



Consortium for the Regional Support for Women in Disadvantaged and Rural Areas

Response to: Engagement on Welfare Supplementary Payment Schemes

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Foyle Women's
Information
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Women's Regional Consortium: Working to Support Women in Rural Communities and Disadvantaged Urban Areas

1. Introduction

1.1 This response has been undertaken collaboratively by the members of the Consortium for the Regional Support for Women in Disadvantaged and Rural Areas (hereafter, either the Women's Regional Consortium or simply the Consortium), which is funded by the Department for Communities and the Department of Agriculture, Environment and Rural Affairs.

1.2 The Women's Regional Consortium consists of seven established women's sector organisations that are committed to working in partnership with each other, government, statutory organisations and women's organisations, centres and groups in disadvantaged and rural areas, to ensure that organisations working for women are given the best possible support in the work they do in tackling disadvantage and social exclusion.¹ The seven groups are as follows:

- ♀ Training for Women Network (TWN) – Project lead
- ♀ Women's Resource and Development Agency (WRDA)
- ♀ Women's Support Network (WSN)
- ♀ Northern Ireland's Rural Women's Network (NIRWN)
- ♀ Women's TEC
- ♀ Women's Centre Derry
- ♀ Foyle Women's Information Network (FWIN)

¹ Sections 1.2-1.3 represent the official description of the Consortium's work, as agreed and authored by its seven partner organisations.

1.3 The Consortium is the established link and strategic partner between government and statutory agencies and women in disadvantaged and rural areas, including all groups, centres and organisations delivering essential frontline services, advice and support. The Consortium ensures that there is a continuous two-way flow of information between government and the sector. It also ensures that organisations/centres and groups are made aware of consultations, government planning and policy implementation. In turn, the Consortium ascertains the views, needs and aspirations of women in disadvantaged and rural areas and takes these views forward to influence policy development and future government planning, which ultimately results in the empowerment of local women in disadvantaged and rurally isolated communities.

1.4 The Women's Regional Consortium appreciates the opportunity to respond to the Department for Communities (DfC) Engagement on Welfare Supplementary Schemes. Many of the Consortium partners are members of the Cliff Edge Coalition NI who recognise the importance of these mitigation payments in the lives of the people we represent.

1.5 The Welfare Mitigations package is one of the positive developments to come from devolution and it is proof that we can have a better social security system which treats people fairly and ensures they have enough to live dignified, healthy lives. A joint report from the Northern Ireland Affairs and Work and Pensions Committees concluded that the mitigations package was a success and should be extended to claimants in similar circumstances in different parts of the UK.²

1.6 We wish to endorse the response made by the Cliff Edge Coalition NI and the Women's Policy Group (WPG) both of which groups we are represented on. We also support the response made by academics Professor Gráinne McKeever, Dr Mark Simpson and Dr Ciara Fitzpatrick from the School of Law, Ulster University and the

² Welfare policy in Northern Ireland, First Joint Report of the Work and Pensions and the Northern Ireland Affairs Committees, September 2019
<https://publications.parliament.uk/pa/cm201719/cmselect/cmniaf/2100/2100.pdf>

response from the Trussell Trust NI. We fully endorse their responses and urge the DfC to take their evidence fully into consideration.

2.0 General Comments

The Women's Regional Consortium wishes to raise a number of concerns about the format of this consultation:

- The consultation period was originally just 4 weeks long (then extended by one week). This short deadline goes against all existing good practice on consultations and we note that section 3.11 of the Department's Equality Scheme states that consultation periods should last a minimum of 12 weeks.³ We understand that legislative timetables are tight and this can necessitate shorter deadlines but this causes real difficulties for those trying to make responses. It means that organisations like ourselves have insufficient time to properly consult with affected women so that their views/experiences which are so critical to this process are effectively silenced. We suggest that the deadline should have been longer to facilitate genuine and meaningful consultation on what are important payments for those on the lowest incomes.
- We are also concerned that the consultation period takes place largely during a holiday period. It is possible that many of those who are most likely to benefit from mitigation payments may be on holiday, looking after children during the school holidays and busy preparing for the return to school so may have even more limited time to contribute to this consultation.
- We have concerns about the format of the consultation questions. The survey asks a series of questions with a range of options followed by a space to expand the answer. As WRDA guidance on public consultations⁴ states: "*the binary 'agree/disagree' nature of many questions hides the complexity of how people feel about different issues.*" The answers to these 'agree/disagree' questions needs careful analysis alongside the accompanying text. Careful consideration

³ DfC [dfc-equality-scheme.pdf \(communities-ni.gov.uk\)](#)

⁴ Women at the Heart of Public Consultation, A guide for Public Authorities and Women's Organisations, WRDA, November 2017
https://wrda.net/wpcontent/uploads/2018/10/WRDA_WomenAtTheHeartOfPublicConsultation.pdf

must be given to the fact that respondents may select one of these options but provide further clarification in the text. They may have several qualifications to their answer and if these are not addressed their answer may be different. The results from the 'agree/disagree' answers must not be considered in isolation or presented in such a way that they paint a misleading picture of responses.

- We know that many of those who receive the WSPs do not recognise the term 'Welfare Supplementary Payment' or even the term 'mitigation' and do not realise that they benefit from these. This could mean many of those with important contributions to make to this consultation will simply not recognise that it applies to them. Providing such a short deadline for consultation also means that organisations who work with affected groups cannot do the necessary work to explain the content of the consultation and meaningfully collect the views of those impacted.
- We believe that meaningful engagement with people with lived experience is vital in relation to this consultation. Welfare Supplementary Payments are important and valuable payments in the lives of recipients. They should be given the time and space to discuss the importance of these payments in a format that they can understand and in ways where they feel comfortable and empowered to contribute. We would like to find out more about how the Department proposes to do this.
- The Community and Voluntary sector are responding to a wide range of Government consultations over the coming weeks from a number of different Government departments and there is considerable pressure on an already overstretched sector. While we appreciate the opportunity to be able to contribute to this important consultation, we hope that it is not solely the remit of the community and voluntary sector to engage those with lived experience on this issue.
- We appreciate that the Department has organised an information event to discuss this consultation and we welcome this engagement.

2.1 Women, Poverty and Welfare Reform

Poverty is an issue which impacts on the lives of many women in Northern Ireland and is harmful not only to the women themselves but to their children, families and wider communities. Women are generally more likely than men to live in poverty across their lifetimes. Lone parents (in Northern Ireland Census results show that the majority of single parent households are headed by a woman (93%)) are even more vulnerable to poverty. Women often bear the brunt of poverty in the home managing household budgets to shield their children from its worst effects. This means that women end up acting as the 'shock absorbers' of poverty going without food, clothes or warmth in order to meet the needs of other family members when money is tight.⁵

“As long as my two kids are fed and watered, I don’t care if I eat.”

(Quote taken from Women’s Regional Consortium Research on the Impact of Austerity/Welfare Reform on Women, March 2019)

“Women are the ones who often give up/do without to absorb debt rather than let it impact on their children. I’ll do without spuds and put the spud on the child’s plate. Women are at the frontline of this.”

(Quote taken from Women’s Regional Consortium Research on Women’s Experiences of the Cost-of-Living Crisis in Northern Ireland, June 2023)

Women are more likely to be in receipt of social security benefits, more likely to be in low-paid, part-time and insecure work and also more likely to be providing care which limits their ability to carry out paid work. This contributes to keeping women’s incomes generally lower over their lifetimes and therefore puts them at greater risk of poverty. These existing gender inequalities are also likely to be further worsened by the ongoing Cost-of-Living Crisis.

“I am now scraping along to provide food and keep a roof over mine and my child’s heads. The cost to survive is atrocious.”

(Quote taken from Women’s Regional Consortium Research on Women’s Experiences of the Cost-of-Living Crisis in Northern Ireland, June 2023)

⁵ A Female Face, Fabian Society Blog by Mary-Ann Stephenson, Women’s Budget Group, February 2019 <https://fabians.org.uk/a-female-face/>

A decade of austerity and welfare reform policies have disproportionately impacted on women. Research by the House of Commons Library shows that 86% of the savings to the Treasury through tax and benefit changes since 2010 will have come from women. It shows that, by 2020, men will have borne just 14% of the total burden of welfare cuts, compared with 86% for women.⁶ These welfare reform and austerity measures have tended to limit the ability of the system to protect against poverty.⁷

Locally, an analysis of the impact of the reforms by the Northern Ireland Human Rights Commission (NIHRC)⁸ showed that across most income levels the overall cash impact of the reforms is more negative for women than for men. This is particularly the case for lone parents (who are mostly women) who lose £2,250 on average, equivalent to almost 10% of their net income.

Research by the Women's Regional Consortium on the impact of austerity⁹ and on the impact of Universal Credit¹⁰ on women shows the extent to which changes to the social security system have worsened women's ability to provide for their children and families and made them more vulnerable to financial hardship and poverty. Gendered policies such as the two-child limit and Benefit Cap as well as the introduction of Universal Credit which has been described as discriminatory by design have caused many women to struggle to afford the basics and to feed and provide for their children and families.

⁶ Estimating the gender impact of tax and benefit changes, Richard Cracknell, Richard Keen, Commons Briefing Papers SN06758, December 2017

<http://researchbriefings.files.parliament.uk/documents/SN06758/SN06758.pdf>

⁷ Protecting dignity, fighting poverty and promoting social inclusion in devolved social security, Dr Mark Simpson, Ulster University, June 2018

http://www.niassembly.gov.uk/globalassets/documents/raise/knowledge_exchange/briefing_papers/series_7/simpson060618.pdf

⁸ Cumulative impact assessment of tax and social security reforms in Northern Ireland, NIHRC, November 2019

https://www.nihrc.org/uploads/publications/Final_CIA_report_Oct_2019.pdf

⁹ Impact of Ongoing Austerity: Women's Perspectives, Women's Regional Consortium, March 2019

<http://www.womensregionalconsortiumni.org.uk/sites/default/files/Impact%20of%20Ongoing%20Austerity%20Women%27s%20Perspectives.pdf>

¹⁰ The Impact of Universal Credit on Women, Women's Regional Consortium, September 2020

<http://www.womensregionalconsortiumni.org.uk/sites/default/files/The%20Impact%20of%20Universal%20Credit%20on%20WomenRevised.pdf>

“It’s degrading – how can I provide for my family? Kids ask can we get this, can we get that and I have to say no all the time.”

(Quote taken from Women’s Regional Consortium Research on the Impact of Austerity/Welfare Reform on Women, March 2019)

Concerns about austerity measures have been raised internationally by the CEDAW Committee. Following its recent examination of the UK, the CEDAW Committee raised concerns about the impact of austerity measures on women stating its concern about the *“disproportionately negative impact of austerity measures on women, who constitute the vast majority of single parents and are more likely to be engaged in informal, temporary or precarious employment.”*¹¹ The Committee recommended that the UK government *“undertake a comprehensive assessment on the impact of austerity measures on the rights of women and adopt measures to mitigate and remedy the negative consequences without delay.”*¹²

The social security system has a vital role to play in easing the impact of poverty on people and families. As the Covid19 pandemic and the Cost-of-Living Crisis has shown, people need to be able to rely on the social security system when times get tough and they are hit by unexpected costs or lost earnings.

Addressing women’s disadvantage in the economy requires action to ensure that women are able to be economically independent not only through paid work but also through a properly supportive social security system which provides a safety net when women are not able to work. It is important that proposals around social security recognise the contextual factors which increase women’s vulnerability to poverty. These include high rates of female economic inactivity, no childcare strategy, high numbers of women with adult care responsibilities, a weak labour market, high numbers

¹¹ Concluding Observations on the eighth periodic report of United Kingdom of Great Britain and Northern Ireland, CEDAW/C/GBR/CO/8, March 2019 (para 17)
https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CEDAW/C/GBR/CO/8%20&Lang=En

¹² Ibid, para 18

of women working part-time and in precarious jobs and wages lower than the UK average.¹³

“The benefits system doesn’t help people to go out and seek work. The jobs women do are often the lowest paid. If they leave benefits for low paid work they just end up getting further into the poverty trap.”

(Participant at Consultation Event)

2.2 The Impact of the Cost of Living Crisis on Women in Northern Ireland

The Women’s Regional Consortium and Ulster University carried out detailed research with women on the impact of the Cost-of-Living Crisis on their lives and families. This research was carried out in February and March 2023 with 250 women across Northern Ireland. A research paper summarising the findings was published by the Women’s Regional Consortium and Ulster University in June 2023¹⁴ and the main findings were:

- 96% of the women felt their financial situation was worse than it was in the previous year.
- 91% of the women reported difficulty paying their bills as a result of cost of living increases.
- The bills the women were finding it most difficult to pay were:
 - 75% food shopping;
 - energy bills - 73% electricity, 52% gas, 30% home heating oil;
 - 38% travel costs;
 - 34% internet bills;
 - 27% school costs.
- The price increases reported as having the biggest impact on women’s household budgets were increases in energy bills (90%) and increases in food bills (89%).

¹³ Shadow report for the examination of the UK by the Committee on the Convention to Eliminate Discrimination against Women, NIWEP, January 2019

¹⁴ Women’s Experiences of the Cost-of-Living Crisis in Northern Ireland, Women’s Regional Consortium & Ulster University, June 2023

<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/06/Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf>

- Just over half of the women reported being in debt (56%) and of these 82% reported they had to borrow as a result of cost of living increases.
- 62% of the women reported they had been unable to save recently and 31% reported their savings had decreased. None of the women reported they had been able to increase their savings.
- 90% of the women felt that the Cost-of-Living Crisis had impacted on their physical or mental health or both.
- Of the women who had children, 78% felt that cost of living increases had negatively impacted on their children.
- 92% of the women reported that cost of living increases had negatively impacted on their ability to take part in social activities.
- The actions taken by the women to cope with cost of living increases were:
 - 86% buying cheaper items;
 - 81% cutting energy use;
 - 55% using charity shops/second hand websites;
 - 49% reduced the use of their car/public transport;
 - 47% relying on friends/family for help;
 - 43% skipped meals.
- 78% of the women had felt cold or hungry or both as a result of cost of living increases.
- 41% of the women had needed to use a foodbank/other charitable support due to increases in the cost of living.
- Women reported a number of areas that would help them cope better with increases in the cost of living:
 - 87% increased help with energy bills;
 - 53% cheaper public transport/help with fuel costs;
 - 46% increases in the value of social security benefits;
 - 38% increased help with school costs;
 - 36% better paid work;
 - 36% increased help with housing costs;
 - 31% cheaper borrowing for essential items;

- 22% increased help with childcare.

The impact of the Cost-of-Living Crisis on women is best summarised by the following quote from a woman who took part in a focus group for the research who said: *“We’re not living, we’re just existing.”*

Rising prices for the most essential items, such as food, energy, transport and clothing meant that many women saw their household budgets being increasingly squeezed. This left little room to afford anything beyond the bare essentials and in some cases meant that women could not even afford the basics for themselves, their children and families. This took a significant toll on their lives impacting negatively on their health and wellbeing.

Women are more likely to do the grocery shopping, more likely to be responsible for household budgets and more likely to be responsible for children’s costs so they are more affected by cost of living increases which are especially noticeable in essential household items.

“Women normally run the house and do the grocery shopping. I’m the one buying the kids their clothes and managing the finances. You take on the financial impact of it and the constant thinking about it.”

“I don’t think anyone recognises the impact of this Crisis on women especially. We have a high level of responsibility and it’s impacting really badly and Government are not taking enough notice. People are suicidal and feel like a failure. I’m lying in bed at night and getting really bad intrusive thoughts to the point where I look at my daughter and think if something happens to me who will look after her? I asked the person in charge in my hostel to ring me in the morning and check if I’m OK. It’s really, really impacting on people and Government need to be more aware of the impacts of this Crisis.”

“Sometimes you struggle between turning the heating on and feeding the children. As a mother you’d go without to make sure the kids have what they need. I’ve made dinner sometimes and there hasn’t been enough for everyone so I’ve lied and said it’s alright I’ve eaten so that I can try and make it stretch.”

(Quotes taken from Women’s Regional Consortium Research on Women’s Experiences of the Cost-of-Living Crisis in Northern Ireland, June 2023)

2.3 Welfare Reform Mitigations

In Northern Ireland a package of mitigation measures was agreed by the Northern Ireland Executive to protect some claimants from the harshest impacts of welfare reform.¹⁵ The New Decade, New Approach agreement¹⁶ committed to both extending existing mitigations in Northern Ireland beyond March 2020 when they were due to run out and to carry out a review of the mitigation measures.

The Cliff Edge Coalition¹⁷ is made up of over 100 organisations from across the community and voluntary sector, academia and trade unions in Northern Ireland who came together in 2018 to campaign to sustain and strengthen these crucial welfare reform mitigations. These organisations span a range of concerned groups representing women, children, mental health, housing, poverty, food banks and many more. Several Women’s Regional Consortium partners are part of the Cliff Edge Coalition including Women’s Support Network who are part of the Coalition’s working group.

Cliff Edge is campaigning for the strengthening of the mitigations package in Northern Ireland. The campaign has three key asks which would help to strengthen the social security system and provide important protections against poverty especially for those most impacted.¹⁸ These are:

¹⁵ Welfare Reform Mitigations Working Group Report, Professor Eileen Evason, January 2016
<https://www.executiveoffice-ni.gov.uk/sites/default/files/publications/ofmdfm/welfare-reform-mitigations-working-group-report.pdf>

¹⁶ New Decade, New Approach, January 2020
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/856998/2020-01-08_a_new_decade_a_new_approach.pdf

¹⁷ <https://www.lawcentreni.org/cliff-edge-coalition/>

¹⁸ <https://www.lawcentreni.org/wp-content/uploads/2023/04/CEC-Full-Member-Briefing-May-2023-.pdf>

- **Removing the two-child limit.** This is a highly gendered policy which is likely to have a harsher impact in Northern Ireland due to larger average family sizes compared to GB.
- **Resolving the five-week wait in Universal Credit.** Research by the Women's Regional Consortium clearly shows the negative impact of the five-week wait on low-income families and women.¹⁹
- **Provide support for private renters affected by the Local Housing Allowance (LHA).** Rent has been rising at unprecedented levels in Northern Ireland, almost twice as fast as anywhere else in the UK. As of Q3 2023, the average price per month for a rental property in NI was £810 per month, a 17% increase on the same period in 2021, when it was £691. Single parents (93% of whom are women) are disproportionately impacted by restrictions to the LHA rate. In 2022/23, 40% of single parent households were living in the private rented sector (compared to 23% in 2003).²⁰ The family type at the highest risk of being in relative poverty was single with children at 38%²¹ and are therefore more likely to be in need of support to pay for their housing costs.

The Women's Regional Consortium believes that these strengthened mitigations would provide vital protections for the people of Northern Ireland especially for the many women who have been so adversely affected by welfare reform policies. They are even more necessary in the context of the Cost-of-Living Crisis which like any other economic crisis tends to hit women harder.

We are firmly of the belief that strengthening the mitigations package is essential to provide protection from financial hardship and poverty and also to help with economic recovery. Money provided through benefits is spent in local economies. Therefore,

¹⁹ The Impact of Universal Credit on Women, Women's Regional Consortium, September 2020
<http://www.womensregionalconsortiumni.org.uk/sites/default/files/The%20Impact%20of%20Universal%20Credit%20on%20WomenRevised.pdf>

²⁰ Family Resources Survey: Northern Ireland 2022/23, NISRA & DfC, May 2024
[Family Resources Survey: Northern Ireland 2022/23 \(nisra.gov.uk\)](http://www.nisra.gov.uk/family-resources-survey-northern-ireland-2022-23)

²¹ Northern Ireland Poverty and Income Inequality Report, 2022/23, NISRA & DfC, March 2024
[Northern Ireland Poverty and Income Inequality Report, 2022/23 \(nisra.gov.uk\)](http://www.nisra.gov.uk/northern-ireland-poverty-and-income-inequality-report-2022-23)

strengthening the mitigations package increases the amount of money available to spend, increasing demand at a time when action is needed to create jobs and revive local businesses. Investing in the benefits system to lift people out of poverty and help them get through the Cost-of-Living Crisis is a sensible approach.

“Universal Credit has put me into debt. At no point before this was I without electric, wondering how I was going to feed my kids for the next few days and sitting with no heat, but now with Universal Credit I am.”

“We had to wait 6-7 weeks on the first payment of UC and it was an absolute nightmare. We really struggled. We had to go to the foodbank and call St Vincent de Paul for help.”

(Quotes taken from Women’s Regional Consortium Research on the Impact of Universal Credit on Women, September 2020)

“What’s even worse is that you don’t get any money for your third child. I only get £40/month for my son through Child Benefit. He’s the one who needs the most – he uses up most of the electricity and gas as he’s anemic and needs more heat.”

(Quote taken from Women’s Regional Consortium Research on Women’s Experiences of the Cost-of-Living Crisis in Northern Ireland, June 2023)

The independent Welfare Mitigations Review Report²² has recommended retaining the existing mitigations for the Benefit Cap and the Bedroom Tax in addition to a number of new mitigations for Northern Ireland including offsetting the two-child policy and help during the Universal Credit five-week wait. Their recommendations to strengthen the mitigations package target households on a low income and those containing an adult and/or a child with a disability alongside benefitting women in particular. We agree with our colleagues in the Cliff Edge Coalition that by implementing the recommendations in the Welfare Mitigations Review it would move towards creating a social security system in Northern Ireland which is closer to a human rights-based model: *“Expanding the mitigations and implementing recommendations contained in The Review Report, would help further realise economic and social rights under Articles 9 and 11 of ICESCR – the right to social security and to an adequate standard of living.”*

²² [Welfare Mitigations Review \(communities-ni.gov.uk\)](https://www.communities-ni.gov.uk/welfare-mitigations-review)

We welcome the fact that the Department’s consultation on their Budget 2024-25 allocations²³ outlined earmarked funding in full for the existing welfare mitigations. However, we were disappointed to note that no allocation was made to deliver on any new mitigations. We believe that this will have a disproportionate adverse impact on women.

Equality statistics on the Welfare Supplementary Payments provided on the table below show that across all the Welfare Supplementary Payments these were paid to more women than men (57% to women, 43% to men).

Welfare Supplementary Payments Proportions (%) of Section 75 Group Category Responses (Gender)²⁴

Section 75 Group	Category	All WSP Schemes %	SSSC	Benefit Cap	PIP Dis	PIP Red	PIP Conflict Related	Disability Premiums	Carers	ESA Time Limiting
Gender	Male	43	42	14	49	47	45	51	39	40
	Female	57	58	86	51	53	55	49	61	60

2.4 The Universal Credit Contingency Fund (UCCF)

As part of the original mitigations package a Universal Credit Contingency Fund was set up through Discretionary Support to provide non-repayable grants to cover living expenses where financial difficulty occurs during the 5-week wait. However, there have been problems with uptake and knowledge/awareness about this Fund.

²³ <https://www.communities-ni.gov.uk/consultations/consultation-department-communities-budget-2024-25-allocations>

²⁴ Northern Ireland Welfare Supplementary Payment and Discretionary Support Schemes Section 75 statistics November 2017 to March 2023, Department for Communities, January 2024 <https://www.communities-ni.gov.uk/sites/default/files/publications/communities/dfc-welfare-supplementary-payment-schemes-section-75-statistics-november-2017-to-march-2023.pdf>

Women's Regional Consortium research with local women on the impact of Universal Credit²⁵ found that 86% of the women we spoke to as part of this research had not heard of the Universal Credit Contingency Fund and were therefore unable to access this important help.

“They need to tell people about the help available (referring to the Contingency Fund). You just don’t know about it. It would have helped me not get into further debt.”

“If I had known about the Contingency Fund that would have really helped me. Now they are taking £75 a month off me and I’m really struggling and getting more and more in debt.”

(Quotes taken from Women’s Regional Consortium Research on the Impact of Universal Credit on Women, September 2020)

Research by the Joseph Rowntree Foundation on Universal Credit in Northern Ireland²⁶ highlighted the lack of knowledge about existing help with Universal Credit: *“Levels of awareness of the discretionary mitigations were often low, and the systems for claiming them were sometimes problematic.”* Women’s Regional Consortium research on the Impact of the Cost-of-Living Crisis on Women²⁷ also found a lack of awareness of sources of financial support including the UCCF (as well as Discretionary Support and the Adviser Discretion Fund). The opaque names of the schemes, which do not describe what they provide, is viewed as a constraining factor in ensuring those who are in greatest need can access the support. There is also a lack of consistent communication from Government departments, which means that the knowledge is not

²⁵ The Impact of Universal Credit on Women, Women’s Regional Consortium Northern Ireland, September 2020

<http://www.womensregionalconsortiumni.org.uk/node/150>

²⁶ Universal Credit could be a lifeline in Northern Ireland, but it must be designed with people who use it, Ruth Patrick and Mark Simpson, with UC:Us, Joseph Rowntree Foundation, June 2020

<https://www.jrf.org.uk/report/universal-credit-could-be-lifeline-northern-ireland-it-must-be-designed-people-who-use-it>

²⁷ Women’s Experiences of the Cost-of-Living Crisis in Northern Ireland, Women’s Regional Consortium & Ulster University, June 2023

<https://www.womensregionalconsortiumni.org.uk/wp-content/uploads/2023/06/Womens-Experiences-of-the-Cost-of-Living-Crisis-in-NI-2.pdf>

being effectively communicated to those who need it most, creating scope for misinformation and a lack of awareness.²⁸

“I am recovering from serious mental health issues and addictions. I was on Universal Credit and had to get an Advance Payment which I had to use to pay my rent. I didn’t know about the Contingency Fund. If I cut my Advance Payments down it will take longer to pay off and I want to get this loan cleared otherwise I won’t be able to get a loan to help with the kid’s presents at Christmas.”

(Quote taken from Women’s Regional Consortium Research on Women’s Experiences of the Cost-of-Living Crisis in Northern Ireland, June 2023)

The Cliff Edge Coalition endorses the recommendations made by the Independent Advisory Panel Report into the Review of Welfare Mitigations²⁹ which are:

- Increasing the budget for the UC Contingency Fund to £5million
- Amending the guidance to enable payments to be more readily made under the Fund
- Changing the Fund’s name to Universal Credit New Claims Payment
- More active and wider promotion of the Fund by Communities NI – the existence of this payment should be made clear upon a Universal Credit application and explained that it may be open to claimants to help avoid the need for an Advance Payment.

The Review also proposed that a longer-term solution needs to be found to the Universal Credit 5-week wait stating:

- Work is needed to examine a number of alternative solutions to the five-week wait through the setting up of a dedicated working group with input from those with lived experience and the advice sector.

The Women’s Regional Consortium also supports these recommendations from the Review and would like to see urgent progress on the recommendations particularly

²⁸ Independent Review of Discretionary Support, Department for Communities, February 2022
[Independent Review of Discretionary Support \(communities-ni.gov.uk\)](https://www.communities-ni.gov.uk/sites/default/files/publications/communities/dfc-welfare-mitigations-review-independent-advisory-panel-report-2022.pdf)

²⁹ Welfare Mitigations Review - Independent Advisory Panel Report, October 2022
<https://www.communities-ni.gov.uk/sites/default/files/publications/communities/dfc-welfare-mitigations-review-independent-advisory-panel-report-2022.pdf>

around the budget increase, the change of the Fund's name and more active promotion of the Fund. We also would like to see work begin on the setting up of the working group to explore longer-term solutions and would be willing to provide input to such a group.

2.5 Gender Budgeting and Equality Responsibilities

The Women's Regional Consortium endorses the following statement on Gender Budgeting from our colleagues in the NI Women's Budget Group:

Gender budgeting requires government departments to analyse the different impact of the budget on people of different genders, starting as early in the budget cycle as possible. The aim of gender budgeting is to ensure that the distribution of resources creates more gender equal outcomes. Over time, gender analysis should become embedded at all stages of the budget process. Women's intersecting identities are also included in this analysis and policy-makers are expected to promote these areas of equality as well. There is widespread political support for gender budgeting in Northern Ireland and a growing evidence base that it can help create a more equal society. In the current budget crisis women will experience particular disadvantages due to the pre-existing socio-economic conditions. For example, there is strong evidence that women have suffered disproportionately from over a decade of Westminster austerity measures, the pandemic, and the cost-of-living crisis.³⁰ We cannot afford to continue making decisions at the expense of women and risk further degradations to gender equality and additional intersecting equalities as well.

Not only is there an immediate need for gender budgeting in our current crisis, but the benefits would help to improve the budgetary process. Gender budgeting is good budgeting; it encourages greater transparency of government processes, more in-depth

³⁰ MacDonald, E.M. (2018) The gendered impact of austerity: Cuts are widening the poverty gap between women and men. British Politics and Policy at LSE

<https://blogs.lse.ac.uk/politicsandpolicy/gendered-impacts-of-austerity-cuts/>

Charlton, E. (2023) This is Why Women are Bearing the Brunt of the Cost of Living Crisis According to Research. World Economic Forum

<https://www.weforum.org/agenda/2023/01/cost-of-living-crisis-women-gender-gap/>

assessments of how policies and budgets affect constituents and closer cooperation between governmental and non-governmental stakeholders. It encourages a more targeted approach to the spending of public money, which will improve policy outcomes. Implementing gender budgeting mechanisms would provide decision-makers with the tools to recognise and mitigate gendered economic impacts and promote gender equality. Whilst political crises that affect budget processes are outside the control of departmental officials, strategically embedding gender budgeting measures will create a firewall to prevent such disproportionate disadvantages in future.

We recognise that the current equality screening and impact assessment duties under Section 75 provide policy infrastructure that could be used to progress gender budgeting. The EQIA process allows space to identify budget impacts on women and opportunities to promote more gender equal outcomes. However, too often the analysis included in these documents focuses only on equal treatment or stops at the point of acknowledging pre-existing inequalities. For gender budgeting to be fully implemented, the next stage must be to reformulate budgets and budgetary policy with targeted measures to improve outcomes for women and girls. Additionally, Section 75 screening and impact assessment typically takes place at the very end of the budget planning process or after the budget has been finalised. The OECD³¹ highlights that best practice for gender budgeting is to embed it at all levels of policy- and budget-making: planning, formulation, approval, implementation, monitoring and reformulation. It is crucial that gender equality obligations are not a 'tick-box exercise,' but rather that gender equality is mainstreamed in every area of the budgetary process through gender analysis of data supported by experts from civil society.

³¹ OECD (2023), OECD Best Practices for Gender Budgeting, OECD Journal on Budgeting, vol. 23/1, <https://doi.org/10.1787/9574ed6f-en>.

3.0 Specific Questions

1. Are you responding as:

- A private individual
- On behalf of a group or organisation

1a. Please detail your group or organisation name here:

Women's Regional Consortium

Continuation of current schemes

The 2022/23 Annual Report for Welfare Supplementary Payments, Discretionary Support, Standards of Advice and Assistance Sanctions provides the latest findings on each of the Welfare Supplementary Payment schemes. Each of these schemes are listed below, alongside the number of people who received mitigation in 2022/23:

- Benefit Cap - 2,160 people
- Loss of Carer Payments - 180 people
- Loss of Disability-Related Payments - less than 5 people
- Social Sector Size Criteria ("the bedroom tax") - 37,390 people
- Time Limiting of Contributory Employment and Support Allowance - 50 people
- Transition to Personal Independence Payment from Disability Living Allowance (now only receiving new cases from children who claim Personal Independence Payment after their 16th birthday) - 1,530 people

2. Which of the current schemes do you think should be continued?

Benefit Cap

- This scheme should be continued
- This scheme should not be continued
- Not sure

Loss of Carer Payments

- This scheme should be continued
- This scheme should not be continued
- Not sure

Loss of Disability-Related Payments

- This scheme should be continued
- This scheme should not be continued
- Not sure

Social Sector Size Criteria (“the bedroom tax”)

- This scheme should be continued
- This scheme should not be continued
- Not sure

Time Limiting of Contributory Employment and Support Allowance

- This scheme should be continued
- This scheme should not be continued
- Not sure

Transition to Personal Independent Payment from Disability Living Allowance

- This scheme should be continued
- This scheme should not be continued
- Not sure

Please expand on your answer below:

The Women's Regional Consortium is of the view that all the existing WSPs should be kept. Some of them while only applicable to a small number of people are very important to those people and in some cases provide important passporting to other benefits/premiums.

We point the Department to the Section 75 statistics³² in relation to these payments which clearly show that the WSPs are largely paid in greater numbers to women and people with disabilities. Therefore, stopping these payments would have greater adverse impacts for women and people with disabilities.

We also wish to highlight that those who are providing care are more likely to be women and the Section 75 statistics show that the Carers WSP is paid to 61% women compared to 39% men. We know from the work of our colleagues at Carers NI and the Carer Poverty Commission that there are significant issues with carer poverty in Northern Ireland. Research suggests that one in four unpaid carers in Northern Ireland (25%) are living in poverty – significantly more than Northern Ireland's non-carer population (16%) and higher than the carer poverty rate across the UK (23%). This means around 55,000 unpaid carers are living in poverty.³³ We also know that the help available for carers through the social security system is inadequate despite the fact that people providing unpaid care for sick or disabled family members and friends are saving Northern Ireland's health service £5.8 billion in care costs each year.³⁴

At a minimum we believe that these WSPs need to be kept. Poverty statistics indicate that the current level of social security entitlement is not meeting the needs of claimants.

³² Northern Ireland Welfare Supplementary Payment and Discretionary Support Schemes Section 75 statistics November 2017 to March 2023, Department for Communities, January 2024
<https://www.communities-ni.gov.uk/sites/default/files/publications/communities/dfc-welfare-supplementary-payment-schemes-section-75-statistics-november-2017-to-march-2023.pdf>

³³ The experiences of poverty among unpaid carers in Northern Ireland, A report from the Carer Poverty Commission, August 2023
<https://www.carersuk.org/media/lrub4q5i/the-experiences-of-poverty-among-unpaid-carers-in-northern-ireland.pdf>

³⁴ <https://www.carersuk.org/reports/the-economic-value-of-unpaid-care-in-northern-ireland/>

Nearly one in five people in Northern Ireland live in poverty.³⁵ One in four children in Northern Ireland are living in poverty with as many as two in five children in single parent families growing up in poverty.³⁶ Just under a third of disabled people in Northern Ireland are living in poverty and a higher proportion of disabled people are in a family in receipt of income-related benefits – 35% compared to around a quarter of non-disabled people.³⁷

The Expert Advisory Panel Report into an Anti-Poverty Strategy for Northern Ireland has stated that the benefit system has become a driver of poverty and destitution and made a number of recommendations including permanently ending the ‘bedroom tax’, the two-child limit, the benefit cap and the five-week wait. The Expert Panel has also suggested the introduction of a Northern Ireland Child Payment to tackle child poverty levels.³⁸

Research by the Women’s Regional Consortium over a number of years has shown that women consistently report that levels of social security are inadequate to live dignified, healthy lives and living on benefits does not provide sufficient income to afford the essentials and meet basic household bills.³⁹

Recently released statistics from the Trussell Trust⁴⁰ show the stark consequences of the inadequacy of Universal Credit in Northern Ireland:

- Almost four in ten (37%) people claiming Universal Credit in Northern Ireland ran out of food in the last month and did not have enough money to buy more.
- The charity estimates that 30,000 people claiming Universal Credit in Northern Ireland have needed to use a food bank in the last 12 months.

³⁵ <https://www.jrf.org.uk/report/poverty-northern-ireland-2022>

³⁶

https://www.savethechildren.org.uk/content/dam/gb/reports/ten_years_too_long_a_decade_of_child_poverty_in_northern_ireland.pdf

³⁷ <https://www.jrf.org.uk/report/poverty-northern-ireland-2022>

³⁸ <https://www.communities-ni.gov.uk/system/files/publications/communities/dfc-social-inclusion-strategy-anti-poverty-expert-advisory-panel-recommendations.pdf>

³⁹ See research papers – Impact of Ongoing Austerity on Women (2019), Making Ends Meet (2020), The Impact of Universal Credit on Women (2020), Women Living with Debt (2022), Women’s Experiences of the Cost of Living Crisis in Northern Ireland (2023), all available here:

<https://www.womensregionalconsortiumni.org.uk/research/>

⁴⁰ https://x.com/Trussell_NI/status/1830878457053495518

- Just over four in ten people (42%) claiming Universal Credit in Northern Ireland are either behind on bills and credit commitments or are finding it a constant struggle to keep up with them.

The Women's Regional Consortium believes that social security should be sufficient to allow people to afford the basic essentials of life. We support the 'Essentials Guarantee' campaign⁴¹ by the Joseph Rowntree Foundation and the Trussell Trust. This guarantee would embed in the social security system the principle that, at a minimum, Universal Credit should protect people from going without the essentials. This would include an independent process to regularly determine the level of the Essentials Guarantee based on the cost of essentials, that the Universal Credit standard allowance must at least meet this level and that deductions (such as debt repayments to Government) can never pull support below this level.

We provide more detail in relation to the Bedroom Tax and the Benefit Cap mitigations in our answer to Question 3.

Social Sector Size Criteria and Benefit Cap

In the latest published Annual Report on the Welfare Supplementary Payment Schemes for 2022/23, it was reported £2.4 million was paid out to 2,160 people in respect of Benefit Cap mitigation and just over £23 million was paid out to 37,390 people with regards to Social Sector Size Criteria ("bedroom tax") mitigation.

3. With regard to the Social Sector Size Criteria ("bedroom tax") and the Benefit Cap, do you think the Department should continue to provide full support, or provide support on a tapered basis (reducing or stopping over time)?

⁴¹ <https://www.jrf.org.uk/press/call-landmark-change-universal-credit-so-people-can-afford-essentials-research-shows>

Benefit Cap

- Continue to provide full support
- Provide support on a tapered basis (reducing or stopping over time)
- Not sure

Social Sector Size Criteria (“the bedroom tax”)

- Continue to provide full support
- Provide support on a tapered basis (reducing or stopping over time)
- Not sure

Please expand on your answer below:

The Women’s Regional Consortium fully supports the continuation of both the Benefit Cap and Social Sector Size Criteria (SSSC) mitigations. As members of the Cliff Edge Coalition we have long campaigned for the continuation of these important payments and we understand how necessary these are in the lives of the women and families who are affected by these punitive welfare reform policies.

We point the Department to the Section 75 statistics on gender for the Benefit Cap and the SSSC in the table below which show that these WSPs are paid to more women than men. The Benefit Cap is a highly gendered policy affecting higher numbers of women. This is because the majority of non-working households receiving the highest levels of benefits are single parent households and most single parents are women. The Section 75 statistics show the WSP for the Benefit Cap is paid to 86% female compared to 14% male. In terms of the WSP for the SSSC these are less gendered than the Benefit Cap WSP but still paid to more females (57%) than males (43%). Reducing or stopping support for the Benefit Cap and SSSC WSPs would therefore have greater adverse impacts for women compared to men.

Welfare Supplementary Payments Proportions (%) of Section 75 Group Category Responses (Gender)⁴²

Section 75 Group	Category	All WSP Schemes %	SSSC	Benefit Cap	PIP Dis	PIP Red	PIP Conflict Related	Disability Premiums	Carers	ESA Time Limiting
Gender	Male	43	42	14	49	47	45	51	39	40
	Female	57	58	86	51	53	55	49	61	60

We are in agreement with our academic colleagues Professor Gráinne McKeever, Dr Mark Simpson and Dr Ciara Fitzpatrick from the School of Law at Ulster University who have stated in their response to this survey:

“Our concern, however, is what the impact of removing this Payment would be, both on those currently in receipt of it and on other sources of support that such claimants would then have to rely on.....We note that the cost of these payments, combined, is £25.4 million. While we understand that the Department’s budget has to be managed and targeted effectively, if these Supplementary Payments were removed, the counter-factual is not that £25.4 million would automatically be saved. The question to be considered in removing these payments is what will happen to those currently in receipt of them and significantly, where will they go if they are unable to meet a higher rent obligation.”

The Women’s Regional Consortium is also concerned about the impact of the removal/reduction of these WSPs and believe that this could put significant pressure on the already reduced budgets of both Discretionary Housing Payments and Discretionary Support. These are both discretionary by nature and are subject to increasing demand so offer no security and are time limited. This would result in a transfer of the

⁴² Northern Ireland Welfare Supplementary Payment and Discretionary Support Schemes Section 75 statistics November 2017 to March 2023, Department for Communities, January 2024
<https://www.communities-ni.gov.uk/sites/default/files/publications/communities/dfc-welfare-supplementary-payment-schemes-section-75-statistics-november-2017-to-march-2023.pdf>

mitigations to discretionary payments and may not ultimately result in any significant savings.

The alternatives for those who would lose the SSSC WSP could also include moving to a smaller home, moving to the private rented sector or becoming homeless. These are all problematic given inadequate social housing stock levels, rising rents in the private rented sector, the inadequacies of local housing allowance payments and increased spending on temporary accommodation as a result of homelessness. The result of removing/reducing the SSSC WSP would therefore be likely to be even more costly to the Department and unlikely to yield any savings.

As we stated in our previous answer, many social security claimants are struggling to make ends meet with current levels of social security unable to meet the costs of the essentials. The Cost-of-Living Crisis is bringing the inadequacy of social security benefits into sharper focus, increasing the numbers of people impacted by poverty. Households in the bottom 20% of incomes across the UK are facing worrying levels of financial stress and deprivation which have risen significantly. 75% have reported going without essentials, 20% have reported going hungry and 53% are in arrears with at least one bill.⁴³ Therefore, reducing claimant's income even by relatively small amounts is likely to tip many more people into poverty, hunger, destitution and homelessness. We believe that reducing or stopping the existing WSPs will have significant adverse impacts for individual claimants, their families and communities. Addressing the fall out of reducing/stopping support is even more expensive for the Department to address than retaining the existing levels of help so it makes no sense to pursue.

⁴³ <https://www.jrf.org.uk/report/going-under-and-without-jrfs-cost-living-tracker-winter-202223>

Alternative methods for providing support

In Scotland, Discretionary Housing Payments help with housing costs if a person's benefit is reduced because of the Social Sector Size Criteria ("bedroom tax") or the Benefit Cap.

More information on Northern Ireland's existing Discretionary Housing Payments scheme can be found on the Housing Executive website.

4. Do you think alternative methods should be considered for providing support for the Social Sector Size Criteria ("bedroom tax") or the Benefit Cap?

Benefit Cap

- Yes, alternative methods should be considered
- No, alternative methods should not be considered
- Not sure

Social Sector Size Criteria ("the bedroom tax")

- Yes, alternative methods should be considered
- No, alternative methods should not be considered
- Not sure

Please expand on your answer below:

It is impossible to answer this question without the detail of the alternative methods proposed. Without knowledge of what these are then it is dangerous to rely on the results of the answers to this question as people may respond differently depending on what alternative methods are put forward.

We do not believe that alternative methods should be considered. If, as the consultation suggests, it is likely to be through Discretionary payments then we are opposed to this. These payments are discretionary meaning that they will not be

available to everyone, they are not automatic and the budgets for existing discretionary payments are under significant pressure. There are already considerable issues with people not claiming the benefits/help they are rightfully entitled to and this would only ensure that some of those who need this important help will not receive it.

We support the comment made by our academic colleagues Professor Gráinne McKeever, Dr Mark Simpson and Dr Ciara Fitzpatrick from the School of Law at Ulster University who have stated:

“To use DHPs to mitigate the SSSC and benefit cap in line with the Scottish approach would serve no purpose. The Department would face the administrative upheaval of transferring the case load (with the attendant risk of some claimants inadvertently dropping out of the system) with no impact on expenditure.”

Allocation of mitigation scheme funds

The Independent Advisory Panel Report into the future of welfare mitigations, published in October 2022, made several recommendations proposing new mitigation schemes. These included additional support for carers, mitigating the two-child limit policy and Cost of Work Allowance payments for those in low paid employment.

5. Do you think the current funding for the existing Welfare Supplementary Payment schemes should be allocated to fund different/new mitigation schemes?

- Yes
- No
- Not sure

Please expand on your answer below:

We have serious problems with the framing of this question. To suggest removing funding for the existing mitigations as the price to pay for having new mitigations is disingenuous. As members of the Cliff Edge Coalition, we have campaigned for the extension of the existing mitigations **as well as** the strengthening of the mitigations

package to include some new mitigations. It is wrong to suggest that in order to have new mitigations funding must be taken from the existing ones.

The ongoing Cost-of-Living Crisis, the impact of welfare reform measures as well as worsening poverty rates in Northern Ireland have reinforced the need for the existing mitigations to continue **and** made the strengthening of the package even more urgent. We know that the costs of poverty are damaging and have long-term impacts on health, housing, education and justice meaning that inaction on poverty is simply not an option.

The Women's Regional Consortium supports the comment made by our academic colleagues Professor Gráinne McKeever, Dr Mark Simpson and Dr Ciara Fitzpatrick from the School of Law at Ulster University who have stated:

“A new mitigation package would require a different funding model and additional resources to tackle the problem of child poverty in particular, through mitigation of the two-child limit. Cutting existing mitigations to finance this, however, would amount to little more than moving funding around. The winners and losers might be different, but the level of loss overall would be arguably consistent.”

We particularly support their following comment about the policy intent of the SSSC and Benefit Cap being about generating behavioural change among claimants including moving into paid work. We wish to stress to the Department the considerable issues that exist in Northern Ireland around childcare availability and affordability which have been well documented since the return of the NI Assembly and which have a gendered impact:

“The potential to move into work to off-set the absence of a mitigation payments is stymied by the absence of childcare parity in Northern Ireland, an impact more likely to be experienced by women.”

The Need to Strengthen the Mitigations Package

We reiterate the Cliff Edge Coalition's three key asks which we believe would help to strengthen the social security system and provide important protections against poverty especially for those most impacted.⁴⁴ These are:

- **Removing the two-child limit.**
- **Resolving the five-week wait in Universal Credit.**
- **Providing support for private renters affected by the Local Housing Allowance (LHA).**

Removing the two-child limit

The following points made by the Cliff Edge Coalition at the Opposition Day Debate⁴⁵ clearly make the case for the mitigation of the two-child limit in Northern Ireland:

- Families in receipt of Universal Credit affected by the two-child limit lose out on £3,455 per child per year for third, or subsequent children born after 1 April 2017.
- End Child Poverty Coalition statistics indicate that 10% of children in Northern Ireland are affected by the two-child limit.⁴⁶
- Larger families are much more likely to experience poverty. In 2021/22, across the UK the poverty rate for children in families with three or more children was 42%,⁴⁷ compared with 23% and 22% among children in families with one or two children respectively. This is important given the average family size in NI is larger than in Great Britain with 21.4% of families in NI having three or more children compared to 14.7% in the UK.⁴⁸
- The Department for Communities Northern Ireland Poverty and Income Inequality Report (2022-23),⁴⁹ indicates rates of poverty have increased across Northern Ireland. In 2021/22, 16% of the NI population were in relative poverty

⁴⁴ <https://www.lawcentreni.org/wp-content/uploads/2023/04/CEC-Full-Member-Briefing-May-2023-.pdf>

⁴⁵ <https://www.lawcentreni.org/wp-content/uploads/2024/04/Cliff-Edge-Coalition-Opposition-Day-Briefing-on-two-child-limit.pdf>

⁴⁶ [New data reveals North/South divide of children hit by two-child limit on benefits - End Child Poverty](#)

⁴⁷ [Two Child Limit Data - End Child Poverty](#)

⁴⁸ [Families with dependent children by number of dependent children by UK countries and English regions, 2015 - Office for National Statistics](#)

⁴⁹ [Northern Ireland Poverty and Income Inequality Report, 2022/23 \(nisra.gov.uk\)](#)

and in 2023/23 the figure for relative poverty had increased to 18%. The impact is greatest on children. The statistics also show that the percentage of children living in relative poverty in NI in 2022/23 was 24%, up from 18% in 2021/22.

- A report from the NI Audit Office⁵⁰ estimates the cost of child poverty in the region to be between £825m and £1bn per year. The Child Poverty Action group estimates that Child Poverty costs the UK economy at least £39 billion per year.⁵¹
- We cannot afford not to invest in children who will be responsible for the society and economy of the future.

According to the Northern Ireland Comptroller and Auditor General, *“an investment on reducing child poverty has the potential to result in significant long-term savings for the public purse as well as mitigating future harms caused to children as a result of growing up in poverty.”* The removal of the two-child limit was also recommended by the Expert Advisory Panel for an Anti-Poverty Strategy⁵² and the Welfare Mitigations Review Independent Advisory Panel Report⁵³ who recommended mitigating the two-child limit through the introduction of a Welfare Supplementary Payment called a “Better Start Larger Families payment”.

An Institute for Public Policy Research (IPPR) and Changing Realities report⁵⁴ proposes recommendations aimed at improving the social security system which would lift one million people throughout the UK out of poverty overnight and make work pay for thousands of people on Universal Credit. Notably, one of the key recommendations is to remove the two-child limit which arbitrarily caps benefit entitlement with no regard for the costs families face.

⁵⁰ [NI Audit Office Report - Child Poverty in Northern Ireland.pdf](#)

⁵¹ <https://cpag.org.uk/sites/default/files/2023-08/The%20cost%20of%20child%20poverty%20in%202023.pdf>

⁵² <https://www.communities-ni.gov.uk/system/files/publications/communities/dfc-social-inclusion-strategy-anti-poverty-expert-advisory-panel-recommendations.pdf>

⁵³ <https://www.communities-ni.gov.uk/sites/default/files/publications/communities/dfc-welfare-mitigations-review-independent-advisory-panel-report-2022.pdf>

⁵⁴ Snakes and ladders: Tackling precarity in social security and employment support, IPPR and Changing Realities, February 2024

[Snakes and ladders: Tackling precarity in social security and employment support | IPPR](#)

Resolving the five-week wait in Universal Credit

The following points show the case for resolving the five-week wait in Universal Credit in Northern Ireland:

- A Joseph Rowntree Foundation Report⁵⁵ highlights the five-week wait as one of the key elements designed in the benefit system that increases poverty.
- Figures from The Trussell Trust show the devastating consequences of the inadequacy of Universal Credit with over half of people receiving Universal Credit unable to afford enough food.⁵⁶
- The House of Lords Economic Affairs Committee⁵⁷ described the five-week wait as the main cause of insecurity stating: *“The wait entrenches debt, increases extreme poverty and harms vulnerable groups disproportionately.”*
- The Work and Pensions Select Committee heard evidence to suggest that people on Universal Credit are more likely to need a food bank or to have rent arrears than people on the legacy benefits it replaces and that moving to Universal Credit may lead to a rise in psychological distress.⁵⁸
- A National Audit Office report⁵⁹ has found that the initial five-week wait can exacerbate claimants debt and financial difficulties despite the availability of advance payments. According to the report 80% of low-income households had a deduction from their first payment. The scale of these deductions can be significant and impacts on their ability to cover their food, bills and daily living costs.
- A report by Gingerbread⁶⁰ shows that 58% of single parents affected by the five-week wait had to go without or cut back on food with 21% saying their children had to do the same.

⁵⁵ [UK Poverty 2023: The essential guide to understanding poverty in the UK | JRF](#)

⁵⁶ [Over half of people receiving Universal Credit unable to afford enough food - The Trussell Trust](#)

⁵⁷ Universal Credit isn't working: proposals for reform, House of Lords Economic Affairs Committee, July 2020

<https://publications.parliament.uk/pa/ld5801/ldselect/ldeconaf/105/105.pdf>

⁵⁸ Universal Credit: The wait for a first payment, Work & Pensions Select Committee, October 2020

https://publications.parliament.uk/pa/cm5801/cmselect/cmworpen/204/20403.htm#_idTextAnchor001

⁵⁹ Universal Credit: getting to first payment, National Audit Office, July 2020

<https://www.nao.org.uk/wp-content/uploads/2020/07/Universal-Credit-getting-to-first-payment.pdf>

⁶⁰ The single parent debt trap, Gingerbread, February 2021

https://www.gingerbread.org.uk/wp-content/uploads/2021/02/The-single-parent-debt-trap_web.pdf

- A study by the Trussell Trust⁶¹ has revealed the detrimental impact the Universal Credit five-week wait is having on people's mental health. Many people reported experiencing high levels of anxiety, especially as they did not know how much they would receive and when with some even reporting feeling suicidal.
- Research by Ulster University⁶² has found that UC was repeatedly described as a 'driver' for illegal lending particularly around the harm caused by the five-week wait and government debt deductions.
- Research by the Joseph Rowntree Foundation⁶³ in Northern Ireland found that participants unanimously associated the early stages of a Universal Credit claim with financial hardship and usually debt. Participants in this research found it hard to recover from the financial hardship that the five-week wait caused and described ongoing difficulties linked to reduced Universal Credit payments because of repaying Advance Payments and other historical debts. They described a 'domino effect' as debt led to more debt and aggravated mental health problems as people struggled to meet essential needs.
- Law Centre NI have highlighted UC:Us research⁶⁴ which indicates that money difficulties was the defining experience of Universal Credit and that the five-week wait operated as the trigger.

⁶¹ #5WeeksTooLong, Why we need to end the wait for Universal Credit, The Trussell Trust, September 2019 https://www.trusselltrust.org/wp-content/uploads/sites/2/2019/09/PolicyReport_Final_ForWeb.pdf

⁶² https://www.consumercouncil.org.uk/sites/default/files/2020-07/Illegal_Money_Lending_Report.PDF

⁶³ Universal Credit could be a lifeline in Northern Ireland, but it must be designed with people who use it, Ruth Patrick and Mark Simpson, with UC:Us, Joseph Rowntree Foundation, June 2020 <https://www.jrf.org.uk/report/universal-credit-could-be-lifeline-northern-ireland-it-must-be-designed-people-who-use-it>

⁶⁴ Law Centre NI's Submission to the Committee for Work and Pensions Inquiry into Universal Credit: The Wait for a First Payment, Law Centre NI, May 2020 <https://lawcentreni.s3.amazonaws.com/Law-Centre-NI-Universal-Credit-the-wait-for-a-first-payment-17-April-2020.pdf>

The Welfare Mitigations Review Independent Advisory Panel Report⁶⁵ has made recommendations for both interim measures and longer-term solutions to the five-week wait which have been endorsed by the Cliff Edge Coalition:

- **Interim:** Amend guidance to interpret the Universal Credit Contingency Fund (UCCF) more widely; change the name of the fund, increase the Contingency Fund Budget to £5m; and wider promotion of the payment by the Department for Communities NI and beyond.
- **Longer term:** Work is needed to examine a number of alternative solutions to the five-week wait through a dedicated working group, with input from those with lived experience and the advice sector.

Providing support to private renters affected by the Local Housing Allowance

The following points from our colleagues at Housing Rights⁶⁶ show the case for providing support to private renters affected by the Local Housing Allowance (LHA):

- The current social housing waiting list stands at over 47,000 households.⁶⁷
- In the Private Rented Sector, where rents have been rising at unprecedented levels, average monthly rent has risen from £664 in Q4 2020⁶⁸ to £830 in Q4 2023⁶⁹ driven by a lack of supply in the face of increasing demand. Consequentially, the average private renter spends almost £2,000 more per year to keep a roof over their heads than three years ago.
- Loss of rented accommodation remains one of the top three causes of homelessness in Northern Ireland.
- In responses to Assembly Written Questions from Daniel McCrossan MLA, the Minister for Communities revealed that as of November 2023, 50,150 private

⁶⁵ <https://www.communities-ni.gov.uk/sites/default/files/publications/communities/dfc-welfare-mitigations-review-independent-advisory-panel-report-2022.pdf>

⁶⁶ <https://www.housingrights.org.uk/sites/default/files/documents/policy-research/dfc-response-june-2024.pdf>

⁶⁷ <https://datavis.nisra.gov.uk/communities/Quarterly-Bulletin-January---March-2024.html>

⁶⁸ <https://content.propertypal.com/northern-ireland-housing-market-trends-q4-2020/#:%7E:text=The%20housing%20market%20ended%20the,in%20the%20region%20of%203.5%25.>

⁶⁹ <https://content.propertypal.com/northern-ireland-housing-market-update-q4-2023/>

renters in Northern Ireland had a shortfall between their LHA and their private rent.⁷⁰ The average monthly shortfall for Universal Credit recipients was £129, and for Housing Benefit recipients, was £97.⁷¹ Despite a welcome realignment of the rate of LHA to the lowest 30 percentile implemented in April 2024, this trend is likely to remain for the long term as long as supply needs are not being met.

- Single parents (93% of whom are women) are disproportionately impacted by restrictions to the LHA rate. In 2022/23, 40% of single parent households were living in the private rented sector (compared to 23% in 2003).⁷²
- The family type at the highest risk of being in relative poverty was single with children at 38%⁷³ and are therefore more likely to be in need of support to pay for their housing costs.

The Welfare Mitigations Review Independent Advisory Panel Report⁷⁴ has recommended the establishment of a Financial Inclusion Service to provide advice and money management for low-income families who have been impacted by shortfalls in the LHA. This will provide access to a grant to assist in meeting shortfalls between housing costs paid through benefit and contractual rent. These recommendations have been endorsed by the Cliff Edge Coalition.

Conclusion

The Women's Regional Consortium believes that a strengthened mitigations package would provide vital protections for the people of Northern Ireland especially for the many women who have been so adversely affected by welfare reform policies. These are even more necessary in the context of the Cost-of-Living Crisis which like any other economic crisis tends to hit women harder.

⁷⁰ AQW 10214 /22-27

⁷¹ AQW 10214 /22-27

⁷² Family Resources Survey: Northern Ireland 2022/23, NISRA & DfC, May 2024

[Family Resources Survey: Northern Ireland 2022/23 \(nisra.gov.uk\)](https://www.nisra.gov.uk/family-resources-survey-northern-ireland-2022-23)

⁷³ Northern Ireland Poverty and Income Inequality Report, 2022/23, NISRA & DfC, March 2024

[Northern Ireland Poverty and Income Inequality Report, 2022/23 \(nisra.gov.uk\)](https://www.nisra.gov.uk/northern-ireland-poverty-and-income-inequality-report-2022-23)

⁷⁴ <https://www.communities-ni.gov.uk/sites/default/files/publications/communities/dfc-welfare-mitigations-review-independent-advisory-panel-report-2022.pdf>

We are firmly of the belief that strengthening the mitigations package is essential to provide protection from financial hardship and poverty and also to help with economic recovery. Money provided through benefits is spent in local economies. Therefore, strengthening the mitigations package increases the amount of money available to spend, increasing demand at a time when action is needed to create jobs and revive local businesses. Investing in the benefits system to lift people out of poverty, ensure their benefits meet the cost of essentials and help them get through the Cost-of-Living Crisis is a sensible approach.

Publishing preference

The Department for Communities will produce a report setting out their assessment of the operation of each of the ongoing Welfare Supplementary Payment schemes by 31 March 2025, publishing it on the Department's website and laying it before the Assembly. Some responses from this survey may be published in that report.

6. The Department for Communities would like your permission to publish your survey response. Please indicate your publishing preference:

- Publish response
- Publish responses anonymously (this will remove the name of the group or organisation)
- Do not publish response