

Submission on the Draft Anti-Poverty Strategy for Northern Ireland

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Introduction

An Anti-Poverty Strategy for Northern Ireland has been long-awaited by organisations and advocates who seek an end to poverty and deprivation in Northern Ireland – and it has been much needed by the people we support who are living in hardship, deprived of the resources they need to thrive.

At St Vincent de Paul we provided around £5,000,000 in assistance directly to people in our Northern Region experiencing poverty and deprivation in 2023/24. The main areas of support were electricity, food, gas, oil, and household goods. Our research with our Members following the cost-of-living crisis found that volunteers were assisting people in increasingly complex circumstances including individuals navigating the benefit system, people struggling with multiple rising bills, and refugees and asylum seekers with very little to no income¹. Addressing these challenges requires an ambitious, evidence-led Strategy.

Unfortunately, the draft Strategy published by the Executive does not meet the needs of the people living in poverty in Northern Ireland today. For this reason, the Society of St Vincent de Paul was one of the signatories of the Open Letter to the Executive, signed by over 75 organisations and faith leaders². We, along with our colleagues in the community and voluntary sector, emphasised that the Strategy does not fulfil what oversight bodies outline as basic requirements of any strategy.

This Strategy lacks a clear diagnosis of the structural factors that push people into poverty, and it does not make the necessary commitments to change the systems that keep people in hardship. An emphasis on continuing current solutions will, by default, continue current problems. The language and focus in this Strategy often reduces poverty to an individual problem, addressing it on this basis. This is a mistake: individual changes will not eradicate poverty in Northern Ireland. We worry

¹ SVP (2023). Beyond Breaking Point. <u>Beyond-Breaking-Point.pdf</u>

² Northern Ireland Anti-Poverty Network (2025). Open Letter to the Executive. https://niapn.org/open-letter-to-the-executive-the-draft-anti-poverty-strategy-is-not-fit-for-purpose/

that there is a failure to understand the factors driving child poverty, a lack of acknowledgement of the role of housing and homelessness in pushing people into poverty, and no acknowledgement of those groups at high risk of poverty for whom work as a 'pathway out of poverty' is not feasible. In result, there is no throughline between contributors to poverty, actions, and intended outcomes in this Strategy.

Throughout the Strategy, the associated strategic commitments are not SMART and will not bridge the gap between today's reality and the aspirational outcome statements, even those that are specified and clear. We are concerned that:

- 1. There is an over-reliance on employment as a pathway out of poverty and a failure to account for working households in poverty, one parent families, and people with disabilities for whom this 'pathway' is out of reach.
- 2. There is not a clear enough link between action and intended outcome;
- 3. There is an overreliance on 'continuation' of current services, which will not lead to a step change in outcomes;
- 4. Where there is reference to a new action, it is too often extremely vague (e.g.: 'We will prepare and deliver a programme which will offer inclusive pathways to work');
- 5. There is limited reference to funding or level of service provision, and no reference to new funding;
- 6. There is not an indicator against each outcome, reducing accountability in the Strategy.

Given the ambiguity of many of the outcomes in this Strategy, the lack of a clear link to the listed actions and the lack, for many outcomes, of an indicator is troubling. The Anti-Poverty Strategy requires timebound targets with a clear link to the relevant (funded) actions and outcomes that will influence them. Without these targets, there is no political or governmental accountability for any change in indicators, whether tracked or not. To deliver on the Strategy, there must be clear, targeted outcomes with specified actions and indicators to measure delivery and 'success'.

We worry that the actions as specified in the Strategy rely too heavily on a continuation of existing programmes and funding. Without any commitment to additional funding and with a reliance on 'continuation', it is readily apparent that the profound transformation required to eliminate poverty will not be achieved.

We hope that the Executive revisits this draft Strategy following this consultation process. The Strategy must be reviewed and relaunched when it is fit for purpose.

The Strategy's Vision

The vision's emphasis on eradication and sustainability is much needed. It is important that measures taken by the Executive and other services are maintained on a long-term basis so that they become a stable and reliable part of peoples' lives and the landscape of public services. Inconsistency in delivery and the creation of 'cliff edges' will only act as barriers in the long-term eradication of poverty.

We note that a key phrase in the vision is "working together". Unfortunately, this strategy has engendered little faith in any such collaboration. The overwhelming response of the community and voluntary sector to this strategy has been one of frustration and disappointment: the failure to include recommendations from the Anti-Poverty Strategy Design Group. We would welcome a renewed commitment to collaboration and stress that any collaboration must have clear impact on any end-product. In the spirit of collaboration, we direct you to the updated recommendations from members of the Anti-Poverty Strategy Design Group³.

In addition, we would like to see a positive vision introduced to the statement. The current statement is focused on eradication and does not reference what will be achieved through this eradication, or how it will impact peoples' lives. For example,

³Anti-Poverty Strategy Group (2025). Recommendations on the Development of an Anti-Poverty Strategy for Northern Ireland. https://www.nicva.org/sites/default/files/2025-09/Final%20Anti-Poverty%20Strategy%20Recommendations%20Paper%20-%20Updated%20August%202025.pdf

eradicating poverty will allow all people to thrive with the resources they need to achieve their potential and lead fulfilled lives.

Headline Indicators

The lack of targets clearly associated to each headline indicators raises questions over how impactful collating these indicators will be. Even where these indicators are intended to guide the overall Strategy, there are outcomes and actions of relevance to these indicators that should be clearly tied to these figures.

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Other headline indicators to include:

We believe the following indicators should be included which incorporate deprivation indicators for children which reflect the lived reality of growing up in poverty and include the impact of disability on poverty rates to increase accountability for this group. We also recommend including an indicator targeting poverty in one-parent families, given the barriers that childcare pose to this group and the challenges associated with entering work.

- Material deprivation, including children who are both in poverty and deprived.
- Poverty in households with a disabled member.
- Poverty in one-parent families.

Pillar One: Minimising Risks

Pillar One states an intention to minimise the risks and root causes of people falling into poverty. While a focus on the root causes of poverty is much needed, this Strategy lacks a clear diagnosis of the structures driving poverty in Northern Ireland.

We believe there are several missing outcomes and are disappointed with the ambiguity and passivity present in the analysis of this section. There needs to be a stronger diagnosis of the challenges and causal factors that lead to deeply entrenched inequalities in the description of risk factors. This must be coupled with a stronger commitment to equality within each outcome. Below, we address two key outcomes in this Pillar and further outcomes in need of inclusion.

Childhood Education

We are concerned the outcome statement reference to 'maximised opportunities' is vague and impossible to measure. Instead, the outcome should state a clear commitment to equality for all children. Rather than 'addressing' socio-economic gaps, the strategy should commit to 'mitigate' or 'eradicate' them.

In the Introduction to this Strategy, you point to the fact that 25% of children are in Relative Poverty (AHC) and 21% are in Absolute Poverty (AHC)—it is unclear how this outcome seeks to specifically address this reality. These outcomes should be linked to clear measures in the relevant section.

Family/Childhood Factors

There is too much ambiguity in this outcome: what exactly is the 'good family structure' being referred to, and how will it be 'promoted'?

In our experience at St Vincent de Paul, we see that the poverty and deprivation risk for one parent families is very high, and this is reflected in research. 41% of lone parent households in Northern Ireland are in poverty (AHC), representing the family type at highest risk⁴. We suggest that the outcome in this case be something more akin to: 'The link between family structure and poverty is broken, and families of all shapes and sizes will live free of poverty, accessing the goods and services they need to thrive.'

⁴ NISRA (2025). Northern Ireland Poverty and Income Inequality Report, 2023/24. https://datavis.nisra.gov.uk/communities/PII_report_2324.html

Likewise, the phrasing of the rest of the outcome statement lacks concreteness. 'Families and young people experiencing disadvantage will be supported, helping them to have fulfilling and complete home and family lives.' What does this outcome actually look like in a young person's life? How do we know when there is success or improvement in this outcome? 'Supported' and 'helping' are extremely passive, and 'fulfilling and complete' are vague descriptions of an outcome that is impossible to measure.

Further Outcomes in Need of Inclusion:

A key risk factor for entering poverty is employment outcomes: unemployment and underemployment, and the factors influencing these, must be addressed with a specific outcome. This is not only about supporting people in high quality work suitable to them but also severing the link between unemployment and poverty. To do so will require addressing the poverty caused by inadequate unemployment benefits and poor design aspects of the benefit system.

Specific recommendations on this have been extensively outlined by numerous review and advisory groups commissioned by the Executive over recent years. For example, see <u>A Scoping Review of the Literature on Poverty in Northern Ireland</u>. Another factor absent from this section is the role of housing, housing costs, and homelessness in pushing people into poverty and deprivation. In our experience, any framework for minimising the risks of people falling into poverty must include outcomes targeting housing and homelessness. The precarity of the private rented sector, with insecurity and soaring rents, and the need for top-ups paid to landlords, chronically depletes the incomes of the households we support and can push them into a crisis either financially or in terms of homelessness.

Actions Under Pillar One

As stated above, we are concerned that there is not a clear link between outcomes, actions, and indicators. This is highlighted by the fact that the strategic commitments

under Pillar One appear to target only four of the six outcomes in this section. 'Substance Use' and 'Ethnicity' have no associated actions within the first years of the strategy. It is difficult to square this with the assertion that these factors 'must be addressed in order to effectively target poverty'. Without any commitments to act on these outcomes it is unclear what bearing they have on the Strategy at all.

The specific relationship between action and outcome is made unclear by the decoupling of the strategic commitments from the outcomes provided. What is the relationship between 'research to understand the impact of Westminster's two child limit' and 'fulfilling and complete home and family lives' for families and young people? While other strategic commitments have clear bearing on the (inferred) related outcomes, such as the strategic commitment to the Healthy Child Healthy Future programme and the Family/Childhood Factors outcome, this connection is nevertheless clouded by ambiguity in the outcomes and a failure to tie the given actions to each outcome area.

Again, we highlight that many of the actions in this Pillar and others are continuations or delivery of existing policy. It is unclear from these actions what new resources will be put to achieving the outcomes listed under this Pillar.

Indicators Under Pillar One

It is confusing that there are six outcomes and only three measures for this Pillar. The measures seem to only capture three of the listed outcomes. Whilst the chosen indicators are important, we suggest there should be an indicator against each outcome – otherwise there will be no way of measuring any (dis)improvement upon review of this strategy.

The decisions underpinning the selection of these measures it not clear: why is it the case that, for the 'Substance Use' outcome, there is no associated strategic commitment, and yet it is the subject of one of the only measures for this Pillar? If no

change is to be implemented in this area, what is the function of this measure within the strategy?

Further, the lack of measures for each outcome minimises any accountability. There is no way of evaluating whether, per the Family/Childhood Factors outcome, families and young people have been supported and are living more fulfilling home and family lives. This outcome as it stands is also not well captured by any of the indicators listed under the Vision/Overall Strategy.

The Strategy must be able to clearly answer both how an outcome is being measured, and how a strategic commitment is calibrated to any such measures and outcomes.

Pillar Two: Minimising Impacts

Pillar Two is focused at minimising the impacts of inequality and maximising life opportunities for those in poverty. We welcome the strong outcomes included in this section (e.g.: 'Everyone has access to good quality, affordable, and sustainable housing'; 'People experiencing or at risk of poverty have access to free, quality-assured advice services'). However, as with Pillar One, several statements are too vague. We are specifically concerned about Outcomes 1 & 2.

Outcome 1: Access to Resources

'Appropriate and effective financial support will be provided to those in our society who are socio-economically disadvantaged. Older people, children and adults with disabilities will be helped to access appropriate support.'

It is unclear if the 'appropriate and effective financial support' will be provided to all who are 'socio-economically disadvantaged', or only the groups identified in the next sentence—older people, children, and adults with disabilities. The statement leaves us with several questions: What are the criteria of socio-economic disadvantage? What supports will be available to those in poverty who do not fall into the specified

groups? What is meant by 'financial support'? We would suggest and welcome greater clarity on this outcome, who it is targeting, and what supports it aims to deliver.

Outcome 2: Access to Education

'The costs of accessing and participating in education will be minimised, with particular consideration given to children from socio- economic disadvantaged families.'

Again, we question the criteria of socio-economic disadvantage to be used here—without clarity, there is limited accountability. Further, we are disappointed by the reference to costs being minimised rather than eradicated: full participation in education should be completely free. For the Society and our Members, access to free education is essential. We see the importance of education as a pathway out of poverty and too often see this pathway closed-off by barriers families face in giving their child access to school on fully equal footing to their peers. Added costs such as school uniforms, school trips, extra-curriculars, and the costs of further education all add up and entrench inequalities in education for these children and their families. The 'particular consideration' given to any 'socio-economic disadvantaged families' (however defined) must be clearly outlined if it is to be something families can rely on.

<u>Further outcomes to be included:</u>

It is our experience that many people experiencing poverty do not have access to the basic essentials to live a healthy and dignified life. This is evidenced extensively in official statistics and wider research. This includes limited access to foods, adequate household goods, and the energy needed to keep a home warm. Too often, families must make choices between these essentials, to the detriment of their health and dignity.

These must be an outcome committing to improving access to these basics for those in poverty. While we recognise that Outcome 1 references financial supports, a

specified and targeted outcome is needed to ensure that basic dignity if ensured for all those experiencing poverty.

The emphasis on Lived Experience is welcome; for this reason, its inclusion under Pillar Two is confusing, as the inclusion of Lived Experience is surely central to the Vision/Overall Strategy and should be embedded in the delivery of each Outcome in each Pillar. In that vein, in the re-development of this Strategy we strongly urge greater consultation of people with lived experience of poverty.

Actions Under Pillar Two

Unlike Pillar One, it appears as though all of the outcomes in Pillar Two have associated actions. An exception to this is 'The Lived Experience of those in Poverty', though this is understandably an action to be implemented within each of the actions listed in this strategy.

We welcome several commitments under this Pillar that reference clear actions:

- The commitment to deliver a new Fuel Poverty Energy Efficiency Scheme.
- Continuing its commitment as a Living Wage employer
- Introduction of school uniform legislation

However, we note seven of the actions reference 'continuation' which is concerning given the level of change needed to improve the lives of people living in poverty. Where there are instances of ambition in this Pillar, there is a lack of clarity about the specific actions needed to achieve these commitments. For example: 'We will ensure that everyone, including those in or at risk of poverty, has access to good quality, affordable and sustainable homes. This will include work to tackle a range of issues including revitalisation of the Housing Executive and transformation of the Private Rented Sector. We will oversee the development of action plans as part of the implementation of the Executive Housing Supply Strategy. (Department for Communities).'

Whilst this strategic commitment is welcome, without further specifics it is difficult to see what will lead to the 'revitalisation of the Housing Executive and transformation of the Private Rented Sector'. We would like to see details of the specific steps the Department will take that will (1) revitalise the Housing Executive and (2) transform the private rented sector.

There needs to be further clarity about the selection process of the following commitment: 'We will provide advice, increase awareness and provide focused support to ensure that older people, and children and adults with disabilities can access their full benefit entitlement. This will include a programme of work to promote Pension Credit uptake and delivery of the Make the Call wraparound service.' Increasing 'uptake' alone will do little to eradicate poverty. Failure to address core issues in benefits such as the two-child limit and the five-week wait continue to entrench poverty in our communities.

Moreover, if there is going to be specific reference to some groups being supported and not others there needs to be a clear evidence base around why these groups have been selected. We would be concerned that groups including lone parents have been left out. In this instance, access to their full benefit entitlement should be a commitment made to all people in poverty and accessing the benefit system.

Indicators Under Pillar Two

We repeat the concerns outlined above with respect to the relationship between the given indicators, outcomes, and strategic commitments. Whilst the chosen indicators are important, we suggest there should be an indicator against each outcome. We acknowledge that it is expected that some indicators will inform aspects relevant to other pillars—here, we see that one of the measures under Pillar One is relevant to 'Access to Education'.

Here, as in Pillar One, only three indicators have been provided for some 8 outcomes, being targeted by 18 specified actions. There is no measure for 'Access

to Resources', 'The Impact of Place', 'The Lived Experience of those in Poverty', or 'Advice Services'. If resources are being put into each outcome, accountability requires that there be clear measures for each outcome.

Pillar Three: Exiting Poverty

While we welcome this Pillar's focus on employment and education as a pathway out of poverty, the associated commitments and actions are too vague to give any confidence they will achieve the desired outcomes. Further, we believe there is a lack of attention to those groups for whom employment is clearly not presently serving as a pathway out of poverty, as well as groups currently less able to access the labour market.

There is insufficient specificity of who struggles to access the labour market, why they struggle, and how the actions listed in this section will help improve outcomes for those experiencing poverty. For example, under 'gaining employment' the strategy references the importance of reducing household worklessness – what specific actions will be taken for these families? In the same vein, what is the strategy for one parent families, who are the household type at highest risk of poverty, and the only group experiencing rising in-work poverty? Likewise, what is the strategy for people with disabilities who wish to work but are currently limited from accessing the labour market? We are particularly concerned by the lack of specific reference to the following groups: carers, people with disabilities, and one-parent families. The strategy taken for these groups must not be dedicated to fitting them into pathways clearly ill-suited to their needs and circumstances.

We welcome the inclusion of an outcome committed to providing a 'wide range of good jobs' and targeting in-work poverty. Again, we would like this outcome to be better specified. We see people working in low-paid jobs who, when rent is paid, as in the same situation financially as individuals on benefits and are made to choose between food and warmth. There is a disincentive to enter the job market where there are jobs keeping people in poverty rather than offering a way out of it.

Further outcomes to be included:

We are dismayed that the only references are to exiting poverty through work, given that we know that for some groups at the highest risk of poverty, work is not currently feasible. This includes carers who do not have the time to also work; people with disabilities for whom work is not an option; and single parents with young children who cannot yet work. These groups are not at the margins of poverty in Northern Ireland: lone parent families are the most likely to be in poverty, more than 1 in 4 carers in Northern Ireland is in poverty⁵, and 4 in 5 people referred to food banks in Northern Ireland are disabled⁶. These households all require support to exit poverty, despite being in situations where employment is not currently feasible.

Where outcomes are listed that do impact on these groups, they are again vague and tied only to work, with no acknowledgement that work may not be an option and that poverty must still be addressed in such cases. For example, 'Childcare', which elaborates a vague commitment to 'identify ways to assist' disadvantaged families in 'addressing gaps in childcare provision', appears to be aimed only at maximising families 'potential in the workplace'.

Actions Under Pillar Three

Again, we strongly suggest that the relationship between each outcome and related actions is clearly specified. Without a clear link between the two, there can be no accountability. Here, we welcome the inclusion of strategic commitments which appear (and again, we emphasise the lack of clarity) to be evenly distributed across Pillar Three's outcomes.

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⁵ Carers NI (2023). Policy Measures to Tackle Poverty Among Unpaid Carers in Northern Ireland. https://www.carersuk.org/media/vpala4ts/policy-measures-to-tackle-poverty-among-unpaid-carers-in-northern-ireland.pdf

⁶ Trussell (2025). Hunger in Northern Ireland. https://cms.trussell.org.uk/sites/default/files/2025-09/hunger in northern ireland 2025.pdf

We welcome instances of specific commitment such as introducing a new Employment Rights Bill, Good Jobs Charter and funding the NI Franchise of the Living Wage Foundation. We also welcome the specific reference to a budget allocated to the childcare subsidy for working parents eligible to Tax Free Childcare, though this does not represent any 'new' funds as part of this strategy. However, other actions remain far too vague, for example: 'We will prepare and deliver a programme which will offer inclusive pathways to work'.

Indicators Under Pillar Three

We direct you to our comments above. There are four outcomes and only three measures—this is particularly concerning given these outcomes are presented as forming pathways out of poverty. That there is no measure for the outcome on Childcare is worrying: the lack of accessible and affordable childcare is a clear barrier for many one-parent families, even those for whom work is possible.

Conclusion

We offer the above comments and recommendations in deference to those we support living in poverty, facing challenges that should rightly be targeted and removed by any Anti-Poverty Strategy.

Once again, we urge you to meaningfully engage with the huge volume of research that has been produced by the Independent Expert Advisory Panel (2020), the Anti-Poverty Strategy Co-Design Group (2022), the Welfare Reform Mitigation Review (2021), the Discretionary Support Review (2022) and the hundreds of pages of Northern Ireland specific evidence produced by organisations and academics that provides clear evidence of the interventions that work to tackle poverty.