

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?

(Required)	This scheme should be continued	This scheme should not be continued	Not sure
Benefit Cap	x		
Loss of Carer Payments	x		
Loss of Disability-Related Payments	x		
Social Sector Size Criteria (“the bedroom tax”)	x		
Time Limiting of Contributory Employment and Support Allowance			x
Transition to Personal Independence Payment from Disability Living Allowance	x		

Please expand on your answer below:

Benefit cap relates to the amount of benefit a family are receiving if there are not disabilities within the household. The two key elements within UC most likely to be impacted by the Benefit Cap are Housing Element and Child Element together. Indeed, from your statistics, it is only families with children so far impacted by benefit cap.

If we look at the most recent census data in terms of the family demographic in urban versus rural- families are more likely to be larger in rural areas. – only 5% had 3 or more children in Belfast compared to 10% in Mid-Ulster and 9% in Fermanagh and Omagh or 9% in Newry Mourne & Down.

In addition, we note the lack of update on the Move to UC from Tax Credits to UC especially for self employed people, of which there tends to be more in rural communities eg farmers, trades people. With these issues still unresolved and currently being investigated by DFC and NISRA in terms of lack of uptake or not surviving past the first 3 assessment periods, it is a serious risk to remove this protection at a time rural communities require it most. UC is still very much in a transitional phase and requires that specific rural lens. We have huge concerns that changes for farm households, who have lost out on key income payments post Brexit and now are in a period of significant transition.

DLA and carers allowance or element mitigations are now in relation to a child moving from DLA to PIP. We refer therefore to the family composition figures above and whilst the risk is now lower due to the move from DLA to PIP for adults being complete, thus freeing up much of this mitigation package, there is evidence from the advice sector ([PIP0008 - Evidence on Personal Independence Payment \(parliament.uk\)](#) which DWP in England and DFC in NI are aware of and from Disability Rights Forum 2023) that some health issues including Autism, do not transition well from DLA to PIP due to the criteria differential. Programme for Government 2024 indicates that nearly one in five children have special education needs and thus the risk of not transitioning to PIP safely thus losing the DLA and Carer Mitigation has a very serious impact. With SEN services more limited in rural communities and the rural difficulties with accessing support due to poor transport provision- the risk of not providing this support is severe and will adversely impact rural children.

Social Sector Size Criteria mitigation has been extremely important to those who live in Social Housing. Whilst there is significantly more social housing in urban areas and thus the numbers are higher in terms of availing of the mitigation, what is important to note is the housing stock available or not available within rural communities. NIHE most recent survey on housing stock showed males 26-59 requiring a one bedroom house remains the highest ask. In rural areas the limitations are more significant due to the lack of housing options full stop. With nothing confirmed yet in terms of rural development to increase the number of social houses rurally, the removal of this mitigation should not be looked at in isolation but alongside the requirement to address regional imbalances in housing and accessing to services. RCN figures on the target for rural new build social housing being missed for 8 of the past nine years.

Rural Community Network cannot comment on time limited ESA.

3. With regard to 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)?

(Required)	Continue to provide full support	Provide support on a tapered basis (reducing or stopping over time)	Not sure
Benefit Cap	x		
Social Sector Size Criteria ("bedroom tax")	x		

Please expand on your answer below:

The remit is there to extend the mitigations and it would be our recommendation to extend mitigations further until more parity can be achieved between Rural and Urban, East and West.

From the ground in my previous role in advice sector, it is evident that a significant number of tenants are not even aware of the mitigations they currently receive. Removing that cleanly would have a significant impact on rural residents who are impacted by rural specific social issues which result in cost of living issues eg having to travel further to access services, reliance on solid fuel heating systems and older homes which are harder to heat, lack of local services, lack of housing stock available rurally either socially or privately, smaller, intermittent employment patterns and/ or seasonally impacted job markets.

Rural Communities are only starting to see the adverse effects of move to UC since the move from Tax Credit commenced earlier this year, this has not yet been fully explored in relation to the rural needs and warrants further and more detailed attention.

Mitigation packages cannot be looked at in isolation of other goals regarding housing, access to services including health services and waiting list times as well as addressing regional imbalances. Until these issues can be explored and addressed, RCN do not see it a safe time to remove mitigation packages from the Rural Communities they represent.

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

(Required)	Yes, alternative methods should be considered	No, alternative methods should not be considered	Not sure
Benefit Cap	x		
Social Sector Size Criteria ("bedroom tax")	x		

Please expand on your answer below:

Discretionary Housing Payment is currently used in NI to help those in the private rented sector. If we look at the most recent census data on housing tenure, there is a very clear urban versus rural divide. In every council area except for Belfast, renting privately accounts for higher proportion of tenure than social housing. What this means is that social housing is not as readily available in rural areas and this forces those living rurally to seek private rented accommodation.

There is very little security in the private sector for tenants and very little scrutiny for Landlords. RCN are aware that this is under review in terms of DFC Fuel Poverty Strategy and Carbon Emissions targets however, we would question if this will ever reduce the divide between rural and urban in terms of the tenure.

Rural Residents advise us that the DHP application process is very stressful. It is looked at on a case by case basis as oppose to the mitigations which are automatic. With there being such a rural, urban divide this only increases the complexity of rural living and one could go as far to say it discriminates if not addressed. Therefore, RCN welcome "system" proposals for a more cohesive and just system of assistance for both social and private tenants so that there is no discrimination between the two in terms of financial assistance.

We cannot comment on your budgetary ability to facilitate DHP and Mitigations in one budget. It is our view that rural residents have the same human right to a secure and healthy tenancy as urban residents and as the tenure divide is so stark, any attempt to add Social Sector Size Criteria to the DHP budget is only going to adversely affect rural communities more than urban when the reliance on same is higher. We would add that this should not be looked at in isolation without considering housing reform as well as an anti poverty strategy that is rural proofed and regionally balanced.

We also have concerns about the current low budget on DHP resulting in thousands of rural private tenants losing much needed financial support after 2 years.

RCN has spoken to advice sector workers across NI who all report that those who are in receipt of Housing Element of UC, and who have the most complex needs are often left in the worst housing conditions, they are the people landlords don't want to house. With a lack of choice in the housing market in rural areas we have been told that those who are most vulnerable are living in conditions which are 'unfit' and often paying over the odds for

rent, leading to further poverty and disadvantage. DHP needs to continue until such time as a 'fit for habitation' system of inspection with robust law enforcement can be carried out to deter rogue landlords and those who would exploit those who are most vulnerable.

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

(Required) Yes No Not sure

yes

Please expand on your answer below:

Operationally UC is not working for Rural Communities in relation to those who are self employed in seasonal jobs such as farming and construction. We have detailed this under cover of letter to DFC and DEARA and would ask that special consideration be given to mitigations for self employed people especially in those industries.