

Welfare Reform Evidence

Executive Summary

The Coalition Government introduced austerity measures in 2010 to try to claw back some of the countries deficit, those most vulnerable have already been struggling to cope, 50% of the cuts are coming out of two areas, local government and benefits. The Welfare Reform Act 2012 became law on 8 March 2012 in GB and these reforms are expected to be implemented here in Northern Ireland sometime in 2014. The bill is currently awaiting debate in the Northern Ireland Assembly before it goes for royal assent.

The Equality Coalition have collectively been following the progress and implications of this bill and have always stated their concern over the impacts this will have on the most vulnerable in society many organisations from a wide range of sectors have been working tirelessly to bring to light the adverse impacts that the bill will have on those most vulnerable in society, those who will be facing multiple hits from cuts in healthcare and other vital public services.

Throughout the entire process these groups have highlighted time and again that the vital equality and human rights checks have been sidelined, the equality safeguards put in place after the Good Friday/Belfast Agreement have been ignored, and equality laws that were put there for this very reason have not been used. The initial equality impact assessment (EQIA) of the proposed bill by the Department for Social Development (DSD) left out four of our nine equality categories, two of these being religious belief and political opinion, without this EQIA DSD had, and still have, no clear view of how the bill will affect Catholics or Protestants.

We live in a divided society where tensions have been running high over the last year, welfare impacts will disproportionately hit Northern Ireland compared with the rest of the UK as can be seen in the report below. Northern Ireland with 3% of the UK population is facing 4% of the overall financial loss arising from welfare reform, £750m a year out of a UK total of £19b a year. Due to the 'divided society' status of Northern Ireland the welfare reforms will have an impact on our peace process, we would go as far to say that the disguised impacts of welfare reform could de-stabilise Peace.

The communities who are already disenfranchised and disillusioned 15 years on from the Good Friday/Belfast Agreement are the communities who will be hardest hit; they will be propelled into poverty and fall deeper into social exclusion. They will have fewer benefits, less access to healthcare and faced with the abolishment of an independent housing authority these communities will be propelled into severe disadvantage, this can only add to community tensions and the ripple of discontent we have seen in 2013.

Welfare does not need to be implemented under a parity approach despite what our politicians are telling us although we do realise that the pressure is from the Conservative Government in line with their public spending cuts and austerity measures. However our politicians should be looking at the sensitive case of Northern Ireland post conflict and realise that they need to put the case to the Tory Government that the impacts on a divided society will be markedly different than on the rest of the United Kingdom. Equality should underpin this process and the equality laws put in place 15 years ago should be utilised.

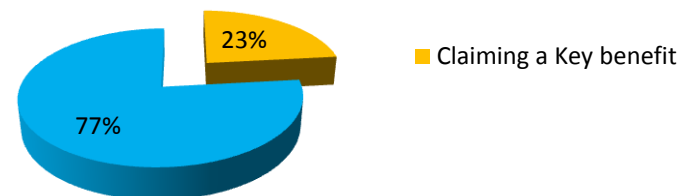
This document shows the impacts under each of the 9 section 75 categories, where possible including the most up to date statistics for each:

Background/ Universal Impacts

According to the NICVA *'The Impact of Welfare Reform'* research paper completed by the Centre for Economic Empowerment, Northern Ireland with 3% of the UK population is facing 4% of the overall financial loss arising from welfare reform this comes to a real sum of £750m a year out of a UK total of £19b a year.

According to the *Labour Market Statistics Bulletin, Nov 2011* Northern Ireland's economically inactive rate for those aged 16-64 is estimated to be 27.1%, the highest of the 12 UK regions. The UK average is around 23.3%. This is 23.3% in Northern Ireland claiming a key benefit compared to 16% in GB (*Advice NI Turning the Tide- The Growth of Food Banks in NI/ NICVA*).

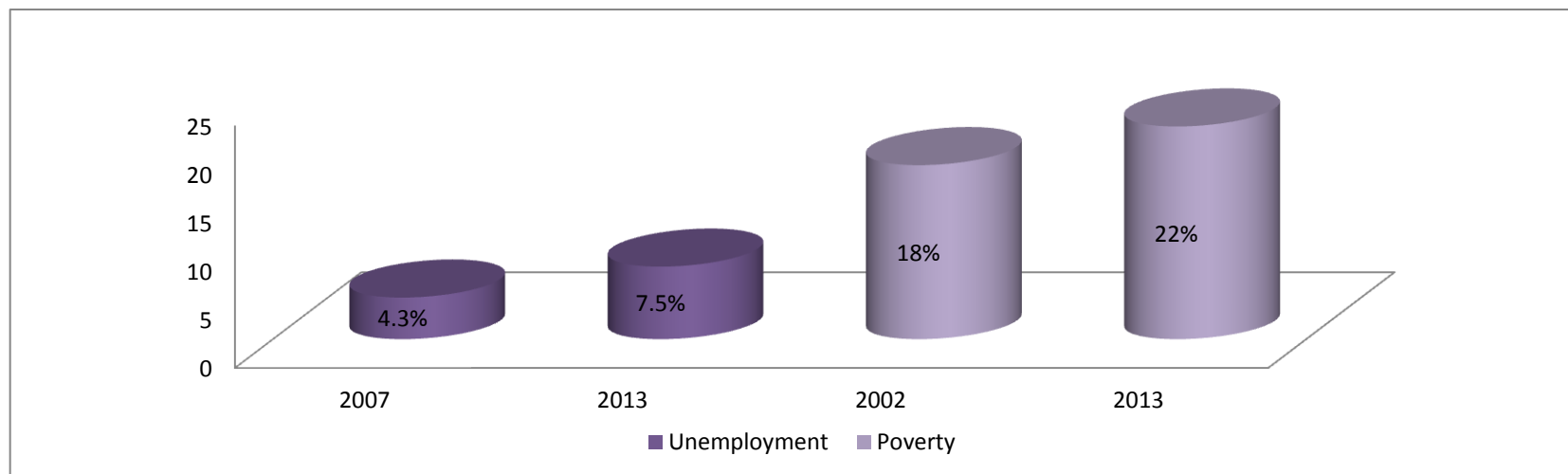
16-64 Years Olds



The claimant count for benefits in Northern Ireland is 6.9%, against a UK average of 5.0%. Northern Ireland is the second highest claimants among the 12 UK regions. *Labour Market Statistics Bulletin, Nov 2011*

Therefore due to both of the above the Benefit Cap (the level of weekly benefits a claimant can receive) is to be £350 for single people and £500 for lone parents and couples, will likely affect 6% of the Northern Ireland claimant population (*Citizens Advice Bureau Advice Guide*).

Welfare Reform has also come off the back of some major austerity cuts mentioned above, unemployment in Northern Ireland has grown from 4.3% in Dec 2007 to 7.5% in Oct 2013 – *figures according to NISRA study 2013. The Oxfam NI Case Study on Austerity* examines the fact that Northern Ireland also has the lowest wages and lowest productivity rates in the UK which will also impact adversely on the new welfare reform measures. Poverty in Northern Ireland has increased from 18% in 2002 to 22% in 2013 according to *NISRA* and according to the *Office of National Statistics*, since 1975 income inequality among working age people (16-64years old) has risen faster than any other Organisation for Economic Co-operation and Development (OECD) country. The UK currently ranks as one of the most unequal countries in the OECD.



Price Water House Cooper's did a response to the draft budget 2011-2015 and they recorded that, day to day spending in Northern Ireland is being cut by 8% and the capital spend by 40%, in real terms this is a decrease of £4 Billion compared to the baseline in 2010/11. Therefore cuts will hit Northern Ireland the hardest as it depends on public spending for 62.2% of its output compared to 39.8% in the UK (Oxfam NI Case Study on Austerity).

This is translating into some shocking figures, such as 500 000 people in the UK are reliant on emergency food, of this number half have visited a food bank due to having benefits cut, payments delayed, reduced or withdrawn (*Advice NI Turning the Tide- The Growth of Food Banks in NI/ NICVA*). This area of food banks is something groups in the community and voluntary sector are going to keep a watchful eye on in the coming months.

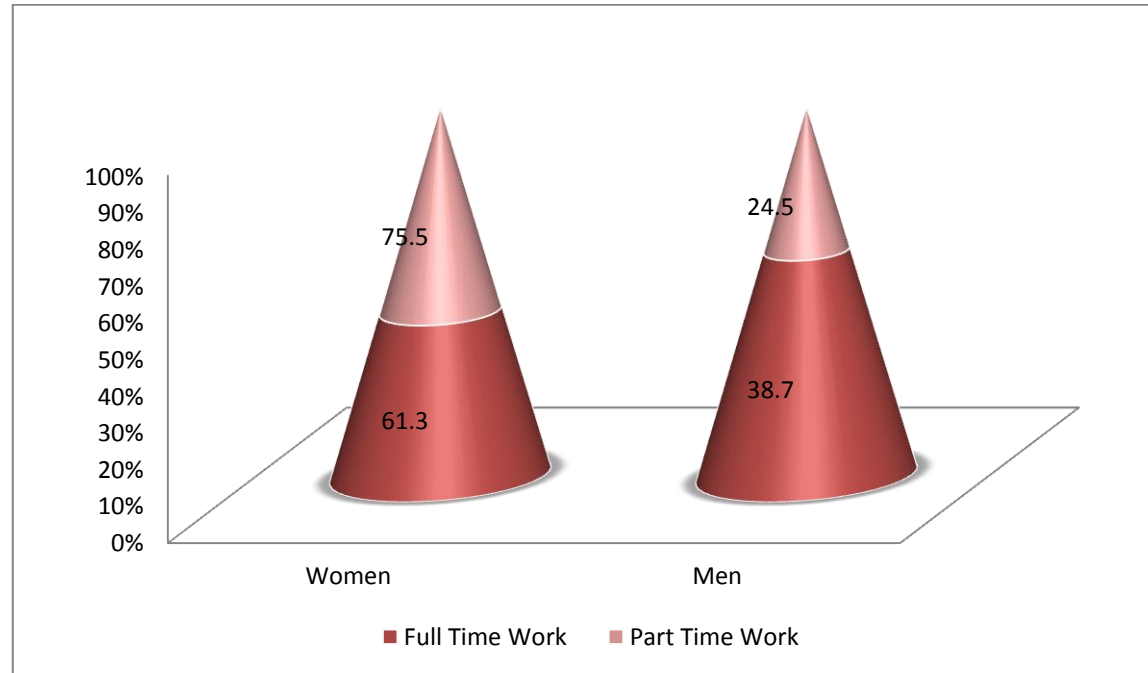
Gender

There are nearly 92,000 lone parents with 150,000 children between them, 73% live in rented accommodation¹. Lone parents head more than a ¼ of all families in Northern Ireland and the vast majority are women. These parents have the lowest standard of living of any household type and are more than twice as likely to be poor as other families. The qualifying age of the youngest child to be reduced from 7yrs to 5yrs, under child benefit reform, for the lone parent to be entitled to income support. The lone parent is moved from income support to job seekers at this age.

This cut to child benefit is happening alone as we will see from this document people often fall into more than one section 75 category and so are being hit twice, sometimes even three times but benefit changes and general austerity. Child Benefit and is currently frozen until 2014 with a 1% uprating between 2014-16 it is to be reformed as above and in the context of bedroom tax, benefit cap, public spending cuts and cuts in health care, all having an adverse impact on women and children.

¹ Hinds Bronagh (July 2011) WRDA: 'Women on the Edge Report' page 55 <http://www.wrda.net/Documents/Women%20and%20the%20Economy%20Section%205%20-%20Lone%20Parents.pdf>

Women are often in low paid, high risk, part time contracts², often they get into a cycle of work and then no work, never having stability and often having to change and re-apply to benefits. Women make up two thirds of the public sector workforce and with public sector cuts will be most affected women make up 61.3% of fulltime and 75.5% of part-time public-sector employees.³



No childcare strategy for Northern Ireland is a barrier to women's economic empowerment and the main barrier to getting women back to work or into work.

² Hinds, B (July 2011) WRDA: 'Women on the Edge Report' page 57 <http://www.wrda.net/Documents/Women%20and%20the%20Economy%20Section%205%20-%20Lone%20Parents.pdf>

³ Molan, P (February 2012) CRC 'Peace Monitoring Report' page 93 http://www.community-relations.org.uk/fs/doc/publications/NIPMR_2012_new_1.pdf

The Equality Commission for Northern Ireland recorded in their CEDAW Shadow Report that ‘it is disappointed in Government’s failure as yet deliver a cross departmental approach to implement a strategy that brings forward affordable, accessible and appropriate childcare to meet the needs of the child; the family and wider society – including the economic participation of women’.⁴

Universal Credit⁵ is a new benefit that has started to replace 6 existing benefits with a single monthly payment. Universal Credit will eventually replace:

- Income-based Jobseeker’s Allowance
- Income-related Employment and Support Allowance
- Income Support
- Working Tax Credit
- Child Tax Credit
- Housing Benefit

As such one single household payment will be made. In couple households this is to be paid to the head of the household, in most cases the man (although the Minister for Social Development in NI has said that he has secured a split or flexible payment method for NI this will not be clear until the bill is passed).

This payment to one person will represent a loss of independent income for women, this also concentrates financial resources and power in the hands of one person and may result in resources not being shared equally. Money provided to women is more likely to be spent on children’s needs than money allocated to men, therefore the move to a household benefit payment could reduce spending on children. There is also concern that other Universal Credit changes could mark the start of a return to a ‘male breadwinner’ model in dual headed households. The single earnings disregard under Universal Credit improves the incentive for one person in a couple household to move into employment, however it may weaken the incentives for many second earners (mainly women) to enter work or continue working- women could lose up to 4.5% of net income.⁶

⁴ ECNI (June 2013) ‘Shadow Report to the Committee on the Elimination of Discrimination Against Women’ page 12
http://www.equalityni.org/archive/pdf/CEDAW_2013.pdf

⁵ Government website ‘Universal Credit’ <https://www.gov.uk/universal-credit/overview>

⁶ Scottish Government (August 2013) ‘The Gender Impact of Welfare Reform’ executive summary and page 8 <http://www.scotland.gov.uk/Resource/0043/00432337.pdf>

Universal Credit could adversely impact those in fear of domestic violence or those who have a partner who has substance abuse issues making it harder for the other to access the money. Women's Aid Federation Northern Ireland lists the following problems with welfare reform:

- lengthy delays for women who are making their first claim
- eligibility for crisis loans
- problems with the assessment of Employment and Support Allowance (ESA), Disability Living Allowance (DLA) and Community Care Grants, and
- Difficulties in obtaining Child Benefit Payments.⁷

Universal Credit will also be paid as a single monthly payment, a sharp contrast to the current system of multiple benefits paid at different times in the month.

Northern Ireland has the second highest loss as a percentage of incomes within the regions and constituent nations of the UK'. This is in part to do with the relatively high proportion of households with children, a section of the society which the IFS says will suffer particular losses, the 'burden of which will be carried by women'.⁸

Women are worse off due to the effects of austerity and now welfare reform- Women face a higher risk of poverty across the whole of Europe than men 25.2% to 23% respectively as reported in the issue paper published by the Council of Europe.⁹

Because bedroom tax has not been implemented in NI yet the statistics are unclear (there are also possible plans not to introduce bedroom tax in NI for old claimants but this again will not be clear until the bill passes) However single people under the new bedroom tax would be urged to share accommodation but it is unclear how this would impact those who have part time access to children, this will adversely affect young single males.

⁷ See WAFNI website <http://www.womensaidni.org/about-us/our-work/policy-and-lobbying/welfare-reform/>

⁸ Molan, P (February 2012) CRC 'Peace Monitoring Report' page 94 http://www.community-relations.org.uk/fs/doc/publications/NIPMR_2012_new_1.pdf

⁹ Issue Paper published by the Council of Europe Commissioner for Human Rights (November 2013) 'Safeguarding human rights in times of economic crisis' page 23 <https://wcd.coe.int/com.instranet.InstraServlet?command=com.instranet.CmdBlobGet&InstranetImage=2429572&SecMode=1&DocId=2099360&Usage=2>

Sexual Orientation

Obviously the impacts that apply to both women and men above will affect this category in the same ways. Sexual Orientation can be hit by a multiple of categories including age/ gender/ religious belief etc and so benefit reform is compounded for those in objective need. Links with the cuts to under 25's housing benefit – see below.

Often young LGB people have to leave home because of issues around being LGB and need to find alternative accommodation but are deemed homeless through choice and so do not gain points on the social housing list, often they don't feel safe in shared housing or hostels and so this will have big implications with regards to housing benefit reform.

According to Cara Friend's submission to the Ad Hoc Committee on conformity with equality requirements¹⁰ (hereafter Ad Hoc Committee),

- Lesbian mothers remaining in opposite-sex relationships would be significantly disadvantaged by a sole payment of Universal Credit to one partner.
- As previously stated 96% of lone parents are women. There is anecdotal evidence to suggest that many lesbian parents are lone parents also. If the absence of adequate childcare facilities in NI and the absence of a childcare strategy, as compared to GB, lone lesbian parents will be placed at a significant disadvantage by the application of conditionality to lone parents with children over 5.
- Single LGBs up to the age of 35 are expected to live in Multiple Occupation Housing. Already the provisions on MOH occupancy for single LGBs up to the age of 25 place significant pressure on young LGBs who have left home because of abusive family relationships and/or experiences in abusive communities. There is ample evidence of widespread homophobic harassment in housing and in communities more generally. Younger LGBs are expected to live in MOH, whether it exists or not, in situations where they may suffer further homophobic harassment or be forced back into abusive family relationships and/or abusive communities. Now it proposed to extend this provision to LGBs up to the age of 35.

¹⁰ Cara Friend submission (Jan 2013) pages 257/8 <http://www.niassembly.gov.uk/Documents/Ad-Hoc-Welfare-Reform-Committee/Report/NIA921115.pdf>

- PIPs entitlement: Little attention is being paid to the development of PIPs. However there is evidence that people with mental disabilities and people with HIV are finding it more difficult to satisfy new criteria for receipt of PIPs. There is ample evidence of significant mental health issues amongst LGB people. There is therefore considerable concern that new criteria for receipt of PIPs and other disability-related benefits will place LGB welfare recipients at a significant disadvantage.
- PIPs assessment: We are very concerned at the contracting-out of these assessments. Assessments associated with disability involve issues of sensitivity and confidentiality. Such sensitivity and respect for privacy can (hopefully) be expected from NHS professionals. However, it is a source of great concern that issues of the sexual orientation of a person with disabilities may arise during these assessments and we have no guarantee that these issues will be appropriately treated by contracted-out assessors.

Race

BME people are 45% less likely to receive state benefits. Often Roma people and other migrants have no recourse to public funds, therefore are not receiving any state benefit despite the contrary perception of many.

There is also a lot of issues affecting other categories such as disabled/ woman etc that will cut across and affect race too this could mean two or three hits on BME people.

In times of austerity there are fewer resources made available for the reception of asylum seekers, less access to legal aid, social and health service. Also the already difficult economic situation for many ethnic minorities will deteriorate further with welfare reform, Roma for example are particularly exposed to long term unemployment. 70%-90% of countries surveyed across Europe show Roma living in conditions of severe material deprivation. ¹¹

¹¹ Issue Paper published by the Council of Europe Commissioner for Human Rights (November 2013) 'Safeguarding human rights in times of economic crisis' page 23

<https://wcd.coe.int/com.instranet.InstraServlet?command=com.instranet.CmdBlobGet&InstranetImage=2429572&SecMode=1&DocId=2099360&Usage=2>

NICEM in their submission to the Ad Hoc Committee¹² covered the rights to social security irrespective of nationality:

- Article 1 of Protocol 1 of the European Convention on Human Rights (ECHR) (which has been incorporated into domestic law by the Human Rights Act 1998) recognises a right to property. At this juncture it is worth bearing in mind that Article 14 ECHR states that all rights of the Convention must be implemented without discrimination. Therefore, every individual's right to social security must be equally protected, irrespective of nationality for example. In addition, in accordance with case law it is arguable that the ECHR prohibits state-enforce destitution under Article 3 of the Convention.¹³
- NICEM is deeply concerned by the Department of Work and Pensions indication that all applications for Universal Credit will now be processed online and claimants will need a bank account. Currently, it is quite difficult for non-British/Irish citizens to open bank accounts upon arrival due to anti-terrorism legislation. Therefore, any move to administer payments in this manner would lead to increased barriers for migrants and could potentially lead to migrants living in destitution.¹⁴
- Differential treatment of EU migrants against human rights, changes in welfare reform would potentially discriminate against EU migrants by paying EU migrants lower rates of pay or putting extra restrictions or requirements.
- Ramifications for migrants who may experience a change in immigration status as they no exclusion in relation to contributory benefits has been provided for. Furthermore, the DWP has indicated that a new residence test will be introduced. Such a test has previously been held to be in breach of EU law.

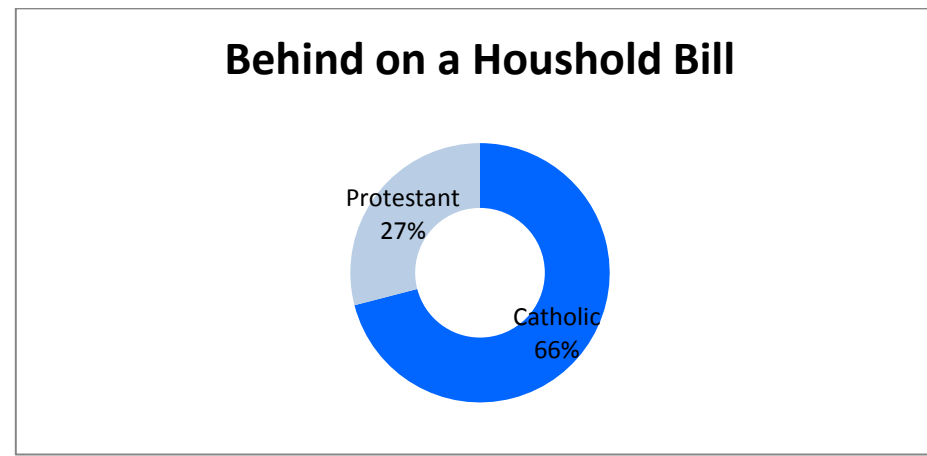
¹² NICEM Submission (Jan 2013) pages 584/5 <http://www.niassembly.gov.uk/Documents/Ad-Hoc-Welfare-Reform-Committee/Report/NIA921115.pdf>

¹³ Regina v. Secretary of State for the Home Department (Appellant) ex parte Limbuela (FC), [2005] UKHL 66

¹⁴ DWP, Universal Credit - FAQ, available at: <http://www.dwp.gov.uk/docs/universal-credit-faqs.pdf>.

Political Opinion/ Religious Belief

On the indices of deprivation for the most recent year on record, 2008-09, the percentage of Catholics for each indicator was higher than the percentage of Protestants. Of those behind with one or more household bill, 66% were from a Catholic household. The comparative figure for Protestants was 27%¹⁵ Catholic West Belfast one of the most disadvantaged areas in UK, there are a higher percentage of Catholics living in poverty than Protestants and so all benefit reform will impact more on Catholics. L/Derry and Strabane will be hit the hardest hit, most deprived areas are getting the largest losses- see above general issues.



There is very limited mobility in the social rented sector. Therefore, a tenants' ability to move may be severely restricted. Restricted mobility is particularly relevant to Northern Ireland as social housing is often segregated on the basis of community background. There is a risk of placing all social housing tenants in financial hardship, as the tenants maybe unable to move because of the de-facto lack of available alternative but still be subject to a reduction in their housing benefit.¹⁶

¹⁵ Family Resources Survey, 2010 http://www.dsdni.gov.uk/index/stats_and_research/stats-publications/stats-family-resource/family_resources/statistics_and_research-frs0809.htm

¹⁶ ECNI Submission (Jan 2013) page 524 <http://www.niassembly.gov.uk/Documents/Ad-Hoc-Welfare-Reform-Committee/Report/NIA921115.pdf>

Marital Status

Many people in Northern Ireland are working poor and so this can impact on child poverty levels, many people are working but on low wages, in unsecured jobs and receive some child tax credit/ child benefit, this small amount of money can make a massive difference to a household living in poverty. See also age.

Both partners must sign the 'claimant commitment' for UC to be paid. As a result, if one partner signs the commitment and the other refuses (for example, due to relationship tensions, or one partner's addiction or mental health problems) then, no UC is paid. This appears to penalize both the partner willing to meet the condition and any children in the claim.¹⁷

New ceiling on total payments per household, applying to the sum of a wide range of benefits for working age claimants, capped at £350 for single people and £500 for lone parents and couples.

Lone parents – see above in gender

Dependants

Welfare Reform proposals will also place significant demands on other people with dependents Parents with one or more children will be obliged to seek and find employment, requiring them to access high quality affordable childcare. However, unlike England and Wales where the Childcare Act 2006 imposes a duty on local authorities to identify and meet childcare needs, Northern Ireland has no corresponding childcare legislation and, therefore, there is no statutory obligation on the part of local or public authorities to provide high quality affordable childcare.¹⁸

¹⁷ Law Centre Submission to ad hoc committee (Jan 2013) <http://www.lawcentreni.org/Publications/Policy%20Briefings/WelfareReformGroupHoL.pdf>

¹⁸ Northern Ireland Welfare Reform Group (2011): Joint Briefing Paper– Welfare Reform Bill 2nd Reading House of Lords, page 6.

The Briefing by the NI Welfare Reform Group also noted that between 2002-2009 the overall number of day care places in Northern Ireland fell by 6% and further added that the decrease of the Childcare element of the Working Tax Credit from 80- 70% from April 2011 was also having an adverse impact on low income family households.¹⁹

It is estimated that there are 207,000 carers in Northern Ireland. Despite contributing an estimated £4.4 billion to the Northern Ireland economy with the unpaid care they provide, the vast majority are worse off financially as a result of becoming carers. (Carers NI) Welfare reform will almost certainly impact disproportionately on them whether it is caring for children, older parents of disabled relatives. Those who do care for someone, this is not taken into account as they are not seen as ‘actively seeking work’ under the Universal Credit reforms.

The lone parent conditionality provision requires that lone parents be available for work when their child reaches the age of 5 years. However, this conditionality assumes that there is an affordable and appropriate childcare infrastructure in place in Northern Ireland available to the individual claimant – looking at the evidence above, this is currently not the case.²⁰ Household benefit cap- 80% affected will have children – 60% of those will be single female’s largely lone parents and 10% single males.

The potential impact of further reducing access to housing benefit for approved foster and kinship carers could have a hugely detrimental effect on our ability to provide family based placements for children who need them.²¹

There has been multiple benefit changes for those with children as dependants including, Sure start grants to the first child only, a 3 year child benefit freeze and withdrawal of benefit from households including a higher earner, changes to tax credits loss of £135m a year and abolition of the health in pregnancy grant.

Hardship Payment – This now needs paid back even though it is only allocated if someone is in crisis thus probably not in a position to ever get to paying this back, this also contravenes the Northern Ireland executive commitment in reducing child poverty.

Those who do have dependent children are not helped into work as there is no childcare strategy and work is centred on cities in Northern Ireland affecting rural people of working age who cannot find work close to home to suit caring needs.

¹⁹ Welfare Reform Group briefing <http://www.lawcentreni.org/Publications/Policy%20Briefings/WelfareReformGroupHoL.pdf>

²⁰ ECNI Submission (Jan 2013) page 525 <http://www.niassembly.gov.uk/Documents/Ad-Hoc-Welfare-Reform-Committee/Report/NIA921115.pdf>

²¹ Fostering Network (Jan 2013) page 275 <http://www.niassembly.gov.uk/Documents/Ad-Hoc-Welfare-Reform-Committee/Report/NIA921115.pdf>

Age

Those of working age will go onto a 'back to work' scheme in GB, there is no back to work scheme in Northern Ireland for these people.

Young males who live in shared social housing will be adversely impacted when trying to have access to children because of shared house status; usually you need to demonstrate you have the room for the child/children to stay. Yet with housing benefit reform and lack of benefits for under 25s people are being forced into shared accommodation.

Young People under 25 no longer qualify for housing benefit thus leaving them with no recourse to housing provision. It has yet to be detailed how this will impact on those who are coming out of care.

Children

Child poverty is high in Northern Ireland and several important chances were lost for children because key strategies were insufficiently developed, implemented or integrated across Government, or failed to adhere to obligations outlined in law, impact of welfare reform will adversely affect children already living in poverty or in working poor families.

Save the Children have detailed that 110,000 children 21%— more than 1 in 4 — live in poverty in Northern Ireland. Nearly 1 in 10 live in severe poverty. In areas like Ballymurphy ward in Belfast the outlook for children is bleak, more than 80% of people have no or low educational qualifications. Long-term unemployment is 45%. The areas that experienced the worst of the conflict in Northern Ireland are also those with the highest levels of deprivation and poverty and so consequently, more than 12%, or approximately 50,000 children, 1 in 4 children are living in severe poverty, more than twice the average in the UK.²²

Disability Action is concerned that Contributory ESA Youth will also no longer be available under the legislation. The EQIA states “Removing the youth provisions will affect young disabled people. The Executive is committed to promoting employment prospects for younger people, with and without health conditions, by investing in employment support, apprentices and further education.”

²² Save the Children <http://www.savethechildren.org.uk/where-we-work/united-kingdom/northern-ireland>

However, there is little detail about the provisions that are being made or the number of people that will be impacted by this change. It may result in a person no longer having access to their own income and being financially dependent on someone else.²³

18,000 children live in households which have been in receipt of income support for 10 years or more – quite possibly growing up in homes where no adult is working.

UK-wide research concluded youth unemployment (16-24 year olds) was at 20.0 per cent²⁴ in 2010; the highest figure in 18 years. The statistic was slightly higher in Northern Ireland at 20.4 per cent youth unemployment²⁵. Our own research concludes that the Welfare Reform proposals are likely to impact on single people, the greatest group largely composed of young people.²⁶

Older People

The bedroom tax will no doubt hit older people the most, people who have spent years of their lives bringing up their children and building communities and networks close to home are being forced to move if they have a spare bedroom or they will be taxed on the number of rooms deemed surplus. There is no guidance outlining if looking after grandchildren on a regular basis would be a bedroom this is in use. There is also no choice about moving if the Northern Ireland housing stock does not have enough 1 bed properties. It is hard to see why people who are willing to move should be persecuted when the housing stock is simply not there.

Northern Ireland has an estimated 57,000 older people, 60% fall below the median income that represents the poverty line- women live longer than men and so women could also be a bigger proportion of this group.

²³ Disability Action submission (Jan 2013) page 510 <http://www.niassembly.gov.uk/Documents/Ad-Hoc-Welfare-Reform-Committee/Report/NIA921115.pdf>

²⁴ Parekh, A., MacInnes, T. and Peter Kenway (2010) op cit.

²⁵ McQuaid, R., Hollywood, E. and Canduela, J. (July 2010) op cit., page 39.

²⁶ Ibid page 97

Disability

6% less people will be entitled to the enhanced rate of DLA under PIP, approx to a loss of £33.25 per week in income. 7% of working age people in Northern Ireland is out of work due to a disability compared to 4% in GB. *Advice NI Turning the Tide- The Growth of Food Banks in NI*

Severely disabled people may require an extra bedroom for a carer, there is no provision at present to protect these people under bedroom tax.²⁷ Also adaptations to houses will have been made especially for disabled people and it is not clear if when asked to move from under occupied homes if these people will have provisions made in new homes.

If a household has 2 children that have disabilities and one that does not they should not be forced to share a room under the housing benefit reform.

Those who do not qualify under the new rules will not be eligible for PIP (New DLA) there is a high amount of people on DLA in Northern Ireland due to the conflict either because of physical injury or mental health problems, this new assessment does not take this into account.

The reassessment process will include approximately 360,000 of the 620,000 disabled people who currently lease a vehicle through the Motability Scheme. Because PIP is a new benefit with different criteria to DLA, some disabled people may not qualify for mobility support under PIP or may do so at a lower level than they had under DLA. As a consequence, they will no longer be eligible to use the Motability Scheme.²⁸

According to Disability Action, figures show that 21% of adults and 6% of children living in private households in Northern Ireland have a disability and the incidence is one of the highest in the United Kingdom. Reforms to benefits and services risk leaving disabled people without the support they need to live independently;

²⁷ Welfare Reform Bill (Northern Ireland) 2011 Completed Equality Impact Assessment, April 2012, Department for Social Development

²⁸ <http://www.motability.co.uk/understanding-the-scheme/pip-and-motability/lord-sterling-transitional-support-package>

Restrictions in eligibility criteria for social care support, the replacement of the DLA with PIP and changes to housing benefit risk interacting in a particularly harmful way for disabled people as detailed in the Disability Action submission to the ad hoc Committee.²⁹

The Government has legal obligations under Article 19 of the UN Convention on the Rights of Persons with Disabilities (UNCPRD). Article 19 requires states to take effective and appropriate measures that will facilitate full enjoyment by disabled people of key rights to independent living and their full inclusion and participation in the community. The removal of benefits could contravene this article as disabled people's day-to-day living costs – for basic items such as mobility aids, care and transport – are 25% higher than those of a non-disabled person.

As it currently stands the weekly income of a disabled person who relies solely on benefits is approximately “£200 below the amount required to live an acceptable and equitable quality of life” according to the Low Incomes Tax Reform Group. DSD has itself admitted that approximately 117,000 people will be impacted by changes to DLA/PIP.

The report by tendered by NICCY in April 2012 found that “Large families where there is a severely disabled child are at risk of being affected by the benefit cap and this could potentially impact on the lives of 6,500 children in Northern Ireland”.³⁰

The removal of SDP under UC is a key concern. Extra support for disabled adults is built into the Universal Credit differently to the current system of premiums and tax credits. In some instances the loss of the SDP will lead to some people being less well off under the UC. It is estimated that the reduction for some people will be up to £58 per week and even the most disabled adults will lose £28 a week.³¹

There are people according to the Disability Action submission to the ad hoc Committee who are finding they are not entitled to ESA but still have a level of disability or ill health that impact on them being able to be available for work. If they apply for JSA presently they have to be available for work but if they have been turned down for ESA applying for JSA is their only option. Disability Action, through advice work are already aware of cases where people have been found ‘fit to work’ but when they turn up to apply for JSA they are being told by Job Centre staff that as they are not ‘available for work’ yet they are not entitled to apply for

²⁹ Disability Action submission (Jan 2013) page 503 <http://www.niassembly.gov.uk/Documents/Ad-Hoc-Welfare-Reform-Committee/Report/NIA921115.pdf>

³⁰ A child's rights impact assessment of the impact of welfare reform on children in Northern Ireland, April 2012, G Horgan and M Monteith (NICCY)

³¹ Disability Action submission (Jan 2013) page 506 <http://www.niassembly.gov.uk/Documents/Ad-Hoc-Welfare-Reform-Committee/Report/NIA921115.pdf>

JSA. Similarly the Welfare Reform Bill will make changes to ESA. For people who are in the Work Related Activity Group (WRAG) for Contributory ESA then there will be a 365 day time limit on claiming for this group. This will come into affect straight away. So if people in this group have already received this benefit for 365 days then they will lose this benefit and will have to apply for other benefits.³²

According to the Equality Commission for Northern Ireland 'Statement on Key Inequalities' prior to the current recession disabled people were twice as likely to be unemployed as non-disabled people³³

In a survey by the Disability Alliance in 2011³⁴, 56% of disabled people said they would have to stop or reduce work if they lost DLA.

The new PIP process will also require disabled people to provide independent medical evidence. The majority of this evidence will come via a medical professional. With GP appointments estimated to cost the NHS up to £60 per visit, therefore based on this, the PIP reassessment process of the current 188,600 DLA claimants could cost the health service in Northern Ireland up to £11 million.³⁵

People who have become severely disabled in youth should be entitled to a sustainable income to support the transition from dependent young person to independent adult without being affected by decisions about work, education and relationships at a vulnerable age. The retention of ESA in youth provisions has a modest additional cost of £390,000 a year which could be met for example, within the Social Protection Fund.

Those who have been medically retired and are on benefits will not be able to access benefits after 3 years- the maximum time you can be on UC, there is nothing to say what will happen to these people once the 3 years are up.

³² Disability Action submission (Jan 2013) page 507/8 <http://www.niassembly.gov.uk/Documents/Ad-Hoc-Welfare-Reform-Committee/Report/NIA921115.pdf>

³³ ECNI (2007): Statement on Key Inequalities, page 12. [http://www.equalityni.org/archive/pdf/Keyinequalities\(F\)1107.pdf](http://www.equalityni.org/archive/pdf/Keyinequalities(F)1107.pdf)

³⁴ Disability Alliance Survey (2001) http://www.disabilityalliance.org/r68.doc#_Toc285815634

³⁵ MENCAP submission (Jan 2013) page 580 <http://www.niassembly.gov.uk/Documents/Ad-Hoc-Welfare-Reform-Committee/Report/NIA921115.pdf>