



**Cliff Edge Coalition NI response to the UK Government's**  
**'Pathways to Work: Reforming Benefits and Support to**  
**Get Britain Working Green Paper'**  
**June 2025**

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## **About the Cliff Edge Coalition**

The Cliff Edge Coalition (CEC) is made up of over one hundred organisations from across Northern Ireland, which came together in 2018 to campaign to sustain and strengthen crucial welfare reform mitigations to protect people across Northern Ireland. The Cliff Edge Coalition Working Group supports the work of the wider Coalition and is made up of fourteen organisations and representatives from across the voluntary and community sector in Northern Ireland acting collaboratively to oversee and shape the work of the wider Coalition.

Welfare reform mitigations were first agreed by the Northern Ireland Executive in 2016 to alleviate some of the harshest impacts of the Westminster welfare reform agenda. Following campaigning by the Coalition, the Northern Ireland Assembly has legislated to indefinitely retain the mitigations for the Social Sector Size Criteria (Bedroom Tax), close the loopholes which had prevented many claimants from accessing financial assistance through the mitigation scheme, and extend the benefit cap mitigations until 31st March 2028.

However, there remains an urgent need for the Coalition to continue its campaign to extend the current mitigations beyond 2028, and to strengthen the mitigations package in NI. The harsh impacts of new welfare challenges which have emerged since the original mitigations were introduced, exacerbated by the ongoing cost-of-living crisis, increasingly deepens the financial hardship and poverty within households. The Coalition is now calling for three further measures which are urgently needed to strengthen the current benefit system in Northern Ireland;

1. Resolve the five week wait for Universal Credit
2. Remove the Two Child Limit
3. Provide support to renters affected by the Local Housing Allowance

## **An overview of this response**

This response to the UK Government's Green Paper "Pathways to Work: Reforming Benefits and Support to Get Britain Working Green Paper" is structured in two parts. The first part responds to our specific concerns around the proposed changes to Personal Independent Payments (PIP), Universal Credit (UC) and the other proposals in the Green Paper. The second part draws upon CEC members' evidence and sets out how NI will be disproportionately impacted by the proposed cuts.

## **An Executive Summary**

The Cliff Edge Coalition is driven by a common goal which is to address growing poverty levels in NI by advocating for a stronger social security system to protect those who are most in need. We are concerned that the proposed policy measures outlined in the Green Paper will have significant adverse impacts upon individuals and the social security system.

As we continue to work alongside officials and elected representatives, we reiterate that Green Paper proposals constitute significant cuts to sickness and disability benefits. If implemented, they risk undermining the NI Executive's priorities in tackling poverty in NI.

Many of the proposed changes are not subject to consultation. This is despite the fact that they will have significant impact. As no Impact Assessment or relevant key data specific to NI has been published, it is impossible to know the full scale of the impact on those who rely on disability benefits. However, as outlined in Part 2, we know that these measures will have a disproportionate impact on people in NI due to higher reliance on disability benefits.

We are concerned that these proposals will have a disproportionate impact upon NI, which is specifically important when considering the legacy of conflict and the higher rates of disability and ill health. This is despite past learning which necessitated the NI Executive to introduce a £585m welfare reform mitigation package (negotiated with HM Treasury) in recognition that the cuts would have a disproportionate impact on people in NI. The NI Executive has continued to fund welfare reform mitigations from its block grant. Despite political parties being unanimously against the proposals, NI Ministers have expressed that further mitigations are unaffordable in the current fiscal climate.

Therefore, we outline our key recommendations:

*Our primary recommendation is that DWP does not proceed with these proposals which will result in severe, adverse effects on those who are most in need across our society.*

*Furthermore the Coalition recommends that;*

- ❖ *DWP should include all of the Green Paper's proposed policy measures within the scope of the consultation;*
- ❖ *An impact assessment for Northern Ireland should be conducted and published to fully assess the scale of changes the proposals will have upon NI;*
- ❖ *DWP should provide clarity on the financial and budgetary implications for the NI Executive on the delivery of these proposals;*

- ❖ *DWP should not proceed with the proposals to change the criteria for entitlement and eligibility for Personal Independence Payment (PIP);*
- ❖ *DWP should put policies in place to ensure the 'right to try' work proposals do not have adverse impacts upon an individual's Universal Credit entitlements;*
- ❖ *DWP and DfC should specifically outline how they will support those who lose entitlement to PIP, including measures for claimants who require it to remain in work;*
- ❖ *DWP and DfC should outline enhanced employee protections (reasonable adjustments) to allow an employee with complex needs to remain in the workplace;*
- ❖ *DWP and DfC should provide further detail on the package of support for claimants who will no longer be eligible for PIP. Clarification must be provided as to how this will be devolved in NI;*
- ❖ *DWP should provide further detail on the changes related to Universal Credit; additional information and clarification on these proposals must be provided;*
- ❖ *DWP and DfC should outline measures to support carers who may also lose their entitlement to Carers Allowance;*
- ❖ *DWP should not proceed with the proposal to time limit the indefinite entitlement to contributory ESA for claimants with limited capability for work related activity;*
- ❖ *DfC should implement the Disability Strategy and Disability Employment Strategy without further delay, which must include measures that will address the challenges resulting from the proposed changes;*
- ❖ *DWP should not cut the rate of benefits;*
- ❖ *DWP should provide further detail on the Access to Work Scheme, and on how this will translate to NI;*
- ❖ *DWP should consider how the proposed cuts to disability will impact local populations; specifically, the socio-economic context of NI must be fully considered;*
- ❖ *The NI Anti-Poverty Strategy and the UK Child Poverty Strategy must be brought forward without further delay.*

## **PART 1**

### **The Scope of the Consultation**

The Coalition is concerned about the policy measures which are being consulted upon, and also those which are not included in this consultation process. The government is not consulting on the vast majority of the estimated £5bn (OBR estimate) or £7bn (JRF estimate) in disability benefit cuts by changing PIP criteria, scrapping the Work Capability Assessment and reducing the UC Health Element. In this context we are disappointed with these proposals, as the Minister for Social Security and Disability, Sir Stephen Timms previously said:

*“We want a system that genuinely works for disabled people and those with health conditions, as well as the country and the economy, and we want to hear their views and voices at the heart of the new system.” (7 April, 2025)*

The absence of consultation on *all* of the measures, means that disabled people will find it much more difficult to engage with democratic processes.

*“Would the fact they are not consulting on these changes not fall under discrimination? Really it’s against our human rights.”*

*“It’s not good that the government is not consulting on some of these changes, it comes across as deceitful.”*

- *Participants at a Women’s Regional Consortium focus group on the proposals in the Pathways to Work Green Paper*

### **Personal Independence Payment (PIP)**

#### **The Changes to PIP**

The CEC is against the proposal to change the criteria for entitlement to PIP. PIP is designed to cover the additional costs of a disability, both for “daily living” and for “mobility”. The proposed changes will require claimants to score 4 points in one of the 10 daily living descriptors to qualify for PIP. **This change is not subject to consultation.** However, it is estimated that by 2029-30, 800,000 people are expected to lose the daily living part of PIP and 400,000 will lose PIP altogether. (Resolution Foundation) This will push 50,000 children 250,000 people overall into poverty by 2030. (DWP own’s assessment, Spring Statement).

In NI, over 88,410 PIP claimants are in receipt of the lower Standard Rate Daily Living and so possibly more likely to be affected by the proposed new rule (a minimum score of four on at least one of the daily living activities). In addition, the latest data shows that 46% of claims in payment have a main disabling condition recorded under the highest medical category of ‘Psychiatric disorders (Mental

Illness)'. The CEC is concerned that those with mental health issues are at higher risk of not scoring 4 points on a single daily living descriptor and this is in the context of the mental health emergency in NI which in short, provides significant barriers for people to access interventions. The data also shows that 105, 520 claimants, or 48%

*"The PIP Daily Living award is akin to a load-bearing wall in a house. The whole financial structure and integrity of a household is often predicated upon it. Once it gets removed the house collapses. This will become even more serious once the UC health component is dependent on PIP eligibility."*

- Paul Woods, Disability Advocacy Officer, Community Advice Fermanagh

of PIP claimants are 55 and older and who are likely to have larger barriers to employment, particularly if they are awaiting for health treatment (DfC, 2025).

The Government is consulting on the principle of the 'right to try' work. While this is a welcome initiative the CEC is concerned about how this will impact an individual's reassessment process, as outlined in the following case study:

#### *Case Study: The risks of work and PIP reassessment*

A woman aged 27 with anxiety and depression following multiple miscarriages, decides she is going to try some part time work. Her counsellor suggested it might improve her mental state. She has a job in a small, local shop. She is coping well, some days are good and some are not, but the shop staff know her and will allow for days she does not feel strong enough to come in. This lady is now "engaging with people" (descriptor 9 in the regulations) which is contrary to the PIP eligibility criteria. She will therefore lose the points awarded for this descriptor at review stage which could potentially be enough for her to lose PIP completely upon review. This is a very difficult situation for this lady as she has to decide whether to take the risk of trying work, or potentially losing her safety net. She cannot mentally cope with working full time and relies on PIP to get by.

The CEC is concerned about the removal of PIP, particularly from those who require it to remain in work. The case study above shows how engaging with work can cause an individual to lose support when they need it to remain in work. We are concerned that there are currently inadequate employee protections, in terms of reasonable adjustments (such as flexible working) to allow an employee with complex needs to remain in the workplace. The Green Paper states "People who are in receipt of Personal Independence Payment (PIP) are less likely to leave the benefit now than when it was first introduced." This statement is reflective of poor work structures and low wages at a time of serious cost of living pressures. These issues could have been addressed instead of targeting disability benefits.

*'Tightening eligibility and raising assessment thresholds could see many lose essential financial support, which in turn affects access to linked benefits like Carer's Allowance and increases the risk of poverty and social exclusion.'*

- Compass Advocacy Network, Cliff Edge Coalition Member

It is very difficult to take this section in isolation of the forthcoming White Paper which considers introducing a new scoring system for PIP which will, of course, result in many people losing their entitlement to PIP.

#### Health and eligible care needs of those no longer eligible for PIP

DWP is proposing to offer those who are no longer eligible for PIP a package of support which could for example include treatments, equipment and personal care. The CEC is unclear about how this support will be devolved to NI. Our health system is severely compromised with extensive waiting lists and long waiting times to be seen. Those who are most vulnerable to losing entitlement to PIP, are those with non-physical disabilities such as mental ill-health. The Public Accounts Committee (2024) outlined the continued and substantial deficiencies in services, particularly for children, individuals with co-occurring mental health and substance use issues, and those requiring crisis intervention in Northern Ireland with chronic underfunding in mental health services.

*“This change means people with less severe but still significant difficulties-such as challenges with budgeting, social engagement, or managing personal care-may lose entitlement. For people with learning disabilities, losing PIP could mean a loss of at least £4,000 a year and the withdrawal of other linked supports, pushing many into financial hardship.”*

- Compass Advocacy Network, Cliff Edge Coalition Member



*“If you push people back to work when they are not ready then suicide rates will go up – people will be under too much pressure.”*

*“There’s no funding for mental health – so many people have mental health issues and they can’t get mental health support as it is. How can they kick somebody off support when they’re waiting on an appointment or assessment – the waiting lists are so long.”*

*“They need to look at the root cause of the problems – they need to look at the causes of mental health issues here then maybe more people would be able to go out to work. This comes right down to the core – what will they do for all those people suffering from mental health problems – what help will they give them? They’ll be even more depressed if they take their money away.”*

*“They need to look at providing support services in schools to help early on, to help children prepare for work and to help them deal with mental health issues.”*

- *Participants at a Women’s Regional Consortium focus group on the proposals in the Pathways to Work Green Paper*

#### **Case Study: The impact of the proposals on Carer’s Allowance and UC**

Susan and John\* are a couple with no children, savings or pensions. They live together in a house they own paying a mortgage of £600/month with rates of £128/month. Susan suffers from fibromyalgia and depression and John is her carer.

Susan receives PIP Standard Daily Living and Standard Mobility of **£446.77 per month**

John receives Carer’s Allowance for caring for Susan of **£360.97 per month**

Together they have a joint claim for UC of **£892.09 per month** which is made up as follows:

Standard Allowance - Couples Rate	= £628.10
LCWRA for Susan	= £423.27
Carers Element for John	= £201.68
<b>TOTAL ENTITLEMENT</b>	<b>= £1253.05**</b>

\*Not their real names, \*\* From this total the amount of Carers Allowance is deducted as it is an earn earnings replacement benefit leaving John and Susan with a UC claim of £892.09/month.

Susan and John sought advice with their housing costs because they were in debt with their mortgage. Their advice centre, Community Advice Fermanagh, ran a check to see if they could increase their income any further and found they were entitled to a Rate Rebate of **£127.62/month** and a **Support for Mortgage Interest Loan of £143.35/month**.\*\*\*

In total, under the current rules, Susan and John are entitled to **£1970.80/month in social security benefits**. The **Support for Mortgage Interest** is a loan to help with housing costs and has to be repaid if/when the house is sold or transferred.

Susan currently receives the following points from the PIP activities:

Activity	Descriptors	Points
<b>1. Preparing food</b>	c. Cannot cook a simple meal using a conventional cooker but is able to do so using a microwave	<b>2</b>

Activity	Descriptors	Points
<b>4. Washing and bathing</b>	c. Needs supervision or prompting to be able to wash or bathe	<b>2</b>

Activity	Descriptors	Points
<b>6. Dressing and undressing</b>	c. Needs either – (i) prompting to be able to dress	<b>2</b>

Activity	Descriptors	Points
<b>9. Engaging with other people face to face</b>	b. Needs prompting to be able to engage with other people	<b>2</b>

\*\*\* The Support for Mortgage Interest is a loan to help with housing costs and has to be repaid if/when the house is sold or transferred

Under the new rules, Susan and John would see a monthly reduction in their income of £1071.73/month.

In addition, conditionality rules for UC will mean that John will be required to look for work despite caring for Susan for 35+ hours per week. If John manages to obtain work, the new rules would mean they would be unable to receive the £684 Work Allowance in UC.\*\*\*\* Therefore, 55% of John's earnings would come off the couple's UC award.

If John is able to get 23 hours of work or more a week at minimum wage this would then put them out of UC entitlement altogether and also out of entitlement to a Rate Rebate and Support for Mortgage Interest despite effectively now having two jobs.

\*\*\*\* You can get a Work Allowance in UC if you and/or your partner who you live with have a limited capability for work due to illness or disability

## **Changes to other benefits**

### **The changes to Universal Credit**

The Pathways to Work Green Paper proposes significant changes to the extra financial support in UC for those with health conditions or disabilities that significantly limit their ability to work.

At present this support is provided through the Limited Capability for Work-Related Activity (LCWRA) element which is currently worth £97/week on top of the UC standard allowance.

The government is planning to make changes to the assessment process and the rates of this support over the coming years. These changes are not subject to consultation. The main changes are as follows:

- The LCWRA will be re-named the UC health element
- The UC health element will be restricted to only those who receive a daily living award in PIP – meaning that if someone is not eligible for the daily living component of PIP they would also lose the health element of UC, even if they have a health condition or disability that limits their ability to work, resulting in some claimants losing £97/week
- The UC health element will be frozen at £97 per week until 2029/2030 for existing claimants. Current recipients will lose £10 a week as a result of the

health element being frozen (in 2029/30 it would have been £107 a week if uprated by CPI inflation)

- The UC health element for new claimants will be reduced to £50 per week in 2026/2027 and then frozen until 2029/2030 in effect reducing by almost half the value of the health element for people who have been assessed as unable to work. Eventually, all recipients will be receiving this lower rate. CPAG (2025) estimates this will push an additional 100,000 children into poverty in the long run, as well as reducing living standards for many more.
- The Work Capability Assessment (WCA) which determines eligibility for the LCWRA element will be scrapped and the PIP assessment will be used to assess entitlement for the health element of UC from 2028/2029 focusing on the impact of disability on daily living rather than capacity to work.
- Anyone who has LCWRA (prior to April 2026) and remains LCWRA following their assessment, will not see their UC health entitlement changed. In other words, this change will impact new claimants first and then will impact existing claimants only when their PIP entitlement is scheduled to be reviewed
- The standard allowance of UC is to increase by £5 a week above CPI uprating in 2029/30 meaning a single person aged 25 or over would be entitled to £106 a week instead of £101 a week if uprated by inflation only.

The Government is also consulting on proposals to raise the age at which someone can receive the UC health element to 22, which as outlined above will have significant repercussions for young people.

Government analysis of the impact of the health and disability benefit reforms across the UK states that they expect 2.25 million current recipients of the UC health element to be impacted by the freeze with an average loss of £500 per year. They expect 730,000 future recipients of the UC health element to be impacted with an average loss of £3,000 per year. Although both of these cuts will be slightly offset by the small rise in the basic rate of UC. The government expects that 3.9 million households not on the UC health element are expected to gain from the increase in the standard allowance with an average gain of £265 per year (Spring Statement, 2025).

The CEC is concerned about these changes given that NI is a low-income economy and more people are entitled to means-tested benefits like UC for this reason. Analysis of the most recent claimant data for UC (August 2024) shows that the number of claimants on UC in Northern Ireland reached 197,780.

Research for the House of Commons Library (December 2017) showed that previous welfare reform and austerity policies hit women harder and we are also concerned about the gendered impacts of these proposals. In Northern Ireland, UC claimant statistics show that 39% of claimants were male and 60% were female. 39% of the claims in payment were made to lone parent households (61,600) and Census figures show that 93% of lone parent households are women.

Further analysis of the number of households in payment in NI (156,270) shows that 58,350 households were in receipt of the Limited Capability for Work additional element (37%). These figures show that there are likely to be a large number of UC claimants in NI who will be impacted by these proposals.

The CEC is also concerned about the impact of these proposals on carers. Within UC the carers element provides an additional amount on top of the standard allowance if a person provides care for someone who receives certain health or disability related benefits. The impact of tightening eligibility for disability benefits including PIP could result in the loss of this carer element within UC. Most recent figures for UC (August 2024) show there are 32,010 households (20%) receiving the carers element. There are also implications for receipt of Carer's Allowance (addressed later in this response). Figures show that nearly 60% of carers in NI are women and the poverty rate for unpaid carers in NI is higher (28.3%) than the poverty rate for carers in the rest of the UK (23.6%). These proposals are likely to have severe financial impacts for unpaid carers who are already struggling financially.

### Contributory Benefits

CEC is very concerned, particularly by the Government's plans to time-limit the indefinite entitlement to contributory ESA for those assessed as having limited capability for work-related activity. On one hand, the Government outlines that they will revitalise the "something-for-something" contributory principle and with the other hand they will take it away from those people who have long-term sickness, by limiting receipt to 12 months. Instead, individuals will claim a new "unemployment insurance" which will require them to actively seek work, with easements for people unable to work. It is not clear how people's ability to work will be assessed with the abolition of the WCA.

### Employment

#### Disability and Work

The Ulster University Economic Policy Centre (UUEPC, 2022) report on labour outcomes for disabled people in Northern Ireland indicates that just over one in three disabled people is in work here, compared to over half of disabled people in the UK.

The disability employment rate gap of 44 percentage points is higher in NI compared to 29 percentage points in the UK (UUEPC, 2022).

Mencap's 'Big Learning Disability Survey' (2019) suggested that up to 23% of working age adults with a learning disability, including those with lower support needs, have a paid job in the UK, compared with 53% of working age adults with any disability, and 76% of the general population.(ONS (2019) A08: Labour market status of disabled people. Dataset. Aug 2019.)

The CEC is very concerned that there is no Disability Employment Strategy in place, as the previous one ended in 2020. It is currently being developed by DfC to align with the Disability Strategy. Therefore, it is difficult to ascertain a clear and coherent picture on the support that currently exists for people who have a disability. This is very concerning in the context that thousands of people will lose access to PIP and the health element of UC.

Furthermore, the CEC is concerned by the Government's position that cutting people's benefits will increase disabled people's participation in the labour market. Modeling by the Resolution Foundation estimates that the Government's cuts to disability and incapacity benefits may lead to between 38,000 and 57,000 more people across the UK entering paid work by 2029-30. Additional employment support delivers extra employment of between 23,000 and 48,000. Under a best-case scenario 105,000 more people would be in work by the end of Parliament, yet an estimated 3.2 million families will lose support through the cuts to PIP and UC-Health (Resolution Foundation, 2025). Considering the particular 'place' based issues related to NI, for example, the continuing impact of the conflict, it is likely that NI will have proportionately less people in employment than other parts of the UK.

*"My husband is on the standard rate of PIP. He is ex-army and suffers from mental health issues, PTSD and hearing loss. He needs to get out of the house for his mental health and has a part-time job. His PIP helps to pay for his taxis to work as he doesn't drive. If they take away his PIP it won't help him to stay in work. It costs him £8-£10 to get there and that's only one way."*

*"Businesses don't want to employ people with mental health issues – if they need mental health days and things like that."*

*"It will fall on to employers, they will have to deal with it and they don't want to."*

*"Where are the jobs? Employers don't even have the money to make reasonable adjustments. If you go to work with a disability then you're going to need reasonable adjustments and support. There isn't the money to support that."*

*"People with disabilities shouldn't be discriminated against when they go to work but they are."*

*"Employers are not going to do it unless they're going to be compensated for it. The business needs to make money. They will not want to take on someone with a disability if they're going to need more time off. Employers need support to employ people with disabilities."*

*"I get PIP as a single parent and I'm struggling as it is to get by. If I was to go back to work I'd only be able to go back part time with the children and my current physical and mental disabilities (cerebral palsy and mental health issues). I would need a high wage to be able to survive on part time work pro-rata."*

- *Participants at a Women's Regional Consortium focus group on the proposals in the Pathways to Work Green Paper*

### Access to Work

The Green Paper seeks views on the future of Access to Work, which offers advice and provides support for the additional costs, that are above and beyond the reasonable adjustments employers are legally required to provide, that arise for disabled people in work.

We agree with the concerns highlighted by Cliff Edge Coalition member RNIB NI,

*"In Northern Ireland, employers are expected to pay a contribution to costs depending upon their size, with large employers expected to pay all costs. As such, it appears that the Green Paper is suggesting harmonisation downward, with the rest of the UK beginning to operate as Northern Ireland currently does. RNIB's Employment Team in Northern Ireland found that these costs can put some employers off, especially small businesses with limited resources. This is particularly true for blind and partially sighted employees, whose costs can be much higher than most other AtW applicants due to the cost of assistive technology.*

*Access to Work is not working well in the UK, owing to significant delays, and a lack of awareness amongst both job seekers and employers, which has been identified as a key problem in Northern Ireland. Additionally, unlike other AtW applicants in the UK, employees in Northern Ireland are asked to furnish medical evidence to receive AtW funding, which acts as an additional barrier to a source of funding which is already difficult to access. As such, RNIB NI is unconvinced that Access to Work will serve as an effective counterbalance to PIP cuts."*

- *RNIB, Cliff Edge Coalition NI Member*

As outlined in part 2 of this response there are critical issues with the funding provided through the UK Prosperity Fund (UKPF) which replaced investment for employment support for those with disabilities in Northern Ireland, following the UK exit from the EU. A CEC member outlined that the interventions are short term in nature (normally six months) in comparison to the European Social Fund (ESF)

which provides between 1-3 years of support depending on individual needs. This means that those who are targeted are more likely to be closest to the labour market. There is a significant funding gap with the UKSPF providing around half of the funding that was available via the ESF, which has resulted in losing significant numbers of training and employment staff. There is also a lack of regional co-ordination of specialist provision and therefore progress on reducing the employment disability gap has been limited. There is uncertainty about the future of the UKSPF and it's currently unclear how it will interact with the proposals outlined in the Government's Green Paper. Furthermore, there is a degree of duplication in terms of what is provided by DfC.

## **The Impact on Housing**

### **These reforms will:**

- Force many people under 35 onto the shared accommodation rate, resulting in their housing support being drastically cut
- Narrow eligibility for impacted prospective social tenants
- Make many previously exempt people subject to the Bedroom Tax
- Cost the Department for Communities more in mitigating the Bedroom Tax
- Private renters are not protected by mitigations, so those impacted and no longer exempt from Bedroom Tax will see a reduction in housing support
- Housing support will reduce for those with the Severe Disability Premium whose eligibility is reliant on the daily living element of PIP
- Increase the risk of homelessness for those people impacted

### **Lost exemptions**

The daily living component of PIP can exempt people from non-dependant deductions, ensuring they receive the full amount of housing costs through UC. The additional eligibility requirement that a minimum of 4 points must be scored on one PIP daily living activity to receive the daily living element of the benefit means many people will lose their PIP. This could have the knock-on impact of recipients losing certain exemptions and allowances, which will impact their housing benefit, housing costs through UC and certain exemptions. The impacts of this are set out below.

<i>Broad Rental Market Area</i>	<i>1 Bedroom LHA Rate per week</i>	<i>Shared Accommodation Rate per week</i>	<i>Loss per week</i>
<i>Belfast</i>	£139.34	£75.75	£63.58



<i>Lough Neagh Upper</i>	£96.91	£71.08	£25.83
<i>Lough Neagh Lower</i>	£97.34	£83.49	£13.85
<i>North</i>	£119.79	£74.22	£45.57
<i>North West</i>	£99.33	£88.21	£11.12
<i>South</i>	£110.08	£65.49	£30.38
<i>South East</i>	£109.62	£79.70	£29.92
<i>South West</i>	£88.68	£71.28	£17.40

### Shared Accommodation Rate

Single people who are under 35 and currently receive the daily living element of PIP are exempt from the Shared Accommodation Rate and are instead entitled to full housing benefit or housing costs through UC. The Shared Accommodation Rate is a lower rate, and its policy intent is to cover the cost of one room in shared accommodation. If a person loses their entitlement to the daily living element of PIP, they will also lose their exemption from the Shared Accommodation Rate and will see a drastic fall in their housing support. This would have a devastating impact on the people affected, particularly if they are in the Private Rented Sector.

People who would otherwise be expected to share a bedroom, but cannot due to a disability, are currently entitled to the extra bedroom under the Social Size Criteria (Bedroom Tax). The eligibility for this extra bedroom is dependent on a person receiving DLA care component at the middle or high rate, attendance allowance, or the daily living component of PIP. Under these reforms, many will lose that daily living component. If a person is relying on the daily living component of PIP for bedroom eligibility, and loses it under these reforms, they will be classed as having an extra bedroom under the Social Size Criteria and therefore subject to the Bedroom Tax.

Existing social tenants will be protected from the Bedroom Tax by Welfare Supplementary Payments. This will, however, have the knock-on impact of increasing the cost incurred by the Department for Communities of mitigating the Bedroom Tax.

For prospective social tenants on the housing waiting list who are on the daily living component, and were applying for a home based on their eligibility for that bedroom

entitlement, they may lose that entitlement and therefore may no longer be considered for a home of that size if they lose the daily living component. An example of this would be a family of four, two parents and two children under the age of 10, with one parent on the daily living element of PIP who requires their own room. The family is eligible to apply for a three-bedroom home, based on their need and current policy. Under these reforms, if that parent loses their daily living element, that family's eligibility under the social size criteria reduces from three-bedrooms to two bedrooms, despite no reduction in need. Note there is NIHE discretion on applications and they will assess every case on need, but these reforms would remove that eligibility and make it more difficult for that family to access a home that meets their needs, and require more arduous evidence gathering for the family in support of their application.

Private Renters will be afforded no protections and subjected to a reduction in their housing support of 14% if they are deemed to have one spare bedroom, and 25% if they are deemed to have two or more spare bedrooms. This would increase the shortfall between their housing support and their rent payments, causing a devastating impact on that person's affordability. People with disabilities are already at increased risk of homelessness. The loss of the daily living element of PIP would make it increasingly difficult for those people in the private rented sector to afford their rent, in the middle of a housing crisis, when rent prices are rapidly inflating, and loss of rented accommodation remains one of the top three reasons for homelessness presentations.

*"My biggest fear if I went to work is that my rent is £600 – how would I pay that without help? I live in the private rented sector. If I go out to work then I'll lose the help I get with my rent and I'd be homeless."*

*- Participant at a Women's Regional Consortium focus group on the proposals in the Pathways to Work Green Paper*

The situations outlined above would also apply to people who require carers who must regularly stay overnight in order to provide overnight care to a member of the household who is in receipt of the daily living component of PIP. If the household member were to lose their daily living component, they too would lose eligibility for the bedroom of their carer. Again, the NIHE has discretion to assess these cases on an individual basis, based on the needs of the applicant. It is the experience of Housing Rights advisors, however, that proving overnight care is needed is already a difficult task, and the loss of the daily living element would make it even more difficult.

For prospective tenants in this situation, loss of the daily living element would narrow their eligibility, and if overnight caring could not be accommodated for clients, there may be a knock-on impact on the care system.

### Severe Disability Premium

The Severe Disability Premium (SDP) is an additional amount of money that can be added to certain income benefits to support people who are severely disabled. One of the income benefits that SDP can be added to is housing benefit, and a person is eligible for it if they are in receipt of PIP daily living.

Therefore, people in receipt of SDP will have their housing benefit increased by £76.40 per week which will help people make their rent. If a person were to lose the daily living element of PIP they may no longer be eligible for SDP and face a significant loss of income.

### General Impacts

Aside from the direct knock-on impacts highlighted above, the loss of PIP could have a devastating impact on people's ability to afford their homes. It is the experience of Housing Rights that many clients rely on their PIP to make rent in both the social and private sectors, and to make their mortgage payments in the homeowner sector.

There is a deep and profound housing crisis in Northern Ireland, characterised by an extreme disparity between supply and demand, which makes accessing suitable, sustainable homes extremely difficult, and deep affordability issues, particularly in the private rented sector.

The impact of these reforms will be to narrow eligibility and damage affordability for people who are disabled. Cutting support to an already vulnerable group will make it increasingly difficult for impacted people to find and sustain a suitable home, while simultaneously making them more vulnerable to homelessness at a time when the NIHE cannot meet current demand and is relying on temporary accommodation.

## **PART 2:**

***The cuts to disability benefits will have a disproportionate impact in Northern Ireland.***

### **The impact upon Northern Ireland**

The thirty-year conflict in Northern Ireland (NI) has created long-term and multi-generational issues. One of the most prominent is that NI has a proportionately higher number of people who claim disability benefits than other parts of the UK. Devlin et al (2025) report that those who have had more intensive exposure to the conflict (50-64 age bracket) are around 21 percentage points more likely to be claiming disability benefits.

A study of Adverse Childhood Experiences (ACEs) by Walsh et al (2025) in NI provides an understanding of the impact of trauma on our society. 60% of our adult population reports at least one ACE with nearly one in five experiencing four or more ACEs. 30% reported conflict-specific adversities. Adults with 4 or more ACEs were 5 times more likely to report chronic health issues, 14.8 times more likely to experience PTSD and 9.6 times more likely to have a diagnosed mental health condition. High ACE exposure was associated with higher rates of excessive alcohol consumption, drug use, smoking and reduced physical activity all contributing to long-term health burdens. These figures point to the increased likelihood of claiming disability benefits in NI and the need for increased support including community investment.

Since the Good Friday/Belfast Agreement, NI has struggled to achieve consistent and long-term political stability, which has had stark consequences in the development of social infrastructure and modernised legislation which should play a key role in creating a more prosperous and accessible economy. Rather, we have public services, which are habitually characterised as being “in crisis.” Our health system and waiting times are the worst in the UK. The NI Audit Office reported in 2023 that 26.3% of the NI population are on waiting lists compared to 12.4% in England and 24% in Wales. Economic inactivity (26.9%) is higher than other UK regions (Department of Economy, 2025), comparatively lower wages (NISRA, 2024) and the cost of childcare is higher and additionally there is no comparative “free childcare” scheme.

The CEC expresses deep concern that the Government at Westminster is disregarding the importance of *place* in respect of how the proposed cuts to disability will impact local populations. Devlin et al (2025) has recently used the NICOLA survey (NI Cohort for the Longitudinal Study of Ageing) and has concluded that there is a direct link between exposure to the conflict and mental ill health as well as cancer diagnosis. Data presented by the JRF (2025) shows that almost 40% of those with cancer and between 45-50% of people with a psychiatric disorder across the UK

are at risk of losing PIP as they scored less than 4 points in every daily living activity at their last PIP assessment.

*“If they’re going to take away that help we all need here in NI especially with mental health then they need to put something in place to help people with their mental health.”*

*“They don’t care about us here in NI that were left behind for all those years.”*

*“If they want us to get into work then they need to increase the wages here to make people want to go out to work.”*

*“People will owe more money – they’re going to end up borrowing more especially in NI and going to the wrong groups for money and getting into debt. They will have to borrow to live and many could end up borrowing from paramilitaries.”*

- *Participants at a Women’s Regional Consortium focus group on the proposals in the Pathways to Work Green Paper*

As we await the forthcoming Anti-Poverty Strategy and UK Child Poverty Strategy, the Coalition is concerned that the implementation of the outlined policy measures will further increase and deepen poverty across Northern Ireland. Recent statistics published by the Department for Communities (DfC) highlight that poverty is deepening with 15% (291,000) of people and 20% (90,000) of children living in absolute poverty (Department for Communities, 2025). These statistics emphasise ‘children are at a higher risk of living in poverty’, (DfC, 2025), leading this concern to be noted across the sector as,

*“The welfare cuts will inevitably and significantly impact families with children, driving hardship and undermining tackling child poverty.”*

- *Action for Children NI, Cliff Edge Coalition Member*

*“Child poverty is going to up significantly as a result of these changes. People can’t even afford to buy their kids shoes. They’re having to buy for one child one week and another child two weeks later as they don’t have the money. People are getting themselves in debt – you’re cutting down what you buy and it’s still not enough. You’re not able to buy food and gas at the same time, you’re buying yellow label foods and it’s still not enough.”*

*“How do we protect our kids – the next generation – there’s going to be so much poverty as a result. It’s 2025 and our kids are still suffering.”*

- *Participants at a Women’s Regional Consortium focus group on the proposals in the Pathways to Work Green Paper*

### **Economic Inactivity**

The JRF also presents evidence contrary to the Government’s assertion that the cuts to disability benefits will drive people into work. Indeed, the measures will drive up to 400,000 more people into poverty. There is no doubt that NI will feel the pain of the cuts disproportionately. A key reason is because NI has the largest proportion of ‘economically inactive’ people who are classed as long-term sick or disabled. Over the last 15 years, economic inactivity in NI has been consistently higher than the UK average. The latest economic inactivity rate is 26.9% compared to the UK rate of 21.3% and is the second highest of the twelve UK regions (Department for Economy, 2025) A report by Ulster University’s Economic Policy Centre (2022) concludes that even allowing for the fact that there is a higher incidence of more limiting conditions in NI and the lower qualification profile of disabled people relative to the UK average, there is still evidence of a *disability penalty*. Only 1 in 3 disabled people in NI are in paid work compared to over half in the UK. Economic growth for NI will require structural barriers to economic inactivity to be addressed. The authors emphasise that NI has not only the lowest disability employment rate, but it also has the largest unemployment gap between disabled and non-disabled persons. (UUEPC, 2022).

*‘With only 6% of people with a learning disability known to social services in employment, the barriers to work—including lack of tailored support, inaccessible workplaces, and reduced specialist services following the loss of ESF funding are significant. Without a robust safety net, these barriers will only increase.’*

*- Compass Advocacy Network, Cliff Edge Coalition Member*

*“My daughter has serious mental health problems and has pushed herself into college and got herself a job as a trainee hairdresser. Her employer wouldn’t work around her mental health so now doesn’t have a job. She wanted some flexibility in the job for her bad days but the employer wouldn’t have that. She’s just a trainee to them. It’s going to get to the point where if no one is going to take her on and support her she’ll end up on benefits because of this.”*

*“I’m struggling as it is and I’m a single parent. If I did go back to work I would only be able to work part time because of my mental and physical disabilities and looking after the children. It would hardly be worth it – I would need to get a high wage job to have enough pro-rata through part-time work.”*

*- Participants at a Women’s Regional Consortium focus group on the proposals in the Pathways to Work Green Paper*

Progress on tackling the significant barriers to work that disabled people face has been glacial. The situation has been made worse due to the significant loss of the European Social Fund to third sector organisations. The UK Shared Prosperity Fund offers only a partial replacement for the £13m of funding that was lost to organisations running employability schemes (Belfast Live, 2023). As will be outlined below, NI has a patchwork of disability support which at present is not equipped to cope with increased pressure, without extensive investment and significant action to increase accessibility. The Government has committed to investing £1 billion annually into an employment, health and skills support package. Employment support is completely devolved to NI. It is unclear what NI will receive as part of a subsequent Barnett Consequential. Crucially, this money will not be ring-fenced and could fall victim to the major shortfalls in other public services. There is a significant need to intensively work with the business sector to ensure that they are equipped to provide flexibility and reasonable adjustments to facilitate more disabled people entering the labour market. The Equality Act 2010 does not apply in Northern Ireland – current legislation, the Disability Discrimination Act dates back to 1995.

## **Disproportionate deprivation**

The statistics available from the Department for Communities show that there were 220,060 claimants in receipt of PIP in NI (February, 2025). It is estimated that 40% of PIP claimants have a lower award and are at risk of losing entitlement under the cuts proposed in the Green Paper. 46% of claimants in NI have a main disabling condition recorded under 'psychiatric disorders' (mental illness).

Research has consistently shown that disability claimants – which includes those suffering from mental illness and suicide ideation are more concentrated in areas of deprivation. Lloyd et al (2025) have been creating a new deprivation index which has allowed them to drill down into spatial equalities at a very local level. In their research, deprivation is categorised under three distinct domains - employment (people unemployed as a percentage of all people employed and unemployed – excluding full time students), education (people with no qualifications as a percentage of all people aged 16 and over), and health (a combination of information on general health status and limiting long term illness). The results show:

- **Education deprivation is highest in Northern Ireland at 27%**, with Yorkshire and the Humber ranked second at 19%.
- Health deprivation (using self-reported health) is particularly pronounced for NI – **nearly 28% of areas in Northern Ireland rank within the most deprived 10% by poor health across the UK**. This compares to 23% in Scotland, 16% in the North East of England and – at the other extreme – just 1.5% of areas in London and 2.65% in the East of England.
- When results are summarized at local authority level, **Derry and Strabane and Belfast (both within Northern Ireland) have larger shares of their areas within the most deprived 10% across the UK than do any of the other 374 UK local authorities**.
- For health deprivation, **Belfast (NI) has the largest proportion of areas in the most deprived 10%, with Glasgow (Scotland) ranked second and Derry and Strabane (NI) ranked third**. This is further exacerbated in Northern Ireland due its sparsity and rurality, with access to health services remaining a significant concern. Multiple Deprivation Measures indicate that six out of the top ten most deprived areas in Northern Ireland in relation to access to services are rural.

This speaks to decades of political instability and a lack of public investment. In the Green Paper, the Government emphasises the benefits of “good work,” however 26% of the NI population are already at a significant disadvantage, due to their lack of qualifications. Trussell research has revealed that over one in five (22%) of referrals to foodbanks in NI report poor health as a reason.



## **Disability Prevalence**

The Family Resources Survey shows that one quarter of the NI population had a disability. Disability prevalence varies notably by Local Government District (LGD) with Derry City and Strabane having the highest disability prevalence at 36% compared to the average across LGDs in NI at 24%.

Over the last 10 years the number of people with a disability has grown for both males and females with approximately 244,000 females and 225,000 males in NI reporting having a disability.

The Independent Mechanism in Northern Ireland (IMNI), a joint role held by the Equality Commission for Northern Ireland and the Northern Ireland Human Rights Commission, has further outlined there are disproportionate impacts facing disabled people living in Northern Ireland in relation to welfare reform.

## **Food Insecurity**

Family Resources Survey (2023/24) figures show a higher prevalence of food insecurity in households with a disability. 85% of households with a disabled adult were food secure (79% with a disabled adult under pension age) compared to 96% of households with no disabled adults. Households in receipt of income-related benefits also experienced low levels of food security with an estimate of 74% in 23/24.

Furthermore, data from Trussell (2024) shows that **114,000** people who live in disabled families now face hunger and hardship. If you live in a disabled family (with either a disabled adult or child) you are far more likely to face hunger and hardship than if you live in a non-disabled family (15% vs. 8%). These figures are measured as people whose total resources fall more than 25% below the Social Metrics Commission's poverty Line.

Trussell (2025) conducted modelling to estimate the potential impact proposed reforms to disability and incapacity benefits (specifically the changing element rules for PIP and Rebalancing support in Universal Credit) may have on the number of people in the NI who are at risk of facing hunger and hardship. The modelling for policies uses the IPPR Tax Benefit Model, alongside bespoke, in-house microsimulation scripts. Across all policies, Family Resources Survey (FRS) and Households Below Average Income (HBAI) data for the financial year 2022/23 is used as the basis of projections.

For all of the reforms considered, rates of hunger and hardship are compared to base data, under pre-measures policy, reweighted to reflect projected increases in benefit caseload (pre-measures). Throughout, comparisons are made in-year, so quoted increases in hunger in hardship for (for example) 2029/30 compare modelled post-measures data for 2029/30 to projected baseline data for 2029/30. Therefore,

Trussell's evidence concluded that Northern Ireland is impacted disproportionately by the rebalancing of Universal Credit, seeing a 0.2 percentage point increase compared with an increase of 0.1 percentage points for the UK as a whole concluding an additional 15,000 people in Northern Ireland will face hunger and hardship as a direct consequence to the proposed reforms.

### **Significant economic consequences for the local economy**

There was widespread opposition to the cuts to social security that were implemented by the Coalition government (Welfare Reform Act, 2012). Research published by Beattie and Fothergill (2013) aligns with Lloyd et al (2025) in respect of the largest losses being felt in the most deprived areas. Beatty and Fothergill found that Belfast would be hit harder than any major city in Britain. Derry and Strabane would also be hit hard. Beattie and Fothergill also found that lowering incomes more than elsewhere, a key effect of the welfare reforms, would also widen the gap in prosperity between Northern Ireland and the rest of the UK. This conclusion bears out in multiplicity of socio-economic areas. Not only is the 'prosperity gap' widening between the rest of the UK and NI, but also between NI and the Republic of Ireland. Recent research from the Economic and Social Research Institute's Comparative Analysis of Economies of Ireland and Northern Ireland provide a stark picture of different experiences depending on where you live. Some key findings include:

- Household disposable income in Ireland is 18.3% higher than in NI (as of 2018), and the gap has widened over time.
- Inpatient and outpatient waiting lists were similar for those waiting between zero and six months for treatment in 2024; however, the rates for longer durations are much higher in NI. **86 per 1,000 people in NI on waiting lists for 18+ months, compared to 12 per 1,000 in Ireland.**
- Life expectancy is an important indicator that tends to encapsulate the impacts of multiple well-being determinants across a range of areas including income levels, educational attainment and access to health services. In 2021, life expectancy for children aged below one in Ireland was 82.4 years compared to 80.4 years in NI, a gap of 2 years. As was the case with many other key metrics, the gap between Ireland and NI in life expectancy has also been widening over recent years.

Beatty and Fothergill (2013) also found that some households and individuals, notably sick and disabled people, would be hit by different elements of the reform. This is the case in respect of the proposals outlined in the Green Paper and will have significant and sweeping impacts on thousands of families, most of whom are concentrated in already economically depressed areas. This is particularly the case where Carers Allowance is attached to a PIP claim.

*“This isn’t just a cut to benefits, it’s a cut to everything. If they want you to go back to work then you’ve to pay your rent with no help, you’d have no free school meals, no uniform grant, you’re not entitled to any other help. Then social services will get involved because they’ll say you’re not looking after your kids.”*

- *Participant at a Women’s Regional Consortium focus group on the proposals in the Pathways to Work Green Paper*

### **A Double Whammy for Carers**

The CEC view the plans as a double whammy for carers in terms of the impact on those carers who are disabled themselves (2021 NI census data shows 29.3% or 64,130 of carers are disabled) and the potential loss of the benefits of the person they care for. Higher eligibility requirements for PIP will mean carers could lose their entitlement to Carer’s Allowance (CA) and the Carer Element in UC by 2029/30 as PIP is a gateway for accessing carer benefits.

Currently 77,460 people in NI claim Carers Allowance (February 2025) and 220,060 claimants were in receipt of PIP on 28 February 2025 in NI. 42% (93,060) of claims in payment are awarded the enhanced rate for both the daily living and mobility components. We know that 28.3% of NI carers live in poverty, a rate which is higher than the poverty rate for carers in the rest of the UK (23.6%), and considerably higher than poverty rates amongst adults in NI who do not have caring roles (17.4%) (Carer Poverty Commission, 2023). We also know that 59% of carers are women. The Family Resources Survey (2023/24) shows that carers are more likely to be economically inactive due to sickness/disability (13%) than the adult population overall (10%). Many carers have higher household bills due to the requirements for maintaining a warmer house and associated utilities as well as costs of food and medical/health supplies.

### **Young People**

There will be a significant impact for young people, immediately there will be an impact for those between 18-22. The proposals outline that they will be precluded from receipt of the Health Element of UC. This change will ripple down to children who are currently claiming Disability Living Allowance (DLA). Research by the Mental Health Champion in Northern Ireland (2023) shows that the well-being of 11-year-olds has declined in recent years to its lowest ever score and that their worries relate to relationships with peers, relationships at home and that concern about household finances was also a common source of stress. In keeping with the wider evidence on mental health, childhood adversities were associated with higher risk. Prevalence rates were higher among children living in an area of deprivation,

children living in a single parent household, those living in urban areas and children living in households where an adult was in receipt of benefits. Higher rates of poor mental health were associated with having poor physical health and additional educational needs.

The same study found that 45.2% of 16-year-olds (over half of females) had a probable mental illness (32.8% of males and 52.9% of females). A report by the Samaritans (2025) highlighted that suicidal ideation has increased since 2012/13, particularly among under-18s, where self-harm and ideation rates have risen by 76%. Research also shows that suicide rates are highest in deprived areas, with three times as many deaths in the most disadvantaged decile compared to the least (Martinez-Ales et al., 2020). Men are three times more likely to die by suicide than women, with the highest risk in their 30s. High-risk groups include carers, people with disabilities, and LGBTQIA+ individuals, while urban and rural rates show little difference (Pescosolido et al., 2020).

### **Access to Transport**

NI has a significant rural population. Public transport is essential for people to access services, but there are major problems. NI has the worst transport connectivity in the UK (Bradley, 2021), and internally, there is a stark East-West divide in the presence and quality of transport infrastructure which is frustrating economic progression. For example, the current rail network in NI has 51 railway stations east of the River Bann and three to the West of the Bann.

This was demonstrated acutely by the efforts of a journalist to get by bus from rural Fermanagh to one of the region's main hospitals by bus. It took him four different buses and four hours and forty minutes to reach Altnagelvin in Derry (Belfast Telegraph, 2023). Rural Communities Transport supported a project "Cancer Connected Communities West" which provided transport for people in rural locations to Altnagelvin for cancer treatment. The report noted that accessible transport is a primary concern for people going through this kind of treatment:

*"Assumptions are unrealistic, that friends and family can take time off work to drive patient to their hospital appointments"*

Access to PIP ensures that those who are going through cancer treatment are more likely to be able to afford to travel to receive cancer treatment.

Northern Ireland is the most car-dependent region of the UK, with around 69% of journeys being made by car (Department of Infrastructure, 2023). This is partly due to the rural nature and the of the region but is mainly due to the lack of investment in public transport. According to a Grant Thornton report in 2019, the number of passenger journeys on NI's public transport networks increased by over 4.5 million between 2015 and 2019. This is despite NI devoting the lowest amount of funding for

public transport: £84 per person was allocated in 2018/19, which is just 27% of the UK average expenditure, and down from £97 per person in 2013. While the Grant Thornton report recognised that transport links had improved in the Greater Belfast area, this has not been the case outside of that area and the report highlighted the impact of poor public transport on employment and training opportunities across the region. The 2025-26 Budget proposed by the Department of Infrastructure proposed a 5% increase in funding to Translink, which is far from adequate in the context of the proposals.

## **Conclusion**

The CEC is united in its opposition to these cuts.

*“If these cuts go ahead the suicide rate will go up, drug and alcohol problems will get worse too. Crime rates will go up through shoplifting, etc. You can’t blame people, it’s horrible.”*

- *Participants at a Women’s Regional Consortium focus group on the proposals in the Pathways to Work Green Paper*

*Cliff Edge Coalition Member, the Northern Ireland Anti-Poverty Network’s lived experience advisory panel created postcards to engage the local community in the consultation. Here are a few responses:*

*I oppose the disability benefit cuts because...*



*“I receive PIP benefits which help me get around. Without these I would not be able to access some of the help I need.”*

*“my mum will be unable to pay her rent, pay for food - she will be unable to live.”*

*“I work with vulnerable adults and these cuts are not a duty of care to them.”*

It is grossly unfair that the Government has made a decision **not** to consult on major changes that will have a devastating impact on sick, deaf and disabled people's lives. The sheer scale of the proposed cuts expose a significant gap in the Government's understanding of what it is like to be sick and disabled. Furthermore the CEC are very concerned that the Government has completely overlooked the socio-economic context of Northern Ireland. As outlined throughout this response, the cuts will have a disproportionate impact on our people and will change the fabric of our society as our most deprived communities are plunged deeper into poverty and despair. It will further negate social progress and undermine the NI Executive's commitment to foster peace and prosperity. The proposals should be scrapped immediately.

**For further information about this response please contact:**

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*For more information on the Cliff Edge Coalition, please visit:*

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

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