £0.8, while the remaining £1.6 would be returned to wider society.

Introducing this policy would require an investment of approximately £1.5bn over the next 30 years, while the total savings over the same period are £3.5bn (of which £1.1bn to the Exchequer). The average annual costs and benefits after adjustments are £50.1m, and the average savings are £118.1m (of which £38m to the Exchequer).

As shown in the figure below, the policy will create significantly more benefits than costs throughout the examined period, with similar dynamics as above. In the first year, the policy would require an investment of almost £188.3m and would return approximately £331.7m.

Figure 9. Adjusted total costs and benefits of proposed policy per year (million £, 2024-2053)

Adoption leave minus 2 weeks+

Group 3: Kinship carers with an SGO or CAO, kinship foster carers, and informal carers

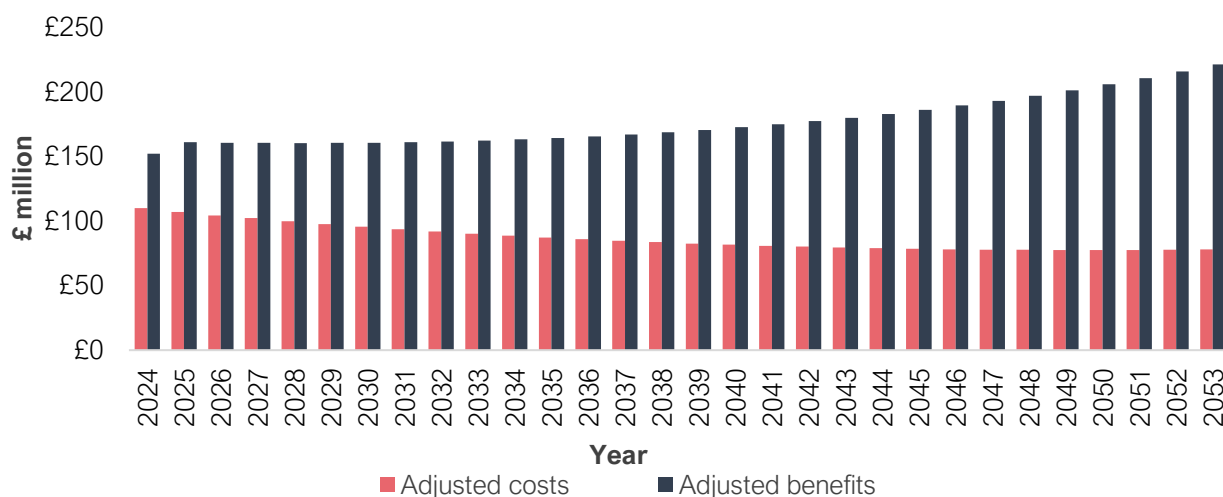
A. New carers

The next policy scenario we examined was the introduction of paid employment leave for all new kinship carers, including informal ones. As with all previously examined policies, the proposed policy would create net savings. In particular, our estimates show that **each £1 spent on this policy would return £2.0** over the next 30 years, £0.5 of which would be returned to the Exchequer and £1.5 to wider society.

The total investment needed for this policy is approximately £2.6bn over the next 30 years, while the total savings over the same period are £5.3bn (of which £1.2bn to the Exchequer). The average annual costs and benefits after adjustments are £86.9m and the average savings are £177.0m (of which £29.4m to the Exchequer).

As shown in the figure below, the policy will create significantly more benefits than costs throughout the examined period. As in adoption leave, the costs are increasing over time, despite the apparent downward trend in the figure.

Figure 10. Adjusted total costs and benefits of proposed policy per year (million £, 2024-2053)

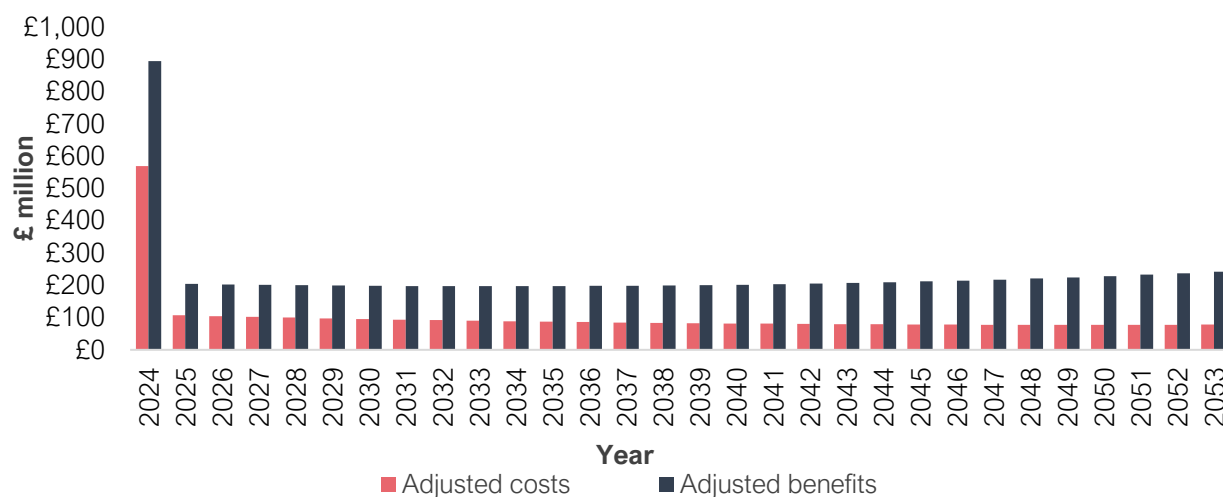


B. New and existing carers

Similar to adoption leave, expanding the policy to include existing kinship carers increases the BCR. In particular, our estimates show that **each £1 spent on this policy would return £2.3** over the next 30 years. The return to the Exchequer would be £0.8, while the remaining £1.5 would be returned to wider society.

The introduction of this policy would require an investment of approximately £3.1bn over the next 30 years, while the total savings over the same period are £6.9bn (of which £2.4bn to the Exchequer). The average annual costs and benefits after adjustments are £102.2m and the average savings are £231.3m (of which £79.7m to the Exchequer).

As shown in the figure below, the policy will create significantly more benefits than costs throughout the examined period, with similar dynamics as above. In the first year, the policy would require an investment of approximately £568.8m and would return almost £894.1m.

Figure 11. Adjusted total costs and benefits of proposed policy per year (million £, 2024-2053)

Group 4: Kinship carers with an SGO or CAO, and informal carers

B. New and existing carers

Excluding kinship foster carers would not significantly affect the costs and benefits of the proposed policy, compared to Group 3,b. According to our estimates, **each £1 spent on this policy would return £2.3** over the next 30 years (£0.8 to the Exchequer and £1.5 to wider society).

The introduction of this policy would require an investment of approximately £2.8bn and would return £6.4bn (of which £2.2bn to the Exchequer) over the next 30 years. The average annual costs after adjustments are approximately £94.3m, and the average savings are £214.5m (of which £73.4m to the Exchequer).

Figure 12 presents the evolution of the adjusted costs and benefits over time. The policy will generate more benefits than costs each year, throughout the examined period. In the first year, the policy would require an investment of almost £524.5m and would return approximately £841.2m.

Figure 12. Adjusted total costs and benefits of proposed policy per year (million £, 2024-2053)

Conclusions

This report outlines our findings from analysing the impacts of introducing paid employment leave policies to kinship carers. After reviewing the relevant academic literature and domestic and international policy documents, and in collaboration with FRG, we identified 2 policy targets. The selected policy targets are adoption leave and adoption leave minus 2 weeks.

We then explored the impacts of introducing these policy targets for the following groups:

- **Group 1:** Kinship carers with an SGO or CAO
 - A. New carers only
 - B. New and existing carers
- **Group 2:** Kinship carers with an SGO or CAO and kinship foster carers
 - B. New and existing carers
- **Group 3:** Kinship carers with an SGO or CAO, kinship foster carers, and informal carers
 - A. New carers only
 - B. New and existing carers
- **Group 4:** Kinship carers with an SGO or CAO and informal carers
 - B. New and existing carers

Our methodological approach is in line with best practice in policy appraisal as outlined in HM Treasury Green Book (2022). In particular, we monetised costs and benefits to public finances, carers, children, and wider society over 30 years using a Cost Benefit Analysis model. All figures are reported in nominal terms, adjusted for optimism bias at a level of 10%, and discounted with QALY and STPR rates.

In summary, extending adoption leave to kinship carers would yield significantly greater benefits than costs for all examined target groups and durations. The Benefit-Cost Ratios (BCRs) we have estimated range from £2.0 to £2.4. As a result, **it is estimated that investing £1 in paid employment leave for kinship carers would return at least £2.0 in total benefits**. This includes at least £0.4 of savings to the Exchequer and £1.5 of savings to society.

The table below summarises the BCRs for each policy option and target group. The results suggest that the jointly most cost-effective policy options are adoption leave minus 2 weeks for (i) new kinship carers with an SGO or CAO, (ii) new and existing kinship carers with an SGO or CAO, and (iii) new and existing kinship carers with an SGO or CAO and kinship foster carers, together with (iv) adoption leave for new kinship carers with an SGO or CAO. The least cost-efficient recommendations are those targeting all new carers, excluding existing ones.

However, care should be taken when comparing the findings of different policy options. The difference between the lowest (£2.0) and highest (£2.4) BCRs is too narrow to reliably attribute to the design of the different policy options rather than the underlying assumptions used in our models. As a result, the main finding of this report is that offering paid employment leave to kinship carers would be cost-effective across all examined options, regardless of the care arrangement type, target group, and leave duration.

Table 2. Summary of BCRs by policy option and target group

Policy option	Target group	BCR
Adoption leave minus 2 weeks	New kinship carers with an SGO or CAO	£2.4
Adoption leave minus 2 weeks	New and existing kinship carers with an SGO or CAO	£2.4
Adoption Leave	New kinship carers with an SGO or CAO	£2.4
Adoption leave minus 2 weeks	New and existing kinship carers with an SGO or CAO, and kinship foster carers	£2.4
Adoption Leave	New and existing kinship carers with an SGO or CAO	£2.3
Adoption Leave	New and existing kinship carers with an SGO or CAO and kinship foster carers	£2.3
Adoption leave minus 2 weeks +	New and existing kinship carers with an SGO or CAO and informal carers	£2.3
Adoption leave minus 2 weeks +	New and existing kinship carers with an SGO or CAO, kinship foster carers, and informal carers	£2.3
Adoption Leave +	New and existing kinship carers with an SGO or CAO and informal carers	£2.2
Adoption Leave +	New and existing kinship carers with an SGO or CAO, kinship foster carers, and informal carers	£2.2
Adoption leave minus 2 weeks +	New kinship carers with an SGO or CAO, kinship foster carers, and informal carers	£2.0
Adoption Leave +	New kinship carers with an SGO or CAO, kinship foster carers, and informal carers	£2.0

Finally, it is important to acknowledge the limitations of our analysis. Firstly, there might be wider benefits not captured in our estimates. For instance, there is evidence suggesting that paid employment leave has a positive impact on the wellbeing of parents, but the form and strength of the evidence did not allow us to include this in our model. Secondly, our analysis is based on several assumptions, the most important being the size of the informal care population. Finally, some of the estimates we used are sourced from surveys with small sample sizes. These issues were partially addressed by an evidence review, discussions with FRG, and adjusting for optimism bias.

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