five parties in the Northern Ireland Executive about the extent to which the Bill should be amended to address the issues identified by the two committees – a "welfare reform crisis" that became a genuine threat to the stability of the devolution settlement as a whole.[44] The two dominant parties, the Democratic Unionist Party and Sinn Féin, appeared relatively united in their concern at the inherited Bill, but divided as to the appropriate response, with the DUP more cautious about divergence from Westminster entailing additional costs. Despite these differences, an agreed position gradually appeared to emerge, ultimately reflected in a formal political agreement[45] and in the large number of amendments accepted when the Bill returned to the Assembly in February 2015. This consensus was to prove fragile: a dispute over whether a proposed supplementary payment fund to protect claimants from financial loss should be open to future claimants or only to continuing claimants led to the defeat of the Bill at its final stage three months later. [46] The next change of tack would come almost as quickly, with the Northern Ireland parties and the UK and Irish governments agreeing to a "fresh start" on a number of contentious issues, including the future of welfare reform.[47] This saw social security powers temporarily transferred from Stormont to Westminster, for the purpose of extending the reforms included in the Welfare Reform Act 2012 and sections 8 to 22 of the Welfare Reform and Work Act 2016 to Northern Ireland.[48] Secondary legislation establishing Universal Credit was eventually made just over three years after Great Britain.[49] In the interim, £173 million was deducted from the block grant to account for the additional cost to the Exchequer of funding benefits in Northern Ireland resulting from (at that point) the non-implementation of reforms that had already occurred in Great Britain.[50]

The impact of welfare reform in Northern Ireland

Welfare reform since 2010 has generated concern and controversy across the UK, with parties represented in both the Scottish Government and Northern Ireland Executive prominent among the critics. Opposition to measures emerging from Westminster was variously driven by ideological considerations, belief that the reforms would not achieve their stated objectives even when these were desirable and the view that the policy prescriptions of an Anglo- or London-centric elite did not meet the needs of other parts of the UK.[51] All three perspectives could be observed among policymakers in Northern Ireland between 2011 and 2016. Simpson found some ideological opposition to austerity in general and disciplinary welfare-to-work models in particular, but little evidence of an alternative, Northern Ireland-specific ideology of welfare in a fragmented party political environment.[52] Simplification and promotion of a return to paid work were broadly seen as

[44] N Emerson, 'Stormont must learn lessons from the welfare reform crisis' (Irish News, 17 January 2019) <http://www.irishnews.com/opinion/columnists/2019/01/17/newton-emerson-stormont-must-learn-lessons-from-the-welfare-reform-crisis-1528719/?ref=sh>
[45] Northern Ireland Office, *The Stormont House Agreement* (Belfast: NIO, 2014)
[46] Sinn Féin, *Welfare: the facts* (Belfast: Sinn Féin, 2015) <http://www.sinnfein.ie/files/2015/Welfare_the_facts_SF1.pdf>
[47] Northern Ireland Office, *A fresh start: the Stormont agreement and implementation plan* (Belfast: NIO, 2015)
[48] Northern Ireland (Welfare Reform) Act 2015 c34; Welfare Reform (Northern Ireland) Order 2016 no 215 (c17); Welfare Reform and Work (Northern Ireland) Order 2016 no 999 (NI 1)
[49] Universal Credit Regulations (Northern Ireland) 2016 no 216; Universal Credit Regulations 2013 no 376
[50] Northern Ireland Audit Office, *Welfare reforms in Northern Ireland* (Belfast: NIAO, 2019)
[51] M Simpson, 'Renegotiating social citizenship in the age of devolution' (2017) 44(4) Journal of Law and Society 646
[52] See also AM Gray and D Birrell, 'Coalition government in Northern Ireland: social policy and the lowest common denominator thesis' (2012) 11(1) Social Policy and Society 15

desirable, but lack of opportunity in the Northern Ireland labour market was thought by some to be a much more important barrier to (re-)employment than any disincentive effect of social security. [53]

More pragmatically, the cost-benefit analysis for welfare reform looks different in Northern Ireland than it does at UK level. Due to the parity arrangements, any savings flowing from benefit cuts accrue to the Treasury, while the economic losses affect people in the region.[54] These losses are greater than in any other UK region, welfare reform up to and including Bill before the Assembly in 2013 projected to take £650 per person per year out of the Northern Ireland economy. The equivalent reforms were projected to take an average of £470 per person per year out of the economy in Great Britain, or £530 in the worst affected areas (north east and north west England). High levels of disability and economic inactivity, alongside the previously mentioned labour market weakness, are key contributors. [55] Specific policy changes affecting Universal Credit claimants are likely to have a particular impact. The reduction of Housing Benefit (or the housing element of Universal Credit) to under-occupying social tenants is a prime example. Whereas 19% of working age social tenants in England and 31% of those in Great Britain overall were estimated to have excess bedrooms in 2013, the equivalent figure in Northern Ireland was 58%.[56] The Northern Ireland Housing Executive stated in evidence to the Committee for Social Development that it would have "a major issue" if it were required to find smaller housing units at short notice for such a high proportion of tenants.[57] Consequently, there are serious concerns at the likely impact on funding for social housing development and maintenance of the social sector size criteria.[58]

[53] See also AM Gray and D Birrell, 'Coalition government in Northern Ireland: social policy and the lowest common denominator thesis' (2012) 11(1) Social Policy and Society 15
[54] Northern Ireland Audit Office, *Welfare reforms in Northern Ireland* (Belfast: NIAO, 2019)
[55] C Beatty and S Fothergill, *The impact of welfare reform on Northern Ireland* (Sheffield: Centre for Economic Empowerment, 2013)
[56] K Gibb, *The 'bedroom tax' in Scotland* (SP paper 409, Edinburgh: Scottish Parliament, 2013)
[57] G Flynn in Committee for Social Development, 'Minutes of evidence – 25 October 2012', *Report on the Welfare Reform Bill (NIA Bill 13/11-15)* (NIA 74/11-15, Belfast: Northern Ireland Assembly, 2013) 364
[58] Northern Ireland Audit Office, *Welfare reforms in Northern Ireland* (Belfast: NIAO, 2019); Chartered Institute of Housing Northern Ireland, *Impact of welfare changes on rented housing in Northern Ireland* (Belfast: CIHNI, 2017)

The implementation of Universal Credit in Northern Ireland

The implementation of Universal Credit in Great Britain has been a stuttering process. Work commenced in April 2013, but an initial aspiration that the legacy means tested benefits and tax credits would be fully replaced by the end of 2017 has been long since abandoned.[59] The graph below gives an indication of how the projected implementation schedule for Great Britain has slipped back. New claimants who would previously have applied for one or more of the legacy benefits are now required to apply for Universal Credit instead, but the migration of continuing claimants remains at a very early stage. By the start of 2016, there were fewer than 200,000 universal claimants compared to an original plan of 4.5 million.[60]

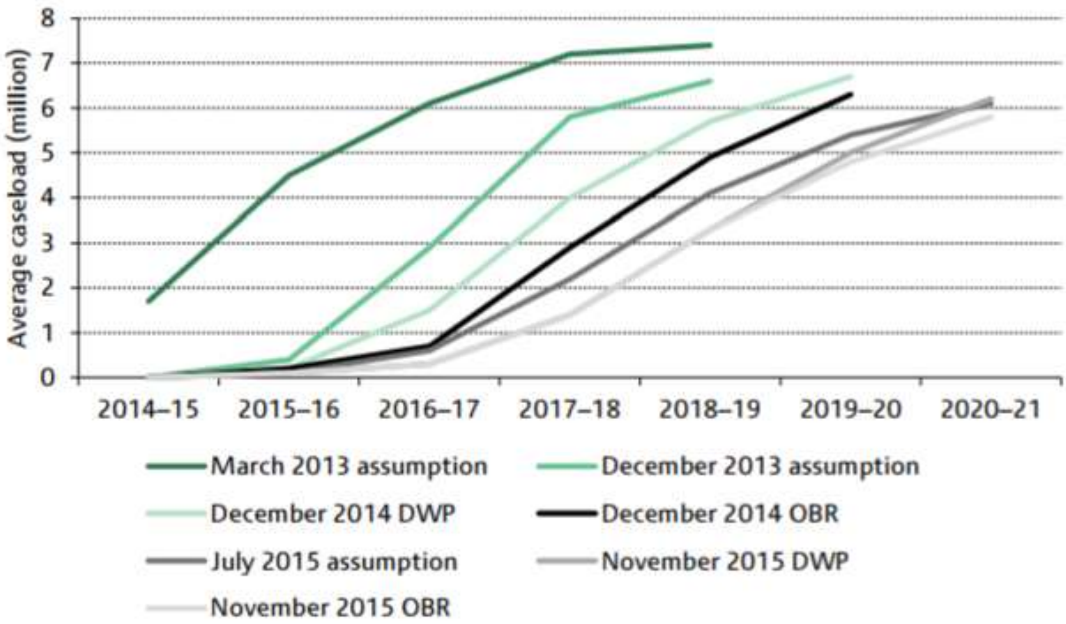

Figure: Changing assumptions about the Universal Credit implementation schedule from the Department for Work and Pensions and the Office for Budget Responsibility[61]

Due to the stop-start legislative process, Regulations establishing Universal Credit in Northern Ireland were only made in May 2016,[62] more than three years after the equivalent in Great Britain.[63] Implementation in Northern Ireland did not begin until September 2017, around the time it was initially envisaged that roll-out would be completed in Great Britain.[64] In the event, the repeated delays in Great Britain have led to the Department for Communities revising its schedule since then. DfC presents its approach of following behind DWP as advantageous as it enables "Northern Ireland to take advantage of lessons learned from the experiences of the Department for Work and Pensions."[65] Most recently, this has been reflected in the decision to postpone commencement of

[59] Comptroller and Auditor General, *Rolling out Universal Credit* (HC1123, London: National Audit Office, 2018); Northern Ireland Audit Office, *Welfare reforms in Northern Ireland* (Belfast: NIAO, 2019)

[60] J Browne, A Hood and R Joyce, 'The (changing) effects of Universal Credit' in C Emmerson, P Johnson and R Joyce, *IFS Green Budget 2016* (London: Institute for Fiscal Studies, 2016)

[61] J Browne, A Hood and R Joyce, 'The (changing) effects of Universal Credit' in C Emmerson, P Johnson and R Joyce, *IFS Green Budget 2016* (London: Institute for Fiscal Studies, 2016) 242

[62] Universal Credit Regulations (Northern Ireland) no 216

[63] Universal Credit Regulations 2016 no 376

[64] Northern Ireland Audit Office, *Welfare reforms in Northern Ireland* (Belfast: NIAO, 2019)

[65] Northern Ireland Audit Office, *Welfare reforms in Northern Ireland* (Belfast: NIAO, 2019) 4

the managed migration of continuing claimants of legacy benefits onto Universal Credit from the planned start date of July 2019 to sometime in 2020. This will enable DfC to await the outcome and conclusions of the DWP pilot migration exercise planned for 2019.[66]

Rollout of Universal Credit to new claimants and those with a relevant change of circumstances took place on an area-by-area basis between September 2017 and the end of 2018, with Belfast adopting the new benefit between June and November 2018.[67] 35,000 people were receiving Universal credit by January 2019.[68] Up to 300,000 continuing claimants were expected to undergo managed migration as the legacy benefits are retired, although delays in the commencement date may reduce this figure somewhat as more people can be expected to move to Universal Credit due to a change of circumstances or cease claiming benefits as time passes.[69]

The introduction of Universal Credit in itself creates a mixture of 'winners' and 'losers' in terms of overall benefit entitlement. Discounting transitional protection and any Northern Ireland mitigation payments, 2016 estimates suggest that 114,000 households will experience an increase in entitlement (average £26 per week), 126,000 will experience reduced entitlement (average £39 per week), with 72,000 households unchanged.[70] The direct impact of Universal Credit, though, is only half the story. The falling value of key benefits, two-child limit to support, household benefit cap, reduction of the local housing allowance, penalisation of under-occupation by social tenants and loss of the additional payment to ESA support group/UC with limited capability for work claimants affect Universal Credit and the legacy benefits alike. Benefits left *outside* Universal Credit and devolved to local government in England have been particularly vulnerable to reduction.[71]

Summary

The differences between how people in Northern Ireland and people in Great Britain will experience Universal Credit – set out in more detail in the next section – will be limited, and in many cases time-limited. Nonetheless, the significance of even small departures from parity should not be underestimated, given how closely aligned the two social security systems have traditionally been. This divergence has occurred in response to ideological opposition to UK Government-led austerity measures, questions about the impact of certain reforms on claimants' human rights and, above all, concerns that the negative effects of reform would be disproportionately felt in Northern Ireland. It is unlikely that many claimants will be in a position to discuss human rights issues or to generalise about the impact of reform on Northern Ireland. Still, there is an opportunity for future research to consider whether individual claimants' experiences might point towards human rights concerns or exemplify some of the ways in which the effects of reform are more keenly felt in Northern Ireland than in Great Britain.

Mitigating the impact of welfare reform

From legislative deadlock to a 'Fresh Start'

Although the Welfare Reform Bill failed to complete its passage through the Assembly, the two committee reports and amendments adopted along the way reflected a shared view among the

[66] Letter from Colum Boyle to Universal Credit stakeholders (8 January 2019)
[67] Department for Communities, 'Update on Universal Credit rollout schedule' (DfC news release, 2 February 2018) <https://www.communities-ni.gov.uk/news/update-universal-credit-rollout-schedule>
[68] Law Centre NI, 'Law Centre (NI) social security bulletin (no 17)' (Law Centre NI, 1 February 2019)
[69] Northern Ireland Audit Office, *Welfare reforms in Northern Ireland* (Belfast: NIAO, 2019)
[70] Department for Communities, *Northern Ireland Universal Credit information booklet* (Belfast: DfC, 2016)
[71] J Meers, 'Discretion as blame avoidance: passing the buck to local authorities in "welfare reform"' (2019) 27(1) Journal of Poverty and Social Justice 41

regional parties that measures were necessary to shield citizens in Northern Ireland from some of the perceived negative effects of the changes made. The Fresh Start agreement ring-fenced £585 million from the devolved budget for a four-year programme of mitigations, protecting certain claimant groups from financial loss, usually for a fixed period. The agreement also promises an unspecified increase in funding for independent welfare advice services. In addition, divergence from Great Britain in Universal Credit payment patterns is a longer standing commitment.

Table: Budgetary allocation to welfare reform mitigations in Northern Ireland[72]

Year		2016-17	2017-18	2018-19	2019-20
Fresh Start Agreement	Agreed amount	£135m	£150m	£150m	£150m
	Welfare	£75m	£75m	£75m	£75m
	Tax credits	£60m	£60m	£60m	£60m
Mitigations Working Group	Welfare	£46m	£89m	£93m	£84m
	Tax credits	£14m	£53m	£49m	£49m
	Administration	£5m	£7m	£7m	£7m
Actual spend		£20m	£58m	n/a	n/a

The agreement specified that some of these funds would be used to compensate social housing tenants who would otherwise lose benefit income as result of the social sector size criteria. A working group was then appointed to make recommendations for the best use of the remaining budget; many, although not all, of its proposals are relevant to Universal Credit claimants.[73] Universal Credit claimants in Northern Ireland can benefit from some of a set of supplementary payments, changes to the payment patterns for Universal Credit and differences in the operation of the conditionality regime. The greatest cumulative financial loss to claimants, however, results from below-inflation uprating of working age benefits and tax credits since 2011 and there have been no proposals to make good this loss of income.[74] Hence, while it might be argued that devolution was acting as "a bulwark against austerity policies,"[75] this has only ever been true to a limited extent. In addition, most of the mitigations only apply to reforms introduced under the Welfare Reform (Northern Ireland) Order 2015,[76] equivalent to the Welfare Reform Act 2012; those made by the Welfare Reform and Work (Northern Ireland) Order 2016,[77] reflecting the Welfare Reform and Work Act 2016, are not subject to the current package. The exception is the supplementary payment for mitigation of the household benefit cap, which is paid at the necessary level to negate the effect of the cap at either its original or later, lower level.[78] Finally, the current set of supplementary payments will expire in March 2020 and it is not currently clear what, if any, financial mitigations will operate after this point.

[72] Northern Ireland Office, *A fresh start: the Stormont agreement and implementation plan* (Belfast: NIO, 2015) 22; actual spend figures from Northern Ireland Audit Office, *Welfare reforms in Northern Ireland* (Belfast: NIAO, 2019) – note that the allocation for 2019-20 would subsequently be reduced in that year's Budget.
[73] Welfare Reform Mitigations Working Group, *Welfare Reform Mitigations Working Group report* (Belfast: OFMDFM, 2016)
[74] Northern Ireland Audit Office, *Welfare reforms in Northern Ireland* (Belfast: NIAO, 2019)
[75] C Murphy, NIA deb 18 November 2015 vol 109 no 7 p22
[76] No 2006 (NI 1)
[77] No 999 (NI 1)
[78] Welfare Supplementary Payment (Benefit Cap) Regulations (Northern Ireland) 2016 no 389 reg 2

Supplementary payments

Article 137 of the Welfare Reform (NI) Order 2015 empowers the Department for Communities to make Regulations providing for supplementary payments to "persons who suffer financial disadvantage" as a result of the reforms flowing from that Order and the Welfare Reform and Work (NI) Order 2016. Article 137A specifically provides for the making of Regulations in respect of supplementary payments to claimants affected by the social sector size criteria. In addition, article 137B envisages a cost of work allowance, in the form of annual one-off payments to in-work claimants of Universal Credit or working tax credits during 2017, 2018 and 2019. Due to the absence of a functioning Assembly during this period, no Regulations in respect of a cost of work allowance have been made and the allowance will not now come into existence during the current mitigations period, despite having been allocated 20% of the mitigations budget.[79] The hiatus of the Assembly has also meant Regulations for the extension of most of the supplementary payments to Universal Credit claimants have not been made. However, the Department has decided to make "administrative payments, similar to the Welfare Supplementary Payments for existing benefits, to help those entitled to Universal Credit who incur financial disadvantage as a result of specified welfare changes." [80] Regulations for any supplementary payments that remain relevant will be laid when the Assembly resumes business.

The social sector size criteria was among the higher-profile reforms of the coalition period and the Executive did not wait for a recommendation from the mitigations working group to announce its mitigation.[81] The legislation provides for a supplementary payment to social tenants whose Housing Benefit or Universal Credit housing costs element is reduced because of under-occupancy[82] for any period between January 2017 and March 2020.[83] The supplementary payment is equivalent to the reduction of Housing Benefit or Universal Credit.[84] Eligibility terminates in most cases when the claimant moves to another social rented property but continues to under-occupy by the same number of bedrooms or more and other changes of circumstance can result in loss of eligibility. [85] A total of 121 social tenants forfeited eligibility for the supplementary payment for this reason between April 2017 and March 2018.[86]

The next case in which a supplementary payment may be made is to a claimant with dependent children (or whose partner has dependent children) whose Housing Benefit is reduced as a result of the household benefit cap. An equivalent administrative payment is available to Universal Credit claimants in the same position. The supplementary payment is equal to the reduction of benefit applied as a result of the cap, so in effect the cap does not apply to households with children.[87] To be eligible for the payment, a claimant must have been in uninterrupted receipt of Housing Benefit or

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[79] Northern Ireland Audit Office, *Welfare reforms in Northern Ireland* (Belfast: NIAO, 2019)
[80] Department for Communities, 'Administrative welfare supplementary payments' (Belfast: DfC, undated) <https://www.communities-ni.gov.uk/articles/administrative-welfare-supplementary-payments> accessed 31 January 2019
[81] Northern Ireland Office, *A fresh start: the Stormont agreement and implementation plan* (Belfast: NIO, 2015)
[82] Universal Credit Regulations (Northern Ireland) 2016 no 216 sch 4 para 35; Housing Benefit Regulations (Northern Ireland) 2006 no 405 reg B14(2)
[83] Welfare Reform (Northern Ireland Order) 2015 no 2005 (NI 1) art 137A
[84] Housing Benefit (Welfare Supplementary Payments) Regulations (Northern Ireland) 2017 no 35 reg 3, 5
[85] Housing Benefit (Welfare Supplementary Payments) Regulations (Northern Ireland) 2017 no 35 reg 2, 6
[86] Advice NI, Housing Rights and Law Centre NI, 'Welfare reform: mitigations on a cliff edge' (Belfast: Advice NI, Housing Rights and Law Centre NI, 2018)
[87] Welfare Supplementary Payments Regulations (Northern Ireland) 2016 no 178 reg 4, 4A

Universal Credit from 30 May 2016 until the date on which he or she comes into scope for the cap.[88] This payment continues until 31 March 2020.

The remaining supplementary payments are of more limited duration. An additional payment is available to individuals whose claim for contributory Employment and Support Allowance began before the limiting of eligibility to 365 days in any two financial years.[89] If eligibility for the contributory benefit expires and the claimant moves onto income-based ESA but his or her award is less than the previous contributory award, or an application for income-based JSA is unsuccessful, or no application is made within 56 days, the payment is equivalent to the difference between the previous and current award, including where the current award is zero.[90] Eligibility for the supplementary payment terminates after one year, or on a successful application for contributory ESA, or on 31 March 2020, whichever comes first.[91] The supplementary payment might affect when an individual begins a claim for Universal Credit or the level of his or her award. The disparity between the funds allocated to mitigation schemes and the actual spend on supplementary payments is in part due to fewer people than anticipated experiencing a loss of income due to the time-limiting of ESA.[92]

Various categories of payment to carers may be affected by the transition from Disability Living Allowance to Personal Independence Payment – Carer's Allowance, carer premium within Jobseeker's Allowance, Employment and Support Allowance or Income Support, Income Support for carers and the additional amount for carers in Pension Credit. If the carer has been entitled to one of the relevant payments, but the person cared for moves from DLA to PIP and is not awarded the PIP daily living component at the requisite rate, the payment will be lost. In the case of the carer premium that applies to the benefits to be replaced by Universal Credit, a supplementary payment is equivalent to the premium lost will be awarded, continuing until the person cared for ceases to be entitled to a PIP supplementary payment, a new carer premium is awarded, an appeal is concluded, for one year or until 31 March 2020, whichever is soonest.[93] No payment is made in respect of periods when either the carer or the person cared for is resident in a care home or is a hospital in-patient at public expense.[94]

The final category of supplementary payment is available to claimants of Income Support, Jobseeker's Allowance, Employment and Support Allowance, Working Tax Credit or Pension Credit who lose a disability premium (including severe or enhanced disability premium) as a result of the transition from Disability Living Allowance to Personal Independence Payment. The rules are similar for each benefit. If the claimant is in receipt of the relevant benefit with a disability premium at the point of transition from DLA to PIP, but the claimant or one of the joint-claim couple is not awarded the element of PIP that confers eligibility for the premium, then eligibility for the premium terminates. The supplementary payment is equivalent to the lost disability premium or, where appropriate, the difference between the lower and higher rate severe disability premium. It is payable for one year, until the award of a new disability-related premium, until the termination of

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[88] Welfare Supplementary Payments Regulations (Northern Ireland) 2016 no 178 reg 4 – in the case of Universal Credit, the same principle is applied to the current administrative payment
[89] Welfare Reform (Northern Ireland) Order 2015 no 2006 (NI 1) art 57
[90] Welfare Supplementary Payments Regulations (Northern Ireland) 2016 no 178 reg 7, 8
[91] Welfare Supplementary Payments Regulations (Northern Ireland) 2016 no 178 reg 9, 10
[92] Department for Communities, *Review of welfare mitigations schemes* (Belfast: DfC, 2019)
[93] Welfare Supplementary Payment (Loss of Carer Payments) Regulations (Northern Ireland) 2016 no 253 part 3; reg 20
[94] Welfare Supplementary Payment (Loss of Carer Payments) Regulations (Northern Ireland) 2016 no 253 reg 28, 29

eligibility for the main income replacement benefit (eg Income Support) or until 31 March 2020, whichever is soonest.[95] The supplementary payment will also cease at the conclusion of any appeal against refusal of PIP or the requisite component thereof, or if the claimant's PIP award subsequently changes.[96] PIP-related supplementary payments have also seen an underspend compared to initial projections as fewer migrating DLA claimants than expected have seen their awards decrease (19% compared to a prediction of 33%),with more than expected experiencing an increase, and because migration has taken longer than initially anticipated.[97]

Payment arrangements for Universal Credit

Universal Credit will be subject to further Northern Ireland-specific features, which do not entail any additional payments to claimants but are designed to address some of the other issues identified by the two Assembly committees, notably to assist with budgeting. These departures from administrative practice in Great Britain were announced, along with the mitigation of the social sector size criteria and some measures affecting other benefits, in a letter from the Minister for Social Development to Northern Ireland church leaders, following a period of negotiation between political leaders, civil society and the DWP.[98] The Minister said Universal Credit claimants in Northern Ireland would:

- Receive fortnightly payments by default, with the option of moving to monthly payments (the default option in England and Wales) if they wish;
- Be offered a choice of a single household payment to an individual or joint back account or a split payment for couples making a joint claim;
- Have the housing costs element of the benefit paid directly to their landlord, unless they opt out of this arrangement.[99]
- Receive transitional protection in line with Great Britain, ensuring no cash-terms reduction of benefit when changing to Universal Credit, unless because of a change of circumstances.

Fortnightly payment are justified on the basis of concerns raised by stakeholders that some claimants might have difficulty budgeting between monthly payments, echoed by the Committee for Social Development's report on the Welfare Reform Bill. Direct payment of the housing element to landlords is intended to enhance housing security by reducing the risk of arrears and ensure "social housing provision has a firm financial basis," housing associations having warned that the sustainability of their finances could be threatened if tenants fail to pay rent.[100] The Minister's letter gives no specific reason for facilitating split payments for joint claimants, but the decision was presumably influenced by the ad-hoc committee's warning that a single payment to one member of

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[95] The relevant provisions for income support claimants are at Welfare Supplementary Payment (Loss of Disability-Related Premiums) Regulations (Northern Ireland) 2016 no 254 part 2

[96] Welfare Supplementary Payment (Loss of Disability-Related Premiums) Regulations (Northern Ireland) 2016 no 254 reg 32, 39, 40

[97] Department for Communities, *Review of welfare mitigations schemes* (Belfast: DfC, 2019)

[98] See BBC News, 'Nelson McCausland meeting Lord Freud to discuss NI welfare reform' (BBC News, 16 October 2012) <https://www.bbc.co.uk/news/uk-northern-ireland-19955918>; NICVA, 'Lord Freud meets with sector representatives at NICVA' (NICVA news release, 28 November 2012) <http://www.nicva.org/article/lord-freud-meets-sector-representatives-nicva>

[99] Letter from Mervyn Storey MLA to NI church leaders (20 October 2014) <https://webarchive.nationalarchives.gov.uk/20141203165711/http:/www.dsdni.gov.uk/church-leaders-group-oct14.pdf> accessed 31 January 2019

[100] Chartered Institute of Housing Northern Ireland, *Impact of welfare changes on rented housing in Northern Ireland* (Belfast: CIHNI, 2017)

the couple – likely to be the male partner – could have "adverse impacts on women and children."[101] This reflects wider warnings that the single household payment could increase vulnerability to domestic abuse. [102] By the end of 2018 it was understood that no split payments of universal credit were actually being made in Northern Ireland,[103] although it was reported a few months later that two joint-claim couples *were* exercising the option.[104] No specific measures exist to lessen the impact of the five-week wait for a first universal credit payment following a successful application (with 21% of claimants in Great Britain having to wait longer still for payment in full), leading to reports of growing demand for crisis services.[105]

The appointment of Amber Rudd as Secretary of State in November 2018 was followed swiftly by the announcement of a further round of tinkering with Universal Credit. Several of the changes announced – in the absence of full detail of how they would be implemented – look likely to bring aspects of the administration of Universal Credit in England and Wales into line with Scotland and somewhat closer to practice in Northern Ireland. While noting that increased payment frequency and direct payment of the housing costs element to landlords are already available in certain circumstances in England and Wales, the Secretary of State expressed an aspiration to increase take-up of these options, including by allowing private landlords to request direct payment. There was also a commitment to promote "women's economic empowerment" by addressing ways in which "the current structure of household payments penalises women." This would involve unspecified changes to make it more likely that in joint-claim couples the payment is received by the main carer as well as greater flexibility as to how and when childcare costs are paid.[106]

Claimant activation

In principle, Universal Credit claimants in Northern Ireland are subject to the same set of behavioural conditions as their counterparts in Great Britain. As noted above, Universal Credit is intended to act as a system of "welfare that works,"[107] in the sense that its operation is geared towards moving claimants into paid employment and enabling them to progress in employment, through a combination of the removal of barriers, incentivisation and coercion. The same claimant groups exist and are subject to the same kind of conditions. The only significant legislative difference is the limitation of the maximum sanction period (for repeated higher level failures) to 546 days. The DWP

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[101] Ad-hoc Committee, *Report on whether the Provisions of the Welfare Reform Bill are in conformity with the requirements for equality and observance of human rights* (NIA 92/11-15, Belfast: Northern Ireland Assembly, 2013) 4

[102] Women's Aid Federation Northern Ireland, 'Submission to the Ad Hoc Committee on Conformity with Equality Requirements relating to the Welfare Reform Bill', Ad-hoc Committee, *Report on whether the Provisions of the Welfare Reform Bill are in conformity with the requirements for equality and observance of human rights* (NIA 92/11-15, Belfast: Northern Ireland Assembly, 2013); M Howard, *Universal Credit and financial abuse: exploring the links* (London: Women's Budget Group, 2018); S Ditum, 'Why universal credit is a feminist issue' (New Statesman, 27 October 2017) 17

[103] Advice NI, Housing Rights and Law Centre NI, 'Welfare reform: mitigations on a cliff edge' (Belfast: Advice NI, Housing Rights and Law Centre NI, 2018)

[104] Law Centre Northern Ireland, 'Law Centre NI social security bulletin no. 21 – join the #CLIFFEDGENI COALITION' (Belfast: Law Centre NI, 2019)

[105] Comptroller and Auditor General, *Rolling out Universal Credit* (HC1123, London: National Audit Office, 2018); C Drake, *Universal Credit and debt* (Citizens Advice, 2017)

[106] A Rudd, 'Universal Credit: personal welfare' (speech at Kennington Jobcentre, January 2019) <https://www.gov.uk/government/speeches/universal-credit-personal-welfare>

[107] Department for Work and Pensions, *Universal Credit: welfare that works* (Cm 7957, London: DWP, 2010)

and DfC decision maker guides for Jobseeker's Allowance and Universal Credit sanctions are also the same in substance.[108]

In practice, conditionality has tended to operate differently for claimants in Northern Ireland, even if there has been convergence towards a similar contracted-out, payment-by-results model for activation schemes.[109] A snapshot shows that whereas in the calendar year 2014 the number of Jobseeker's Allowance sanctions in England and Wales was equivalent to 31% of the average quarterly claimant count, in the financial year 2013-14 the sanctioning rate in Northern Ireland was equivalent to 13% of the quarterly claimant count in early 2014. The gap is even wider when higher level sanctions are considered in isolation.[110] The comparison is not perfect as statistics on sanctioning have not been routinely published in Northern Ireland and the information used here was released in response to an Assembly question. This will now change due to the new duty placed on the Department to report regularly on the operation of sanctions, including the number imposed, duration and reason.[111] Other analyses have suggested that between 2012-13 and 2014-15, the sanctioning rate in Great Britain had "gone from around three times higher than Northern Ireland to around five times higher."[112] Policymakers in Northern Ireland have suggested that this reflects an organisational culture within the Northern Ireland Social Security Agency that is less suspicious and punitive to claimants than that within DWP.[113]

The mitigations working group recommended the creation of a dedicated helpline to assist sanctioned claimants with appeals or hardship payment applications, and that the claimant should automatically be informed of this service when being informed of the sanction.[114] This function has now been subsumed within the general welfare changes helpline. The Department for Communities has also published a leaflet giving general advice on how to avoid a sanction.[115]

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[108] Department for Work and Pensions, 'Chapter 34: JSA sanctions' in *Decision maker guide vol 6* (London: DWP, 2013/last update 2019); Department for Communities, 'Chapter 34 – Jobseeker's Allowance sanctions' in *Decision makers guide – vol 6* (Belfast: DfC, 2018); Department for Work and Pensions, 'Chapter K1: sanctions: general principles' in *Advice for decision making: staff guide* (London: DWP, 2013/last update 2019); Department for Communities, 'Chapter K1 – sanctions – general principles' in *Advice for decision making* (Belfast: DfC, 2019)
[109] Department for Employment and Learning, 'Minister announces new employment programme Steps 2 Success (NI)' (DEL news release, 18 June 2013) <http://www.northernireland.gov.uk/news-del-180613-minister-announces-new> accessed 28 October 2015
[110] Author's calculation based on figures from: Department for Work and Pensions, 'Jobseeker's Allowance and Employment and Support Allowance sanctions statistics' (London: DWP, 2015) <https://www.gov.uk/government/collections/jobseekers-allowance-sanctions> accessed 28 October 2015; Office for National Statistics, 'Regional labour market, May 2015' (Newport: ONS, 2015) <http://www.ons.gov.uk/ons/rel/subnational-labour/regional-labour-market-statistics/may-2015/stb-regional-labour-market-may-2015.html> accessed 28 October 2015; Minister for Social Development, AQW 46136/11-15, 2 June 2015; Minister for Social Development, AQW 46169/11-15, 9 June 2015
[111] Welfare Reform (Northern Ireland) Order 2015 no 2006 (NI 1) art 125
[112] A Tinson, 'Welfare sanctions in NI: the facts' (Scope NI, 1 April 2016) <https://scopeni.nicva.org/article/welfare-sanctions-in-ni-the-facts>
[113] M Simpson, 'Renegotiating social citizenship in the age of devolution' (2017) 44(4) Journal of Law and Society 646
[114] Welfare Reform Mitigations Working Group, *Welfare Reform Mitigations Working Group report* (Belfast: OFMDFM, 2016)
[115] Department for Communities, 'Jobseeker's Allowance sanction information' (Belfast: Northern Ireland Executive, 2018)

Mitigations after 2020

The Fresh Start agreement provides for funding for a package of welfare reform mitigations until March 2020. As outlined above, various supplementary payments flowing from the introduction of Personal Independence Payment or reform of contributory Employment and Support Allowance are only payable for a maximum period of one year after the relevant financial loss takes effect. It is likely that these payments will no longer be relevant after 2020, even if there is an ongoing loss of income on the part of the affected individuals. For example, the number of people likely to be in scope for the ESA supplementary payment by March 2020 is so small that DfC has been unable to carry out a full statistical analysis of the impact of its withdrawal.[116] Payments to claimants affected by the benefit cap or social sector size criteria are made on an ongoing basis and there is an urgent need to consider what will happen to these mitigations after 2020. Differences of practice other than supplementary payments – the shorter maximum sanctioning period and the payment arrangements for Universal Credit – can be expected to continue.

Supplementary payments to claimants affected by the social sector size criteria represent the most significant mitigation in terms of expenditure, at more than £22 million per year (on average, £12.50 per claimant per week).[117] Assembly debate on the legislative consent motion that paved the way for the Northern Ireland (Welfare Reform) Act 2015 was marked by sometimes-bitter disputes about whether motion would effectively result in the introduction of the 'bedroom tax' to Northern Ireland.[118] Even setting aside the small number of claimants whose benefit has been reduced due to under-occupancy after moving house, it is clear that the social sector size criteria *will* apply in Northern Ireland after March 2020 in the absence of legislation to prolong the mitigation. Anecdotal evidence from housing associations suggests many tenants seeking to move house during the mitigation period did not know that the supplementary payment could be lost as a result,[119] and it seems fair to assume that some will be unaware of the possible ending of the payments in 2020; some may be entirely unaware of the size criteria.[120] In July 2018, some 32,777 social tenants were receiving supplementary payments. Given the extent of under-occupancy in Northern Ireland and the fact that 45% of the social housing waiting list consists of single people, while only 18% of the stock consists of one-bedroom properties, it is likely that large numbers of people would be affected by the ending of the mitigation.[121] The small number of claimants who had lost supplementary payments by June 2018 saw their average rent arrears increase from £46 prior to the end of the supplementary payment to £174 by November 2018. Outright withdrawal of the mitigation is projected to result in a collective loss of benefit of £21 million per year; the resulting increase in arrears is likely to be less, but still significant. [122]

[116] Department for Communities, *Review of welfare mitigations schemes* (Belfast: DfC, 2019)
[117] Advice NI, Housing Rights and Law Centre NI, 'Welfare reform: mitigations on a cliff edge' (Belfast: Advice NI, Housing Rights and Law Centre NI, 2018); Department for Communities, *Review of welfare mitigations schemes* (Belfast: DfC, 2019)
[118] NIA deb 18 November 2015 vol 109 no 7 p19-69
[119] Chartered Institute of Housing Northern Ireland, *Impact of welfare changes on rented housing in Northern Ireland* (Belfast: CIHNI, 2017)
[120] Northern Ireland Housing Executive Research Unit, *Welfare reform in Northern Ireland: a scoping report* (Belfast: NIHE, 2018); Northern Ireland Housing Executive Research Unit, *Tenant perceptions, awareness and experience of welfare reform* (Belfast: NIHE, 2018)
[121] Advice NI, Housing Rights and Law Centre NI, 'Welfare reform: mitigations on a cliff edge' (Belfast: Advice NI, Housing Rights and Law Centre NI, 2018)
[122] Northern Ireland Housing Executive Research Unit, *Welfare reform in Northern Ireland: a scoping report* (Belfast: NIHE, 2018)

The household benefit cap is one of the less costly mitigations, with just under £4 million spent in 2017-18,[123] but like the social sector size criteria the associated supplementary payment is available on an ongoing basis throughout the mitigation period, not for a fixed period per claimant. The general enabling provision in the primary legislation sets no cut-off date for supplementary payments made under it,[124] but the Regulations provide that payments end in March 2020.[125] In July 2018, 1,580 households were receiving supplementary payments, £48 per week on average but with eight per cent of capped claimants receiving £100 per week or more. 84% of capped claimants are lone parents, with all of the remainder couples with children.[126] The Department for Communities has suggested that termination of the supplementary payment could be compensated for through the Discretionary Housing Payments scheme, as the underspend against the DHP budget in 2017-18 was roughly in line with spending on the benefit cap supplementary payment.[127]

The provision of the 2015 Order that empowers the department to make supplementary payments is not subject to any time limit, nor does it limit supplementary payments to the mitigation of financial losses flowing from that Order – the reforms in the 2016 Order also fall within its scope.[128] Consequently, there is potential for the current supplementary payments to be extended, or for new mitigations to be introduced. The main advice sector organisations in Northern Ireland have called for the retention of "a number of the current mitigations" – these are not identified, but are likely to include the social sector size criteria and household benefit cap – and suggested mitigations additional to those currently in place. These include:

- A one-off, non-recoverable payment to support new Universal Credit claimants through the five-week period before a first payment is received.
- A supplementary payment to mitigate the non-availability of transitional protection to legacy benefit claimants who are required to claim Universal Credit due to a change of circumstances (natural migration).
- Funding for unspecified services to address the needs of low income tenants affected by various aspects of welfare reform.
- A supplementary payment to mitigate the effect of the two child limit on Universal Credit and Child Tax Credits, so that each additional child brings the same top-up to income.
- A supplementary payment to mitigate the loss of a disabled child premium as the result of the transition from Disability Living Allowance to Personal Independence Payment.
- Discretionary support to be paid as a grant, not a loan, to households including a child or disabled person.
- No additional conditionality for lone parents of children under five years old.
- No sanctions applied to households including a child or disabled person.
- Increased funding for advice services, including specialist housing advice, tribunal representation and co-location of services.

Whether, and how, such a package could be put in place in the current context is uncertain. The Northern Ireland Assembly was dissolved for an election on 24 January 2017. It met again on 13

[123] Advice NI, Housing Rights and Law Centre NI, 'Welfare reform: mitigations on a cliff edge' (Belfast: Advice NI, Housing Rights and Law Centre NI, 2018)
[124] Welfare Reform (Northern Ireland) Order 2015 no 2006 (NI 1) art 137
[125] Welfare Supplementary Payment Regulations (Northern Ireland) 2016 no 178 reg 4(6)
[126] Advice NI, Housing Rights and Law Centre NI, 'Welfare reform: mitigations on a cliff edge' (Belfast: Advice NI, Housing Rights and Law Centre NI, 2018)
[127] Department for Communities, *Review of welfare mitigations schemes* (Belfast: DfC, 2019)
[128] Welfare Reform (Northern Ireland) Order 2015 no 2006 (NI 1) art 137

March 2017, when the sole item of business was the signing of the roll of membership and has not met since, although at the time of writing a new round of political negotiations to explore the prospects for restoration was getting underway.[129] Regulations providing for payments to persons who suffer financial disadvantage require affirmative resolution by the Assembly.[130] As noted above, the Assembly gave its approval to Regulations putting in place various supplementary payments but did not do so for those payable to Universal Credit claimants, although these have been prepared in draft form.[131] This has not prevented such claimants receiving supplementary payments. Legally speaking, it might be possible to question whether making these administrative payments is within the powers conferred on Department for Communities by the legislation. However, the Fresh Start agreement provided a strong political mandate and the necessary funds to put the recommendations of the Mitigations Working Group into practice. [132] The political intent would have been thwarted had the gradually increasing number of Universal Credit claimants been unable to access supplementary payments equivalent to those available to legacy benefit claimants, with the Regulations in respect of legacy benefits providing the detail of how each payment operates. In the case of the proposed cost of working allowance, the political mandate and budget were present but the legislative detail was absent, and the payment has not been introduced.

No funding was committed to similar measures beyond March 2020 and it is not apparent that a comparable political commitment was made. Advice sector organisations have argued that the political intent of *A fresh start* was that application of the social sector size criteria should be deferred indefinitely, except where the legislative exception applies, and that the underspend up to the present could be treated as surplus funds to be spent on further mitigations.[133] This might conceivably form a basis for the continuation of certain of the current supplementary payments, but not for any of the additional forms of assistance the advice providers advocate. Legislation empowers senior officers of the Northern Ireland departments to exercise Ministerial functions in the absence of a Minister until August 2019.[134] However, given that Regulations under art 137 of the 2015 Order require approval by the to take effect, it seems unlikely that this would provide a basis for the creation of additional supplementary payments. The prospect of the UK Parliament legislating for additional support for citizens in Northern Ireland that is not available to those elsewhere in the UK appears equally remote. Further, the surplus of £136 million in the mitigations budget for 2016-17 and 2017-18 was reallocated to other services and the Secretary of State has reduced the allocation for supplementary payments in the 2019-20 Budget by £29 million.[135] A

[129] T May and L Varadkar, 'Statement by PM Theresa May and Taoiseach Leo Varadkar' (Prime Minister's Office, 26 April 2019) <https://www.gov.uk/government/news/statement-by-pm-theresa-may-and-taoiseach-leo-varadkar-26-april-2019>; K Bradley, 'Secretary of State for Northern Ireland statement on political talks' (Northern Ireland Office, 26 April 2019) <https://www.gov.uk/government/news/secretary-of-state-for-northern-ireland-statement-on-political-talks>
[130] Welfare Reform (Northern Ireland) Order 2015 no 2006 (NI 1) art 137(5)
[131] Department for Communities, *Review of welfare mitigations schemes* (Belfast: DfC, 2019)
[132] Northern Ireland Office, *A fresh start: the Stormont agreement and implementation plan* (Belfast: NIO, 2015); Northern Ireland Executive, *Budget 2016-17* (Belfast: Northern Ireland Executive, 2016)
[133] Advice NI, Housing Rights and Law Centre NI, 'Welfare reform: mitigations on a cliff edge' (Belfast: Advice NI, Housing Rights and Law Centre NI, 2018)
[134] Northern Ireland (Executive Formation and Exercise of Functions) Act 2019 c28 s1-3; Northern Ireland (Extension of Period for Executive Formation) Regulations 2019 no 616
[135] Department for Communities, *Review of welfare mitigations schemes* (Belfast: DfC, 2019); Department of Finance, 'Northern Ireland Budget 2019-20: explanatory notes and tables' (Belfast: Department of Finance, 2019) <https://www.finance-ni.gov.uk/publications/northern-ireland-budget-2019-20>

functioning Assembly is therefore likely to be a precondition to the development of a reprofiled mitigations package, as the Department acknowledges:

> "The Department will not be able to make amendments to the existing mitigations legislation as it is subject to Affirmative Resolution (i.e. must be approved by the Assembly)… In the absence of a functioning Assembly it is considered that the only viable option for providing the legal authority for the Department to make mitigation payments beyond 2020 would be for the Westminster Parliament to bring forward appropriate legislation." [136]

The report goes on to state that the UK Parliament could *not* in fact legislate for social security in Northern Ireland in the absence of a further legislative consent motion from the Assembly, but this is not strictly true. As the sovereign legislature, it is within the competence of Parliament to legislate in any area of policy, anywhere in the UK, although by convention it normally does not legislate on devolved matters in the absence of legislative consent from the affected region.

Summary

Northern Ireland is not alone in seeking to shield citizens from some of the perceived negative effects of 'welfare reform', but thanks to the extent of its devolved social security powers it has been able to put in place the most ambitious set of mitigating measures for universal credit claimants. While Scotland has introduced comparable flexibilities around payment arrangements and made additional payments to negate the effect of the social sector size criteria, the other supplementary payments are unique to Northern Ireland. Since these payments are generally made automatically, it is possible that not all beneficiaries will realise they are receiving a top-up to their benefit. This means that research with universal credit claimants will have to carefully consider participants' circumstances to determine whether they are likely to be in receipt of a supplementary payment. How much claimants feel they benefit from the various mitigation measures and the likely impact of the future withdrawal of supplementary payments are among the most important questions to be answered about universal credit in Northern Ireland.

Universal credit in Northern Ireland: the research evidence to date

The main published research on Universal Credit in Northern Ireland to date is the initial study conducted by the Department for Communities in line with its obligation to report regularly on the impact of welfare reform in Northern Ireland. This examined awareness of various reforms among people affected (or, in the case of Universal Credit, likely to be affected) by them. It found that 77% of claimants of benefits scheduled to be replaced by Universal Credit knew of the new benefit, although only 10% knew "a great deal" or "a fair amount."[137] Awareness of other changes likely to affect Universal Credit claimants (the benefit cap and social sector size criteria) was higher, while only 34% of applicants for discretionary assistance knew of the change from the Social Fund to the new system of discretionary support payments. The 'pre-Universal Credit' claimant group was not asked to comment on communications received as implementation had not reached this stage, but across the board there were significant levels of dissatisfaction with the clarity, adequacy and timeliness of information provided about reforms – particularly among those in scope for the benefit cap.

[136] Department for Communities, *Review of welfare mitigations schemes* (Belfast: DfC, 2019)45
[137] Analytical Services Unit, *Welfare reform (NI) claimant baseline surveys* (Belfast: DfC/NISRA, 2019) 30

that this figure will decrease. Given the reported difficulties of engagement with a fully digital application and compliance process, [144] the fear must be that it could increase. 31% of 'pre-Universal Credit' respondents in the DfC survey used the internet no more than once a month and only a third said they had previously managed a benefit claim or looked for jobs online, or would be interested in doing so.[145]

In the DfC survey, 78% of prospective Universal Credit claimants agreed with the statement "I would be better off in work or working additional hours." However, this finding says nothing about whether the introduction of Universal Credit has increased perceptions that people would be better off in employment, which would be the case for most out-of-work claimants regardless. 30% of respondents in scope for the benefit cap did feel that its introduction had increased their motivation to enter employment.[146] Even under the legacy system, most claimants felt they knew what conditions they had to meet to retain their entitlement and were well supported in their jobseeking. However the significant minorities who disagreed should not be ignored – particularly the 10% who felt they had *not* received a clear explanation of their benefit conditions, potentially putting them at risk of a sanction.[147] Ultimately, it may be inferred that supply was the biggest obstacle between claimants and a return to paid work: 52% disagreed with the statement that "there are a sufficient variety of jobs that I can apply for."[148] This is in keeping with the findings of previous research with policymakers[149] and highlights that changes to the conditionality regime and deduction rates can only ever have a limited impact on labour market engagement in the absence of sufficient suitable opportunities.

Summary

As this section demonstrates, the research evidence base on Universal Credit in Northern Ireland is limited to date, and largely based on projections of financial impact and survey research with actual or prospective claimants. There is a need for qualitative research that allows for an in-depth exploration of claimants' experiences of Universal Credit, including the Northern Ireland-specific mitigations, to help answer the questions highlighted throughout this report.

Conclusion and next steps

The implementation of Universal Credit in Northern Ireland remains at a relatively early stage, although sufficient numbers of claimants are now receiving the new benefit to make this an opportune time for a study of its impact. Thus far, little research evidence exists of the impact of Universal Credit on claimants in Northern Ireland: something which this research project will, at least partly, address. Like most aspects of the devolved social security system, Universal Credit represents a policy inherited from Great Britain rather than devised to meet the specific needs of Northern Ireland. Nonetheless, it is clear that a significant part of the policy community shares DWP's aspirations for the benefit, that it should deliver a simplified system of working age social assistance,

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[144] C Easton, 'Welfare that works? The Universal Credit information technology system and disabled people' (2014) 20(3) Web Journal of Current Legal Issues <http://webjcli.org/article/view/354/467>; G McKeever, M Simpson and C Fitzpatrick, *Destitution and paths to justice* (London: Legal Education Foundation/York: Joseph Rowntree Foundation, 2018)

[145] Analytical Services Unit, *Welfare reform (NI) claimant baseline surveys* (Belfast: DfC/NISRA, 2019) 28

[146] Analytical Services Unit, *Welfare reform (NI) claimant baseline surveys* (Belfast: DfC/NISRA, 2019) 10

[147] See M Oakley, *Independent review of the operation of Jobseeker's Allowance sanctions validated by the Jobseekers Act 2013* (London: DWP, 2014)

[148] Analytical Services Unit, *Welfare reform (NI) claimant baseline surveys* (Belfast: DfC/NISRA, 2019) 27

[149] M Simpson, 'Renegotiation social citizenship in the age of devolution' (2017) 44(4) Journal of Law and Society 646

under which claimants have fewer barriers and greater financial incentives to enter and progress in paid employment. At the same time, there has been some ideological opposition to UK governments' austerity agenda, of which the 'welfare reform' project is one strand, and more widespread concerns that certain features of Universal Credit – notably the social sector size criteria – are ill suited to the specific circumstances of Northern Ireland. Consequently, although Universal Credit shares the same objectives and largely works the same way on both sides of the North Channel, there are some difference, albeit that these are limited, in some cases temporary and potentially becoming less stark given recent announcements from DWP.

This investigation, then, has three main tasks. First and foremost, to explore, in a participatory way, claimant perspectives on the experience of receiving Universal Credit. This will include an assessment of whether UC is succeeding in its own terms by incentivising and supporting jobseeking behaviour and ultimately transition to and progression in paid employment, as well as the effects of the Northern Ireland-specific payment patterns and supplementary payments. The experience of transitioning to universal credit (whether from paid work or from another benefit) will also be of interest given the concerns identified elsewhere about the digital application process, subsequent wait for an initial payment and extent of administrative errors when processing claims in Great Britain.[150] Equally importantly, the project will evaluate UC from the claimant perspective. This includes whether UC enables claimants to obtain what they consider to be an acceptable standard of living, is appropriately administered and supports them to achieve their own goals. These might include aspirations to participate in work in its different forms, including paid work, volunteering, parenting and care work. Second, to draw on this knowledge base to develop recommendations for the future evolution of Universal Credit in Northern Ireland, including but not limited to a package of mitigation measures beyond the expiry of the current supplementary payments in 2020. Third, to identify lessons for governments in Great Britain based on the claimant experience in Northern Ireland and (in particular) the Northern Ireland-specific aspects of its operation. In keeping with the participatory ethos of the project, this will be led by the claimant-participants themselves across a series of research workshops and stakeholder engagement activities, with support from the research team and voluntary sector partners.

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[150] Child Poverty Action Group, 'CPAG's early warning system – report on Universal Credit top issues' (London: CPAG, 2018); C Drake, *Universal Credit and debt* (Citizens Advice, 2017); Comptroller and Auditor General, *Rolling out Universal Credit* (HC1123, London: National Audit Office, 2018)