



Society of St Vincent de Paul

# Submission to the Department for Communities' Budget 2024-25 Equality Impact Assessment

August 2024

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## Contents

Introduction .....	2
Key observations .....	3
Recommendations .....	4
Response to consultation questions .....	5
1. Are there any data, needs or issues in relation to any of the Section 75 equality categories that have not been identified in Section 6 of the EQIA consultation document? If so, what are they and can you provide details? .....	5
2. Are there any adverse impacts in relation to any of the Section 75 equality groups that have not been identified in section 7 of the EQIA Consultation document? If so, what are they? 7	
3. Please state what action you think could be taken to reduce or eliminate any adverse impacts in allocation of the Department’s budget. ....	14

## Introduction

The Society of St Vincent de Paul Northern Region (SVP) supports tens of thousands of people facing poverty and exclusion in Northern Ireland each year. Through direct support and friendship we aim to promote self-sufficiency and work for social justice. SVP Northern Region has seen a significant increase in demand for its services over recent years due to the combination of a pandemic, cost of living crisis affecting food, gas and electricity and cumulative social security cuts and changes.

We wish to share our experience with the Department for Communities (‘the Department’) to inform its impact assessment for Budget 2024-25. In this submission we express our concern at the impacts that will arise from the Department’s proposed Budget allocations and urge the Department to review its decisions on key funding streams that prevent poverty and exclusion and consider alternative mitigations.

We greatly regret that the Department has been required to make these decisions due to the insufficient funding levels allocated by the Executive. We believe that the Department and the Executive must present a more comprehensive plan to mitigate the impacts of the budget cuts: as things stand, we fear the planned cuts will result in greater hardship for those most at risk of poverty and exclusion in Northern Ireland. This will lead to higher demand for public services, including those managed by this Department as well as others including Health and Education.

August 2024

The Department has outlined the severity of the financial constraints it is facing, outlining the context of:<sup>1</sup>

- Inflation leading to rising costs of providing public services whilst demand for its services increase;
- A reduction in funding of £277 million over 12 years on the Department's Resource Baseline Budget;
- Specific reductions so far include reducing by almost 1/3 Discretionary Support Grant expenditure through policy changes, and a 1/5 reduction in funding for employment supports through Labour Market Partnership Programme with Councils, and the Department carrying significant vacancies.

The proposed Budget allocations for 2024/25 mean there will be Non-Ringfenced Resource allocations 17% below the Department's bids, and a 48.5% shortfall against the Department's Capital DEL bids. The result of this, as stated by the Department, will be: 'Similar to 2023-24, managing Resource and Capital shortfalls of this magnitude will undoubtedly have a continued significant and adverse impact on the Department's ability to deliver public services in 2024-25.'<sup>2</sup>

We present our analysis and feedback below in the hope that it can inform greater protections for those at risk of poverty and exclusion.

### *Key observations*

The Department for Communities has not been given a sufficient budget to address the needs of people in poverty. The proposed cuts will lead to less investment in preventing poverty and higher spending on responding to immediate and acute needs. People already in more precarious or chronically low income scenarios will feel the most pain.

Ultimately, it is very regrettable that insufficient funding means the Department has been forced to deprioritise actions – such as building social homes and improving energy efficiency – that lead to long term reductions in poverty and hardship and represent good value for money for the state.

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<sup>1</sup> [Budget 2024-25 \(communities-ni.gov.uk\)](https://communities-ni.gov.uk/budget-2024-25)

<sup>2</sup> Ibid. p4

We urge the Department and Executive to prioritise getting back on track with these funding streams at the earliest opportunity – in the final decisions for this Budget and through in-year monitoring rounds.

- We welcome the maintenance of funding for Welfare Mitigations which have a profound and tangible positive impact on those people we support.
- We also very much welcome a ‘top up’ of the resources available for Discretionary Support Grants by approximately £8million, the increased funding for Supporting People programme via the NIHE<sup>3</sup>, and the small increase in funding for the Community and Voluntary Sector which is sorely needed.
- However, we regret that JobStart support for young people will not expand and are concerned at suggestions that other employment supports may be reviewed – these are long term investments and cutting them back will have long term consequences.
- We are deeply concerned about the inability to begin more than 400 new social homes this year at the same time as cuts to community homelessness supports. Building social homes is an essential investment in a balanced housing market, and the primary route to sustainable housing for many low income households: given that approximately 500 social homes are sold each year, a decrease in social housing stock at this time is hard to fathom. It will result in an even more overheated private rental market, and more people at risk of homelessness.
- The very low allocations of Affordable Warmth funding also means many people in NI will continue to experience poor quality housing and energy poverty. This is regrettable for the immediate impact on individuals and will have knock on impacts on public services such as healthcare, and longer term means NI will fall behind on climate change mitigation and just transition.

### *Recommendations*

- We believe the Department needs to consider a greater range of data sources in its considerations of the impacts that will arise from its proposed Budget choices.
- We also believe it is necessary for the Department to propose alternative measures and mitigations that offer greater protection to people in Northern Ireland at the greatest risk of poverty and the deepest forms of social exclusion such as homelessness.
- In year funding rounds and any future opportunities for more funding should go towards investments in preventing the long term effects of poverty, and this must include social housing, employment supports, and the Affordable Warmth Scheme.
- The Executive must now publish its Anti-Poverty Strategy and put it on statutory footing to safeguard preventative funding streams in Budget allocations, including social housing and Affordable Warmth.

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<sup>3</sup> Although we note NIHE have stated this is not sufficient to roll out the Supporting People strategy: [The Housing Executive - News \(nihe.gov.uk\)](https://www.nihe.gov.uk/news/housing-executive-news)

## Response to consultation questions

- 1. Are there any data, needs or issues in relation to any of the Section 75 equality categories that have not been identified in Section 6 of the EQIA consultation document? If so, what are they and can you provide details?*

### Independent reviews

It is disappointing to see the absence of any reference to significant independent reviews that have considered functions of the Department for Communities, in particular the Report from the Anti-Poverty Strategy Expert Advisory Panel<sup>4</sup>, the Welfare Mitigations Review<sup>5</sup> and the Discretionary Support Review<sup>6</sup>. Each of these reports provide comprehensive and pragmatic recommendations for the Department, including assessments of current strengths and weaknesses. In the face of such significant cuts and impact on services, it is essential the Department shows it has incorporated the learning from these Reviews into its decision-making.

### Research into poverty levels and dynamics within NI

There are a number of studies into poverty in Northern Ireland that it would be beneficial for the impact assessment to incorporate. Key among these is the Department's own literature review of poverty which covers risk factors for entering poverty and enabling factors to leave poverty.<sup>7</sup>

The Joseph Rowntree Foundation has published research on poverty in Northern Ireland which examines it in the context of the four jurisdictions of the UK, offering insights and comparisons into the dynamics in NI, such as the role of housing quality and affordability and employment supports.<sup>8</sup>

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<sup>4</sup> [Report from the Anti-Poverty Strategy Expert Advisory Panel | Department for Communities \(communities-ni.gov.uk\)](https://www.communities-ni.gov.uk)

<sup>5</sup> [Welfare Mitigation Review | Department for Communities \(communities-ni.gov.uk\)](https://www.communities-ni.gov.uk)

<sup>6</sup> [Discretionary Support Independent Review | Department for Communities \(communities-ni.gov.uk\)](https://www.communities-ni.gov.uk)

<sup>7</sup> [communities-ni.gov.uk/sites/default/files/publications/communities/scoping-review-of-literature-on-poverty-ni\\_0.pdf](https://www.communities-ni.gov.uk/sites/default/files/publications/communities/scoping-review-of-literature-on-poverty-ni_0.pdf)

<sup>8</sup> <https://www.jrf.org.uk/report/poverty-northern-ireland-2022>

August 2024

Save the Children have taken a decade-long view of child poverty in NI<sup>9</sup> which should be used to examine the impacts of the proposed budget changes on children, 21% of whom live in poverty (2021-2022 figure)<sup>10</sup>.

### Energy Poverty

There is insufficient evidence and analysis on the impacts of the significant reduction in the Affordable Warmth programme. We believe key data sources should include: up to date information from the Utility Regulator tracker, figures from the Consumer Council's 2022 study of fuel poverty levels, and survey information from National Energy Action. These sources all clearly show the high levels of energy poverty being experienced, and the concentrations amongst certain groups including Section 75 protected groups.

The latest official measure of energy poverty in NI shows that in 2016 22% of households were spending more than 10% of their income if they were to 'maintain a satisfactory level of heating'.<sup>11</sup> More recent indications suggest a surge of energy poverty as households faced soaring energy costs in recent years: the Consumer Council, based on a nationally representative survey, has suggested a rate of 51% of households spending more than 10% of their net income as of June 2023.<sup>12</sup>

There is also data that offers more detail on the experience and risk of energy poverty. For example, looking at customers with oil heating, the Consumer Council found the highest risk for not being able to buy a fill of oil was amongst fuel-poor households, younger people, people with a disability, lower income people, those in urban areas, and those in receipt of UC.<sup>13</sup> Being in receipt of UC was the highest reported risk factor for both having run out of oil (49%), and of those 92% reported it was due to unaffordability.

The significant cuts in Affordable Warmth funding will have a disproportionate impact on these groups.

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<sup>9</sup>[https://www.savethechildren.org.uk/content/dam/gb/reports/ten\\_years\\_too\\_long\\_a\\_decade\\_of\\_child\\_poverty\\_in\\_northern\\_ireland.pdf](https://www.savethechildren.org.uk/content/dam/gb/reports/ten_years_too_long_a_decade_of_child_poverty_in_northern_ireland.pdf)

<sup>10</sup> [Beyond-Breaking-Point.pdf \(svp.ie\)](#)

<sup>11</sup> <https://researchbriefings.files.parliament.uk/documents/CBP-8730/CBP-8730.pdf>

<sup>12</sup> [https://www.consumercouncil.org.uk/sites/default/files/2023-07/Home\\_Energy\\_Index\\_June%202023\\_Bulletin.pdf](https://www.consumercouncil.org.uk/sites/default/files/2023-07/Home_Energy_Index_June%202023_Bulletin.pdf)

<sup>13</sup> [2 \(consumercouncil.org.uk\)](#)

August 2024

### Research into the administration of benefits

The EQIA points to concerning impacts into the administration of benefits, stating staff vacancies could lead to ‘delays in benefit payments, impact on telephony and service delivery performance, and place working age customers in financial hardship’.<sup>14</sup>

This is of real concern to SVP, as we often support people when they have a delayed benefit payment: in a survey of SVP members in 2023, 27% of respondents referred to a delay in accessing benefits as the main reasons for contacting SVP for help.<sup>15</sup> There have been 3 substantive pieces of qualitative research in NI with UC claimants (by JRF with UC:Us<sup>16</sup>, and Save the Children<sup>17</sup>) and advisers and claimants (by Advice NI<sup>18</sup>) which we believe would provide useful information to the Department in its assessment of impacts. The Trussell Trust’s report ‘Hunger In Northern Ireland’ also reveals the impacts of social welfare delays (as well as inadequate payment levels) on people who are forced to rely on emergency food assistance.<sup>19</sup>

### *2. Are there any adverse impacts in relation to any of the Section 75 equality groups that have not been identified in section 7 of the EQIA Consultation document? If so, what are they?*

Many of the groups SVP supports most often are members of the Section 75 groups that the Department has identified will be impacted by cuts: we are concerned we are going to see an increasing level of need due to the disproportionate hardship caused to these groups.

Our recent report ‘Beyond Breaking Point: Sharing the perspective of SVP members on the cost of living crisis’<sup>20</sup> shared that of people requesting assistance to SVP in 2022, one parent families and those living alone were the groups most likely to seek support from SVP, representing 83% of all requests (44% from lone parents and 39% from those living alone).

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<sup>14</sup> [Budget 2024-25 \(communities-ni.gov.uk\)](#)

<sup>15</sup> [Beyond-Breaking-Point.pdf \(svp.ie\)](#)

<sup>16</sup> <https://www.jrf.org.uk/report/universal-credit-could-be-lifeline-northern-ireland-it-must-be-designed-people-who-use-it>

<sup>17</sup> <https://www.savethechildren.org.uk/content/dam/gb/reports/its-hard-to%20survive-families-experiences-of-the-welfare-system-and-the-cost-of-living-in-northern%20ireland.pdf>

<sup>18</sup> <https://www.adviceni.net/policy/publications/move-universal-credit-get-ready>

<sup>19</sup> <https://www.trusselltrust.org/wp-content/uploads/sites/2/2023/08/2023-Hunger-in-Northern-Ireland-report-web-updated-10Aug2023.pdf>

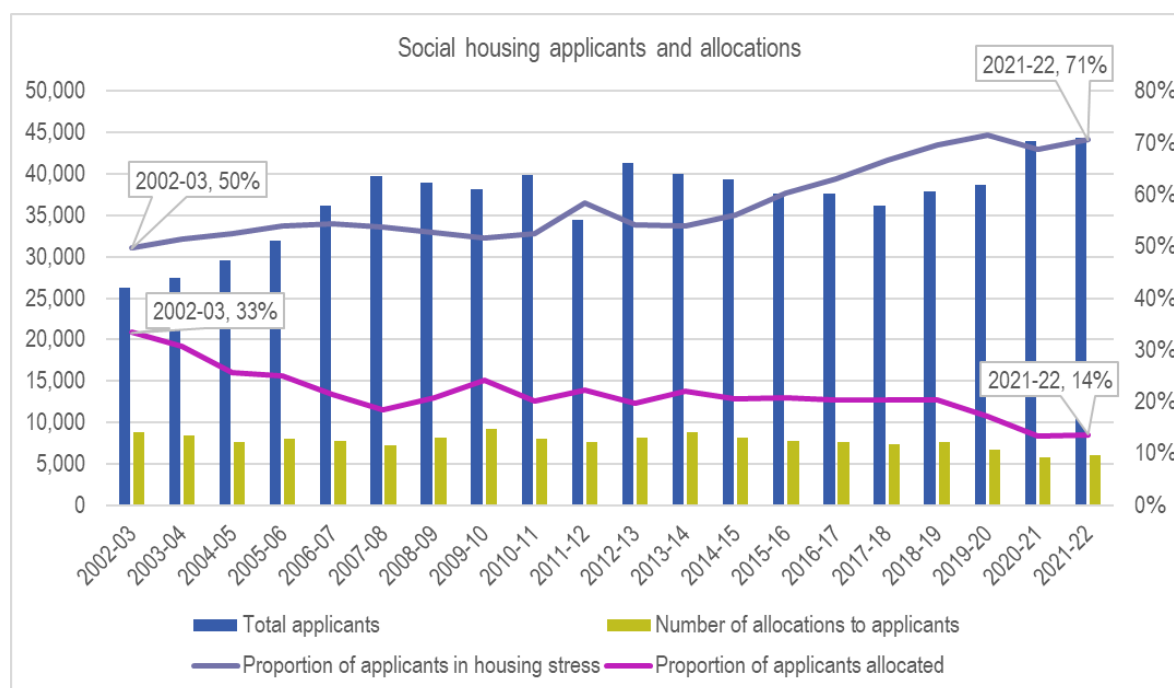
<sup>20</sup> 20

Many of the households receiving help have family members living with a disability or long-term illness.<sup>21</sup>

People accessing housing and homelessness supports

We are deeply concerned about the impacts of the reduced housing and homelessness supports that will result from the proposed Budget. This will have immediate and long terms impacts on many Section 75 groups, and we believe will lead to higher levels of housing stress and crisis.

There is already significant pressure on the social housing system, with the numbers of people awaiting housing increasing and the prevalence of housing stress amongst those on the waiting list also rising.



Source: Northern Ireland Housing Statistics, 3.5 Social rented sector waiting lists and allocations 2002-03 to 2021-2, <https://www.communities-ni.gov.uk/publications/northern-ireland-housing-statistics-2021-22>

In conjunction with rising rents in both private and social rented housing, a reduction in social housing stock – beginning c. 400 houses a year when c. 500 houses are sold each year to tenants<sup>22</sup> – will lead to an increasingly pressurised housing market, with limited options for those struggling to access stable housing. We agree with the Departments

<sup>21</sup> [Beyond-Breaking-Point.pdf \(svp.ie\)](#)

<sup>22</sup> [NIHE Response to DFC Budget EQIA 24-25](#)



August 2024

analysis that the current proposals are 'likely to adversely impact on people within all Section 75 categories'.<sup>23</sup> As this is the Departments own assessment, we cannot see how it is acceptable for the Executive to proceed with the proposed Budgetary allocations.

The proposals require the Northern Ireland Housing Executive (NIHE) to deprioritise longer term and preventative work in the face of rising temporary accommodation costs, which it has a Duty to provide to eligible households. However, even with this prioritisation, NIHE states that 'The level of funding for homelessness services is insufficient to meet statutory obligations to provide temporary accommodation based on projected demand'.<sup>24</sup>

It is our view that social housing offers the most sustainable solution to many families in poverty or on low incomes, and that NIHE must be allocated sufficient funding to significantly grow the stock available to be allocated to new applicants, alongside sufficient funding to meet its Duty to people requiring temporary accommodation. NIHE should not be required to trade-off between short and long term housing strategies, balancing growing need for temporary accommodation with 'the largest projected drop in social housing output of its kind in a generation at a time when housing need is at its most acute'.<sup>25</sup> This displays a lack of long-term strategic approach to housing and homelessness within Northern Ireland.

In terms of impacts on people, these decisions will be felt by housing applicants who will remain in the private sector while they await social housing, as well as the proposed budget allocations having an immediate impact on services providing support in communities. The Department states NIHE will have to 'focus saving on the third sector/ voluntary and community sector groups, in particular longer term preventative work.' The impact of this will be felt immediately by these groups and the people they support, and there will be long term knock on impacts felt by both the Department and its Arms Lengths Bodies, and across public service in Northern Ireland. This will include the Healthcare sector, Education, and beyond. Housing Rights NI give as an 'extremely conservative estimate' that homelessness already costs almost £0.5 billion per year.<sup>26</sup> Cuts to preventative work will only exacerbate these costs.

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<sup>23</sup> [Budget 2024-25 \(communities-ni.gov.uk\)](https://communities-ni.gov.uk)

<sup>24</sup> [NIHE Response to DFC Budget EQIA 24-25'](#)

<sup>25</sup> [The Housing Executive - News \(nihe.gov.uk\)](https://nihe.gov.uk)

<sup>26</sup> [dfc-response-june-2024.pdf \(housingrights.org.uk\)](https://housingrights.org.uk)

Insights from 'Beyond Breaking Point'<sup>27</sup>

In a survey of SVP members, respondents stated that of the main reasons people get in touch regarding housing, affordability was the main issue with almost 60% of respondents checking this box. This was closely followed by furnishing new tenancies for those moving into new accommodation.

*“People receive a housing allowance but because of a shortage in social housing stock, they often have to opt for rents which exceed to benefits rent allowance. They have to pay a top up which eats into their already inadequate benefits allowance. It’s a vicious circle.”*

*“I am seeing more homeless people being put into properties with absolutely no furniture, white goods or floor covering. A recent client slept on the bare concrete floor for two nights before ringing us. Fortunately, we were able to get her a bed and basic furniture the same day.”*

People with disabilities

The Department’s Equality Impact Assessment states that there may be a disproportionate impact on people with disabilities from many funding reductions, including from reduced social housing output, Affordable Warmth, and benefits administration. This is very concerning as people with disabilities and their families are already at a far higher risk of poverty in Northern Ireland, and 51% of people who live in a family with a disabled member live in poverty compared to 35% of the total population.<sup>28</sup> Considering the high rates of people who are out of work due to disability and health, the restriction of funding for employment supports is very disappointing. These programmes are a long term investment and help to break cycles of poverty.

Insights from 'Beyond Breaking Point'<sup>29</sup>

SVP members frequently witness the disproportionate rates of poverty amongst families with a disabled member, including amongst families caring for a disabled or ill child.

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<sup>27</sup> [Beyond-Breaking-Point.pdf \(svp.ie\)](#)

<sup>28</sup> [Beyond-Breaking-Point.pdf \(svp.ie\)](#)

<sup>29</sup> [Beyond-Breaking-Point.pdf \(svp.ie\)](#)

The impact of poor mental health was mentioned time and time again during the research for 'Beyond Breaking Point'. The need for early intervention and consistent support was clear:

*"We are in a lot of households where mental health issues are at the core, and heartbreakingly, too many young school leavers don't seem to get the support to go into and sustain employment; more localised initiatives to break this cycle would be a good starting point."*

### Energy poverty

The proposed reduction in the Affordable Warmth Scheme is of significant concern for those household living in energy poverty, which we know disproportionately impacts a range of Section 75 groups. The Northern Ireland Housing Executive has highlighted that the current Budget proposals represent a '53% cut in the number of households in fuel poverty (1,465) availing of the scheme compared with 2023/24.'<sup>30</sup>

The impact of the proposals will lead to higher levels of energy deprivation as well as financial distress for those households who may have otherwise received support through the Affordable Warmth programme. Households facing energy poverty either go without the essential energy they need to stay warm and healthy, cut back elsewhere (very often the food budget) to afford essential energy, or must go into arrears with their supplier if they cannot afford to meet their energy needs upfront. SVP members support many people who face these impossible choices and would benefit from an extension rather than retrenchment of the Affordable Warmth scheme.

### Insights from 'Beyond Breaking Point'<sup>31</sup>

As part of the Beyond Breaking Point research, analysis of calls to SVP Northern Region in 2022 showed that request for help with energy are a key driver of people to get in touch with the Society, with almost 40% of callers requiring help with more than one issue and the majority of these relate to food and energy. 'Energy' can include requests for help with gas, electricity, oil and coal. Overall, two thirds of calls are for the essentials of food and energy.

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<sup>30</sup> [The Housing Executive - News \(nihe.gov.uk\)](https://www.nihe.gov.uk/news)

<sup>31</sup> [Beyond-Breaking-Point.pdf \(svp.ie\)](https://www.svp.ie/Beyond-Breaking-Point.pdf)

An SVP member commented on the particular vulnerability of oil heating on people we support: *'Oil is completely unaffordable. Many houses in NI are still oil dependent. It requires people to have a chunk of money which isn't possible on low benefits rates.'*

### Administration of benefits

We are concerned about the potential delays to benefit payments and deterioration of telephone and customer services standards as a result of the Department carrying so many staff vacancies. This is particularly important in light of the transition to Universal Credit (UC), with research suggesting 1 in 5 people do not successfully complete the move from legacy benefits to UC.<sup>32</sup> This has serious implication for people on the lowest incomes who need to maximise the levels of support they receive in a complex system. Any reduction in support and advice available to people will impact the numbers and the process of transitioning to UC.

While we understand this is an option the Department has been forced to take in light of an insufficient budget, it is important for us to state that this will have a significant impact on people we support. It is very unfortunate that the Department itself can only forecast deteriorating service levels, and we believe a more comprehensive mitigation strategy must be proposed.

### Insights from 'Beyond Breaking Point'<sup>33</sup>

Already SVP members support many people struggling with the benefits system, who have limited awareness of their entitlements or find the system too difficult to navigate.

In a survey of SVP members, challenges in the benefits application process was identified as a key issue among 60% of responses with many referencing a complicated application process, administrative barriers and delays, as well as technicalities or bureaucracy that could lead to a client required to begin the process again without any income supports. Greater challenges for those with literacy or for those whom English is not their first language in navigating the system were identified by a number of respondents. A move to online applications and processes is also causing difficulties for these claimants, who often have to invest in more expensive phone packages so that they can keep journals up to date

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<sup>32</sup> [One in five legacy benefit claimants not switching to Universal Credit - NAO press release](#)

<sup>33</sup> [Beyond-Breaking-Point.pdf \(svp.ie\)](#)

and to respond to new appointments being set up. Failures in technology can result in a sanction and weeks without money. Clients have to divert money for essentials towards phone top ups just to keep on the right side of the benefit system.

An SVP member stated: *'There needs to be an urgent review of the benefits system and in particular its administration. We have to step in in many cases to support families with no food or heat because of maladministration. Benefit is stopped on a technicality without consideration as to how a family is to exist.'*<sup>34</sup>

### Employment supports

We are disappointed that given the Department's restricted funding allocation, it will be unable to extend the JobStart programme and has indicated it is reviewing other employment programmes. These employment programmes are the foundations for a more equal job market, and reduced poverty and hardship in the long term. They are an essential investment in Northern Ireland's future, and we urge the Department to maintain current funding, and increase funding as soon as possible.

### Insights from 'Beyond Breaking Point'<sup>35</sup>

A common concern amongst SVP members are the families we support who would benefit from high quality employment and training supports, as well as those already in work but who are dealing with low pay, low or unpredictable hours, or balancing childcare costs and availability with work. There is a strong feeling amongst members that we are increasingly supporting families who are in work but just cannot get by and are seeking support for the first time.

*"A young single parent mother with 4 children has a part time job in a cafe. She has to use taxis to get herself to and from work and her children to and from childcare. She enjoys her job but financially she would be better off staying at home."*

*"We are in a lot of households where mental health issues are at the core, and heartbreakingly, too many young school leavers don't seem to get the support to go into and*

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<sup>34</sup> [Beyond-Breaking-Point.pdf \(svp.ie\)](#)

<sup>35</sup> [Beyond-Breaking-Point.pdf \(svp.ie\)](#)

*sustain employment; more localised initiatives to break this cycle would be a good starting point.”*

Employment issues affecting refugee and asylum seekers were also raised and related to work requirements, lack of income support and language difficulties when engaging with the system.

*3. Please state what action you think could be taken to reduce or eliminate any adverse impacts in allocation of the Department’s budget.*

SVP are deeply concerned about the levels of poverty we are witnessing across Northern Ireland. Any further cuts to support will have detrimental impacts on the most vulnerable members of our community. Every effort must be made to prevent and mitigate the worst impacts of further cuts and the rising cost of living on households.

We are greatly concerned that these cuts will:

1. Directly increase hardship by the withdrawal of certain supports, exacerbation of administrative delays, etc.
2. Indirectly increase hardship and poverty by reducing capacity for actions that offer a way of reducing and preventing poverty in the long term.
3. This will lead to greater need in the short, medium and long term as people are forced to call on emergency assistance and continued poverty will increase demands on services such as healthcare.

Unfortunately these impacts may be brought to bear on the level of need seen by SVP members: the amount of people we assist has increased greatly since the pandemic and cost of living crisis, and recent research with our members has shown they are supporting more people with increasingly complex needs. An SVP member stated in our ‘Beyond Breaking Point’ research:<sup>36</sup>

*“My fear is that the needs will exceed our capacity to respond both in terms of volunteer capacity in terms of time and emotional capacity.”*

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<sup>36</sup> [Beyond-Breaking-Point.pdf \(svp.ie\)](#)

August 2024

It is imperative that the Department pursues any and all means to minimise funding cuts, and that the finally implemented Budget gives greater weight to addressing the causes of poverty.

In particular we call for:

- We believe it is necessary for the Department to propose further alternative measures that offer greater protection to people in Northern Ireland at the greatest risk of poverty and the deepest forms of social exclusion such as homelessness.
- In-year funding rounds and any future opportunities for more funding should go towards investments in preventing the long term effects of poverty, and this must include social housing, employment supports, and the Affordable Warmth Scheme.
- The Executive must also now publish its Anti-Poverty Strategy and put it on statutory footing to safeguard preventative funding streams in Budget allocations, including for social housing and Affordable Warmth. Although we understand that within overall fiscal constraints the Executive and Departments have had to make very hard decisions, we believe that if an Anti-Poverty Strategy were in place long-term and preventative funding streams may have been given greater prominence in budget allocations.

We thank the Department for its consideration of this submission and would be pleased to provide any further information or assistance.

Contact: [socialjustice@svpni.co.uk](mailto:socialjustice@svpni.co.uk)