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## ‘What size is the room?’: using the law to resist the UK’s bedroom tax

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### INTRODUCING THE BEDROOM TAX

Since 2008, the United Kingdom (UK) has been largely governed under principles of austerity, a now-normative condition first established in the aftermath of the global financial crash. Central to the austerity regime has been the decimation of welfare, including legislation that has penalised people in receipt of benefits in a range of ways, including through their homes. This chapter explores the role of the law in both curtailing people’s rights to home, and providing grounds for resistance. I argue that the domestic is not solely a site constrained by legal frameworks, but also a space through which resistance can be enacted. And whilst these acts might not in all cases look like popular imaginings of resistance – for example, large-scale public protests and other forms of direct action – they are nonetheless fundamental in eroding the influence of austerity. More than this, in the case of the bedroom tax, these piece-meal forms of resistance have to date been the most successful in enabling people to reclaim their legal rights to home. This chapter examines the ways in which social tenants and empathetic stakeholders have utilised spaces of law to resist the imposition of the UK’s ‘bedroom tax’, and is based on research I conducted in 2014–17 exploring the impact of the policy. Methods consisted of (anonymised) interviews with affected social tenants, housing associations, charities and related stakeholders, and observation of online support groups.

The bedroom tax (officially the ‘removal of the spare room

subsidy’) is one of a suite of measures introduced by former Prime Minister David Cameron’s Conservative–Liberal Democrat Coalition government in the 2012 Welfare Reform Act, the crowning jewel of austerity politics. It constituted a drastic overhaul of the British welfare system, and included measures such as stringent Work Capability Assessments for those in receipt of Employment Support Allowance,<sup>1</sup> and mandatory contributions to council tax regardless of household income (Nowicki 2018). The bedroom tax comprised the core housing element of the Act, signalling a significant shift in welfare governance and reconstituting definitions of value and space in the social housing context. The policy affects social tenants in receipt of housing benefit,<sup>2</sup> reducing the amount of rent eligible for housing benefit for those deemed to have one or more ‘spare bedroom’. The rules allow one bedroom for a single adult (over 16) or adult couple, and one bedroom per two children (one room per child is permissible if they are different sexes and over the age of ten).<sup>3</sup>

An initial impact assessment in 2013 by the Department for Work and Pensions estimated that around 660 000 working-age social tenants would be affected by the policy; this has since risen by 50 000 (Department for Work and Pensions 2012; Jayanetti 2021a). The government framed the decision to implement the bedroom tax as one based around fairness and tenure equality, stating that the policy was introduced in order to bring social rents ‘in line with the private rented sector’ (Department for Work and Pensions 2014). The ‘removal of the spare room subsidy’ tapped into a growing rhetoric regarding social housing tenants as taking up valuable space that they do not need, at a cost to the taxpayer. This further entrenched narratives of people in receipt of state support as ‘scroungers’: lazy non-contributors to society (Tyler 2013). The bedroom tax’s introduction was the product of a long lineage of discrediting those in receipt of welfare that stretches back to the 1970s, and gained particular traction during Margaret Thatcher’s premiership (1979–90). The shift from Keynesian to neoliberal ideology during this period augmented social housing from being a product of post-World War II egalitarianism, to a dysfunctional system that enabled people to ‘get away with’ having low housing costs. This rhetoric became especially pertinent in areas of the country where housing costs are high, such as inner London (Hamnett 2012). This already present

sentiment was exacerbated all the more in the wake of the 2008 financial crash and resulting recession, where scapegoating the working class became a common method of distracting people from the real reasons behind their own increasing precarity; namely, cuts to crucial welfare services, cuts to wages and growing costs of living in real terms (Nowicki 2018; McKenzie 2015).

However, arguably the public mood regarding social housing at the time was somewhat misread in regard to the ‘removal of the spare room subsidy’. Shortly after it was announced, the policy’s official title became largely obscured, and it is now widely known as the ‘bedroom tax’. This was much to David Cameron’s consternation, who stated: ‘I don’t accept the bedroom tax is a tax – it’s an issue about benefit’ (Brown 2013a). The Labour Party’s Lord Best, who is often attributed with coining the term, defended the policy’s unofficial renaming, arguing that ‘if you have to pay a sum of money and you can’t escape from doing so, and that sum of money goes to the government – it looks to me all very much like having a tax’ (Brown 2013b). The policy’s popular renaming helped to cement negative public feeling towards it in a way that other measures introduced in the Welfare Act had not. The use of the word ‘bedroom’ conjures up imagery of an aspect of home most associated with intimacy and the private. The bedroom connotes many intensely personal activities in human life: the bedroom is where we sleep, where we have sex, where we retreat in order to be alone, where we ready ourselves for the day, where we recover when we are unwell. The term ‘bedroom tax’ has also been compared to and evoked memories of the much maligned Conservative taxation of the late 1980s and early 1990s, the ‘poll tax’<sup>4</sup> (Stephenson 2013). The bedroom tax therefore gained traction as a controversial and invasive policy before it had even been implemented and its impact fully realised. This certainly helped to legitimise early acts of resistance, particularly in relation to its legal curtailment of rights to domestic space.

The policy also proved particularly controversial due to its disproportionate impact on disabled people. According to research conducted by Moffatt et al. (2015), around a third of all social tenants affected by the policy are living with a disability. In part for these reasons, the bedroom tax instigated public empathy and

collective action against the policy in a way not seen with other elements of welfare reform. The bedroom tax was framed by those seeking to resist it as the insertion of discriminatory legislation into the home, and as this chapter will attest, it was through these legislative spaces that social tenants and housing associations began to fight back. After outlining growing interest in the legal sphere in geographical scholarship, the remainder of the chapter highlights three instances of legally framed resistance to the bedroom tax: tenants taking the government to court, the establishment of social media legal advice groups, and housing associations and charities taking advantage of legal and policy loopholes. Through these three examples, the chapter concludes by calling for an expansion of what we understand as resistance, where resistance takes place, and who is able to resist.

#### LEGAL GEOGRAPHIES, INTIMATE LIFE AND EMERGENT RESISTANCE

In recent years, legal geography has emerged as growing sub-discipline. Spearheaded by the Canadian geographer Nicholas Blomley, the co-constitution of space and law has become consolidated as a significant area of inquiry within the subject, with the legal and the geographical being more clearly understood as intrinsically connected to one another (Blomley 1994). As David Delaney (2015: 99) notes, ‘in our world, there is nothing in the world of spaces, places, landscapes, and environments that is not affected by the workings of law’. Most recently, the role of law in shaping space, and vice versa, has been explored through a feminist lens by Katherine Brickell and Dana Cuomo, among others. Brickell and Cuomo identify what they term ‘feminist geolegality’ as the intersection between feminist geopolitics and legal geographies (Brickell and Cuomo 2019). They argue for an understanding of the geopolitical and the legal which acknowledges that traditional understandings of geopolitics (warfare, terrorism, and so on) and ‘banal’ intimate violences as inseparable. As Sjoberg and Gentry (2015: 358) highlight, ‘Looking at where women are and where gender is shows that war, terrorism and insecurity are as often in the bedroom as on the battlefield, and as often in the family home as in houses of government’. Extending discussion of the entanglements of law, geopolitics and feminism, Brickell and Cuomo call for further interrogation of the ways in which the legal

becomes inscribed onto bodies, homes, and other so-called everyday spaces. In doing so, they reveal the complexities of the legal arena as a site of control, but also as a means of resistance by which women and other marginalised groups struggle for transformation (Brickell and Cuomo 2019).

This is certainly true of the bedroom tax, the intimacies of which are writ large in its name. The bedroom tax serves as an example of national legislative decision-making about who is deserving of what kind of home. This is particularly pertinent considering that the bedroom tax disproportionately impacts disabled people who are in need of extra space for a wide range of reasons, from storing medical equipment, to having to sleep in separate rooms from partners due to their condition. As scholars in the field of disability geographies have noted, disabled people are commonly figured as tragic characters, ‘failing to meet normal standards of form, mobility and ability’ (Parr and Butler 1999: 3). The disabled body is constructed via a spatial logic that separates people both corporeally and psychologically on the basis of their disability (Imrie and Edwards 2007). This is built into the bedroom tax, which renders the disabled body invisible at the same time as de-valuing it through disproportionately punitive legislation. And yet, in keeping with legal geographers’ understanding of law and space as co-constituted, the law has served as a means of resistance, as well as subjugation, for those impacted by the bedroom tax. As the following sections explore in greater detail, it is the very confines of the legal sphere as a mechanism of separation and categorisation (Brickell and Cuomo 2019) that have been utilised by both social tenants and empathetic housing association employees as a means of challenging the bedroom tax. Such forms of legal resistance can be considered within the remit of what Sarah Hughes refers to as emergent resistance: forms of resistance that do not necessarily fit with pre-determined typologies (Hughes 2020). Tracing resistance in its becoming, Hughes (2020: 1143) argues: ‘prevents a foreclosure of emergent forces into predetermined forms (e.g. of activist, intentional subject, protest, tactic or dispute), and thereby keeps open the category of resistance to other subjects, materials, spaces and temporalities which do not always cohere to an (expected) resistant form’.

The examples in this chapter speak to such emergent resistance through a consideration of the ways in which social tenants and empathetic stakeholders (housing associations, housing and welfare charities) have challenged the bedroom tax, identifying and navigating legal spaces through which to resist its imposition in largely mundane settings not usually equated with resistance movements: online social media groups and housing association offices. The chapter's first case study, of social tenants taking the government to court, is a far more spectacular and perhaps expected form of resistance. However, what remains external to expected resistant forms are the people enacting it: disabled, working-class social tenants, a group of people for whom the court-room is often associated as a punitive, rather than emancipatory, space. In sum, as the remainder of this chapter explores, the relationship between the law, the body and the domestic is not one that is solely constraining and destructive, but also a site through which we might better understand the ways in which varying forms of resistance emerge.

## LEGALLY CHALLENGING THE GOVERNMENT

Challenging the bedroom tax using legal routes has proved to be a prevalent, and at times successful, means of resisting its implementation. In doing so, social tenants affected by the bedroom tax further legitimise their challenge to government by using governance structures themselves as a means of resistance. This use of legal frameworks in resisting the bedroom tax can be found at every level of the national court system. Since its implementation, the policy has been contested in both First-Tier and Upper Tribunals<sup>5</sup> on a wide range of grounds: from discrimination against disabled people, in particular those who need overnight care, specialist equipment storage, or separate rooms from partners; to discrimination against single parents who do not have primary custody of their children; to appeals on the grounds of rooms being too small or of an inappropriate shape to be considered a bedroom. Legal challenges to the bedroom tax have since risen through the courts, taking place in both the Court of Appeal and the Supreme Court, the highest in the UK legal system. Cases such as that of the Carmichaels, widely reported at the time, brought to public attention components of the bedroom tax that discriminate against the specific needs of many disabled people. Jacqueline Carmichael,

who has spina bifida, was subject to the bedroom tax despite having to sleep in a separate room from her husband (who is also her full-time carer) due to her condition. They took their case to court,<sup>6</sup> and at a tribunal hearing in 2014 a judge ruled that the Carmichaels were entitled to two bedrooms, and that the bedroom tax should not have been imposed (Royal Courts of Justice 2014).

Later that year, a group of disabled adults, including the Carmichaels, took their concerns further, making a case against the bedroom tax in the Court of Appeal<sup>7</sup> on the grounds that the policy was a curtailment of their human rights. The Court ruled against their case, stating that ‘although the under-occupancy rules were discriminatory, for disabled adults the discrimination was justified and therefore lawful’ (Leigh Day 2014). However, in January 2016, the Court of Appeal went on to rule in favour of two other parties penalised by the bedroom tax, on the grounds that in their cases the policy was unlawful.<sup>8</sup> The policy was challenged by the grandparents of a teenager who needs overnight care, and by a victim of domestic violence whose ‘spare’ room consists of a panic room to protect her from a violent ex-partner (BBC 2016). A further victory was won in November 2016, when the same group whose case had been rejected by the Court of Appeal won in the Supreme Court.<sup>9</sup> Collectively, these rulings mean that social tenants whose partners need to sleep in separate rooms due to medical conditions, who act as overnight carers for disabled family members, or social tenants who have panic rooms installed, are now able to challenge the legality of their penalisation using the Supreme Court rulings as case-based evidence. This was strengthened further by another Supreme Court case in 2019<sup>10</sup> where the Court ruled that a man, known as RR, should not be penalised by the bedroom tax as it was a curtailment of his human rights. Alongside this, it was ruled that it is not legal for local authorities to apply the bedroom tax in cases where it would lead to a breach of the Human Rights Act (Leigh Day 2019). These successes have again set precedent for other households in similar circumstances to challenge the bedroom tax through the use of case law as evidence of discrimination. Although a case law approach is unable to provide a universal challenge to the bedroom tax, it has nonetheless broken ground for its dismantling through providing a means of protection for a range of groups.

The success of these legal challenges highlights the ways in which law can be used to expose and redress spatial injustice (Delaney 2016). These challenges to the bedroom tax focused on the ways in which the legislation discriminates against disabled people, and those protecting themselves from domestic violence, asking the courts to redraw understandings of the ‘spare bedroom’ in many instances as a necessary space for the assurance of wellbeing and safety. They brought to the fore the ways in which governments often discriminate against disabled bodies, and particularly how policies such as the bedroom tax discount the spatial and architectural needs of those who are marginalised by a political discourse that understands home and housing through the lens of able-bodied needs only (Imrie and Edwards 2007). To return to Brickell and Cuomo’s (2019) emphasis on the intricate relationship between the body, law and resistance, these examples highlight the ways in which tenants repurposed the categories of spare bedroom etched into the bedroom tax. In this way, they were able to utilise the legal sphere to highlight the discrimination that the bedroom tax imposed upon their bodies and domestic needs.

#### VIRTUAL LEGAL SPACES: THE ROLE OF SOCIAL MEDIA IN LEGALLY CHALLENGING THE BEDROOM TAX

Reworking the law from a barrier to an aid has been utilised to challenge the bedroom tax in other ways than through the high-profile cases discussed above. A key method of resistance also lies in the use of social media, in particular Facebook groups, that provide support and information for those affected by the bedroom tax. In these groups, members receive and share advice based on their experiences, with the goal of appealing the policy through the tribunal system. Although perhaps not immediately identifiable as such, due to their association with the everyday (often wrongly placed in opposition to the spectacular and political), these seemingly mundane virtual spaces constitute an important method of reframing the legal system as a means of protecting homes under threat from welfare reform.

Social tenants affected by the bedroom tax use these groups to post queries relating to the size and shapes of their rooms, looking for

advice on whether they are able to launch an appeal on the basis that what their local authority has deemed a 'spare bedroom' is in fact too small to be legally classed as such. Other members post previous disputes that claimants have won on similar grounds in order to help people to build their cases. Pinned posts in the groups highlight areas of potential appeal by posing questions such as 'What size is the room?', 'Can you easily fit a bed and basic bedroom furniture in there?', and 'Would the bed be too near, or obstructing, the radiator?'. The groups also often include links to templates for appeal letters in order to help those fighting bedroom tax decisions to navigate the legal process. Using amalgamated knowledge, group members encourage one another to take action and fight to reverse local authority decisions. Here, social media also functions to de-mystify the court room; a space usually understood as a site of resistance only for those who have high levels of economic and social capital. Social media in this instance reconstructs the courtroom as an attainable site through which resistance to the bedroom tax can be sought, and rights to social housing re-established. Here, the very mechanisms that have been used to categorise and define who is and is not deserving of multiple bedrooms are repurposed, providing routes through which to reclaim what does, and crucially what does not, count as a spare bedroom.

The phenomenon of social media as a key contemporary site of resistance and dissent has garnered academic interest particularly since the 2011 Arab Spring and the global Occupy movement of the same year, which were the first high-profile instances of social media's role in global political activism (Gerbaudo 2012). Indeed, social media is often in part attributed to the over-throwing of dictators across Egypt, Tunisia, Morocco and Libya during the Arab Spring period (Tudoroiu 2014). Since 2011, the optimistic stance that social media is a positive tool for change has been complicated by rises in far-right political extremism, the 2016 election of Donald Trump in the United States, and rampant Covid-19 pandemic conspiracies facilitated by Facebook and other platforms. However, social media nonetheless continues to provide an integral means of resistance for people who are socially and spatially excluded and marginalised. This at times contradictory relationship highlights the ways in which modes of resistance are entangled in power relations. In the case of Facebook, its status as one of the world's most

influential companies means that it can exert huge influence on national politics, whilst at the same time providing an integral means of communication for grassroots resistance movements. This makes it an especially important and fascinating platform for geographers interested in examining the relationship between power and resistance.

Social media in the context of the bedroom tax has provided a means of connecting people who are often excluded from both traditional spaces of public protest, and from the legal sphere: sites often demarcated by socio-political barriers such as gender, race, dis/ability and economic and educational attainment. Members of the bedroom tax support groups encourage others to take an active role in establishing legal challenges through publicising and celebrating group members' appeal wins, and reiterating the far-reaching impact of individual successes. This emphasis on both a long-term solution to the bedroom tax on an individual scale, and the contribution of individual wins in dismantling the legislation more widely, encapsulates a form of piecemeal resistance that supports larger outcomes. The continual challenging and dismantling of the law that underpins the bedroom tax has the potential to eventually erode its legal legitimacy altogether.

Social media support groups provide mechanisms to connect and construct networks of community-based activism. They are also an important means of circumventing socio-economic geographical barriers to the legal sphere. Social tenants who may not otherwise have been able to become involved in organised resistance, due to disability or low incomes restricting their mobility, are enabled and empowered by the construction of a virtual network. Mobilities scholarship has identified sociality and community identity as being produced through networks of people and ideas that cannot necessarily be ascribed to living in close geographical proximity (see Cresswell 2010). This, too, can be said of immobility (or reduced mobility) and exclusion from traditional spaces of resistance such as the street or public square. For those who are unable, or decide not to, engage in more publicly performative forms of resistance, communities that are unbound by spatial fixity become key sites through which to challenge punitive laws and reclaim rights to home. Such social

media groups also work to de-mythologise and reframe the legal spaces of the city from spaces of intimidation to spaces of emancipation. First-Tier or Upper Tribunal appeals are dealt with on a case-by-case basis, and are much smaller in scale than the Supreme Court hearings in terms of their potential for immediate and widespread change. They are nonetheless crucial spaces through which social tenants challenging the bedroom tax can potentially regain autonomy over their own homes, and pave the way for others to do the same. The Facebook groups do not evoke the spectacle of resistance that Supreme Court victories do. They do, however, entrench resistance into the everyday experience of living with the bedroom tax by normalising social tenants' understanding that they have both the legal right and resources to challenge it. By utilising an everyday space such as a social media site to encourage resistance and reworking (Katz 2004) of the law, group members consequently open up the legal space of the courtroom as an emergent site of revolt.

#### FINDING OTHER MEANS: DISCRETIONARY HOUSING PAYMENT AND LEGAL LOOPHOLES

It is not just tenants themselves who have used legislation as a means of resisting the bedroom tax. Housing associations and housing and welfare charities have also provided support for people through the use of alternative financial streams and legal loopholes found in the bedroom tax. Discretionary Housing Payment (DHP), a pot of funding allocated to local authorities to provide housing support, as well as other forms of welfare support such as tax credits and Employment Support Allowance (ESA), were used where possible to cover the shortfalls created by the bedroom tax. The role of these stakeholders as key challengers of the bedroom tax further highlights the potentially powerful effects of multiple, piecemeal methods of resistance.

Indeed, throughout the research project, I found that housing associations themselves also faced precarious outcomes as a consequence of the bedroom tax, namely through a loss of income from residents. There were therefore high levels of motivation to find ways of working around the legislation. Employees of housing associations and charities who I interviewed often talked of the varying ways in which they tried to offset the worst effects of the

bedroom tax. The welfare officer for a small housing association, managing properties predominately in an east London borough with high levels of deprivation, told me that their organisation had (as of 2014) not evicted anyone as a consequence of the bedroom tax, and that this was largely due to the existence of DHP. Indeed, all housing associations I spoke with cited DHP, a funding source that had been more commonly used to support private rather than social tenants, as the most common and effective means of reducing the impact of the bedroom tax in the short-to-medium term.

A welfare adviser for a UK debt charity confirmed that DHP provided a vital source of relief for clients affected by the bedroom tax. They helped clients to apply to their local authority for DHP funding, as well as looking into whether they were eligible for further tax credits or higher levels of ESA in order to make up some of the income lost through the bedroom tax. Housing associations and charities relied on using some government schemes to mitigate the effects of others, combating the loss of income in one area by attempting to extract more money from another. Similarly to the example of the Facebook support groups, this is an approach that utilises legal and policy knowledge to subvert and challenge the bedroom tax.

This was also evident in the emergence of a legal loophole in the bedroom tax legislation which housing associations and charities utilised to help clients claim back lost income. 4(1)(a) of Schedule 3 of the Housing Benefit and Council Tax Benefit (Consequential Provisions) Regulations 2006 effectively exempted tenants who have been continuously in receipt of housing benefit at the same address since 1 January 1996 (Wilson 2016). This again enabled those working in housing support to employ legal frameworks as a means of reducing the impact of the bedroom tax. Indeed, one housing association welfare officer informed me that at least 30 of the households affected within the housing association that he worked for had been exempted from the bedroom tax as a consequence of the loophole. Until its closure by the Department for Work and Pensions in 2014, they had found the loophole a highly successful method of using legal routes to counteract the bedroom tax.

However, whilst such support and commitment to mitigating the

harms caused by the bedroom tax and enabling people to remain in their homes is commendable, these methods are ultimately short-term and responsive, rather than transformative, in their approach. Reliance on DHP as a mitigation strategy is particularly precarious, as DHP funding allocations from central government continue to be cut. Although DHP funding was increased from £139.5 million to £180 million in 2020/21 as a consequence of the coronavirus pandemic, it has since been cut back to £140 million for the 2021/22 financial year; a reduction of 22 per cent, and lower than previous years' budgets (Jayanetti 2021b). This is in spite of fears that rent arrears are only set to spiral in the aftermath of eviction moratoriums and other protective measures ending in 2021 (although these measures did not include a bedroom tax moratorium). In sum, the utilisation of alternative legislation as a method of resistance can only go so far when that too is being dismantled by those in government.

## CONCLUSION

This chapter has highlighted the various ways in which legal frameworks have been used to resist the bedroom tax. From ambitious legal challenges taken to the Supreme Court, to the establishment of Facebook groups advising affected social tenants on how to contest implementation on a range of legal grounds, the very legal systems that have been used to categorise and constrain social housing tenants have been reconstituted as a means of resistance. Empathetic stakeholders, too, have used alternative legislation and legal loopholes to mitigate the impacts of the bedroom tax. Together, these methods highlight the complex relationship between law and space, whereby legal frameworks can contribute to the protection as much as to the dismantling of spatial injustice (Delaney 2016). Alongside this, the chapter has contributed to resistance scholarship in its challenging of the expected subjects and spaces of resistance to government policies. Through these piecemeal and emergent forms of resistance, individuals have both protected themselves from reductions in housing benefit, and paved the way for others to do so. As Delaney (2016: 268) notes, legal geography is an important facet in understanding 'how unjust geographies are made and potentially un-made'.

And yet, the bedroom tax remains. Indeed, recent estimates indicate that the number of people affected by the legislation has risen by 50 000 as a consequence of soaring numbers of benefit claims due to rising unemployment and illness during the Covid-19 pandemic (Jayanetti 2021a). Yet, despite its growing prevalence, the bedroom tax, once a headline staple and cause for multiple large-scale marches on Parliament, has receded in public memory; what the journalist Frances Ryan refers to as a form of ‘political amnesia’ (Ryan 2019). Perhaps, then, in a climate where political outrage has long moved on, the continuation of these piecemeal legal resistances have become ever more crucial in this battle of attrition: dismantling the bedroom tax, one legislative piece at a time.

## NOTES

1. Work Capability Assessments (WCAs) are designed to determine whether a claimant is eligible for employment support allowance or should be seeking work. They have been hugely controversial since their implementation, with regular instances where claimants have been found fit for work despite having severe diagnosed health conditions (see the Spartacus Network’s 2015 testimony

- for some detailed examples of these). The discriminatory nature of WCAs against disabled people was also illuminated when in 2013 a three-judge panel ruled that WCAs substantially disadvantage claimants with mental health disabilities (*Secretary of State for Work and Pensions v MM & Anor* [2013] EWCA Civ 1565).
2. In the UK, tenants renting from both social landlords (generally local authorities or housing associations) and private landlords are eligible for state support with rent, although the rules vary between social and private housing.
  3. There are several other instances where the rules allow a separate bedroom:
    - Any other child (other than a foster child or child whose main home is elsewhere).
    - Children who can't share because of a disability or medical condition.
    - A carer (or team of carers) providing overnight care.
    - An approved foster carer who is between placements, but only for up to 52 weeks from the end of the last placement.
    - A newly approved foster carer for up to 52 weeks from the date of approval if no child is placed with them during that time.
    - Rooms used by students and members of the armed or reserve forces who are away but intend to return home. (Department for Work and Pensions 2014).
  4. Much like the bedroom tax, the poll tax is a well-known instance of Conservative policy that many argued explicitly targeted the poor and working classes through the disproportionate taxation of larger, usually working-class, households (Esam and Oppenheim 1989).
  5. First-Tier and Upper Tribunals form part of the 2007 overhaul of the tribunal system in the UK. First-Tier Tribunals are divided into seven chambers, structured around subject areas. There are four Upper Tribunals, where decisions made in First-Tier Tribunals can be appealed.
  6. Case title: (*Secretary of State for Work and Pensions v Carmichael and Sefton BC*).
  7. Case titles: *R (on the application of Carmichael and Rourke) (formerly known as MA and others)* and *R (on the application of Daly and others) (formerly known as MA and others) (Appellants) v Secretary of State for Work and Pensions (Respondent)*.
  8. Case numbers: C1/2014/2539 and C1/2015/0502.
  9. Case title: *R (Carmichael) v Secretary of State for Work and Pensions* [2016] UKSC 58 ('*Carmichael SC*').
  10. Case title: *RR v Secretary of State for Work and Pensions*.

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