



# RECOMMENDATIONS ON THE DEVELOPMENT OF AN ANTI-POVERTY STRATEGY FOR NORTHERN IRELAND

A POSITION PAPER FROM  
MEMBERS OF THE ANTI-POVERTY  
STRATEGY DESIGN GROUP

Revised Version (Updated August 2025)

## Update Note

This paper is a revised and updated version of the civil society [Anti-Poverty Strategy Design Groups](#) original recommendations, first published in September 2022. The original paper presented a comprehensive, evidence-based suite of proposals outlining how an Anti-Poverty Strategy could meaningfully address poverty in Northern Ireland. You can view the group's original paper [here](#).

This updated version reflects the evolving societal, political, and economic context. It has been revised by group members to ensure continued relevance and impact. The paper is intended to inform the development of a robust Anti-Poverty Strategy for Northern Ireland. The Department for Communities (DfC) has launched a [public consultation](#) on a draft strategy, which closes on 19 September 2025. Following careful analysis, the group has concluded that this current draft is not fit for purpose and fails to outline the necessary steps to meaningfully address poverty in Northern Ireland.

In response, the group has updated its original recommendations to reinforce what civil society considers the essential components of a meaningful and effective Anti-Poverty Strategy. These recommendations are grounded in expert insight, evidence, and the lived experiences of those affected by poverty.

Group members remain committed to working constructively with government to eradicate poverty in Northern Ireland. A critical first step in this process is the development of a strategy that is both robust and fit for purpose.

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## Introduction

### 1. Who We Are

This paper has been produced by a range of civil society organisations in their role as members of the [Anti-Poverty Strategy Co-Design Group](#). **(A full list of all those organisations who have contributed to and/or endorsed this paper can be found in Annex A)**

### 2. Background to this paper

There is a statutory obligation within [Section 28E](#) of the Northern Ireland Act 1998, as amended by the Northern Ireland (St Andrews Agreement) Act 2006<sup>1</sup>, for the Northern Ireland Executive to “adopt a strategy setting out how it proposes to tackle poverty, social exclusion and patterns of deprivation based on objective need”.

In line with commitments made under the [New Decade, New Approach agreement](#) (January 2020), the previous Northern Ireland Executive agreed an indicative timetable for the development and publication of a [suite of social inclusion strategies](#), including an Anti-Poverty Strategy, for which the Department for Communities (DfC) would be the lead department.

An [Anti-Poverty Strategy Expert Advisory Panel](#) was appointed by the Department for Communities in October 2020 and was tasked with preparing a report setting out key recommendations to Deirdre Hargey, Minister for Communities, about the themes and key actions the Anti-Poverty Strategy should include and the gaps in provision that it should seek to address.

The Panel’s recommendations were published in the [Recommendations for an Anti-Poverty Strategy: Report of the Expert Advisory Panel \(EAP\)](#) <sup>2</sup> [report \(5 March 2021\)](#) .

The [Anti-Poverty Strategy Co-Design Group](#) was established by the Department for Communities in December 2020, and the Group understood it’s role was to advise and work

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<sup>1</sup> [The St Andrews Agreement, October 2006 - GOV.UK \(www.gov.uk\)](#)

<sup>2</sup> Recommendations for an Anti-Poverty Strategy Report of the Expert Advisory Panel (communities-ni.gov.uk), March 2021

alongside the Department, led by the Communities Minister, in the development and drafting of a new cross-departmental Anti-Poverty Strategy, which is evidence-based and targeted to address objective need, and a supporting action plan to be presented to the wider Northern Ireland Executive for consideration. In doing so the Group would consider the recommendations from the Expert Advisory Panel's earlier report and those gathered via a programme of wider stakeholder engagement.

Membership of the Anti-Poverty Strategy Co-Design group is made up of representatives from across civil society, including the community and voluntary sector, faith-based organisations, Trade Unions, and the offices of the Children's Commissioner and the Equality Commission.

The full Terms of Reference for the Anti-Poverty Strategy Co-Design Group<sup>3</sup> are detailed below:

***Terms of Reference for the Anti-Poverty Strategy Co-Design Group.***

*In accordance with its published terms of reference, the Anti-Poverty Strategy Co-Design Group (the Group) was established to:*

- a) help DfC to understand the experience of, and issues faced by people of all age groups for whom the Strategy will deliver, including children and young people;*
- b) ensure the lived experiences of people are appropriately reflected in the Strategy, obtain the views of relevant stakeholder groups on its content and themes, consider urban/rural implications, provide feedback on these to DfC and ensure these views are appropriately reflected in the Strategy prior to DfC issuing it for public consultation.*
- c) work alongside DfC to ensure that the draft Strategy addresses the themes, content, key actions, and gaps in provision that have been identified by the EAP and wider stakeholder engagement including the Panel's recommendation on:*
  - whether the APS should cover all age groups, or a stand-alone Child Poverty Strategy should also be developed;*
  - a definition of objective need<sup>[1]</sup> in relation to the APS (NB approval should then be sought from the Executive for the definition (if required)).*

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<sup>3</sup> <https://www.communities-ni.gov.uk/articles/anti-poverty-strategy-co-design-group-terms-reference>

- d) throughout development of the Strategy, maintain focus on addressing the themes and biggest issues affecting people of all age groups, including children and young people in NI as a result of living in poverty or likely to become so;*
- e) support DfC in the production of an evidence-based Strategy and action plan which is outcomes-based, appropriately aligned to Programme for Government and takes account of international obligations;*
- f) constructively challenge DfC throughout the development of the Strategy and action plan, and prompt all NICS departments contributing Strategy actions to target resources at the priority areas which need to be addressed; and*
- g) assist DfC in developing detailed proposals for the establishment of robust monitoring and reporting mechanisms with meaningful involvement from representatives of the sections of society at which the Strategy is targeted.*

*The Group have a key role in the co-design and development of the Strategy. However, final decisions on the content of the Strategy and the actions associated with it will be the responsibility of DfC and the Minister for Communities prior to the draft Strategy being presented for public consultation and Executive agreement.*

### **3. How and why this paper has been developed**

We first met as members of the Anti-Poverty Strategy Co-Design Group in December 2020 and then throughout 2021, via a schedule of online meetings coordinated and hosted by the Poverty Policy Team within the Department for Communities. During these meetings, as a Co-Design Group we discussed and explored in depth, the recommendations made in the Expert Advisory Panel's report, supplementing these with group members' own evidence, insight, and expertise, and most critically with the views and experiences of those with lived experience of poverty. This feedback of lived experience included those shared via a series of focus groups and engagement sessions facilitated by a range of Co-Design Group members.

As members of the Co-Design Group, we became increasingly concerned at progress on the development of a draft strategy. Most significantly, group members were concerned with the co-design process, including a lack of clarity as to how the Co-Design Group's contribution was to be considered and reflected in any recommendations to the Northern

Ireland Executive on the Anti-Poverty Strategy's direction and content. This included those key actions that we felt should be prioritised and taken forward within an Anti-Poverty Strategy.

Following a series of letters and meetings with the Communities Minister, an agreement was reached between members of the Co-Design Group and the Minister, that members would take forward the development of a recommendations paper independently to the Department. The paper would outline these group members recommendations for an Anti-Poverty Strategy and would be shared with the *Cross Ministerial Steering Group*<sup>4</sup> to inform their consideration of a draft strategy.

**Please note, due to a range of circumstances, not all members of the Anti-Poverty Strategy Co-Design Group, as originally appointed by the Department for Communities, have contributed to and/or endorsed this paper.**

**(A full list of all those organisations who have contributed to and/or endorsed this paper can be viewed in Annex A).**

To support production of this paper, as a group we facilitated a series of online workshops throughout January 2022, to allow members to agree the process for its development, its format and structure and most substantially to further consider and agree our key recommendations under each of the outcomes outlined in the report, in more detail.

Each Outcome workshop (Outcomes 1- 6) was led by an Outcome Lead(s) appointed via the group's membership. These leads were then responsible for drafting each Outcome section as they appear in the paper. As a result, each outcome section varies in terms of approach and in language, format and layout used.

The recommended actions under each outcome section also draw upon and have been directly informed by the findings of the Expert Advisory Panel's report; our earlier discussions as a Co-Design Group; and wider sources of evidence and examples of good practice identified by group members. Most critically they are underpinned by the views and experiences of those with lived experience of poverty via a series of earlier focus groups and engagement sessions facilitated by a range of Co-Design Group members and/or their organisations in 2021.

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<sup>4</sup> The Group of Northern Ireland Executive Ministers, who along with the Communities Minister will agree the final content of the Anti-Poverty Strategy to be agreed by NI Executive.

A first draft of this paper was shared with the Communities Minister and her Department in February 2022, and group members met with the Minister and Departmental officials in March 2022 to discuss the paper's content in more detail. In April 2022, group representatives also delivered a presentation to Executive Ministers and their officials via a meeting of the *Cross Ministerial Steering Group*, hosted by the Communities Minister, highlighting key recommendations from our paper and our collective priorities for inclusion in the Anti-Poverty Strategy.

The timeframe for completion of our original paper (approximately 8 weeks) was extremely challenging and did not allow for more detailed refinement of its final content. This has meant that inevitably there are some overlaps in terms of recommendations and messaging across the paper, but we very much hope this does not detract from its overall impact and its core messages to Government.

In communication with the Minister and her Department, as a group, we have continued to meet independently, where we can, to further refine and finalise the paper, with the aim of wider dissemination.

Our intention in disseminating this paper is to share our thinking more widely with other key stakeholders across civil society and create opportunities to open the discussion on those key recommendations we have set out. We hope that this feedback will further inform the continued development of the Anti-Poverty Strategy and enrich our contributions as members of the Co-Design Group to the Department's design process.

We are mindful that there is a great level of interest across civil society regarding the ongoing development of the Anti-Poverty Strategy and increasing calls to see meaningful progress. This has only been compounded by growing political, social, and economic challenges, impacted, not least, by the cost-of-living emergency, all of which have a direct impact on the complexities and realities of poverty across our communities.

We consider this paper to be one stage in the process of informing development of the Anti-Poverty Strategy; it is an 'opening position statement', which we hope will add momentum to the Strategy's continued progress. Whilst by no means an 'end' or 'finished' product, we hope that our paper, similar to the publication of the Expert Advisory Panel report, marks a further milestone in the development of the Anti-Poverty Strategy, and that its dissemination will add impetus to the progress of the Strategy's development. We are keen to work in partnership with the Department for Communities, wider government departments and other key stakeholders to further consider and refine our proposals.



We are mindful that this paper is limited to our views and discussions to date, as group members and to the collective evidence that we have considered, and therefore it is intended to be read, ‘as is’ - a summary of our recommendations based on discussion and agreement at the point of production and dissemination.

**This paper was updated in 2025 to reflect the changing societal, political and economic landscape.**

*Some additional comment and supporting evidence from Group members has latterly been added to the paper as an addendum. (These additional materials can be viewed in Annex B).*

#### **4. Current Context**

**The local and global context in which the Anti-Poverty Strategy must be developed, finalised, and implemented is highly complex and increasingly unpredictable.** Persistent challenges—including the long-term impacts of the COVID-19 pandemic, the UK’s departure from the European Union, the intensifying climate crisis, over a decade of austerity, antipathy to income redistribution<sup>5</sup>, the ever-rising cost of living, shrinking public sector budgets, and a wholly inadequate social security system—are generating significant economic, political, and societal pressures. These factors continue to deepen poverty and intensify its consequences.

In light of this, the **Northern Ireland Anti-Poverty Strategy must be dynamic, responsive, and adaptable to ongoing societal change.** It should take a comprehensive approach to delivering key proposals and be designed to evolve over time, **ensuring it can meet emerging needs and address future challenges effectively.** Outlined below are some of those key challenges that we face. It is **incumbent on the full Northern Ireland Executive to ensure that any Anti-Poverty Strategy meaningfully considers and addresses these challenges.** In order to be successful, ownership and delivery of the strategy must not rest with the Department for Communities alone.

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<sup>5</sup> Recommendations for an Anti-Poverty Strategy Report of the Expert Advisory Panel (communities-ni.gov.uk), March 2021  
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#### 4.1 UK Government

The broader UK Government context continues to exert a significant influence on poverty in Northern Ireland. The **enduring legacy of austerity**—characterised by **over a decade of severe cuts to public services and welfare provision**—has left deep structural impacts, particularly on low-income households.

Recent political shifts, including **changes in UK Government leadership and evolving policy priorities**, have introduced further uncertainty and complexity into an already challenging policy landscape. Rather than delivering the positive change required, these developments have often compounded existing difficulties.

Key UK Government policy decisions continue to fall short in addressing the scale and urgency of poverty-related issues. In many cases, they have exacerbated the challenges faced. The long-delayed delivery of a **UK-wide Child Poverty Strategy** remains a concern, with little indication that any forthcoming strategy will meet expectations or adopt the comprehensive, rights-based approach necessary to tackle child poverty effectively.

The decision to retain both the **Two-Child Limit** and the **Benefit Cap** continues to restrict support for larger families, disproportionately impacting children and deepening levels of child poverty. While the recent expansion of eligibility for the **Winter Fuel Payment** was a welcome reversal, it appeared to be driven more by political pressure than by a coherent strategy to address fuel poverty.

Proposals outlined in the UK Governments [Pathways to Work: Reforming Benefits and Support to Get Britain Working Green Paper](#) are particularly concerning. Suggested changes to **Personal Independence Payments (PIP)** will significantly reduce support for disabled individuals and, by extension, affect entitlement to Carer's Allowance—placing additional financial strain on unpaid carers who are already under-supported.

Even where UK Government policy developments have been positive, their benefits are not always fully realised in Northern Ireland due to the absence of ringfencing for Barnett consequential—funding allocations linked to increased spending in England. For example, **recent investments in childcare and access to free school meals in England have not been mirrored in Northern Ireland**, as the associated funding has not been specifically earmarked for these purposes. This lack of designation limits the devolved administration's ability to deliver equivalent support and further entrenches regional inequalities.

In this context, it is **essential that the Anti-Poverty Strategy not only responds to local needs but also actively engages with and challenges the wider UK policy environment**. A strong, evidence-based voice from Northern Ireland is needed to advocate for fairer, more inclusive UK-wide policies that support—rather than hinder any regional efforts to eradicate poverty.

#### *4.2 Northern Ireland political landscape*

The Northern Ireland Executive reformed in February 2024, with four parties sitting in the Executive and the formation of an Official Opposition. While normal business has resumed in the Assembly, **progress on delivery and the legislative programme of the Assembly has been slow**, despite a large number of Executive and Private Members' Bills in the pipeline.

Significantly, it took over a year for the Executive to publish, consult on, and finalise an agreed Programme for Government (PfG) for the remaining years of the Assembly mandate. **By the time the PfG was published in February 2025, there was little over 2 years remaining in the mandate** before the next Assembly elections. Of particular importance for the Anti-Poverty Strategy Group, despite significant urging from organisations broadly across civil society, there was **only one passing reference to an Anti-Poverty Strategy for Northern Ireland<sup>6</sup>, which ultimately lacked specifics and a commitment to resourcing to deliver change**.

It is important to note that while the Executive has been restored, and the Assembly has resumed business as usual, it is still a **fragile political settlement which is marred by the influence of party politics rather than true collaborative working**. Delivery of significant change, such as an Anti-Poverty Strategy, will require all **government ministers and their departments to work together in a new, collaborative way, alongside stakeholders** such as the community and voluntary sector, trade unions, arms-length bodies and academics to achieve real and meaningful change.

#### *4.3 The role of the civic society in Northern Ireland*

**For too long, the voluntary and community sector has been filling the gap where a**

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<sup>6</sup> [https://www.northernireland.gov.uk/sites/default/files/2025-03/programme-for-government-2024-2027-our-plan-doing-what-matters-most\\_1.pdf](https://www.northernireland.gov.uk/sites/default/files/2025-03/programme-for-government-2024-2027-our-plan-doing-what-matters-most_1.pdf), p.73.

**robust anti-poverty strategy should exist**—delivering vital early intervention, prevention, and crisis support across Northern Ireland.

However, **many civil society organisations are now facing unprecedented pressures**. Rising demand for their services is coinciding with a significant reduction in their capacity to respond. This is driven by declining public sector investment, reduced core funding from government, and escalating operational costs.

At a time when communities are experiencing deepening poverty and widening inequality, the sector's ability to meet growing needs is being severely constrained. Many organisations are operating with fewer staff, reduced volunteer engagement, and limited financial resources, all while responding to increasingly complex and urgent social challenges. This has **created a widening gap between the needs of communities and the sector's enduring capacity to deliver support**.

There has also been **a noticeable shift in the relationship between government and civil society**. Civil society organisations are increasingly viewed through a transactional lens—valued primarily for service delivery rather than as essential partners in shaping policy and advocating for systemic change. This shift risks undermining the sector's independence and its critical role in holding government to account, amplifying marginalised voices, and driving responses to key societal issues such as poverty. **Where engagement with civil society in policy development does occur, it is often limited in scope and fails to reflect the time, expertise, and resources contributed**. This inevitability weakens the feedback loop between lived experience and policymaking.

Alarming, **certain government funding mechanisms for voluntary and community sector (VCS) delivery are inadvertently exacerbating poverty**. The prevalent reliance on short-term, project-based funding lacks the stability and flexibility needed to support sustainable, community-driven solutions.

The **sector's unique value and expertise must be recognised as a key asset in delivering a meaningful Anti-Poverty Strategy** and in eradicating poverty across communities. An increasingly overstretched voluntary and community sector cannot be expected to continue mitigating the impacts of poverty alone. **Government must work in genuine partnership with civil society to address the root causes of poverty**—not just its symptoms.

It is wholly unacceptable that voluntary and community-led initiatives such as food banks, community meals programmes, and breakfast clubs remain overwhelmed by demand and are so heavily relied upon by those in need

**A rebalanced relationship and funding model**—one that values the sector’s full contribution, including its roles in advocacy, innovation, and community-building—is essential to achieving delivery of a robust and effective Anti-Poverty Strategy.

#### *4.4 Lessons learned from the Northern Ireland Child Poverty Strategy, 2016-22*

In March 2024, the Northern Ireland Audit Office published their report on the Northern Ireland Child Poverty Strategy, 2016 – 2022<sup>7</sup>. The key findings from the report included:

- “There has been **little sustained improvement in child poverty levels** since 2016.
- “The cost of dealing with the effects of child poverty are likely to be significant – the report **estimated an annual cost of £825m - £1bn**.
- “The **Child Poverty Strategy’s outcomes were not clearly supported by specific actions and interventions**.”

The recommendations stemming from the report highlighted how the Anti-Poverty Strategy should learn from this review, including:

- “An **integrated, cross-departmental anti-poverty strategy is urgently needed**. As coordinating department in this area, when the Department [for Communities] presents a draft strategy to the Executive, it **should include an action plan containing clearly defined indicators and targets aimed at quantifying and reducing poverty**, including measures of persistent poverty and the poverty gap.
- “In leading on a new anti-poverty strategy, the Department should work with other contributing departments to identify opportunities where delivering interventions in a genuinely cross-departmental way (**including the role to be played by non-governmental organisations**) would be appropriate and effective, and present these proposals to the Executive for consideration.”

It is essential that any Anti-Poverty Strategy for Northern Ireland learns from the experience of the Child Poverty Strategy, 2016-2022. The Audit Office report clearly demonstrates the

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<sup>7</sup> <http://niauditoffice.gov.uk/files/niauditoffice/documents/2024-03/NI%20Audit%20Office%20Report%20-%20Child%20Poverty%20in%20Northern%20Ireland.pdf>

importance of actions and targets *accompanying* any strategy, and that addressing poverty will be a truly collaborative, requiring input and interventions from stakeholders beyond government departments.

## 5. Key Issues for Consideration

### 5.1 *Dedicated Resourcing and Long-term Investment*

Our **paper outlines an ambitious set of recommendations with the goal of eradicating poverty in Northern Ireland by 2045** at its core.

In light of the **ongoing cost-of-living crisis, rising levels of poverty and destitution, and increasing economic, social, and political uncertainty**, it is imperative that the Government commits to a sustained and coordinated effort to address poverty in full partnership with all key stakeholders.

While we acknowledge the significant budgetary pressures facing Government departments and public services, we have consistently advised that the **Anti-Poverty Strategy must prioritise new, targeted actions—backed by the necessary resources**—to achieve meaningful progress. Relying solely on existing initiatives risks entrenching the status quo, offering continuity without delivering real change.

Eradicating poverty **requires a comprehensive, long-term approach and sustained investment**. The interventions needed to address the root causes of poverty must be maintained over time to be effective. Although some of the recommendations in this paper are largely cost-neutral, it is essential that Ministers, departments, and agencies recognise that significant progress will only be possible with adequate resourcing and long-term commitment.

**Without this, the Strategy risks falling short**—lacking both ambition and impact—and failing to improve the lives of the growing number of children, families, and individuals experiencing poverty. This concern has also been clearly expressed by the Expert Advisory Panel in their earlier report.

While many of our recommendations will require additional investment, **others can be advanced through more collaborative and innovative working across departments, agencies, and sectors**. Central to this effort is the voluntary and community sector, which has consistently stepped in to address gaps in public policy and service provision. This sector must be properly resourced and supported to act as an equal partner in the final

design and delivery of the Strategy.

## *5.2 Connecting Wider Strategy and Policy Development*

The Anti-Poverty Strategy **must serve as an overarching framework that integrates and aligns with the broader policy landscape of the Northern Ireland Executive**. It should not be confined to a catalogue of existing or proposed initiatives but should instead provide a cohesive and strategic approach to tackling poverty across all areas of government.

Poverty—its causes and consequences—is deeply complex and far-reaching. As such, **our recommendations must be considered within the wider context of government strategy and policy development**. We have made efforts to reference relevant strategies throughout this paper, recognising the importance of policy coherence in achieving meaningful outcomes.

The Strategy **should actively promote and support economic and social policies that address inequality and disadvantage**—factors that disproportionately expose certain individuals and families to poverty and its effects. It must advocate for a whole-of-government approach that prioritises equity and inclusion.

At a minimum, and in line with the Expert Advisory Panels report<sup>8</sup>, the Anti-Poverty Strategy should be informed by and aligned with strategies focused on:

- Educational opportunity and attainment
- Racial equality
- Disability rights
- Gender equality
- Age-related inclusion
- Rural development
- Physical, emotional, and mental health
- Employability and skills
- Housing and homelessness

By ensuring strong connections between these areas, the Strategy can more effectively address the structural and systemic drivers of poverty and deliver lasting change.

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<sup>8</sup> [Recommendations for an Anti-Poverty Strategy \(communities-ni.gov.uk\)](https://communities-ni.gov.uk/recommendations-for-an-anti-poverty-strategy) (Pages 48-60)



### *5.3 Participation, Inclusion, and Co-design*

**Meaningful co-design, participation, and inclusion are essential to understanding the root causes and pathways into poverty**, as well as identifying effective solutions and interventions that can genuinely improve the lives of those experiencing or at risk of poverty.

Going forward, **the lived experience of poverty—and the vital role of civil society in amplifying, advocating for, and supporting the voices of those most affected—must be placed at the centre of the Anti-Poverty Strategy’s development and implementation**. The Department for Communities and the wider NI Executive should ensure that these perspectives are fully embedded within any further design or review processes.

This process must be grounded in the principles of inclusion and meaningful consultation, not only during the initial design phase but also as part of an ongoing cycle of review, reflection, and revision.

We wholly support and endorse the Expert Advisory Panel’s recommendations in this regard, as outlined in their report<sup>9</sup>.

### *5.4 Equality, Intersectionality, and Rights*

**Poverty cannot be separated from the broader inequalities that shape our society.**

The risk of experiencing poverty is not evenly distributed; it disproportionately affects individuals and communities already facing structural disadvantage.

As a group, **we recognise the multi-dimensional nature of poverty and its intersection with other forms of inequality**—linked to age, disability, ethnicity, gender, race, and more. We recommend that the **Anti-Poverty Strategy explicitly acknowledge that eradicating poverty requires addressing these intersectional realities**. This means implementing measures that are sensitive to the structural inequalities that disproportionately impact children, young people, women, deaf and disabled people, Black and minority ethnic communities, LGBTQI+ individuals, older people, those in insecure housing or homelessness, and people living in both rural and urban poverty.

Development work already undertaken by NI government departments including the work of the Department for Communities (DfC) on disability, gender, and other areas through the wider suite of social inclusion strategies—should be continued and should inform and shape

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<sup>9</sup> [Recommendations for an Anti-Poverty Strategy \(communities-ni.gov.uk\)](https://communities-ni.gov.uk) (Pages 23-24).



the continued creation of targeted, tailored responses and actions within the Anti-Poverty Strategy.

The **Strategy must also be underpinned by the statutory duty to promote equality of opportunity, as set out in Section 75 of the Northern Ireland Act 1998**. This legal framework is essential for identifying and addressing the specific impacts of poverty on the nine protected groups.

The importance of an intersectional approach has been further highlighted by the COVID-19 pandemic and the ongoing cost-of-living crisis. As many have observed, *“we may be weathering the same storm, but we are not all in the same boat.”* **Understanding the lived experience of poverty through an intersectional lens is critical** to designing effective, inclusive responses.

We also believe **the Strategy must be grounded in a rights-based approach, aligned with international human rights standards**. It should empower individuals experiencing or at risk of poverty to understand and exercise their rights, while holding public bodies accountable for fulfilling their responsibilities to promote and protect those rights.

We fully support the Expert Advisory Panel’s recommendation that the Anti-Poverty Strategy be rooted in the social and economic rights outlined in **relevant UN Conventions and aligned with the Sustainable Development Goal commitment to ‘end poverty in all its forms everywhere’<sup>10</sup>**.

### *5.5 Overarching, targeted outcomes and monitoring progress*

To ensure accountability and drive meaningful change, poverty must be measured in clear, objective, and consistent ways. The **Anti-Poverty Strategy should therefore include measurable, targeted outcomes aimed at reducing poverty both overall and among specific population groups**. This includes explicit targets for reducing child poverty.

**A robust monitoring and evaluation framework should be embedded** within the Strategy, enabling regular assessment of progress. This framework **must include disaggregated data across key equality categories**—such as age, gender, ethnicity, and community background—to ensure that progress is equitable and that disparities are identified and addressed.

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<sup>10</sup> <https://www.communities-ni.gov.uk/system/files/publications/communities/dfc-social-inclusion-strategy-anti-poverty-expert-advisory-panel-recommendations.pdf> Pages 24-26

Throughout this paper, **we have made several recommendations related to outcome measurement and monitoring, tailored to the specific outcomes under discussion.** We urge that these be carefully considered and integrated into the development of the Strategy.

## Proposed Outcomes

**We support the strategic vision statement proposed for the Anti-Poverty Strategy by membership of the Anti-Poverty Strategy Design Group. This statement reads as follows:**

*“Northern Ireland is an equal society where poverty and its impacts are eradicated, and that respects, protects, promotes and fulfils the rights of those at risk of poverty to ensure they achieve their aspirations.”*

**To achieve this vision, we recommend the Anti-Poverty Strategy commits to the following six high-level outcomes:**

### Outcome 1

The creation of an Anti-Poverty Act which will ensure that the rights of people experiencing or at risk of poverty are promoted, protected, and realised.

### Outcome 2

Working towards eradication by 2045, child poverty will be reduced by half over the lifetime of this Strategy.

### Outcome 3

No working age person shall live in poverty, regardless of whether they are in work, seeking work or unable to work. All those of working age will have sufficient income to participate fully in society and can access services and pathways to sustained and meaningful employment.

### Outcome 4

Working towards eradication by 2045, poverty among older people will be reduced by half over the lifetime of this Strategy. Older people experiencing or at risk of poverty will have adequate income and support in relation to their economic, physical, and mental wellbeing to ensure their equal participation in society.

### Outcome 5

We have attractive, safe, accessible, welcoming, and sustainable environments in the most deprived areas.

### Outcome 6

All people experiencing or at risk of poverty have equal access to high quality public services that meet their needs in a timely manner and are based on dignity, fairness, and respect.

## OUTCOME 1

**The creation of an Anti-Poverty Act which will ensure that the rights of people experiencing or at risk of poverty are promoted, protected, and realised.**

### Summary of calls

- 1.1 Creation of an Anti-Poverty Act containing statutory commitments and objective measures to eradicate poverty over twenty years.**
- 1.2 Commitment to an Anti-Poverty Strategy with clear, time-bound targets for the reduction of poverty by fifty percent over ten years.**
- 1.3 Creation of an independent Anti-Poverty Commission to monitor and promote the eradication of poverty and income inequality.**

### Introduction

To ensure that the rights of people experiencing or at risk of poverty are promoted, protected, and realised, so that they are lifted out of poverty and can participate fully in all aspects of life, we recommend the creation of an Anti-Poverty Act which will deliver:

<b>1.1 Creation of an Anti-Poverty Act containing statutory commitments and objective measures to eradicate poverty over twenty years</b>
<b>Details of proposal</b>
The Act will place an explicit duty on public bodies to recognise the relevance of equality characteristics on the experience and response to poverty - enshrining in law the commitment of the Northern Ireland Executive to Sustainable Development Goal no.1 (2015) which is to 'end poverty in all its forms everywhere'.
<b>Anticipated impact</b>
The setting of targets and timetables for 2030 and beyond, including four objective measures of poverty. It will include a duty to review plans and progress against targets every five years.
<b>Evidence base</b>
Recommendations for an Anti-Poverty Strategy: Report of the Expert Advisory Panel.

<b>1.2 Commitment to an Anti-Poverty Strategy with clear, time-bound targets for the reduction of poverty by fifty percent over ten years.</b>
<b>Details of proposal</b>
The strategic vision is that Northern Ireland is an equal society where poverty and its impacts are eradicated, and that respects, protects, promotes and fulfils the rights of those at risk of poverty to ensure they achieve their aspirations. In doing so the intersectional aspects of poverty will be addressed.
There are six outcomes of the strategy as outlined above. In addition, the Strategy

should be included as a key indicator under the Programme for Government where each department will commit to specific actions that will help reduce poverty levels across society. In doing so there should be a clear indication regarding the way in which resources will be allocated on the basis of objective need and taking account of	Section	75.
The Strategy will also support ‘Poverty Truth’ processes in which the lived experience of poverty is ethically recorded, published, and routinely brought to the attention of stakeholders and policymakers.		
<b>Anticipated impact</b>		
The Strategy will work towards the eradication of poverty by 2040, with child poverty reduced by fifty percent over ten years.		
<b>Evidence base</b>		
Recommendations for an Anti-Poverty Strategy: Report of the Expert Advisory Panel.		

<b>1.3 Creation of an independent Anti-Poverty Commission to monitor and promote the eradication of poverty and income inequality.</b>
<b>Details of proposal</b>
<p>An Anti-Poverty Commission will have responsibilities to:</p> <ul style="list-style-type: none"> <li>(a) monitor progress on eradicating poverty and income inequality;</li> <li>(b) promote the eradication of poverty and income inequality;</li> <li>(c) advise the Executive on any matters relating to poverty; and</li> <li>(d) embed partnership working with experts by experience - both in their work on understanding poverty and inequality and in designing of policy solutions.</li> </ul> <p>The composition of the Commission should include only persons who have experienced poverty, who have worked with persons experiencing poverty and who are experienced poverty researchers and policy makers.</p>
<b>Anticipated impact</b>
Scrutiny of the progress of the NI Executive in eradicating poverty, in line with (i) the duty placed on public bodies by the Anti-Poverty Act; and (ii) the policies aimed at reducing poverty contained within the Anti-Poverty Strategy.
<b>Evidence base</b>
<p>Recommendations for an Anti-Poverty Strategy: Report of the Expert Advisory Panel.</p> <p>The Scottish Poverty and Inequality Commission (<a href="http://www.povertyinequality.scot">www.povertyinequality.scot</a>)</p>

## OUTCOME 2

*Things have got worse in this area since September 2022*

*The child poverty rate (relative child poverty, after housing costs) has increased significantly from 18% in 2021-2 to 25% in 2023-4.<sup>11</sup>*

**Working towards eradication by 2045, child poverty will be reduced by half over the lifetime of this Strategy.**

### Summary of calls

- 2.1 Introduce a new weekly Child Payment to all children in poverty.**
- 2.2 Restore the value of key social security benefits for children to levels prior to austerity cuts.**
- 2.3 Reduce family outgoings and make education cost-free.**
- 2.4 Deliver a new Executive Early Education and Childcare Strategy, targeting families in poverty, which will provide accessible, affordable, high quality, flexible and sustainable childcare.**
- 2.5 Provide targeted interventions for children with specific additional vulnerabilities.**

### Introduction

“Nearly one in every three ... people living in poverty is a child. Along with their parents/carers, they make up nearly three out of every five people living below the poverty line. If we took action to raise the position of households with children above the poverty line, this would improve the living standards of the majority of all of those in poverty. ... The growing weight of evidence of the lifelong impact of adversity in childhood, including child poverty, and the cost of compensating for that impact, together with the *ethical imperative on any civilised society to protect its young*, are further reasons to prioritise the reduction of child poverty. (Expert Advisory Panel (EAP) report p17)

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<sup>11</sup> [https://www.gov.uk/government/statistics/northern-ireland-poverty-and-income-inequality-report-202324#:~:text=From%3A%20Department%20for%20Communities%20\(Northern,Agency%20Published%2027%20March%202025](https://www.gov.uk/government/statistics/northern-ireland-poverty-and-income-inequality-report-202324#:~:text=From%3A%20Department%20for%20Communities%20(Northern,Agency%20Published%2027%20March%202025)

The Executive should commit to eradication of child poverty by 2045, and to reducing child poverty by 50% over the ten years of this Strategy, in keeping with the poverty measures set out in the Act.

A focus group of children was asked ‘What would help people in poverty?’ Their answers reflected an awareness of key issues, and they suggested the following:

- The government should bump up universal credit
- The government should give people money
- People should donate money to charity
- The government should help people find a job
- All children should get free school meals
- The school should make sure that all kids have iPads or a computer to do their schoolwork
- Kids should travel free
- Make petrol cheaper
- Open more food banks
- Pay people more in their jobs
- Give people money each month if they can’t work
- Tutors for kids who don’t go to school
- Free counselling because poverty can make you depressed.

The key calls under this outcome focus on reducing income poverty of children and their families. However, the Executive must also ensure that children experiencing, or at risk of, poverty achieve their full potential, and they and their families and communities are supported to experience physical, mental, social wellbeing through its Children and Young People’s Strategy.

**The priority new action proposed for this outcome is ‘Introduce a new weekly Child Payment to all children in poverty.’**

## **2.1 Introduce a new weekly Child Payment to all children in poverty**

### **Details of proposal**

To deliver a reduction in the number of children living in poverty, a new weekly Child Payment should be introduced, similar to that in place in Scotland. This should, in the first instance, be set at £25 per week per child up to the age of 18, but this could be increased over time.<sup>12</sup> Eligibility criteria could be linked to Universal Credit and legacy benefits, ensuring that all children in poverty, of whom around two-thirds are in working households are eligible, and the payments made directly to families without an application process. Alternative application arrangements should be in place for those not in receipt of benefits, but who otherwise meet eligibility requirements, including families and children seeking international protection who have no recourse to public funds. This payment should be extended, for disabled young people, up to the age of 24.

<sup>12</sup> In Scotland the Child Payment has increased over time, with the current level being £27.15 per child per week.

<b>Anticipated impact</b>
The child payment will have a direct, immediate impact on the household income of families experiencing poverty and will lead to a measurable decrease in the child poverty rate. The level of impact depends on the eligibility criteria, and the level of the child payment.
<b>Evidence base</b>
<p>Deaf and disabled children and their families are more likely to live in poverty than their non-disabled counterparts<sup>13</sup>. Families with disabled children:</p> <ul style="list-style-type: none"> <li>• On average, face extra costs of £581 a month; and,</li> <li>• For almost a quarter (24%) of families with disabled children, extra costs amount to over £1,000 a month.</li> </ul> <p>The EAP report highlighted that increasing family incomes results in positive outcomes for children across a range of measures:</p> <p><i>‘There is considerable evidence that income matters to child outcomes. Two major systematic reviews of literature have examined the relationship between household financial resources and children’s outcomes (...) A large majority of the studies reviewed found significant positive effects of income across the range of children’s outcomes, including cognitive development and school achievement, social and behavioural development, and children’s health. A series of recent studies identified positive income effects on birth weight in particular ... Maternal depression, which impacts greatly on a child’s well-being and their development, improved with increased income.’ (p36)</i></p> <p>A focus group of parents (Barnardo’s, FG 7) reflected on the struggles of meeting the basic needs of their children:</p> <p><i>“I used to work with a mum who, in order to feed her kids, all she ever had was toast, literally. And she would just eat toast for every meal. So, she’d have two pieces of toast in the morning, cup of tea for lunch, and then toast for her tea. Because it was cheap and cheerful and quick. So, I think if you are struggling financially, it can affect things like your diet and your health.”</i></p> <p>Participants in a minority ethnic focus group (FG 1) spoke about their support for the Child Payment: <i>‘The weekly Child Payment recommended by the EAP would be very helpful.’</i></p> <p>See also the Save the Children briefing ‘Children Can’t Wait’ for further information on Child Payments.<sup>14</sup></p>

## **2.2 Restore the value of key social security benefits for children to levels prior to austerity cuts**

<sup>13</sup><https://www.equalityni.org/ECNI/media/ECNI/Publications/Delivering%20Equality/UNCRPD%20investigations/UNCRPD-Implementation-NI.pdf> p.174

<sup>14</sup> [children-cant-wait.pdf \(savethechildren.org.uk\)](https://www.savethechildren.org.uk/children-cant-wait.pdf)



Details of proposal
<p>Apply the principle of non-retrogression to austerity-related social security reforms affecting families with children.</p> <p>The central role of the UK Government in shaping social security policy across the UK is recognised. The UK Government should undertake a review of how the levels of social security payments to families with children have changed over time, and take action to increase these payments up to pre-austerity levels. This should include removing the ‘two child limit’ to UC and child tax credits.</p> <p>We recognise that Social Security is devolved, and so, the NI Executive should put in place mitigations to:</p> <ul style="list-style-type: none"> <li>• Address losses in family incomes due to the two-child limit to Universal Credit and Child Tax Credits;</li> <li>• Restore the value of Child Benefit to 2010 levels;</li> <li>• Restore the value of child elements within Universal Credit; and</li> <li>• Remove the benefit cap, for new claimants as well as those receiving ‘legacy’ benefits.</li> </ul> <p>The NI Executive should also:</p> <ul style="list-style-type: none"> <li>• Ensure that, by default, UC payments are paid to the lead carer of children in ‘two parent’ households;</li> <li>• For the purposes of UC, treat Maternity Allowance as earned income and not deducted pound for pound;</li> <li>• Enhance statutory maternity pay as well as maternity allowance (the minimum standard set by the EU is 14 weeks of full paid leave, but many countries offer more)</li> <li>• Restore the Sure Start Maternity Grant for all babies (rather than just first baby) whose parents have a low income, and widen provision to ensure that parents of disabled babies have access to the grant<sup>15</sup>;</li> <li>• Restore the Health in Pregnancy grant or develop a new mechanism to support a nutritious diet in pregnancy; and</li> <li>• Increase awareness of eligibility for benefits and promote benefit uptake, ensuring information is available in a range of languages.</li> <li>• Extend the Healthy Start scheme to include all families with children under 4.</li> </ul>
Anticipated impact
<p>In a similar way to the first call, this proposal will deliver an immediate increase in family incomes for thousands of families with children across Northern Ireland and will lift a sizeable proportion of children out of poverty.<sup>16</sup> Indeed, the adults within</p>

<sup>15</sup> [Disability Strategy Expert Advisory Panel Report](#) pp.46-48 (accessed 18 December 2021).

<sup>16</sup> NISRA should identify the number of children lifted out of poverty if these measures are implemented.

their households will also benefit from the increased payments. As highlighted above, increasing incomes of families delivers positive change in relation to a wide range of wellbeing outcomes.

### Evidence base

Over a number of years successive UK governments have applied austerity cuts to key social security benefits, including to those provided to families with children. While the Executive provided a package of Welfare Reform mitigations to replace some of the benefits lost through these cuts, this was not the case for the cuts targeted at those benefits provided to families with children, including the Two Child Limit to Universal Credit and Tax Credits and the removal of the family element for new claimants.

The NIHRC commissioned a cumulative impact assessment of tax and social security reforms in NI from March 2010 to May 2019, taking into account the particular circumstances of Northern Ireland and the Executive's mitigation package. This found that households with children have experienced much larger losses as a result of the reforms than households without children. Losses were particularly dramatic for:

- Lone parent households – losing around £2,250 on average, around 10% of their net income;
- Households with three or more children – losing around £2,575 on average, compared to average losses of £50 for households with one child; and
- Households with at least one disabled child – losing around £2,000 on average, compared to households with adults and children without disabilities which lost around £50 on average.<sup>17</sup>

A focus group with parents conducted by Employers For Childcare and Parenting NI identified the impact of 'Welfare Reform' on family incomes:

*'The introduction of Universal Credit, and other changes to the social security system, were raised by participants throughout both discussion groups. Several participants raised the bedroom tax and also the two-child limit, and how restrictions on the amount of support that families can receive in social security benefits has the potential to push families into poverty by not providing enough financial support. Participants also mentioned the impact of the five-week wait for the first payment on Universal Credit. While participants identified that advance loans are available, they noted how this can essentially mean a person is starting their Universal Credit claim in debt. Again, the impact of the debt cycle was reiterated.'*

<sup>17</sup> <https://nihrc.org/publication/detail/cumulative-impact-assessment-of-tax-and-social-security-reforms-in-northern>

## 2.3 Reduce family outgoings, and make participation in education cost-free

### Details of proposal

Remove barriers to educational experience, and reduce hardship in families, by ensuring that participation in education is cost-free including:

- Review school uniform policy (including PE and sports uniforms) and place guidance on a statutory basis. Cap the costs of school uniform and increase the school uniform grant to meet these costs;<sup>18</sup>
- Ensure appropriate access to technology devices and internet to achieve digital inclusion for all children;
- Participation in all school activities should be free (sports, drama, residential trips etc);
- Expanding the funding for the provision of breakfast and homework clubs;
- Review eligibility for Free School Meals, and promote uptake to ensure that all children in poverty are eligible and in receipt of FSMs;<sup>19</sup>
- Restart payments in lieu of FSMs to families in poverty during school holidays on a permanent basis;
- Protect Education Maintenance Allowance to ensure that it doesn't fall below current levels.

Review provision of public transport and school transport in rural areas to ensure young people are able to participate in social, leisure, and afterschool/weekend activities. Provide free public transport to all children and young people under the age of 22.

***Cross referenced in Objectives 3 and 5.***

### Anticipated impact

Implementing these measures will result in increased engagement in education, and participation in school activities. This will contribute to addressing the education 'attainment gap' and reduce families' debt and hardship due to education and transport costs.

Ensuring all children in poverty are eligible for Free School Meals and addressing the stigma associated with it, along with continuing to make payments in lieu of FSMs over holiday periods will address hunger among children.

Protecting EMA will support young people in poverty to stay in education and improve education, training, and career choices in the future.

<sup>18</sup> We note that draft legislation is currently at Committee stage at the Assembly, but that it currently doesn't allow the Minister to set a cap on costs of uniforms. Moreover, there has been no commitment made to increase the level of the school uniform grant to match the cap;

<sup>19</sup> This may be best addressed through providing universal free school meals – this was proposed by all the focus groups with parents and the Barnardo's children's group.

## Evidence base

In each of the focus groups with parents and with young people the costs associated with education were highlighted as critical to address.

Across the focus groups there was broad support for measures to reduce the costs of school uniforms, including of sports and PE uniforms, and for the grant to be increased to meet the costs.<sup>20</sup> Young people felt that schools should have a uniform, but that it should be less formal, and more affordable. *‘One shared how her school blazer alone cost over £100, which was more than the grant she received to help pay for her entire uniform.’* (Young people – VOYPIC, FG3). Parents spoke about the pressure buying uniforms put on family finances, particularly as children grew, (Parents – EFC and PNI, FG2).

*‘I’m dreading it. I don’t see any reason for it [being so expensive], I can’t see a justification for it costing so much money.’ Even parents who get the uniform grant, it barely makes a dent in high school. You can get a blazer and that’s about it.’* (Parents – Barnardo’s, FG7)

Free School Meals (FSMs) were also raised in the focus groups with parents and children. Young people talked about the importance of school lunches, noting that, for some, it was the only substantial meal they received. One young person remarked: *‘I remember going to school without any breakfast and being really starving until lunchtime. It was really difficult to pay attention.’* These young people also noted that they felt even more hungry during holiday periods, especially during the summer holidays, and about how hunger had negatively impacted on their health. Youth workers and teachers also spoke about young people being hungry. (Young people, EA Youth Service, FG5)

When parents discussed this, they queried the eligibility criteria for FSMs:

*“I can’t understand why you get free school meals, if you earn less than £16,000 and you have one child. But if I earn just over £16,000, and I have four kids, it doesn’t matter. I’ve four mouths to feed but we were literally only over that and so I couldn’t get the free school meals. I can’t understand that.”* (Parents, Barnardo’s, FG7)

Eligibility for FSMs was discussed by the APS Co-Design Group and, to inform this, NISRA analysed the proportion of children in poverty who were accessing free school meals. According to this, less than a third of children in poverty are in receipt of FSMs. The Department’s statistical bulletin ‘School Meals in Northern Ireland 2019/20’ reports that in that year 96,686 pupils were eligible for FSMs and there was

<sup>20</sup> Families in England can claim up to £150 per child, between £125 and £200 in Wales and at least £120 to £150 in Scotland. In Northern Ireland, low-income families can receive a grant of £35.75 towards primary school uniform cost and between £73-£78 for post-primary uniform and PE kit. DE have confirmed that the grant rate has not changed in over a decade.

an uptake of 77,210 pupils.<sup>21</sup>

**Percentage and Number of Children in Poverty Receiving / Not Receiving Free School Meals (FSMs) 2016/17 - 2018/19<sup>22</sup>**

FSM Status	Relative Poverty (BHC)		Absolute Poverty (BHC)		Relative Poverty (AHC)		Absolute Poverty (AHC)	
	%	Number	%	Number	%	Number	%	Number
In Receipt of FSMs	28	27,000	28	23,000	32	36,000	30	29,000
Not in Receipt of FSMs	72	69,000	72	58,000	68	77,000	70	67,000
All Children	100	97,000	100	81,000	100	114,000	100	97,000

*Figures based on an average of 3 years of data, Figures are rounded to the nearest thousand / %*

NICCY has since commissioned analysis of FRS data to better understand these figures.<sup>23</sup> This found that four in ten (41%) of children in poverty are not eligible for FSM, and that not all children eligible for FSM are living in poverty according to the current methods for measuring income inequalities, highlighting the inadequacy of the current eligibility criteria to target children in poverty. It found that increasing income thresholds didn't significantly increase the proportion of poor children eligible for FSMs, and that the main reason children in poverty were not eligible was due to their families not being in receipt of benefits.

FSM eligibility should be expanded to include additional eligibility criteria based on the income levels of families, equivalised by family size to ensure that all children in poverty, as well as children in families in receipt of state benefits are entitled to FSM. It is not adequate to increase the number of children able to access FSM solely by increasing income thresholds in the eligibility criteria, as this will only marginally increase the number children in poverty accessing FSM.

The costs and impact of poor provision of public transport was also a topic for discussion. Many raised concerns about the poor provision of public transport in rural areas, resulting in some children not being able to access services or activities. Others noted that young people in low-income families in urban settings may be disadvantaged in terms of free transport to school, which was provided only in relation to distance rules and not family income.

*'There was also an indication from some of the young people that pupils may deliberately miss school rather than be embarrassed about not being able to get on a school bus because they could not afford it. There was a suggestion amongst one engagement group that all school transport should be free to break*

<sup>21</sup> DE/NISRA, (April 2020), [School Meals in Northern Ireland 2019-2020](#).

<sup>22</sup> DfC/NISRA, Information presented at meeting of the APS Co-Design Group 23 February.

<sup>23</sup> NICCY (2025), [Briefing on Free School Meals \(FSM\) eligibility in Northern Ireland - NICCY](#) (Belfast: NICCY).

*down barriers to education for the less well off.’ (Young people and youth workers, EA Youth Service, FG5)*

In addition to the focus group consultations, further information in support of these proposals is set out in the Parent Engagement Group paper ‘School Uniforms in Northern Ireland,’<sup>24</sup> in NICCY’s 2016 report on the costs of education,<sup>25</sup> the Children’s Society 2020 survey,<sup>26</sup> research by the Irish League of Credit Unions,<sup>27</sup> and research by the Nuffield Foundation.<sup>28</sup>

High costs of mandatory school uniform have been recognised as a source of unnecessary financial and emotional stress for families across the UK. Sometimes forcing families to cut back on food and heating, with many having to delay essential bills and take on debt,<sup>29</sup> and turning to doorstep lenders or payday loan companies to meet the costs.<sup>30</sup>

*“With ever increasing cost regards food, electricity, and gas I am struggling now with a brand-new uniform for my eldest child. Again, due to Universal Credit poverty strikes again... It’s just money, money, money in already stressful and difficult times.” (Andrea N, lone parent with two children, Northern Ireland)<sup>31</sup>*

School holidays are a particularly hard time for households experiencing food insecurity. (CiNI 2020) Research suggests that an estimated 3 million children in the UK are at risk of hunger in the school holidays (Forsey, 2017). Accordingly, the Food Foundation’s 2019 [Children’s Future Food Inquiry](#) report found that,

*“the 13 weeks of the year when children are on holiday can create a profound financial pressure point which forces the family into greater food insecurity and in turn leads to cutbacks on other important family expenditure. A shortage of funds can leave them isolated and bored. (p53)*

## **2.4 Deliver a new Executive Early Education and Childcare Strategy, targeting families in poverty, which will provide accessible, affordable, high quality, flexible and sustainable childcare.**

### **Details of proposal**

The Childcare Strategy must be fully costed and resourced, with ambitious targets,

<sup>24</sup> Parent Engagement Group, (Nov 21), ‘[School Uniforms in Northern Ireland: a discussion paper](#)’.

<sup>25</sup> NICCY, (2017), ‘[A Free Education? The cost of education in Northern Ireland](#), (Belfast).

<sup>26</sup> [Children’s Society 2020](#)

<sup>27</sup> [Irish League of Credit Unions](#)

<sup>28</sup> [Research by the Nuffield Foundation](#)

<sup>29</sup> [The costs of going back to school. A Covid Realities Rapid Response Report](#)

<sup>30</sup> Research from the Irish League of Credit Unions identified that just under a third (32%) of families in Northern Ireland go into debt to cover the costs with 21% using a credit; 13% drawing on savings and 2% turning to a doorstep lender or payday loan company. See [Back to school costs](#)

<sup>31</sup> [The costs of going back to school. A Covid Realities Rapid Response Report](#) at p4



to ensure parents can access and afford the high-quality childcare they need to work, or to access education and training, while supporting providers to deliver this sustainably and flexibly. While aspects of this may be universal, significant aspects must be specifically designed to target families in poverty. As part of the Strategy:

- There should be a new funding model, directly funding childcare providers to offer an allocation of **fully funded or subsidised early education and childcare** to all families, targeted particularly when childcare is likely to be of most cost to parents and of greatest benefit to children. Public funding must support a move towards a system where overall access is fair, affordable, flexible, and high quality for all, with specific actions targeting families on low incomes.
- The new funding model must invest in improving the quality of provision, supporting childcare providers to be sustainable, and enhancing pay and conditions for the workforce, ensuring it is properly valued. This model should address the additional costs of childcare provision for disabled children<sup>32</sup>.
- Appropriate school age childcare should be available for families, facilitating a wide range of parental working patterns, both wrapping around the school day and during holidays.
- Flexible and affordable childcare should be available for families where parents work atypical hours and shift patterns.
- Ensure all parents are aware of the financial support they are entitled to with registered childcare costs, and that those not in paid employment because they are caring for their children know about National Insurance credits.
- Cut the five week wait for Universal Credit, and pay the childcare element directly to childcare providers, as with the new expanded ADF for upfront childcare costs
- Expand provision and availability of childcare for older children, particularly those who have a disability or additional needs.
- Ensure sufficient and disability-sensitive childcare as a statutory duty ;
- Staff within childcare settings should receive cultural competency and equality and human rights training.
- Recognise the role of grandparents in providing informal childcare, including raising awareness of Specified Adult Childcare Credits which can count towards their state pension entitlement if they leave work early.
- Give specific consideration to the needs of lone parent families, families who have a child with a disability, families living in a rural area, migrant families, and those from an ethnic minority background, including families who have no recourse to public funds and therefore may be unable to access financial support with the cost of registered childcare.

***Cross referenced in Objectives 3 and 5.***

<sup>32</sup> DFC (2020): [Disability Strategy Expert Advisory Panel Report pp.46-48](#) (accessed 18 December 2021).

Anticipated impact
<p>An effective Early Education and Childcare Strategy will help to reduce child and family poverty in the following ways:</p> <ul style="list-style-type: none"> <li>• Flexible, affordable childcare will reduce pressures on family income and help more parents to participate in work, education, or training, reducing a family’s short and long-term poverty risks</li> <li>• High quality early education and care will improve long-term educational, developmental and employment outcomes for children and counter some of the negative effects of poverty</li> <li>• Reduce the gender pay gap and social inequality through ensuring no-one – including women – are constrained in their employment options by an inability to access or afford childcare.</li> </ul> <p>‘While childcare is an essential part of our economic infrastructure, its role in child development must also be acknowledged; any developmental delay can be quickly identified, and early intervention facilitated. Good quality childcare has been shown to have long-standing benefits for children’s language development and educational outcomes.’ (EAP report, p39, quoting SCUK report)</p>
Evidence base
<p>The Joseph Rowntree Foundation’s <a href="#">UK Poverty 2022 report</a> highlights rising levels of poverty particularly for larger and lone parent families, and those with younger children. It identifies that the cost and availability of childcare can pose a barrier to work that guards against poverty, particularly for parents of three or more children or of younger children.<sup>33</sup></p> <p>A <a href="#">European Commission Technical Report</a> published in March 2019 found that “to achieve significant poverty reductions among young children, both additional childcare slots and increased mothers’ employment should be well targeted.” They also reported that the expenditure could to a large extent be recovered through the financial benefits of additional employment.</p> <p>There is clear evidence from <a href="#">The Institute for Fiscal Studies</a> that children who benefit from quality, enriching childcare achieve better educational outcomes and, over their lifetime, have higher earning potential.</p> <p>Findings from the <a href="#">Northern Ireland Childcare Survey 2021</a> show that:</p> <ul style="list-style-type: none"> <li>• The average cost of a full-time childcare place in Northern Ireland equates to 34% of the median household income, amongst the highest in the OECD countries.</li> <li>• Childcare is the largest or second largest monthly outgoing for 57% of families</li> </ul>



- 28% of families are struggling to meet the costs of childcare. 41% of parents report regularly having to use means other than their income to pay for childcare including savings, overdrafts, credit cards and even payday loans.
- **Lower income households in Northern Ireland are much less likely to be using childcare than households on a higher income** – 26% of families with a household income of £15,000 or less are using no childcare, and a parent is looking after the children themselves. This compares to 4% of families with a household income of £50,000+. Enabling parents on lower incomes to access the childcare they need to work is a key contributing factor to increasing household income.
- For 44% of parents, difficulties in accessing or affording the childcare they need have impacted on their ability to work. This rises to 58% of mothers, compared to 27% of fathers.
- Parents revealed that the times when it is more difficult to afford the childcare they need to work are when returning to work from parental leave and when their child is aged 0-2 years.

The Equality Commission for Northern Ireland has identified the lack of accessible childcare as a particular issue for parents of Deaf and disabled children.<sup>34</sup>

Quotes from parents:

*“I gave up work and my career to care for our children because I felt I had no other option. This impacted my well-being, mental health, and our family’s ability to buy a home. I feel I now have very limited career options for the future.”*

*“Both my husband and I work full time. My husband is on minimum wage and so his entire wage goes on childcare. It is unaffordable when you have no alternative support. I have sleepless nights worrying about the cost of childcare. It is soul destroying.”*

*“I had to reduce my working hours by half so I could afford childcare. Working full time isn’t an option because childcare is too expensive. I’ve had to use food banks to cover us at times. I’m a professional and this shouldn’t be the case.”*

## 2.5 Provide targeted interventions for children with specific life experiences

### Details of proposal

Identify groups of children and young people with specific life experiences, for example: the social exclusion of Travellers; rural isolation; children with care experience; having a disability or caring responsibilities; coming from a minority ethnic background; having experience of violence within the home, sexual exploitation, homelessness and/or hate crime.

Once identified, develop a series of actions to address child poverty among these

<sup>34</sup> ECNI (2013): ‘[Childcare – Maximising the Economic Participation of Women](#)’, page 43 (accessed 30 October 2021).

groups and investigate how poverty interacts with these life experiences.

Consider measures such as a winter fuel allowance for families with disabled children; review the core eligibility criteria for the Warm Home Discount to ensure support is targeted at disabled people who face extra energy costs more effectively.

Review the geographical provision of Sure Start services to ensure wider provision to families in poverty, and broaden this to more deprived Super Output Areas in NI, but also ensure provision in the most deprived rural locations. Ringfence specific funding to the inclusion of disabled children and their families.

### **Anticipated impact**

For every child in poverty, there are specific circumstances that have led to this, particular to their family situation, and their life experiences. While actions listed above to lift children out of poverty may have a positive impact on most, the particular circumstances of others require tailored actions. This will ensure that no child is left behind in the Executive's commitment to eradicate child poverty, and that children are growing up in poverty because of social exclusion linked to their ethnicity or disability, or because of abuse/neglect.

### **Evidence base**

One focus group discussed the need to ensure accessibility to Sure start: *'In terms of child poverty, the expansion of Sure Start has been mentioned for the 30% most deprived Super Output Areas in NI however, you have to be in certain postcodes to avail of help and often people in rural areas miss out on this help. This needs to be addressed as there can be pockets of disadvantage in rural areas which are not reflected within these postcodes. Rural areas tend to miss out on the benefits of Sure Start initiatives. There should be a better measure for them so that more people can access this help particularly those in rural areas.'* (Women, Womens Support Network, FG4)

## OUTCOME 3

**No working age person shall live in poverty, regardless of whether they are in work, seeking work or unable to work. All those of working age will have sufficient income to participate fully in society and can access services and pathways to sustained and meaningful employment.**

### Summary of calls

- 3.1 Address low pay and precarious work, reducing poverty and the risk of poverty.**
- 3.2 Ensure people do not live in poverty through a robust, transparent and human rights-based benefits and social security system.**

### Introduction

We propose that in working towards this outcome over the lifetime of the Strategy, Government will substantially reduce poverty amongst working age people by addressing low pay and precarious work across society, removing barriers to participation in work, and by ensuring that a robust social security system protects against poverty. In doing so, intersectional barriers to employment and access to an adequate standard of living will be addressed.

*“There are two key ways in which the household incomes of those in poverty can be raised. Firstly, some of the poverty of working age people can be tackled through more jobs, more hours and larger pay packets, including dealing with the problem of ‘exclusionary work’...*

*Not all working age people are able to work and, equally important, not all are in a position to work. The so-called ‘economic inactivity rate’ in NI is typically five to six percentage points above the rate in Britain – 26.9 compared to 20.9. Some of this difference is explained by higher rates of chronic illness and disability in workless households and is partly related to the past decades of political violence...*

*The second way of raising people out of poverty is by providing a higher income floor through the benefits system”* (Expert Advisory Panel Report, p.29 - 30)

We propose the following key actions which in our view should be taken as a matter of priority to achieve this outcome. **We would wish to highlight, however, that all the recommendations outlined within Chapters 5 and 7 of the Expert Panel report are relevant to this area and should be taken forward as part of the Anti-Poverty Strategy.**

#### **3.1 Address low pay and precarious work, reducing poverty and the risk of poverty:**

- Fully implement the NI Executive Scoring Social Value policy, allocating sufficient resources across Government to do so. Monitor implementation amongst employers and ensure policy is enforced.
- Pay particular regard to those most affected by low pay (young workers, part-time workers, women, disabled people). Ensure young workers benefit from real Living Wage via the Scoring Social Value policy and bring forward gender pay regulations and measures to close the disability employment gap without further delay.

- Introduce a childcare strategy which ensures affordable, accessible, and high-quality childcare, removing barriers to parents – particularly women’s - participation in work.
- Encourage private sector accreditation as Real Living Wage employers and link social value criteria to other forms of Government support.
- Enhance collective bargaining rights across the economy, adopting legislation to increase collective bargaining coverage.
- Executive to bring forward legislation to ban ‘zero-hours’ contracts.
- Support measures to recognise the needs of growing numbers of older workers.

### Details of proposal

In November 2021, the then Finance Minister launched the Executive Scoring Social Value policy and stated that from June 2022 any company delivering services for government will have to pay staff working on that contract the real Living Wage as calculated by the Living Wage Foundation. The Executive subsequently approved a revised version of PPN 01/21 – Social Value in Procurement in December 2024, which became effective on 24<sup>th</sup> February 2025. The current real Living Wage rate as calculated by the Living Wage Foundation is £12.60 per hour.<sup>35</sup>

The Scoring Social Value policy is a Northern Ireland Executive policy and is mandatory for Government Departments across a range of public bodies.<sup>36</sup> The policy makes clear that any additional costs arising from this condition should be built into business cases. The policy further requires continual monitoring of the delivery of the social value measures included in public contracts.<sup>37</sup>

If properly and fully resourced and implemented across all aspects of public procurement, as a Group we believe the Scoring Social Value policy has the potential to act as a significant lever in reducing in-work poverty. But this policy will only be as effective as its implementation allows. Budget processes within Government Departments and public bodies must ensure that sufficient resources are allocated for the implementation of the policy, and business cases must be monitored to ensure that they have factored in payment of the real Living Wage. Contract monitoring processes must ensure that employers providing services under Government contracts are paying staff the real Living Wage as a minimum and have clear fair work practices in place. Employers found to not be following the policy should not benefit from future contracts. **Without such oversight and enforcement, the Scoring Social Value policy will not have a transformative effect on in-work poverty.**

The Executive should monitor the implementation of the Scoring Social Value policy as it relates to young workers and women in particular.

A particular concern of Group members is the fact that young people have not traditionally benefited from minimum wage increases in the same way as others, due to the fact that

<sup>35</sup> <https://www.livingwage.org.uk/>

<sup>36</sup> <https://www.finance-ni.gov.uk/articles/list-bodies-which-public-procurement-policy-statement-applies>

<sup>37</sup> Procurement Policy Note PPN 01/21 ‘Scoring Social Value’ Available at <https://www.finance-ni.gov.uk/sites/default/files/publications/dfp/PDF%20PPN%2001%2021%20Scoring%20Social%20Value%20March%202022.PDF>

differential rates apply with regards to the minimum wage.<sup>38</sup>

Government should make it particularly clear that the policy applies to all workers under Government contracts, not just those aged 21 and over. The monitoring processes discussed above should have a particular focus on rates of pay for workers aged under 21. As a Group we understand from our previous engagement with officials in the Department of Finance that the policy does not bar under young people from being paid the real Living Wage, but does not apply to apprentices.

We are conscious that, under Section 19 of the Employment Act (Northern Ireland) 2016, provision exists for regulations to be made requiring employers to publish information relating to the gender pay gap, along with a requirement on employers to produce an action plan to eliminate differences where they are found to exist. Additionally, the Gender Equality Strategy Co-Design Group have focussed on the implementation of gender pay gap regulations, strengthened equal pay legislation with full compliance and have highlighted the importance of women having sufficient income and economic independence. Section 19 of the Act further requires that these regulations include statistics within each pay band on disability, and data on the ethnicity pay gap.

In March 2024, the NI Human Rights Commission and Equality Commission for NI issued a report relating to the EU Pay Transparency Directive (PTD) and the UK Government's dynamic alignment obligations relating to Article 2 of the Windsor Framework. This report recommends that, as a result of the obligations under Article 2, the UK Government must transpose provisions of the PTD in NI law.<sup>39</sup> Whilst the Department for Communities has consulted on gender pay gap reporting (closing in February 2025), this did not refer to the obligations arising under Article 2 of the Windsor Framework and the proposals fall far short of what is required in the Directive. The Commission's report provides detailed guidance on the minimum measures which need to be implemented to be in compliance with the Directive, including on thresholds for gender pay gap reporting – which are lower than those proposed in the DfC's consultation - , banning pay secrecy clauses, monitoring and enforcement and action plans.

We would urge the Department for Communities to prioritise the development of robust gender pay gap reporting regulations, in line with minimum obligations set under the PTD, as well as measures to close the disability employment gap, without delay.<sup>40</sup>

For women in particular, childcare remains a significant barrier to participation in the labour market. Affordable, universal childcare is associated with maternal employment rates, but as NIC-ICTU have identified it is important that any policy which seeks to increase women's employment is not one that leads to the continued creation of poor-quality employment in the childcare sector, which itself has an overwhelmingly female workforce.<sup>41</sup> The childcare sector itself is an example of a sector in which greater unionisation and collective bargaining is needed to improve pay and conditions, as we

<sup>38</sup> Currently you must be aged 21 to qualify for the National Living Wage of £12.21 per hour (rate since April 2025). The minimum wage rates apply incrementally for those aged under 21, with under 18s only entitled to £7.55 per hour (<https://www.gov.uk/national-minimum-wage-rates>).

<sup>39</sup> [https://www.equalityni.org/ECNI/media/ECNI/Publications/Delivering%20Equality/DMU/ECNI\\_NIHRC\\_Briefing-paper\\_Pay-Transparency-Directive\\_4-March-2024.pdf](https://www.equalityni.org/ECNI/media/ECNI/Publications/Delivering%20Equality/DMU/ECNI_NIHRC_Briefing-paper_Pay-Transparency-Directive_4-March-2024.pdf)

<sup>40</sup> For further information see Irish Congress of Trade Unions Consultation Response on Gender Pay Gap Reporting regulations.

<sup>41</sup> Childcare in Northern Ireland: Cost, Care and Gender Equality, NIC-ICTU, October 2020 (<https://www.ictuni.org/publications/ictu-childcare-report>), p.4

discuss further below.<sup>42</sup>

As outlined in relation to Outcome 2, a fully funded and resourced Executive childcare strategy is essential for reducing child and family poverty, allowing more women to participate fully in work, education, or training. A key focus of that strategy should be supporting providers to enhance pay and conditions for the childcare workforce, ensuring it is properly valued.

In order to devise appropriate measures for this outcome in relation to poverty amongst working-age adults, we recommend that DfC work in conjunction with the Procurement Policy Branch and CPD within the Department of Finance to estimate how many workers across the private sector are anticipated to benefit from the Scoring Social Value policy over the lifetime of the strategy. This should then be mapped against existing poverty rates amongst working-age adults in order to determine an attainable and realistic target reduction in poverty as a result of the full implementation of the policy over the lifetime of the Anti-Poverty Strategy.

As a Group we are acutely aware that the Scoring Social Value policy has limitations with regards to its potential to address low pay and precarious work across the entirety of the labour market.

**It is vitally important to understand that that it has been identified that increasing minimum rates of pay in of itself does not eliminate low pay.<sup>43</sup> It is vital that both low pay and precarious work be addressed, with the actions described below taken in conjunction with moves to pay the real living wage through implementation of the Scoring Social Value policy. These measures should be viewed as a package, with the success of the outcome dependent upon the effective implementation of all.**

For those workers in sectors of the economy which do not deliver Government contracts, the Executive should encourage employers to be accredited as Real Living Wage employers by the Living Wage Foundation, in line with the example set by the Executive in becoming accredited in November 2021. Consideration should be given as to how the social value and fair work practices outlined within the Scoring Social Value policy should be linked and mainstreamed into policy-making around other forms of Government support for the private and third sectors.

**A key lever to increase wages across the economy at little cost to Government is to enhance collective bargaining rights, increasing collective bargaining coverage.**

Research carried out by the Nevin Economic Research Institute on the impact of collective

<sup>42</sup> In 2019, it was estimated that the childcare sector employs an estimated 10,000 paid workers. Median hourly pay (excluding overtime) amongst childcare workers was significantly below median hourly pay of all workers (excluding overtime). Almost half of all childcare workers were estimated to earn below the real Living Wage (Childcare in Northern Ireland: Cost, Care and Gender Equality, NIC-ICTU, October 2020 (<https://www.ictuni.org/publications/ictu-childcare-report>), p.14, 15 & 16 - 17)

<sup>43</sup> Dr Lisa Wilson of the Nevin Economic Research Institute states that: “*low pay is about much more than the hourly wage rate. In this respect, you can have a very high hourly wage rate but still be low paid, if you only work a small number of hours. Consequently, we need to consider much more thoroughly how pay interacts with other aspects of the labour market to fully capture and appreciate what needs to be low paid and in turn what it takes to end low pay. So, while legal wage floors are vital for regulating the bottom of the labour market, they do not by themselves get rid of low pay – or ensure that work pays.*” ‘Low Pay in Northern Ireland: an Update’ November 2020, by Dr Lisa Wilson, Nevin Economic Research Institute (<https://nerinstitute.net/blog/low-pay-northern-ireland-update>)



bargaining on pay in Northern Ireland has found that whilst education and qualifications remain the most important determinants of pay, a significant collective bargaining premium remains. Whilst Government cannot decide the pay settlements practices of individual firms, it does construct the legislative framework in which pay settlements occur and should not only remove legal barriers to bargaining, but should incentivise it to occur.<sup>44</sup>

At the European level, a Directive on adequate minimum wages is now in force that includes provisions around enhancing collective bargaining rights.<sup>45</sup> **The Executive should move to adopt similar legislation within Northern Ireland, using devolved powers for employment rights.**

In addition to addressing low pay via the Real Living Wage and enhanced collective bargaining, precarious work across the economy must be tackled. Within 'New Decade, New Approach' the parties agreed that the Executive should move to ban zero-hours contracts.

Following a public consultation phase carried out in 2024, the Economy Minister announced in April 2025 plans to bring forward a 'Good Jobs' Employment Rights Bill. Whilst the detailed provisions of the Bill are currently being drafted, the Minister has proposed that under the Bill, people on zero hours contracts will have the right to move to a banded hours contract that reflects their average working hours. Workers on a zero hours contract will also have the right to reasonable notice of shifts, and the right to compensation if shifts are cancelled or curtailed at short notice. The Minister has suggested that zero hours contracts will only be permissible for work that is genuinely casual or seasonal.

The Minister has also referred to the overarching aim of working towards the target in the EU Adequate Minimum Wage Directive of a collective bargaining coverage rate of 80%, highlighting that to reach this target across the economy there needs to be an expansion of trade union membership. The Minister has stated that the legislation will give more workers the opportunity to be represented by a recognised trade union, by lowering the recognition threshold and through trade unions being able to request access to a workplace including to negotiate with employers on issues such as terms, conditions and pay. Employers will not be permitted to unreasonably withhold access.<sup>46</sup>

Whilst the ICTU has welcomed the Minister's proposed way forward as representing progress, it has highlighted that these proposals have yet to be translated into legislation and that this will require further detailed examination.<sup>47</sup>

It should further be noted that a particular concern of Group members, with regards to poverty amongst working-age adults relates to migrant and minority ethnic workers. As NIC-ICTU identify, it is particularly important that these workers can join and organise in

<sup>44</sup> Mac Flynn, P. (2020) The Impact of Collective Bargaining on pay in Northern Ireland, NERI Working Paper Series, NERI WP 2020/N0 66, Belfast: NERI

<sup>45</sup> 2020/0310 (COD).

<sup>46</sup> Oral Statement – Good Jobs Employment Rights Bill – 28<sup>th</sup> April 2025 – Dr Caoimhe Archibald MLA, Minister for the Economy (<https://www.economy-ni.gov.uk/articles/oral-statement-good-jobs-employment-rights-bill-28-april-2025>).

<sup>47</sup> <https://www.ictuni.org/news/unions-welcome-progress-towards-good-jobs-bill-which-helps-workers-and-employers> - NIC ICTU made a full response to the consultation on the Good Jobs Bill which provides detailed commentary on the various proposed themes of the Bill. The consultation response can be accessed at <https://www.ictuni.org/publications/ictu-response-good-jobs-consultation>

trade unions, to avoid exploitation and poor treatment.<sup>48</sup> Efforts to address low pay and precarious work should pay particular regard to protecting such workers.

In addition, the needs of older workers should be considered carefully within this outcome. Measures to support people back into work should be particularly tailored to take account of the issues faced by older workers, with flexibilities in accessing state pensions also being considered.<sup>49</sup>

### Anticipated impact

If taken as a package of measures, the above should result in enhanced household incomes for the lowest paid, reducing poverty and the risk of poverty amongst those in work. The measures would remove barriers to those seeking work, or seeking further work, particularly women. The DfC Poverty and Income Inequality Report identifies that as working-age adults make up nearly 60% of the NI population, changes in income within this group have a large impact on overall poverty measures.<sup>50</sup>

### Evidence base

Chapter 5 of the Expert Panel's report considered work, pay and the benefits system. The proposals outlined here reflect recommendations 5.1 – 5.12 of the Expert Panel.

In 'New Decade, New Approach' the parties agreed that the Executive would commit to becoming a Living Wage employer and should move to ban zero hours contracts.<sup>51</sup>

The Scoring Social Value policy is a Northern Ireland Executive policy and is mandatory for Government Departments and across a range of public bodies. The policy highlights that social value must be explicitly evaluated as an award criterion, with some social values measures, including fair work practices, being required to be incorporated into government contracts. This includes compliance with relevant employment, equality and health and safety law, adherence to relevant collective agreements and adoption of fair work practices for all workers engaged in the delivery of the contract.<sup>52</sup>

Research shows that young workers are particularly likely to be low paid, alongside part-time workers and women.<sup>53</sup>

Recommendation 5.2 of the Expert Panel report called on the NI Executive to support the removal of the lower wage floors for minimum wages that apply to 18-23-year olds and raise the levels for apprentices and under-18s.

The Expert Panel identified that families at least risk of child poverty are those where there are two adults in full-time work or one adult in full-time and one in part-time work.<sup>54</sup> NIC-

<sup>48</sup> <https://www.ictuni.org/black-asian-and-minority-ethnic-workers>

<sup>49</sup> <https://www.tuc.org.uk/research-analysis/reports/extending-working-lives-how-support-older-workers>

<sup>50</sup> DfC Households Below Average Income 2019/20.

<sup>51</sup> P.41

<sup>52</sup> Fair work is as per the Carnegie Trust definition and contains 7 measurements. They are (i) terms of employment, (ii) pay and benefits, (iii) job design and nature of work, (iv) social support and cohesion, (v) health, safety, and psychosocial wellbeing, (vi) work/life balance and (vii) voice/representation (this also includes trade union recognition) - <https://www.finance-ni.gov.uk/sites/default/files/2024-12/PPN%2001%2021%20-%20Social%20Value%20in%20Procurement%20Word%20master.pdf>

<sup>53</sup> See 'Low Pay in Northern Ireland: an Update' November 2020, by Dr Lisa Wilson, Nevin Economic Research Institute (<http://nerinstitute.net/blog/low-pay-northern-ireland-update>)

<sup>54</sup> Expert Panel report p38.



ICTU have stated that consistent evidence shows that becoming a mother is the most important factor in explaining gender inequalities in the labour market. Women with children are much less likely to participate in the labour market, and when they do, they are more likely to work in insecure and part-time positions.<sup>55</sup> NIC-ICTU identify that having one or more children reduces the female likelihood of being in a permanent, full-time job by almost one-third, with only 45% of females with one or more children working in a permanent, full-time job. Fewer than 1 in 3 women with no dependent children work part-time. This compares to almost 1 in 2 women with dependent children.<sup>56</sup> Affordable childcare will allow more women to participate fully in work, education, or training, reducing the gender pay gap and social inequality. As the Expert Panel notes *“childcare is an essential part of any region’s economic infrastructure and needs to be treated as such by NI policy makers.”*<sup>57</sup>

The Nevin Economic Research Institute has identified that there is a causal link between collective bargaining and productivity at both a firm and sectoral level, meaning that whilst workers earn more employers also gain from such arrangements. 53% of employees in Northern Ireland have a trade union that bargains for pay in their workplace compared to 47% who are not covered. There is a stark difference in coverage between the public and private sectors, with 80% of public sector workers in a workplace covered by union negotiated pay, compared to only 32% of private sector employees.<sup>58</sup>

DfC statistics for 2023/24 show that in total, 170,000 working-age adults were in relative poverty BHC with 62% in working households and 38% in workless households. Although being in employment reduces the likelihood of working-age adults being in poverty, the majority of those in relative poverty belong to households where someone works.<sup>59</sup>

There are complex social and systemic barriers to people with disabilities accessing employment and enjoying career progression and development.<sup>60</sup> Northern Ireland has the lowest rate of employment for Deaf and disabled people in the UK.<sup>61</sup> The Equality Commission NI has highlighted concerns expressed by Deaf and disabled people about job security, about money and redundancy arising from the ongoing Covid-19 pandemic.<sup>62</sup>

*“I cannot work in conventional jobs due to my disabilities and access needs. Places would rather turn me away then spend money so I can do a job. I’m now having to try get another degree, fingers crossed, in teaching as I believe it’s the only route left open to me. Otherwise, I will be on benefits for the rest of my life or until I am forced to take that life. This is the harsh but the brutal reality of the situation.”*  
Disabled man, carer with long-term health condition, 16-24.

<sup>55</sup> Childcare in Northern Ireland: Cost, Care and Gender Equality, NIC-ICTU, October 2020 (<https://www.ictuni.org/publications/ictu-childcare-report>), p5.

<sup>56</sup> Childcare in Northern Ireland: Cost, Care and Gender Equality, NIC-ICTU, October 2020, (<https://www.ictuni.org/publications/ictu-childcare-report>), p10.

<sup>57</sup> Expert Panel report p38.

<sup>58</sup> Mac Flynn, P. (2020) The Impact of Collective Bargaining on pay in Northern Ireland, NERI Working Paper Series, NERI WP 2020/N0 66, Belfast: NERI

<sup>59</sup> DfC Poverty and Income Inequality Report 2023/24 (Published 27<sup>th</sup> March 2025) - [https://datavis.nisra.gov.uk/communities/PII\\_report\\_2324.html#](https://datavis.nisra.gov.uk/communities/PII_report_2324.html#).

<sup>60</sup> All Party Group on Disability (2016): *‘Ahead of the Arc’ – A contribution to halving the disability employment gap* (accessed 4 November 2021).

<sup>61</sup> Toman, N. et al (2022): *Progress towards the implementation of the UNCRPD in Northern Ireland*, page 463 (Disability Action for ECNI).

<sup>62</sup> ECNI (2020): *People with disabilities must not be left behind by response to COVID-19*

The TUC has identified that increasing numbers of workers now work into older age, with average retirement ages increasing. However, raises in the state pension age do not account for those workers who leave the labour market early, due to ill health or caring responsibilities, issues that particularly affect women and minority ethnic groups. The impact of the pandemic should also be acknowledged here, with older workers who lose their jobs twice as likely as younger workers to become long-term unemployed.<sup>63</sup>

### **3.2 Ensure people do not live in poverty through a robust, transparent and human rights-based benefits and social security system:**

- Maintain mitigations packages, avoiding ‘cliff-edge’ end dates, including the introduction of the Contingency Fund to support those on Universal Credit.<sup>64</sup>
- End the five-week wait for Universal Credit and convert all loans to grants.
- Seek to remove the two-child limit for child tax credits and mitigate the impact of the two-child limit in the interim.
- Remove the ‘benefit cap’ for new claimants as well as those receiving legacy benefits.
- Legislate to abolish the social size sector criteria (‘the bedroom tax’).
- Coordinate actions with the Disability Strategy Co-Design Group to ensure that Deaf and disabled people are protected from poverty.
- Repeal the PIP benefit and associated assessment for a better alternative.
- Ensure that new claimants on Universal Credit who meet the eligibility and entitlement criteria retain access to the severe disability premium.
- Support the provision of independent advice and advocacy in relation to employment rights and social security.
- Design and deliver a benefits and social security system that is fit for purpose and put in place with appropriate checks and balances to ensure that rights are respected, protected, and fulfilled.<sup>65</sup>

#### **Details of proposal**

Chapter 5 of the Expert Panel’s report considered work, pay and the benefits system. The below, and attached evidence for the proposal, reflects recommendations 7.1 – 7.13 and 6.2 made by the Expert Panel.

Inflation has risen repeatedly, with rapidly rising costs of living. For the Co-Design Group, a robust benefits and social security system is of vital importance in eradicating poverty amongst working-age people, whether they are in work, seeking

<sup>63</sup> <https://www.tuc.org.uk/research-analysis/reports/extending-working-lives-how-support-older-workers>

<sup>64</sup> DFC (2020): [Disability Strategy Expert Advisory Panel Report pp.46-48](#) (accessed 18 December 2021).

<sup>65</sup> The APS Co-Design Group will further explore approaches to ensuring the provision of a human rights based social security system, including further examination of the Scottish model underpinned by the Social Security (Scotland) Act 2018 which sets out Scottish social security principles and the associated Social Security Charter which lays down standards for the provision of social security.

work or unable to work. The system must act as a safety net and a support, raising and sustaining incomes. As the Expert Panel reflect in their report, *“the safety net has been undermined by prioritising restrictions on public expenditure over the reduction of poverty in such a way that there is much ground to be made up just to restore the value of benefits”*.<sup>66</sup>

‘New Decade, New Approach’ contained a commitment to extend welfare mitigation schemes beyond March 2020. The Assembly has passed legislation extending most of the existing mitigations (including those relating to the benefit cap) until March 2025.<sup>67</sup> Legislation extending mitigations for the bedroom tax was also passed by the Assembly, without an end date for the mitigations.<sup>68</sup> The Assembly has further passed regulations<sup>69</sup> to close loopholes in eligibility for the current mitigations in relation to the bedroom tax and benefit cap until March 2025.

**These moves to extend mitigations and remove ‘cliff-edge’ end dates from the bedroom tax mitigations are welcome and should be built upon across all existing mitigations moving forwards. In line with the Expert Panel’s recommendations, the Co-Design Group would highlight that the removal of the benefit cap and bedroom tax should be progressed via the Anti-Poverty Strategy.**<sup>70</sup>

In its report, the Expert Panel has highlighted that the five-week wait for Universal Credit has been shown to be the main cause of the rise in food bank use and increases in debt and hardship.<sup>71</sup> **In line with the report, ending the five-week wait and converting current loans offered to recipients during the five-week wait to grants remain critically important.**<sup>72</sup>

The two-child cap for child tax credits has been highlighted by the Expert Panel as having a particularly severe impact.<sup>73</sup> **As a Group we support the ending of the two-child cap for child tax credits.**<sup>74</sup> **Whilst we understand that taxation is not a devolved matter, the NI Executive should both seek to do all it can to see the two-child cap removed and should take measures to mitigate its impact.**

The Disability Strategy Expert Advisory Panel highlighted numerous issues in its report with regards to social security support for persons with disabilities, including the need for a human rights based approach to social security, drawing on the Scottish model, assessments for Personal Independence Payments (PIP), and the role of private companies in PIP assessments. **It is important that actions taken under the Anti-Poverty Strategy are coordinated with the Disability Strategy to fully protect working-age persons with disabilities from poverty.**

<sup>66</sup> Expert Panel report, p.30.

<sup>67</sup> The Welfare Supplementary Payment (Extension) Regulations (Northern Ireland) 2022 relate to statutory welfare mitigation payments for people who are affected by the benefit cap, time-limited or contributory employment and support allowance, loss or reduction of disability living allowance on transition to personal independence payment (PIP) and any associated loss or reduction of disability-related premiums and carer payments.

<sup>68</sup> Welfare Supplementary Payments (Amendment) Act (Northern Ireland) 2022

<sup>69</sup> Welfare Supplementary Payment (Amendment) Regulations (Northern Ireland) 2022

<sup>70</sup> Expert Panel Report, recommendations 6.2 and 7.3.

<sup>71</sup> P.33.

<sup>72</sup> Expert Panel Report, recommendation 7.5

<sup>73</sup> Expert Panel Report, p.33.

<sup>74</sup> Expert Panel Report, recommendation 6.2

As a Group we are mindful that the Minister for Communities has commissioned a review of the existing welfare mitigations by an independent panel. The conclusions and recommendations of this panel should be carefully considered and will undoubtedly inform the actions taken to eradicate poverty amongst working-age people.

An ongoing concern of members of the Co-Design Group is to ensure that individuals have access to appropriate, independent advice in relation to both employment matters and benefits and social security. Whilst workers who are members of trade unions will have access to advice in relation to employment matters, trade union density across the private sector in particular is low. In general, low-paid workers experiencing poverty will not be in a position to retain support from private solicitors, leaving them with limited means of redress.

### Anticipated impact

Raising the income ‘floor’ through an enhanced and robust social security system will prevent working age people and their families from living in poverty, the risk of which is only increasing due to the impact of the pandemic and the rising cost of living.

### Evidence base

Information provided by the Law Centre highlights that individuals seeking advice on employment issues like pay are often experiencing wider issues that cause financial hardship.<sup>75</sup>

Deaf and disabled people are at a disadvantage to non-disabled peers in accessing, retaining, and progressing within employment in Northern Ireland.<sup>76</sup> Deaf and disabled people continue to be less likely to be in employment than non-Deaf and disabled people within Northern Ireland.<sup>77</sup>

*“I have two degrees a Bachelor and honours degree and a Masters. Yet no-one will employ me due to my disability. They get away with it because the feedback or reasons given are enough to satisfy a glancing review. The only reason my brother is working is because the company he is with are all sufferers of mental health challenges as well and use their lived experience to help others as it is a social enterprise. Without them he would never work anywhere due to his health. I cannot work in conventional jobs due to my disabilities and access needs. Places would rather turn me away then spend money so I can do a job. I’m now having to try get another degree, fingers crossed, in teaching as I believe it’s the only route left open to me. Otherwise, I will be on benefits for the rest of my life or until I am forced to take that life. This is the harsh but the brutal reality of the situation.” - Disabled man carer with long-term health condition, 16-24.*

<sup>75</sup> The Law Centre NI reports that during January 2025 - end of March 2025, 11% of clients were experiencing employment issues directly related to pay and pay entitlements in the workplace. These individuals were often also experiencing wider issues that cause financial hardship. Law Centre NI also advised a large number of clients on terms and conditions of employment and on parental and carers rights.

<sup>76</sup> Department for Communities (2020): [Disability Strategy Expert Advisory Panel: Report and Recommendations](#), p.81 (accessed 10 October 2021).

<sup>77</sup> Ibid, p.81.

The disability payment gap is widening having increased by 20% between 2019 and 2020 from £1.65 to £2.10. This means that a Deaf and disabled worker working 35 hours per week could earn £3,822 per year less than a non-disabled worker.<sup>78</sup> The pay gap for Deaf and disabled women is nearly nine percentage points higher than the gender pay gap. Deaf and disabled women are paid 36% less than non-disabled men.<sup>79</sup>

The Joseph Rowntree Foundation has identified several drivers of poverty for disabled people in the UK:

- disabled people face higher costs of living;
- there is a sizeable difference in the highest level of qualification between those who are disabled and those who are not: 19% of disabled adults have a degree or above, compared with 35% of non-disabled adults;
- disability, ill-health, and society's response to these conditions often prevent people from working. For example, disabled people tend to earn less than their non-disabled counterparts even if they have the same qualification levels.<sup>80</sup>

The disability equality charity Scope UK has highlighted that 'Life costs more for disabled people and their families, spending more on essential goods and services such as heating, insurance, equipment, and therapies. These extra costs mean disabled people have less money in their pocket than non-disabled people or go without. The result is that disabled people are more likely to have a lower standard of living, even when they earn the same'<sup>81</sup>.

Scope's Disability Price Tag report 2019<sup>82</sup> found that disabled people:

- On average, face extra costs of £583 a month;
- On average, a disabled person's extra costs are equivalent to almost half of their income (not including housing costs);
- 1 in 5 disabled people face extra costs of more than £1,000 a month;
- Disabled people's money does not tend to go as far. On average, £100 for a non-disabled person is equivalent to £68 for a disabled person;

Research carried out for the Leonard Cheshire Foundation found that many disabled adults face financial difficulty, which leaves them struggling to pay for essentials:

- A quarter (25%) of working-age disabled adults say they missed a meal because they couldn't afford it;
- Over a quarter (28%) say they have not been able to afford to keep their home warm;
- A third (33%) report having £50 or less per week, after housing and bill costs, to spend on food and other essentials. While 7% reporting having less than £10 a week<sup>83</sup>.

Food bank referral statistics from the Trussell have shown that 6 in 10 (62%) of working-age people referred to a food bank in early 2020 had a disability (as defined by the Equality Act 2010), more than three times more than the general population

<sup>78</sup> TUC (2020) [Disability pay and employment gaps 2020](#) (accessed 1 February 2022).

<sup>79</sup> Ibid.

<sup>80</sup> Ibid, page 57.

<sup>81</sup> See: <https://www.scope.org.uk/campaigns/extra-costs/>

<sup>82</sup> Available at: <https://www.scope.org.uk/campaigns/extra-costs/disability-price-tag/>

<sup>83</sup> See: <https://comresglobal.com/polls/leonard-cheshire-disabled-adults-polling/>

where 19% of working-age adults had a disability in 2017 to 2019.<sup>84</sup>

*“The lengthy processes that you have to go through to prove that you really are suffering from lifelong limiting illnesses is inhumane and degrading. Fighting for medication, treatment, and services. Disabled people are constantly being judged, frowned upon if they're on benefits. The system needs reformed and quickly far too many people are falling through the cracks. People are living in poverty having to go to food banks struggling to make ends meet. Especially with the rise in electric, gas etc. - everything else goes up - though the disabled and their carers are neglected, living in destitution. It's scary how so many are having to decide whether it's electric or heating to try and stay afloat.”*

- Disabled woman carer with long-term health condition, 40-44.

United Nations Committee on the Rights of Persons with Disabilities (2016): [Inquiry concerning the United Kingdom of Great Britain and Northern Ireland carried out by the Committee under Article 6 of the Optional Protocol to the Convention - Report of the Committee](#)

United Nations Committee on the Rights of Persons with Disabilities (2017): [Concluding observations on the initial report of the United Kingdom of Great Britain and Northern Ireland](#)

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<sup>84</sup> Joseph Rowntree Foundation (2022): [UK Poverty 2022 - The essential guide to understanding poverty in the UK](#), page 80.



## OUTCOME 4

**Working towards eradication by 2045, poverty among older people will be reduced by half over the lifetime of this Strategy. Older people experiencing or at risk of poverty will have adequate income and support in relation to their economic, physical, and mental wellbeing to ensure their equal participation in society.**

### Summary of calls:

- 4.1 Press UK government to maintain and improve financial support: protect social welfare benefits; protect the Triple Lock; and review the adequacy of State Pension.**
- 4.2 The NI Executive should ensure addressing poverty in later life is identified as a priority in the Programme for Government and associated delivery plans and actions, in the context of planning for an ageing population.**
- 4.3 Maximise and improve older people's access to benefits, advice, and support.**
- 4.4 Address financial disadvantage and material deprivation experienced by older people.**
- 4.5 Support measures for older people of 'working age'.**
- 4.6 Improved data collection and research on poverty and older people.**

### Introduction

#### Living in an ageing society

Northern Ireland is experiencing more rapid population ageing than elsewhere in the UK and Ireland. The proportion of the population in Northern Ireland aged 65+ is currently 1 in 6 and is predicted to grow sharply in the coming years to reach 1 in 5 by 2030 and 1 in 4 by 2040. This trend is expected to continue and by 2070 there will only be two people of working age for every pensioner.

We need to prepare for our ageing society and respond to the opportunities and challenges this demographic reality presents for the systems that support older people experiencing or at risk of poverty. In the Programme for Government 2024-27, the NI Executive acknowledged the challenges of population ageing and suggested that 'it is vital that the Executive works together to make sure that all of our priorities are designed with this in mind.'

The NI Assembly unanimously supported a motion by Claire Sugden MLA calling on the Executive Office to lead a process of strategic planning for an ageing population. The development of cross-cutting strategic policy on population ageing is vital to the prevention of poverty in older age and to developing social welfare systems that can meet the needs of this growing population.

#### Poverty levels

Although progress has been made on reducing levels of pensioner poverty, there are indications that this progress may be stalled. Latest figures (2023-24) show that 12% of pensioners in Northern Ireland (est. 35,000 people) are in relative poverty calculated after housing costs, the same figure as the previous year. Worryingly, there has been an increase

in the number of older people in absolute poverty from 7% to 9% (est. 27,000 people), suggesting a deepening of poverty for those who are most impacted.

Additionally, there is evidence that traditional methods of measuring income levels such as those used in the Family Resources Survey (FRS) from which NISRA data is derived, do not fully capture the poverty experienced by older people. Measures of material deprivation can highlight the reality of older people's living standards which are often missed in household income data. From the material deprivation questions included in the FRS, the majority of pensioners had access to most of the listed goods and services. Almost one third, however, said that they do not go out socially at least once a month and 69% said that they are not able to take an annual break away from home.

### **Poverty in retirement**

A person's financial position upon retirement is linked to their circumstances over a lifetime, their employment history, earnings levels, the impact of intersecting inequalities, and time out of the labour market.

Research indicates that the groups most at risk of being in poverty in retirement are single women, people living alone, people who are amongst the oldest age group (over 85 years), people from BAME communities, people who rent from private or social housing, people with a disability, people with caring responsibilities and those who are self-employed. It is therefore clear that a structural, intersectional approach to preventing poverty in later life is required, for example, addressing the lifelong gendered patterns of unpaid care undertaken by women that result in lower pension income in retirement.

Evidence indicates that reducing pensioner poverty is linked to three key factors – higher private incomes (from private pensions and work); relatively lower housing costs compared to the rest of the population; and policy changes such as the introduction of Pension Credit in 2003. It is important, therefore, to monitor and address: changes in the proportion of older people retiring with private pensions; shifts in housing tenure for older people such as the trend away from home ownership with more pensioners renting private or social housing, and to ensure adequate levels of government support are in place to lift older people out of poverty.

### **Living on a low income**

Poverty in later life means a miserable existence which can lead to ill health, isolation and poor living conditions. Despite older people being entitled to a range of means tested benefits designed to increase their income, many do not claim because they are not aware they are eligible for benefits, have concerns about the process and their privacy, or may be reluctant to ask for help. Older people can expect to face many significant events in later life, creating new financial challenges, such as bereavement, paying for care, or meeting the extra costs associated with having a disability or long term health condition, or living with frailty.

Older people may be “asset rich” but have limited income and can face difficult choices



about how to stretch resources, including whether to eat or to heat their home. Living with limited access to money also poses a barrier to taking part in social activities such as visiting friends or getting to and from services. This contributes to social isolation and loneliness, with people aged 75+ in Northern Ireland more likely than any other age group to experience chronic loneliness.

### **Rising energy and living costs**

Life has become unaffordable for many older households on low or modest incomes. Many older people are fearful and anxious as the price of essential goods like food and fuel have increased in recent years and remain high. Service user statistics published by Trussell indicate that foodbank use by pensioner-led households in Northern Ireland has risen at a much higher rate than for younger households, with a three-fold increase (194%) between 2019 and 2024.<sup>85</sup> Research carried out by Age UK in 2022 indicated that around 65,000 older households in Northern Ireland had insufficient income to cover their essential spending.

Older people living on fixed low incomes, such as their State Pension and benefits, are already struggling to cover essential energy and living costs and are not in a position to make further cuts to meet unexpected expenses. The Consumer Council for Northern Ireland (2022) Review of Fuel Poverty Levels in Northern Ireland reported that older people are more likely to have larger heating bills due to lower incomes coupled with lower standards of housing and living in poorly insulated homes with inefficient heating systems. As participants in the Consumer Council research, the Department for Communities highlighted older people as being among those spending the highest proportion of income on energy bills (15-20%).<sup>86</sup> Research evidence also shows the disproportionate impact living in a cold home can have on older people's health, such as increased risk of respiratory infections, heart attacks and stroke.<sup>87</sup>

The UK government's decision to means test Winter Fuel Payments in 2024 highlighted the financial hardship faced by thousands of older people in Northern Ireland whose incomes do not meet the very restrictive threshold for means tested benefits but who are still struggling to get by. We are relieved that access to this benefit has been restored for the majority of pensioners in Northern Ireland.

The Fuel Poverty Strategy being developed by the Department for Communities has provided a welcome mechanism for engagement with older people on these issues and Age NI welcomes the draft strategy's key objectives, proposed outcomes, and actions. We are disappointed, however, by the lack of specific, measurable targets – particularly a clear target for reducing fuel poverty. We have also urged that the finalised strategy is backed by comprehensive funding and a detailed action plan for effective implementation. People living

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<sup>85</sup> [EYS-Northern-Ireland-Factsheet-2023-24.pdf](#)

<sup>86</sup> [https://www.consumerCouncil.org.uk/sites/default/files/2022-10/Research\\_Report\\_Review\\_of\\_Fuel\\_Poverty\\_Levels\\_in\\_NI\\_1.pdf](https://www.consumerCouncil.org.uk/sites/default/files/2022-10/Research_Report_Review_of_Fuel_Poverty_Levels_in_NI_1.pdf)

<sup>87</sup> 4 Integrated Care Journal (2023) Elderly and vulnerable at risk from extreme cold at home, new data show. Available at: <https://integratedcarejournal.com/elderly-vulnerable-risk-extreme-cold-home>

on a low income in Northern Ireland, including older people, must also be able to benefit from energy cost support introduced by the UK government without delay.

#### Comments made at focus group:

- Emphasis should be put on advocacy and support for older people.
- Poverty forces people to make choices, for example about diet and food. Older people can be more frugal and people who live on a low income may not be able to afford, for example, fresh fruit and food.
- COVID-19 resulted in higher costs for older people having to order and have groceries delivered. Older people were at home all the time so had greater fuel costs due to heating and lighting for longer.
- The decline of industry in certain areas has had a huge impact. People who were in employment 10 years ago and doing well find themselves unemployed and if they are in the 55 or 56 age bracket, they are highly unlikely to get another job. Some of these people have taken on commitments based on regular income and find themselves in debt.
- Retraining for over 55s is difficult and there is no meaningful focus on supporting those people to gain further employment.
- Impact on housing in an area – if older people who own their own homes are unable to maintain their property, it can be difficult to find someone to carry out repairs at a reasonable cost. This can lead to the house becoming neglected.
- We need to look at homes to see if they are suitable. Older properties may not be well insulated or have good access and it may need adaptations. Living on a fixed income means older people will have to make choices about what they spend. How will people make these choices?

#### 4.1 Press UK government to maintain and improve financial support:

- Protect social welfare benefits
- Protect State Pension Triple lock
- Review adequacy of State Pension

#### Details of Proposal

##### State Pension

The UK State Pension is one of the least generous in the most advanced economies in the world. Ideally, the State Pension should provide income sufficient to cover basic needs, and everyone should have opportunities to build up additional private incomes to allow for a more comfortable retirement. Increasing the level of State Pension and benefits during times of spiralling energy and living costs and rising inflation is crucial for older people and others living on low incomes.

The State Pension can be paid when a person reaches State Pension age, provided they fulfil National Insurance contribution conditions and make a claim. As of April 2025, this is 66 years for men and women with further increases due in the coming years. The APS should consider the impact on older people who are 65+ and living on a low income, but not eligible for the State Pension. The EAP report states that while “the basic state pension

has been protected from the worst of benefit changes and freezes over the past, the rising retirement age has penalised some pensioners.”

### **The Triple Lock**

The UK government reinstated the State Pension Triple Lock from April 2023. This policy is vital in order to maintain the value of the State Pension over time and help current and future pensioners on low and modest incomes. Research by the independent Pensions Policy Institute has shown that “without the triple lock it will be harder for younger workers on low incomes to achieve an adequate income in retirement.”

### **Anticipated Impact**

Reduced level of pensioner poverty for pensioners now and in the future.

### **Evidence**

#### **Comments made at Focus Group:**

- Part of the strategy alludes to the Triple Lock on the State Pension and as far as pensioner poverty is concerned, it is considered as “job done.”
- Just because we have a Triple Lock does not mean there is no poverty among older people especially in rural areas.
- Triple Lock is not ensured long-term.
- Have triggered entitlements such as Pension Credit.
- Living on a fixed income, older people will have to make choices about what they spend now and how will they provide and save for costs in the future.
- Women who stayed at home often don’t have a pension which reflects their contribution as “stay at home parents” raising children.

#### **Other evidence:**

***Pensions at a Glance 2021***, OECD and G20 Indicators, OECD

<https://www.oecd.org/els/public-pensions/oecd-pensions-at-a-glance-19991363.htm>

***How would removal of the State Pension triple lock affect adequacy?***

Pensions Policy Institute

<https://www.pensionspolicyinstitute.org.uk/sponsor-research/research-reports/2018/2018-03-21-how-would-removal-of-the-state-pension-triple-lock-affect-adequacy/>

***Poverty in Later Life, Briefing*** June 2021 Age UK

[https://www.ageuk.org.uk/globalassets/age-uk/documents/policy-positions/money-matters/poverty in later life briefing june 2021.pdf](https://www.ageuk.org.uk/globalassets/age-uk/documents/policy-positions/money-matters/poverty%20in%20later%20life%20briefing%20june%202021.pdf)

***Pensioner Poverty. Making ends meet: why pensioner poverty is still an issue***, July 2021, Age UK

<https://www.ageuk.org.uk/globalassets/age-uk/documents/annual-reports-and-reviews/age-uk-pensioner-poverty-report.pdf>

***Poverty Bulletin: Northern Ireland 2019/20***

<https://www.communities-ni.gov.uk/system/files/publications/communities/ni-poverty-bulletin-201920.pdf>

***UK Poverty January 2022***, JRF

<https://www.jrf.org.uk/data/pensioner-poverty-rates>

***Statement on Visit to the United Kingdom***, by Professor Philip Alston, United Nations Special Rapporteur on extreme poverty and human rights November 2018  
<https://www.ohchr.org/en/NewsEvents/Pages/DisplayNews.aspx?NewsID=23881>  
***Women's State Pension Age: our findings on the Department for Work and Pension's communication of changes***  
[https://www.ombudsman.org.uk/sites/default/files/Women%E2%80%99s State Pension age - our findings on the Department for Work and Pensions communication of changes Final.pdf](https://www.ombudsman.org.uk/sites/default/files/Women%E2%80%99s%20State%20Pension%20age%20-%20our%20findings%20on%20the%20Department%20for%20Work%20and%20Pensions%20communication%20of%20changes%20Final.pdf)

**4.2 The NI Executive should ensure addressing poverty in later life is identified as a priority in the Programme for Government and associated delivery plans and actions, in the context of planning for an ageing population.**

#### **Details of Proposal**

The government should plan and prepare for our ageing population and include a specific outcome on addressing poverty in later life. The population of Northern Ireland is projected to age at a faster rate than the rest of the UK and the NI Executive has acknowledged that all areas of policy must address population ageing in the current Programme for Government.

This changing demographic presents many opportunities and challenges for society, for employers and the economy, for our welfare, education, housing and health and social care systems.

#### **Anticipated Impact**

Improved planning and interventions to respond to changes in demographic impact; social support systems that can meet increased need; equal participation of older people in society.

#### **Evidence**

##### **Comments made at Focus Group:**

- Reference, cross reference, and complement other DfC social inclusion strategies in development or active. Link APS to the work on loneliness.
- Clear ownership of the objectives of the APS and clear responsibility for delivery

##### **Other evidence:**

***2016 Based Population Projects for Northern Ireland***, NISRA

<https://www.nisra.gov.uk/news/2016-based-population-projections-northern-ireland>

***Lived Experience 2023, What matters to older people in Northern Ireland***, Age NI, 2023

<https://www.ageni.org/siteassets/documents/policy/lived-experience-report-2023.pdf>

***At the centre of government planning: The Programme for Government and preparing for an ageing population***

Commissioner for Older People for Northern Ireland, 2024

<https://copni.org/assets/general/resources/At-the-Centre-of-Government-Planning-The-Programme-for-Government-and-preparing-for-an-ageing-population.pdf>

4.3 Maximise and improve older people's access to benefits, advice, and support.
Details of Proposal
<ul style="list-style-type: none"> <li>• Carry out <b>research to understand why previous programmes did not work</b>, including stigma around poverty, asking for help and other barriers and put measures in place to address these.</li> <li>• <b>Reduce the onus on the person to navigate complex system of benefits</b>, consider auto-enrolment and application to benefits at key times e.g. as people approach retirement, live with ill-health, have caring responsibilities, experience the death of a partner etc.</li> <li>• <b>Increase awareness and access to services/programmes and benefits available</b>, so that support systems more effectively reach, guide and advise older people, enabling them to make informed decisions.</li> <li>• <b>Adequately resource advice services</b> for older people, including generalist and specialist advice services delivered by the voluntary and community sectors.</li> <li>• Ensure older people have <b>access to trusted and free financial advice and planning</b> to help people make informed decisions e.g. auto appointments to Pension Wise service.</li> </ul>
Anticipated Impact
<p>Effective, targeted promotion of benefits and support available, reducing pensioner poverty.</p>
Evidence
<p><b>Comments made at Focus Group:</b></p> <ul style="list-style-type: none"> <li>• Data already exists about older people's income, so we may have the ability to apply Pension Credit automatically to those who are eligible.</li> <li>• Have triggered entitlements such as Pension Credit.</li> <li>• An example was given of two older people believing they were not entitled to any benefits. They were awarded Pension Credit, and this was back dated for six months. It was discovered later they had not spent the money as they were afraid that they would be asked to give it back.</li> <li>• Lack of benefit uptake, people who have low pensions feel there is a stigma attached to making a benefit claim or are fearful of disclosing information to authorities.</li> <li>• Clear, concise communications to older people about entitlement to benefits, what is available and how it is accessed.</li> <li>• A lot of information disseminated to older people is done through social contact with groups. If that is unable to happen, what is the alternative, particularly for people who cannot use technology.</li> <li>• How people interpret poverty can be subjective and "poverty" is an emotive word. Individuals can be poor on paper but rich in life.</li> <li>• Application process should be simple and easy.</li> <li>• Homeowners should not be disadvantaged.</li> <li>• To raise awareness of services, there needs to be good communication, through a range of channels, not just digitally.</li> </ul>

- Needs of hard-to-reach people should be addressed.
- “Nothing about me without me,” meaningful co-design and co-production and engagement. This is also required as the strategy develops and progresses.

**Other evidence:**

**Poverty in later life. How people in older age move in and out of poverty and what should be done to reduce it**, Independent Age January 2022

<https://www.independentage.org/poverty-later-life-how-people-older-age-move-and-out-of-poverty-and-what-should-be-done-to-reduce>

**Poverty in later life, Briefing** Age UK June 2021

[https://www.ageuk.org.uk/globalassets/age-uk/documents/policy-positions/money-matters/poverty in later life briefing june 2021.pdf](https://www.ageuk.org.uk/globalassets/age-uk/documents/policy-positions/money-matters/poverty%20in%20later%20life%20briefing%20june%202021.pdf)

**Lived Experience 2023, What matters to older people in Northern Ireland**, Age NI, 2023

<https://www.ageni.org/siteassets/documents/policy/lived-experience-report-2023.pdf>

**EAP Report** (Chapter 8, Pensioner Poverty, pp46-47)

<https://www.communities-ni.gov.uk/system/files/publications/communities/dfc-social-inclusion-strategy-anti-poverty-expert-advisory-panel-recommendations.pdf>

#### 4.4 Address financial disadvantage and material deprivation experienced by older people

##### Details of Proposal

- Introduce **legislation** protecting older people from **discrimination** when accessing goods, facilities, and services.
- Resource and provide funding to **community and voluntary organisations** and community venues to enable and deliver social support and activities, encouraging participation and engagement (e.g. social networks supporting older people, volunteering). Retain the Smart Pass for all over 60s to support equal participation of older people in society.
- **Ensure affordable access to essential goods and services**, monitor the impact of rising energy and other living costs and encourage providers of goods and services to address the needs of their older customers.
- **Address internet and broadband access**, respond to **digital exclusion/confidence**, and have **alternative** systems in place to actively support those who are unable or do not wish to access public services online.
- **Consider the use of new measures of material deprivation** such as that proposed by the Social Metrics Commission which includes ‘inescapable costs’ as this could provide a more accurate picture of the outgoings people face in later life connected to things like managing health conditions or keeping a home safe to live in.

##### Anticipated Impact

Improved quality of life for older people and protection of their rights, enabling them to live with dignity and participate equally in society.



Evidence
<p><b>Comments made at Focus Group:</b></p> <ul style="list-style-type: none"> <li>Local advice organisations/groups need to be sustained, and groups that support older people with issues that are specific to them and/or ageing need to be maintained. If these services are not available, where do older people go?</li> <li>Mechanism that creates links between health, financial and other supports that people are referred to e.g. social prescribing.</li> <li>The impacts of poverty and disadvantage are acutely felt by those older people who are not digitally connected. Affordability of broadband, or the technological means or devices e.g. a laptop or tablet – impact on older people. They are not able to access the internet and cannot access services, as a lot of things are now online. This results in social exclusion.</li> <li>Group unaware of range of support services currently available to them.</li> <li>There needs to be more advocacy for older people in poverty who don't have close family to help them access services, benefits etc.</li> <li>Broken communities and lack of support systems.</li> </ul> <p><b>Other evidence:</b></p> <p><b>EAP report</b> Summary Item 11 page 7  <a href="https://www.communities-ni.gov.uk/system/files/publications/communities/dfc-social-inclusion-strategy-anti-poverty-expert-advisory-panel-recommendations.pdf">https://www.communities-ni.gov.uk/system/files/publications/communities/dfc-social-inclusion-strategy-anti-poverty-expert-advisory-panel-recommendations.pdf</a></p> <p><b>Poverty in later life, Briefing</b> Age UK June 2021  <a href="https://www.ageuk.org.uk/globalassets/age-uk/documents/policy-positions/money-matters/poverty%20in%20later%20life%20briefing%20june%202021.pdf">https://www.ageuk.org.uk/globalassets/age-uk/documents/policy-positions/money-matters/poverty in later life briefing june 2021.pdf</a></p> <p><b>Lived Experience 2023, What matters to older people in Northern Ireland</b>, Age NI, 2023  <a href="https://www.ageni.org/siteassets/documents/policy/lived-experience-report-2023.pdf">https://www.ageni.org/siteassets/documents/policy/lived-experience-report-2023.pdf</a></p> <p><b>Measuring Poverty in the UK 2024</b>, Social Metrics Commission  <a href="https://socialmetricscommission.org.uk/social-metrics-commission-2024-report/">https://socialmetricscommission.org.uk/social-metrics-commission-2024-report/</a></p>

4.5 Support measures for older people of 'working age'
Details of Proposal
<p>Our ageing population, along with the rise in State Pension age, means that there will be an increasing number of older people in work. The Strategy should consider the implications of an ageing workforce in Northern Ireland and the steps required to encourage people into longer and more fulfilling working lives, including facilitating a balance of work and personal needs and circumstances. Unemployment or underemployment in the 50-64 age group is a risk for poverty after retirement and requires measures to tackle economic inactivity that are underpinned by an understanding of the barriers people face to getting and staying in work at this stage of life. The APS should be integrated with other areas of policy and legislation such as the Good Jobs/Employment Rights Bill.</p>

<p><b>Measures supporting working older people should include:</b></p> <ul style="list-style-type: none"> <li>• An older workers' strategy that sets targets around increased employment and retention through the delivery of interventions such as meaningful access to flexible working, visible and accessible support in the workplace, paid carers leave and opportunities for upskilling and reskilling at every age.</li> <li>• Peer role models for older workers.</li> <li>• Monitor data on the impact of rising State Pension age and address any adverse consequences for older people who are 'working age'.</li> </ul>
<p><b>Anticipated Impact</b></p> <p>Increased employment and retention of older people and people approaching retirement age in work, balance of work and caring responsibilities and equal participation of older people.</p>
<p><b>Evidence</b></p> <p><b>Comments made at Focus Group:</b></p> <ul style="list-style-type: none"> <li>• Language – use of the word “pensioners” very limiting as lots of older people continue to work either because they have to or want to stay active and pension age is increasing so not all older people are pensioners.</li> <li>• People are now less likely to be in the same job long-term and this will only increase in the future.</li> <li>• People who have worked in secure professions are in a different position to those who have worked in other sectors with short term contracts and different pension arrangements – they may work the same length of time but often their pension is worth less.</li> <li>• Financially supporting grown up children and the wider family. Role of grandparents in taking on childcare responsibilities so that parents can work. Childhood poverty would be greater if grandparents did not take on this role.</li> </ul> <p><b>Other evidence:</b></p> <p><b>EAP report</b>, Summary item 4 page 6, Summary item 21 page 8  <a href="https://www.communities-ni.gov.uk/system/files/publications/communities/dfc-social-inclusion-strategy-anti-poverty-expert-advisory-panel-recommendations.pdf">https://www.communities-ni.gov.uk/system/files/publications/communities/dfc-social-inclusion-strategy-anti-poverty-expert-advisory-panel-recommendations.pdf</a></p> <p><b>Changing patterns of work at older ages</b>, Institute for Fiscal Studies, June 2021  <a href="https://ifs.org.uk/publications/15485">https://ifs.org.uk/publications/15485</a></p> <p><b>Why older workers are the future</b>, Blog, 2021, Centre for Ageing Better,  <a href="https://ageing-better.org.uk/blogs/why-older-workers-are-future">https://ageing-better.org.uk/blogs/why-older-workers-are-future</a></p> <p><b>A means to many ends</b>, Age UK  <a href="https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/active-communities/rb_sept12_a_means_to_many_ends_older_workers_experiences_of_flexible_working.pdf">https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/active-communities/rb_sept12_a_means_to_many_ends_older_workers_experiences_of_flexible_working.pdf</a></p> <p><b>Working well? How the pandemic changed work for people with health conditions</b>  <a href="https://ageing-better.org.uk/publications/working-well-how-pandemic-changed-work-people-health-conditions">https://ageing-better.org.uk/publications/working-well-how-pandemic-changed-work-people-health-conditions</a></p>



<b>4.6 Improved data collection and research on poverty and older people</b>
<b>Details of Proposal</b>
<p>There is limited data and research available to understand the causes of poverty and the experiences of older people at different times and transitions in life. The APS should take a lifecycle approach that demonstrates a clear understanding of how lifelong inequalities compound in older age and proposes interventions that can both prevent and reduce poverty for older people. This will require better data collection and analysis, including disaggregation to reflect the diversity of older people.</p> <ul style="list-style-type: none"> <li>• Data disaggregated by age cohorts using 5-year brackets in order to track trends in poverty throughout older age.</li> <li>• More research into the causes of poverty in later life and identify actions to address these.</li> <li>• Research into the additional costs associated with ill health, disability, caring for others and links with poverty.</li> <li>• Research into older people moving in and out of poverty, and into poverty of older old people e.g. aged 75+ and 85+.</li> <li>• Regular population wide surveys to establish items and activities that majority consider to be basic necessities, and which represent minimum standards.</li> <li>• Provide an accessible measurement of the ‘poverty gap’ to effectively monitor if poverty for older people is deepening.</li> </ul>
<b>Anticipated Impact</b>
<p>Deepen understanding of poverty experienced by older people, trends, and impact of policy/legislative interventions.</p>
<b>Evidence</b>
<p><b>Comments made at Focus Group:</b></p> <ul style="list-style-type: none"> <li>• Data already exists about older people’s income, so, we may have the ability to apply Pension Credit automatically to those who are eligible.</li> <li>• Clear measures, outcomes, and impact and, crucially, accountability mechanisms involving Ministers and Civil Servants to ensure full implementation of the Strategy.</li> <li>• Women who stayed at home often don’t have a pension which reflects their contribution as “stay at home parents” raising children.</li> <li>• Lack of benefit uptake, people who have low pensions feel there is a stigma attached to making a benefit claim or fear disclosing information to authorities.</li> <li>• The cost of living in rural communities is higher than for city dwellers, this is not reflected in their pension or overall income.</li> <li>• Evidence base, for example, is the retail index different to other regions of the UK?</li> </ul>

- There was a feeling that accessing support can be difficult for older people, it would be good to thoroughly examine the barriers that people perceive and develop supports that overcome these.

**Other evidence:**

***Poverty in later life: How people in older age move in and out of poverty, and what should be done to reduce it***, Independent Age, February 2022

<https://www.independentage.org/poverty-later-life-how-people-older-age-move-and-out-of-poverty-and-what-should-be-done-to-reduce>

**EAP Report**, p24, p27 p62

**It doesn't add up**, Age UK 2022

<https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/it-doesnt-add-up/it-doesnt-add-up---campaign-report.pdf>

## OUTCOME 5

**We have attractive, safe, accessible, welcoming, and sustainable environments in the most deprived areas.**

### Summary of calls

**5.1 Investment is required for the 20% most multi-deprived communities to move people and communities out of poverty.**

**5.2 Addressing and delivering on Regional Balance.**

**5.3 Communities must be part of the decision-making process to break the cycle of poverty.**

**5.4 Investment in Community Wealth Building.**

### Introduction

As a Group we have further considered and developed the key recommendations from the Expert Panel to include suggested actions aimed at explicitly tackling place-based poverty and deprivation.

We fully support the two key assumptions set out in the expert panel's report, as to the purpose of an Anti-Poverty Strategy but believe there is a need to supplement these further to address place-based poverty and deprivation.

We recommend that the 3 interlocking key assumptions of the Anti-Poverty Strategy are:

1. That the Strategy is aimed at directly raising disposable household income.
2. Its proposals should be aligned to people being able to obtain 'good jobs' and the raising of living standards.
3. Its proposals should support Regional Balance, place-based interventions and initiatives to tackle poverty and disadvantage.

There is growing evidence which supports the need for place-based interventions to address key societal challenges, including supporting citizens and communities out of poverty. The Scottish [Community Empowerment Act](#) "offers a holistic or '[whole place](#)' [approach](#) that crosses policy sectors and silos. Its added attraction for policymakers is that it sounds tangible, immediate, and local. It's something an individual can identify with – a place to live, a place of work, and a place to care about and protect." <sup>88</sup>

In Northern Ireland, the Minister for Communities released a statement in April 2021 supporting the need for place-based approaches which said "*These projects provide services that are designed and delivered within local communities. They complement and enhance existing education, health, community safety and other initiatives, to tackle the specific impact that poverty has had on those communities.*"<sup>89</sup>

**5.1 Investment is required for the 20% most multi-deprived communities to move people and communities out of poverty**

<sup>88</sup> <https://whatworksscotland.ac.uk/topics/place-based-approaches/>

<sup>89</sup> <https://www.communities-ni.gov.uk/news/communities-minister-allocates-ps18million-neighbourhood-renewal>

Details of proposal
<p>Place Based Strategy</p> <ul style="list-style-type: none"> <li>• The current and long awaited review of the <b>People and Place Strategy</b> should be finalised with meaningful co-design and proper public consultation. It is important to ensure the legal duty to give regard to rural needs is adhered to. This Strategy should be a key deprivation social strategy linked to both Programme for Government and Well Being Dashboard.</li> <li>• Investment in the People and Place Strategy is required at an estimated cost of approx. £34 million per year.</li> <li>• Cross departmental investment and resourcing based on objective need is needed to help support people and communities out of poverty.</li> <li>• Citizens, the community and voluntary sector, and statutory agencies to work together to jointly develop <b>place-based action plans</b> which have clear targets and accountability measures.</li> <li>• The use of <b>participatory budgeting approaches</b> across Government departments and agencies in determining key budgetary decisions with regard to addressing poverty.</li> <li>• Cross departmental tender and procurement processes by government and agencies would ensure that all contracts will pay at least the real living wage, fully implement “Buy Social” and ensure social value within the scoring matrix.</li> <li>• Investment in health initiatives to increase well-being of people facing poverty.</li> <li>• Education interventions to support children from most deprived communities to reach their potential and move out of poverty.</li> <li>• Equality Impact Assessments used by Government, to have enhanced criteria, to include reducing poverty.</li> </ul>
Anticipated impact
<ul style="list-style-type: none"> <li>• Tackling poverty would be a Programme for Government commitment, with targets and funding attached, which would ensure cross departmental investments into placed based interventions.</li> <li>• There will be a narrowing of the gap between more affluent and deprived communities.</li> <li>• Areas within the top 20% most multi deprived communities would develop joint strategies between citizens, the community sector, voluntary sector, and government agencies to tackle the long-term impacts of poverty.</li> <li>• Communities experiencing deprivation would be empowered.</li> <li>• Education underachievement would be reduced.</li> <li>• Health inequalities would be reduced.</li> </ul>
Evidence base
<p><b>Extracts from Youth Service Report on Engagement with Young People for the Department for Communities Anti-Poverty Strategy</b></p> <p>Deprivation can also impact on a child or young person’s confidence and self-esteem. A recent report from the Children’s Society noted that more than a quarter of children and young people from the poorest families had been the victims of bullies because of the stigma of their parents being unable to afford the cost of school.</p>

Poverty is also an increasing factor in children and young people experiencing adverse childhood experiences (ACEs). According to Public Health Scotland, having high numbers of ACEs is clearly linked to growing up in poverty and deprivation with a higher proportion of people in the most deprived areas reporting ACEs.

Northern Ireland has higher levels of multiple deprivation than the rest of the UK with over a third of the population living on or below the headline. It has been estimated that almost one third of households (29%) in Northern Ireland are sometimes skimping or going without food so that others in their household will have enough to eat. It has also been noted that 7% of households cannot afford regular fresh fruit and vegetables.

The extent of childhood poverty cannot be understated as research has indicated that one in four children and young people in Northern Ireland are currently experiencing poverty. There are approximately 444,000 children and young people in Northern Ireland and government statistics recently indicated 121,000 young people during 2018-19 were deemed to be living in relative poverty after housing costs.

### **Scotland Community Empowerment Act**

Research has shown that when communities feel empowered, there is:

- Greater participation in local democracy.
- Increased confidence and skills among local people.
- More people volunteering in their communities.
- Greater satisfaction with quality of life in the neighbourhood.
- Better community engagement and participation leads to the delivery of better, more responsive services and better outcomes for communities.

Suggested actions under the Act to empower communities in Scotland, are aimed at:

- Funding community-led regeneration through the Empowering Communities Fund.
- Funding participatory budgeting through the £1.5 million Community Choices Fund, giving people more power to make decisions on spending in their local areas.
- Making it easier for communities to take over land and buildings in public ownership through asset transfer.
- Supporting community councils to represent communities' opinions and needs to public bodies.
- Giving communities the ability to request to participate in decisions and processes which are aimed at improving outcomes through participation requests.
- Setting out best practise for public bodies to engage with communities via the National Standards for Community Engagement.
- Providing guidance on common good property.
- Launching the Local Governance Review, a comprehensive review of how local decisions are made and how local democracy is working.

- Supporting public service providers to work together and with local communities via community planning to shape and deliver better services.
- Bringing forward legislation to empower our island communities.

### Research

Current statistics show that four million workers live in poverty, a rise of over half a million over five years. In-work poverty has been rising even faster than employment, driven almost entirely by increasing poverty among working parents. (JRF, 2018) 15% of working age people are in poverty. (JRF, 2024)

## 5.2 Addressing and delivering on Regional Balance

### Details of proposal

Balanced regional development and balanced investment in services, infrastructure and resources will enable areas particularly those outside of the one-hour drive time to regional cities an opportunity to level up economic activity and reduce risk of rural poverty.

**Dedicated investment is required for the 20% most deprived rural communities** to move people and communities out of poverty and there must be acknowledgement that in rural communities, poverty is less obviously “place-based” – poorer households live amongst households that are considered relatively well off. The vast majority of socially excluded rural households are thinly scattered across the rural SOAs so a household-based solution is also needed; The MARA (Maximising Access to Benefits in Rural Areas) household level approach should be replicated and mainstreamed.

### Actively Engaging Communities

In keeping with Section 1(1) of Rural Needs Act (NI) 2016 and the 2025 Judicial Review, *Mid-Ulster District Council-v-Department for Communities*, due regard should be given to rural needs by every government department and public authority in a timely manner inclusive of intent and impact.

Rural proofing/Rural needs identification should involve **active** engagement of rural communities, agencies, and departments in consultation processes, and it should be a meaningful and inclusive approach.

A framework to be developed by statutory agencies, in partnership with communities, on inclusive co-design models to tackle rural poverty and transform communities, with a focus on mitigation. This is particularly relevant regarding issues of child poverty, fuel poverty, and pensioner poverty, all of which have a higher than NI average incidence in rural regions.

### Childcare – Full detail in Outcome 2

Deliver a rural-proofed Childcare Strategy that delivers flexible, affordable, accessible childcare options for rural families. Acknowledging that childcare is both a social and economic issue; encouraging mothers to return to work or training needs to be supported by affordable accessible childcare provision.

### **Housing – Full detail in Outcome 6**

Strategic investment to ensure provision of social and affordable households in rural NI meeting the annual Rural New Build target set by the Housing Executive and in keeping with Programme for Government targets.

New homes should be built which ensure energy and environmentally efficient homes which will reduce costs to the occupiers.

Rent for social housing should be capped at an affordable level and particular attention should be paid to areas where social housing is in short supply and PRS is the only option for local families.

### **Transport**

Develop more strategic, long-term support for local community transport schemes in rural areas geared towards enabling greater access to services, reducing private car usage, and enabling a more just transition for rural communities in the greening of society.

A renewed focus on improved transportation networks into and out of the West of Northern Ireland.

### **Anticipated impact**

- Investment and resources should be made based on objective need in the most deprived rural communities and areas at risk to ensure we have attractive, safe, and sustainable environments and services.
- Cross-departmental investment and resources should be directed towards the top 20% most rurally deprived communities **and** to household level approaches to tackle social, community, economic and environmental disadvantage.
- Rural Proofing is more than completing an RNIA statement it should move to actively identify how services and policies might impact negatively or against rural areas/populations and seek ways to mitigate that. Mr Justice Scofield, in *Mid-Ulster District Council-v-Department for Communities* is quoted as saying “*Having due regard to a statutorily mandated matter requires its active consideration ... This should be more than a mere tick-box exercise*”.
- Reduced child poverty in rural areas.
- Reduced pensioner poverty in rural areas.
- Greater uptake of social security, pension credits, warm homes support and benefits in rural areas.
- Reduced reliance on private transport reducing cost of living for many households and reducing carbon emissions.

### **Evidence base**

#### **Rural Community Network (RCN)**

Multiple deprivation measures for rural areas

[rural-community-network-briefing-paper-041114.pdf \(niassembly.gov.uk\)](https://www.niassembly.gov.uk/publications/rural-community-network-briefing-paper-041114.pdf)

RCN have had a long-standing interest in the issues of poverty and inequality in rural communities in Northern Ireland. We are particularly interested in whether or not the NI Multiple Deprivation Measure under-estimates the extent of poverty in rural areas. Unlike urban areas which are socially segregated poverty in rural areas exists amongst relative affluence. This presents problems for policy makers as area-based



interventions which can work well in urban areas where poverty is spatially concentrated, will not work in rural areas where poor people live alongside people who are relatively affluent.

[Tackling Rural Poverty & Social Isolation – A New Framework | Department of Agriculture, Environment and Rural Affairs \(daera-ni.gov.uk\)](#) While poverty and social isolation exist in both urban areas and rural areas it is recognised that those living in rural areas often experience poverty and social isolation differently due to issues relating to geographical isolation, lower population density and the dispersed nature of many rural settlements. Living in a rural area can also exacerbate the effects of poverty and social isolation for certain groups. For example, additional costs of living in a rural area such as higher fuel or transport costs can have a greater impact on people on low incomes while some groups such as young people or people with disabilities may experience greater difficulties accessing transport services in rural areas than in urban settings.

<https://www.daera-ni.gov.uk/sites/default/files/publications/daera/Key%20Rural%20Issues%202020%20-%20Final.pdf>

Childhood poverty is higher in rural areas with 23% rural children in absolute poverty. Twice as many pensioners in rural areas are likely to experience relative or absolute poverty than their urban counterparts.

Fuel poverty rates in rural areas are twice as high as urban areas – 32%

92% of rural dwellers have a car or van, an essential household expense for rural households.

Briefing paper from 2014 [Rural isolation, poverty and rural community/farmer wellbeing – scoping paper \(niassembly.gov.uk\)](#)

Rural proofing

[Rural Proofing in Northern Ireland an Overview and Recommendations Decem....pdf \(afbini.gov.uk\)](#)

*Northern Ireland has a large rural spatial periphery and sparsity. Its rural population accounts for 38% of total citizens, meaning that more than one in three are considered as geographically dispersed. As market-driven environments follow supply and demand, depopulated areas are used to justify urban centralisation of public, retail, and social amenities, hence leaving many of our rural regions with rudimentary access to services, resulting in a rural-urban dichotomy in respect of food poverty and food access. It is recognised that rural households who experience deprivation, experience it differently than their urban counterparts, mainly due to the isolating nature of dispersed services. This means, rurality can be regarded as an exacerbation to the effects of poverty and in particular food poverty.*

*Long-term food insecurity has a profound impact on health and health inequalities across all lifecycles. Households suffering from food inadequacies will seek to change dietary behaviours with coping strategies such as skipping meals, reducing portion sizes, and increasing household consumption of inexpensive high, fat, salt, and sugar foods. Data from Poverty and Social Exclusion (2014) has found 29% of NI households are 'skimping' or depriving themselves of food in order to feed others. Individuals who consistently consume inadequate diets, in terms of nutritional quality, increase their risk of ill health. Food purchasing and consumption patterns are imperative in shaping*



*health outcomes of individuals. For low-income households, food availability and affordability are dominant influences in food dietary choice as are the type, size, and location of the food retail store. It is no surprise that food availability and affordability within the rural food retail environment is considered a tangible problem that is inversely linked with household food insecurity and ultimately health inequalities.*

[Rural poverty: The impact of rurality on consumers' access to food services, using a food poverty risk index — Ulster University](#)

Fuel Poverty in rural NI – Mainly comes down to lack of access to the gas network and over dependence on solid and home heating oil.

[heatingoil\\_fuel-poverty.pdf \(niassembly.gov.uk\)](#)

Many rural areas are unlikely to be ever connected to the gas network. Other viable solutions need to be found for these consumers, which could include alternative energy sources such as micro-generation and community type combined heat and power (CHP) projects.

Digital poverty and digital exclusion of rural areas:

['Digital poverty' risks leaving students behind - Office for Students](#)

[Childcare - Northern Ireland Rural Women's Network NIRWN](#)

### **5.3 Communities must be part of the decision-making process to break the cycle of poverty**

#### **Details of proposal**

- Investment from government to meaningfully involve people with lived experience of poverty, in central and local government decision making processes to tackle poverty.
- Citizens (including people with lived experience of poverty), Community / Voluntary sectors and statutory agencies to work together to develop a model of best practice regarding co-design.
- Legislation is developed which would require local and central government to develop participatory budgeting between communities and statutory agencies to help transform communities.
- Community Planning Partnerships comprising the council, statutory bodies, agencies, and the wider community, including the community and voluntary sector. The partners will develop and implement a shared plan for promoting the well-being of an area, improving community cohesion and the quality of life for all citizens.
- Utilising the knowledge and expertise from within local council areas, particularly those who have already drafted good practice Anti-Poverty Strategies and tailored to their Council Area.

<b>Anticipated impact</b>
<ul style="list-style-type: none"> <li>• Citizens will be at the heart of community planning and decision-making process.</li> <li>• Better decision making and joined up approaches from central and local government.</li> <li>• Citizens with lived experience of poverty will be empowered to influence policy from central and local government.</li> <li>• Government budgeting would be based on evidence and people with lived experience of poverty.</li> </ul>
<b>Evidence base</b>
<p>Focus Groups:</p> <p>VOYPIC</p> <p>Access to Services</p> <p>Participants were invited to share their thoughts and ideas on the impact of poverty on our access to services. This included both services to alleviate poverty, and general universal services. Thoughts included:</p> <ul style="list-style-type: none"> <li>• Access to healthcare was a particular focus for the group in this section of the discussion. Young people talked about the NHS and its importance in our society. While recognising the pressures on the service, young people talked about their support for the NHS, treating everyone who needs help ‘for free.’</li> <li>• The group talked about centralisation, with some clinics or specialist services only being available in certain areas. The group discussed how, due to cost, some people may not be able to travel to appointments or to get treatment.</li> <li>• When discussing how some people can claim back their travel costs, the group were unsure how this works in practice. They thought some people might find the admin too much of a burden, while others may not have the money to pay up front for travel in the first place.</li> <li>• The group talked about access to dentistry, noting how many of the dentists in their local areas did not take on NHS patients.</li> <li>• One young person also talked about getting glasses and the NHS voucher for these. Because this did not extend to lens modification, the option for thinner lenses was not available, therefore she had to settle for the thick lenses. This has an impact on self-esteem.</li> <li>• The group also discussed how some services are only available to people who are experiencing poverty. They discussed the idea of free school meals (FSM) as a passport to other benefits and opportunities. The group were concerned that ‘advantages of being in poverty’ may have a counter effect, acting as a barrier to moving out of poverty.</li> </ul>

<b>5.4 Investment in Community wealth building</b>
<b>Details of proposal</b>
<p>A community wealth fund of £100 million over 10 years to be developed to support areas trapped in the cycle of poverty. This would involve:</p> <ul style="list-style-type: none"> <li>• Capacity building for Community and Voluntary organisations to develop staff and expertise to socially and economically benefit the area in need.</li> <li>• Support public assets transfer to CVSE sectors.</li> </ul>

<ul style="list-style-type: none"> <li>• Fully committing to an outcomes-based approach.</li> <li>• Collaborating for outcomes.</li> <li>• Budgeting for outcomes.</li> <li>• Strengthening local wellbeing approaches.</li> <li>• Data for outcomes.</li> <li>• Citizen engagement and open government.</li> </ul>
Anticipated impact
<ul style="list-style-type: none"> <li>• A community wealth building fund would be developed for the next 10 years to support the community and voluntary sectors to alleviate poverty.</li> <li>• Residents would have a key say in assets which are no longer required by government. The government process of disposing of assets should engage with residents and social values should be viewed in the same way as financial value.</li> <li>• Communities would have access to a fund for assets transfers which benefit local residents.</li> </ul>
Evidence base
<p><b>The "Preston Model"</b></p> <p>The "Preston Model" is a term applied to how the council, its anchor institutions and other partners are implementing the principles of Community Wealth Building within Preston and the wider Lancashire area.</p> <p>Community wealth building offers an opportunity for local people to take back control, to ensure that the benefits of local growth are invested in their local areas, are used to support investment in productive economic activities and that people and their local institutions can work together on an agenda of shared benefit.</p>

## OUTCOME 6

**All people experiencing or at risk of poverty have equal access to high quality public services that meet their needs in a timely manner and are based on dignity, fairness, and respect.**

This outcome captures a number of the cross-cutting issues for the Anti-Poverty Strategy. These issues are extremely broad, with a significant number of recommendations arising from the EAP<sup>90</sup> and discussion via the Co-design group. The actions we believe are necessary to achieve the outcome as set out above have been summarised under four headings:

**6A. Housing provision and support**

**6B. Access to online services and transport**

**6C. Access to independent advice services and justice**

**6D. Actions to tackle specific types of poverty**

These actions focus on addressing a number of cross-cutting issues which currently cause or contribute to poverty (housing, transport, barriers to online services), can help prevent or deal with the impacts of poverty (access to advice and justice), or are specific manifestations of poverty (fuel, food, period).

The National Institute for Economic and Social Research<sup>91</sup> published its economic outlook for winter 2022. It notes: *The combined effect of higher prices and higher taxes in the form of National Insurance contributions (NICs) will push many households into destitution; our headline projection is a 30 per cent rise in destitution because of the differential impact of inflation upon the poor; however, there are large regional variations, with Northern Ireland projected to have more than twice the average increase.*

*Every region is projected to suffer upwards of a 10 per cent increase in destitution, but the largest increase is projected for Northern Ireland (67 per cent, bringing the total number of destitute households to about 25,000 households). This may be viewed against the context of low and falling participation rates in this part of the UK. This is alarming, particularly against lower presence of foodbanks and a lack of data on support for struggling households in NI (Fitzpatrick et al., 2020; Tyler, 2021).*

6A. Housing provision and support
<b>Summary of proposals</b> <ul style="list-style-type: none"><li>• Long term investment in social housing.</li><li>• Provision of affordable, adequate, appropriate, and accessible accommodation.</li><li>• Greater regulation of the private rented sector.</li><li>• Supports for those experiencing or at risk of housing-related poverty</li></ul>

<sup>90</sup> DfC (2020) [Recommendations for an APS, Report of the EAP](#)

<sup>91</sup> [UK-Economic-Outlook-Winter-2022.pdf \(niesr.ac.uk\)](#)

## What is required

- **Long term investment in social housing** including:
  - Increased supply of one-bedroom properties to meet population requirements.
  - Abolition of the right to buy scheme.
  - A consideration of ways to tackle differentials in rents between NIHE and Housing Association properties.
  - An investigation of the barriers to the development of social housing in rural areas.
- **Provision of affordable, adequate, appropriate, and accessible accommodation**, including:
  - A range of housing models, reflective of populations in urban and rural areas and connected to the community and services.
  - Culturally appropriate housing solutions for extended kinship communities such as Traveller and Roma families.
  - Age appropriate, independent and supported living options for young people generally and young people leaving care (including those who arrive in Northern Ireland as separated or unaccompanied asylum-seeking young people).
  - Age-appropriate inclusive housing solutions for young people at risk of experiencing homelessness, including LGBTQI+ young people.
  - For people with disabilities and older people.
  - By increasing over time, the LHA rate to its original 50<sup>th</sup> percentile value.
  - By overhauling building standards with a view to setting high energy efficiency standards.
  - By introducing compulsory environmental health approval before new lets are put on the market.
- **Greater regulation of the private rented sector** including by:
  - Using rent regulation as a lever to bring substandard private rental properties up to standard.
  - Using HMO regulation across the private rented sector with a view to developing uniform standards across the sector.
  - Investigating the impact of tourism on the availability of homes for those living or wishing to live in tourist destinations.
- **Supports for those experiencing or at risk of housing-related poverty** including:
  - Ensuring adequate support services are in place to protect those at risk of losing tenancies.
  - Ability to use vacant properties for destitute migrants, as part of a wider Ending Migrant Destitution policy, and to address the homelessness crisis more generally.
  - Consideration of the delivery of social care and housing together.

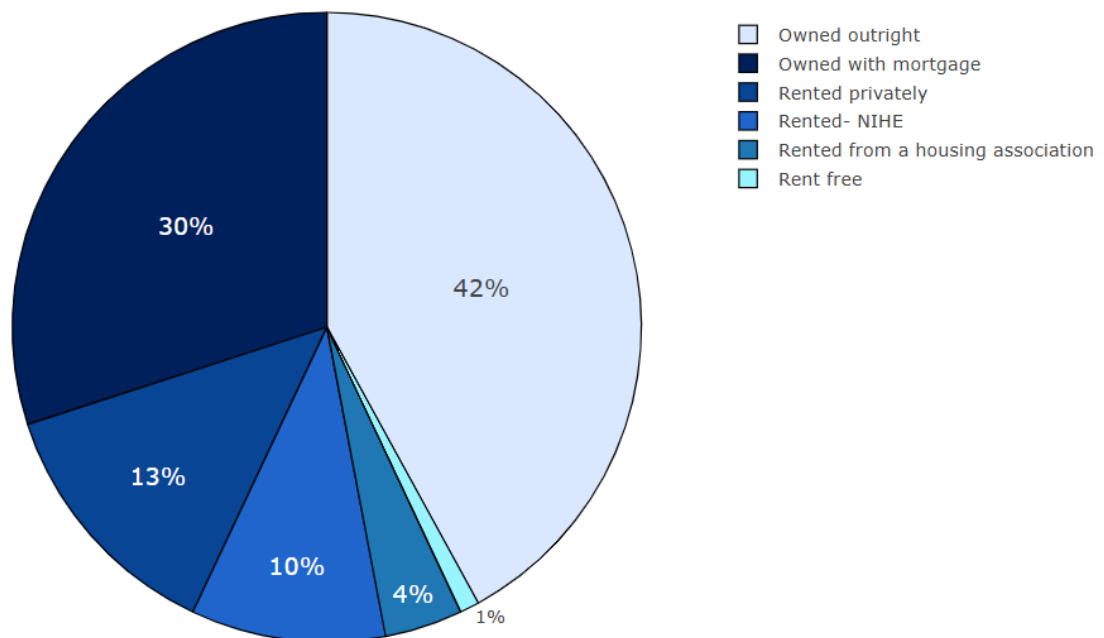
## Impact of calls

- Reduced housing and energy costs.
- Better regulated private rented sector.
- Greater availability of accessible, affordable and quality accommodation.
- People with disabilities, older people, single people, people from minority ethnic groups and those living in rural areas have the home they require.

## Evidence base

The spread of housing tenures in Northern Ireland is as follows:<sup>92</sup>.

### Household tenure 2022-23



Published information regarding homelessness in Northern Ireland<sup>93</sup>, including Waiting List and allocations statistics (May 2024) highlights 29,394 households on the Waiting List which were accepted as homeless and awarded Full Duty Applicant (FDA) status.

### Social housing

The Co-Design Group highlighted that many Northern Ireland Housing Executive properties had been lost due to right to buy.

### Private rented sector

The EAP noted that<sup>94</sup>: *‘One of the consequences of the shift in tenures is that more low-income families with children are now living in the private rented sector with higher rents*

<sup>92</sup> <https://datavis.nisra.gov.uk/communities/northern-ireland-housing-statistics-2022-2023.html>

<sup>93</sup> [Homelessness data breakdown](#) (May 2024)

<sup>94</sup> <https://www.communities-ni.gov.uk/system/files/publications/communities/dfc-social-inclusion-strategy-anti-poverty-expert-advisory-panel-recommendations.pdf>, p48-19

*and poorer conditions than if they were accommodated in the public sector<sup>95</sup>. These households are particularly vulnerable to the gap between housing benefit and local housing allowances which has grown since the cuts to housing benefit introduced in 2011<sup>96</sup>. NI now spends four times as much on subsidising rents as it does on investing in new build and refurbishment<sup>97</sup>. More than half the public expenditure that enables people to pay rents goes to private landlords with no obvious medium or long-term public benefit. Yet the challenges presented by homes that are expensive to heat, and the climate emergency generally, require huge levels of investment in the housing stock. Residential properties are responsible for 14% of NI's greenhouse gas emissions<sup>98</sup>.*

Co-Design Group members commented that private rental is not an option for young people in poverty due to cost barriers. There is also a frustration around 2nd, 3<sup>rd</sup>, and 4th homeowners in areas of Northern Ireland (particularly around the North Coast), with properties only being occupied seasonally, whilst so many people are homeless.

### **Asylum seekers**

The focus group highlighted that Housing Associations in Great Britain can make properties available to asylum seekers if left vacant long-term, whilst this is not possible in Northern Ireland.

### **Rural housing needs**

In June 2021 there were 6491 households on the housing waiting list who wanted to be housed in rural communities and 4077 of those were in housing stress<sup>99</sup>. This represented 14.7% of the overall social housing waiting list in Northern Ireland. The new build target for social housing in rural communities set by the Housing Executive has not been achieved in 6 of the last 7 years.

It is generally agreed that the level of housing need recorded by the Housing Executive through the housing waiting list does not reflect the true level of housing need in rural communities. Many rural residents see no social housing in their area, and do not see any prospect of social housing being built so they turn to the private rented sector. The private rented sector, which is the only housing option for many low-income households in rural communities, often has higher rents and is in effect, subsidised from the public purse through housing benefit. In areas where housing is in short supply, this is causing hardship in low-income families where housing benefit will only meet a proportion of the rent and tenants are forced to find a higher proportion from their own income.

**The number of homeless households presenting to the Housing Executive from rural**

<sup>95</sup> Mac Flynn, P. and Wilson, L. (2018) Housing Provision in Northern Ireland and its Implications for Living Standards and Poverty, Nevin Economic Research Institute. p. 35.

<sup>96</sup> McAuley, M. (2019) Falling Behind: Exploring the gap between Local Housing Allowance and the availability of affordable private rented accommodation in Northern Ireland. HousingRights.org.uk ; and McAuley, M. (2020) The 'Perfect Storm': The impact of COVID-19 on private renters in Northern Ireland, Housing Rights

<sup>97</sup> Data from Chartered Institute of Housing, UK HOUSING REVIEW 2020.

<sup>98</sup> Northern Ireland greenhouse gas inventory 1990-2018, statistical bulletin - data and charts. Department of Agriculture, Environment and Rural Affairs.

<sup>99</sup> Statistics presented by NIHE Rural Unit at Rural Residents' Forum meeting 01.06.21



communities has risen. In June 2021, 2,693 households from rural communities were homeless and defined as Full Duty Applicants. For the majority of these households the reason for homelessness was that their accommodation was no longer suitable to meet their needs, another demonstration of the housing supply issues faced in many rural communities.

The need for affordable housing in rural communities has also been identified by the Housing Executive Rural Unit through their programme of rural housing need tests. There is a cohort of people in rural communities who cannot afford to buy on the private market but are unlikely to be eligible for social housing either. An affordable housing option (to buy or rent) would meet the housing needs of this cohort.

Housing supply in rural communities is vital to ensure their future sustainability. New build social housing in rural communities meets some of the housing needs of rural citizens but it also benefits the rural economy and contributes to sustainable development across the region:

*“Support strong, sustainable growth for the benefit of all parts of Northern Ireland: A growing regional economy will benefit from strong urban and rural areas. This needs a co-ordinated approach to the provision of services, jobs and infrastructure and a focus on co-operation between service providers. Balanced regional growth Building a Better Future and tackling regional imbalance are critical issues for the region.”*

Regional Development Strategy RDS 2035 Building a Better Future

*“Grow a Globally Competitive and Sustainable Economy” and Provide More Social, Affordable and Sustainable Housing* are two of the nine outcomes in the Programme for Government<sup>100</sup>. Without an adequate supply of housing across all tenures in a range of settlements this ambition is unlikely to be realised. Additional housing in rural settlements will contribute to ensuring schools and other public services remain viable. It also contributes to the sustainability of local small businesses and with improved broadband connectivity rural living can be much more carbon efficient than in previous decades. Housing supply in rural settlements needs to consider the development of appropriate infrastructure and services. It also needs to consider rural mobility issues and how housing can link into active and public transport networks to enable people to access the employment and services they need.

Insight and evidence from the Rural Community Network (RCN) strongly agrees that there is a need for better understanding of local housing/rental markets. This is particularly important to inform the local development plan process and allow the Department and local authorities to plan better for housing need and housing supply. A deeper understanding at very local level of the condition of the housing stock across all tenures will be vital as NI Executive implements Energy Strategy proposals which will

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<sup>100</sup> [Programme for Government 2024-2027 'Our Plan: Doing What Matters Most'- Documents | The Northern Ireland Executive](#)

require retro fit of insulation and transition away from OFCH which is a particular issue in rural communities

We need to invest more in engagement with local communities at grass roots level. The area plan development process is technical, time consuming and dominated by developers, landowners, and statutory consultees. If we are serious about place making, then we need to invest time and resources in it and listen to what local communities want from their local places.

Barriers to the provision of **rural** social housing

Barrier 1 - In rural communities the availability of suitable sites for housing within settlement limits at an affordable price for developers appears to be the main barrier constraining the delivery of housing across tenures.

Barrier 2 - The second major barrier are infrastructure deficits – particularly in relation to wastewater treatment which is preventing development of new homes across a range of settlement sizes and all tenures.

Barrier 3 - The availability of funding for social and affordable housing. With approximately 44,000 households on the waiting list and nearly 70% of those in housing stress it will take more than 20 years to build the new homes required to meet this need even if no-one else comes onto the waiting list.

## Focus Group Feedback

### Care experienced young people

*“Housing is really expensive.”* The participants all believed that, for them, owning their own home was out of reach. All three voiced concern about the cost of renting a property, and the practices of some landlords. *“Even renting is really dear. If you fall behind on the rent, some landlords might understand, but most will just kick you out.”* Young people discussed housing and the potential for substandard housing in area of deprivation. This includes issues such as damp, which can lead to serious health concerns.

### Parents

Several participants identified high housing costs, specifically in the private rental sector, as a key cause of poverty, with participants sharing the difficulties for working families in affording their housing payments and other bills. They also mentioned that house prices continue to increase at a faster rate than wages. It was suggested that the cost of private rental accommodation should be capped.

### Parents and Children

Landlords and private rental:

Another thing that comes up a lot is people living in rented accommodation. Some parents, over the winter with economy seven heating systems are spending maybe £90 a week to heat their homes. Windows, where the heat just going right out or through the roof or whatever. So maybe there should be regulations around landlords who are renting homes out to people that they're fit for purpose and that it's not just a money pit

for families.

*“I’m in private rental and I can honestly, I have been very lucky. I’ve been in this private landlord house for nine years; you know on my landlord has been the best. If I ring him and I’ve got a problem, he has it sorted within that day. So that’s why I can say I’m thankful that I have a decent landlord.”*

*“I was quite lucky; my landlord was brilliant as well. It makes a difference whether you go through a letting agent or directly with the landlord. Letting agents can be horrible to work with and private renters struggle more because they feel like they’re under double pressure, the owner of the house and the letting agents as well.”*

*“I think pet friendly landlords is a really, really big deal because most families that I know have got pets and they get turned down for houses. So, they end up taking a house that’s maybe not up to standard or not fit for being lived in simply because the landlord would allow them to have pet. I have seen people move into houses that are dilapidated because they’ve been turned down everywhere else because they can’t take their pets with them. So, people won’t move into a house without their family pet or maybe take accommodation that’s not suitable for them. So, I think if we’re talking about regulating landlords, all of this stuff feeds into that.”*

*“Some letting agencies charge a fee just to go through the form that you fill in with your property. “Sometimes it’s not the landlord, it’s the type of heating that they have in or the type of windows that they have, and they just aren’t fit for purpose. Completely eating up family’s budget.”*

*“Address the poor-quality stock of housing in the private rented sector. Some families can only afford homes with old heating systems and single pane windows and so end up paying much more on heating costs. This should be better regulated.”*

*“Letting agents shouldn’t be able to charge a fee for filling out a form or submitting an application. This is a huge cost to some families.”*

## **Age NI**

Participants talked about the impact on housing in an area if older people who own their own homes are unable to maintain their property, it can be difficult to find someone to carry out repairs at a reasonable cost. Over time, small jobs can become big jobs, and a house can become neglected.

The change and shift from the model of healthcare to more care at home. DoH are already planning hospital care at home, avoiding admissions, speeding up discharge so that people can be cared for at home. Houses need to be fit for this purpose, from parking on the street right through to layout of facilities. There is a huge capital investment that will have to happen in homes/houses to enable hospital care at home. We need to project into the future to see how poverty will impact on healthcare at home.

We need to look at homes to see if they are suitable. If an older person is living in an older house, it may not be well insulated, or have good access and it may need adaptations, etc. Living on a fixed income older people will have to make choices about what they spend. How will people make these choices and how will they provide for this in the future?

### **Ethnic Minority Groups**

Heavy reliance on the private rented sector, as access to social housing is restricted. It is more costly, and therefore a large proportion of income is spent on housing. This reliance on private rented housing is a cause of poverty, not an impact of poverty

Additionally, rogue landlords and poor standards are an issue within this sector. This should be addressed by Councils / NIHE.

Risk of racially motivated attacks on homes of ethnic minority people, in certain areas.

## **6B. Access to Online Services and Transport**

- Ability to access, across Northern Ireland, high speed, affordable and reliable broadband.
- Access to affordable, environmentally friendly transport services across Northern Ireland.

### **Detail of proposal**

**Ability to access, across Northern Ireland, high speed, affordable and reliable broadband**, including:

- Free public access to wi-fi in public buildings.
- Via a policy (akin to Digital Inclusion Scotland – Connecting Scotland Initiative<sup>101</sup>) to address digital exclusion of disabled people, older people, and those in rural communities, and financially support ownership and confident use of digital devices.
- Provision of non-digital channels to access public services.
- Develop and Deliver a Cross-Departmental Digital Strategy - Establish a comprehensive digital inclusion policy for Northern Ireland with clear targets, focusing on infrastructure, affordability, and skills development. This strategy should align with UK government's Digital Inclusion Action Plan: First Steps  
<https://www.gov.uk/government/publications/digital-inclusion-action-plan-first-steps#:~:text=Over%20the%20next%2012%20months,upskilling%20adults%20with%20digital%20skills> .
- Collaborate with Community Organisations: Partner with local NGOs and community groups, supported by policymakers, businesses, and service providers to deliver digital inclusion initiatives tailored to specific community needs.

<sup>101</sup> [Connecting Scotland](#)

- **Invest in Digital Skills Training:** Expand programs such as Go ON NI to provide accessible digital literacy training, especially targeting older adults, individuals with disabilities, and those on low incomes.
- **Enhance Infrastructure in Rural Areas -** Prioritise the expansion of reliable broadband services in rural communities to bridge the urban-rural digital divide.
- **Subsidise Internet Access:** Implement schemes to make broadband and mobile services more affordable for low-income households.

**Access to affordable, environmentally friendly transport services across Northern Ireland, including:**

- Transport services which meet user and potential user needs, to allow access to employment and education opportunities.
- Explore the expansion of free public transport to reduce car use.
- Expansion of the disability pass to free of charge travel (currently half price concession).
- Necessary infrastructure in place (footpaths, lighting) to facilitate the use of public transport.

**Impact of calls**

- Children and young people able to fully engage in online activities, including homework.
- Reduced levels of digital exclusion among groups with persistently lower level of online usage.
- Those people who cannot / do not wish to use online channels can access the services they need via other means.
- Increased use of public transport, with positive environmental impacts.
- People, particularly those who cannot currently, can afford to travel for employment and education, helping to lift them out of poverty.

**Evidence base**

In 2021, the United Nations Human Rights Council adopted a resolution on the promotion, protection and enjoyment of human rights on the internet. We must ensure this right is upheld for all citizens, regardless of their socio-economic status or geographic location. Policymakers, businesses, and service providers need to recognise digital access as a human right and take action to ensure that no one is unfairly discriminated against due to a lack of connectivity, skills, or digital resources.

While digital transformation can enhance service efficiency and accessibility, it can have the opposite effect on those without internet access, digital literacy, or devices; effectively excluding them from essential services and deepening their isolation. We cannot afford to ignore the digitally excluded. As critical services such as healthcare, banking, and public services move online, entire communities' risk being left behind. This isn't merely inconvenient, it's a human rights concern, as it prevents individuals from fully participating in society.

Current Landscape of Digital Exclusion in Northern Ireland Digital Skills in Northern Ireland 2023-24 by NISRA (<https://www.nisra.gov.uk/news/digital-skills-northern-ireland-2023-24>) found:

- Over one in five people (23%) had no digital skills (344,000 people).
- A higher proportion of females reported having no digital skills (25%), and a lower proportion reported having an advanced level of digital skills (21%) when compared to males (21% and 30% respectively).
- Over half (55%) of those aged 65 and over had no digital skills, compared to less than 10% of those aged 16 to 49.
- Over two-fifths (43%) of those who were economically inactive had no digital skills, compared to only 10% of those that were economically active.
- The least deprived areas in NI had a higher proportion (37%) of respondents with an advanced level of digital skills when compared to the most deprived areas (15%).

### **Internet Access and Affordability**

Northern Ireland has the highest rate of non-internet users in the UK, at 14.2% of the population (ONS, 2019).

Affordability remains a barrier in Northern Ireland; While the majority of respondents (78%) to a Consumer Council survey reported that they felt their current broadband contract is affordable, a significant minority (21%) do not. (Broadband affordability and accessibility, Consumer Council for Northern Ireland, June 2024).

### **Impact on Vulnerable Populations**

Digital exclusion disproportionately affects older adults, individuals with disabilities, and those in lower socio-economic groups.<sup>102</sup>

The lack of digital access excludes vulnerable people from engaging with essential services, including online banking, job applications, essential services and accessing healthcare information, all of which can help improve quality of life.

The EAP noted that: 'It is ironic that Universal Credit is 'digital by default' yet caters for some of those most 'digitally excluded'. Low-income households, disabled and older people are more likely to lack access to digital services than the population as a whole<sup>103</sup>. Geography also plays a part in that rural areas are less well-served by fast and reliable internet connections. Exclusion may result from the lack of services and equipment, and also from lack of the five basic skills needed to use computer-based services effectively, issues of provision and training<sup>104</sup>.

<sup>102</sup> <https://publications.parliament.uk/pa/ld5803/ldselect/ldcomm/219/21905.htm>

<sup>103</sup> These are: managing information (e.g. search engines), communicating (e.g. email), transacting (e.g. buying), problem solving and creating. Office of National Statistics (2019) Exploring the UK's digital divide.

<sup>104</sup> Continuous Household Survey (Data for 2019/20).



Patterns of internet provision and usage vary widely across the UK and the island of Ireland. NI has twice the rate of internet non-users (14.2%) as London (7.0%). Across NI, 94% of households in the least deprived areas have home broadband access compared to 78% in the most deprived areas. Only 76% of households have broadband access in the Fermanagh & Omagh council area, compared to 91% in Lisburn & Castlereagh and Antrim & Newtownabbey<sup>105</sup>. Ofcom estimates that 1 in 5 of rural homes and businesses lack ‘decent broadband from a fixed line’. While 91% of households have an internet connection in the Republic of Ireland (in 2019), only 71% of households in the Border region had a fixed broadband connection compared to 92% in Dublin<sup>106</sup>.

With or without internet skills and access, local accessible advice services provide vital supports for navigating public and private services, especially those that low-income households rely most heavily on. For example, personal debt is a significant issue. Across NI, 1 in 6 adults were ‘over-indebted’ in 2018 according to the Money Advice Service. The rates were highest in Derry and Strabane Council area (17.9%) and Mid Ulster (17.6%) which, together with Belfast, account for more than a third (36%) of over-indebted adults in NI. Some of the personal debt problem is invisible as it arises from illegal lending<sup>107</sup>.

Co-Design Group members noted a concern that the rollout of fibre broadband may be too late, as other areas of the United Kingdom are already moving to 5G. As regards a winter fuel payment, Group members noted that some families are forced to make a decision between feeding their families or heating their homes, which is leading to ill health within the household.

### **Input from the Rural Community Network**

The provision of housing is an important factor but cannot on its own, address social and economic decline. There are a complex range of factors at play across communities in terms of economic and social decline which then can manifest in physical decline and in the worst cases dereliction. The provision of housing, on its own, to address physical decline in rural communities is doomed to fail. We need to integrate the development of housing with a more equitable spread of employment opportunities (including remote work) across Northern Ireland to enable sustainable economic development. This requires continued investment in broadband and mobile phone networks and policy that supports small business development. The approach to transport and rural mobility of citizens that reduces household carbon footprint also needs to be designed into our re-development of rural communities.

Turning off 3G signal as reported by Vodafone<sup>108</sup> will mean some areas in Northern Ireland will become ‘not spots’ for even the most basic mobile phone signals.

<sup>105</sup> Ofcom (2020) Connected Nations, UK Report, December. [https://www.ofcom.org.uk/\\_\\_data/assets/pdf\\_file/0024/209373/connected-nations-2020.pdf](https://www.ofcom.org.uk/__data/assets/pdf_file/0024/209373/connected-nations-2020.pdf)

<sup>106</sup> Information and Communications Technology (ICT) Household Survey 2019.

<sup>107</sup> See Livingstone, P. (2019) Christians Against Poverty research into illegal lending in Northern Ireland.

<sup>108</sup> January 2022 [Vodafone to switch off UK 3G network by end of 2023 | Mobile phones | The Guardian](#)



## Focus Group Feedback

### Parents

Move to online services - Concern was raised about the move to online services, such as Universal Credit, but also key services impacted by Covid-19 – for example, a consultation with the GP, health visits and parent support groups. This is a real challenge for people who do not have a suitable device, or who do not have access to Broadband. While for some, this can make services more accessible –for others, it can result in people being unable to access support or services, or not knowing what is available.

There can be varying experiences of poverty depending on whether an individual is living within a rural or an urban community. There was a perception that, in rural communities, there are additional costs associated with transport –as well as difficulties in accessing transport. This can make it more difficult to take up work or to use facilities and services.

### VOYPIC

Transport costs were also raised. This included public transport (bus and rail) and also private transport. The cost of driving lessons and taking a driving test was raised, with some of the young people saying they would not be able to learn to drive because of the cost. Associated costs of owning a car, tax and insurance were also cited as reasons why travel is a concern.

### EA Youth service

Transport poverty was discussed by some of the focus groups and the Youth Workers. They discussed and highlighted the disparity in transport poverty in rural areas as they felt that young people were being restricted and disadvantaged in relation to their FE college or university choice due to the distance they had to travel. They felt that they could not attain the educational services they needed to further their future careers due to the lack of public transport, cost of commuting and no access to a vehicle.

This was reinforced by an Area Youth Worker who stressed that transport poverty was one of the key contributing factors to poverty in local communities. The youth worker stated that young people in rural communities are being discriminated against as they cannot afford to attend the FE college or university they want. The youth worker followed this up by stating that young people needed more affordable means of transport to attend their place of study and that they were being marginalised in terms of what courses are available to them at their local colleges. Further discussion emphasised that more awareness is needed in how young people in rural areas commute to colleges and places of work. To combat this transport poverty, it was suggested by a youth worker that implementing a car incentive scheme for young people would be a step in the right direction.

Young people from urban settings also expressed concerns in relation to transport

poverty however the nature of their concerns contrasted to a degree from their rural based counterparts. For instance, one youth worker highlighted that transport assistance for young people is awarded on a distance-based criteria rather than a means-tested basis. The youth worker stated that he knew of first-hand accounts where a concessionary place on a school bus was not considered for the least well-off pupils as the distance rules were strictly applied to the exclusion of all other relevant criteria.

There was also an indication from some of the young people that pupils may deliberately miss school rather than be embarrassed about not being able to get on a school bus because they could not afford it. There was a suggestion amongst one engagement group that all school transport should be free to break down barriers to education for the less well off.

### **Parents and Children**

*"I spend an absolute fortune on petrol. Spent less on petrol during the pandemic but now that the children are back to school, oh my, do I notice the difference. Now, having to pay petrol because I'm running here, there, and everywhere. There's people who get a free school bus, and they get the same bus stop as my kids, but because I am a couple of streets away from them, I'm not entitled to it. That's something that stands out. Especially secondary school because you're, travelling to the different schools for your kids."*

*"If it was a child whose parent couldn't drive it would be even worse because I think it's £15 a week for a Travel Card. "Paying for transport would put parents off sending their kids to a school that they would do better out of. The kids are missing out on that education because the parents can't afford to pay the buses."*

### **Age NI**

The impacts of poverty and disadvantage are acutely felt by those older people who are not digitally connected. Affordability of broadband, or the technological means or devices e.g. a laptop or tablet, impacts on older people. They are not able to access the internet and cannot access services, as a lot of things are now online. This results in social exclusion.

### **Ethnic Minority Groups**

Feedback from focus groups covered a wide range of areas, these are summarised in the bullet points below:

- We need to be careful not to make assumptions that BME asylum seekers/refugees are non-English speakers. This is inaccurate.
- Inability to access benefits is not due to English proficiency. It's because of institutional racism. It is the policies that have been put in place. Even if you were a citizen, front line workers would in the first instance assume you are not eligible for social welfare support.

- The digital access only became an issue during Covid 19, people didn't have to apply online, and they were living below poverty lines well before Covid 19. Inability to access benefits and services due a lack of English proficiency, and unable to make online applications for benefits due to lack of digital access or skills.
- Undocumented migrants are completely excluded from all healthcare services – a regularisation scheme should allow undocumented migrants to get registered. They cannot get access to GP services, and with the current triage system cannot access A&E. This includes not having access to the Covid 19 vaccine. These individuals may have experienced trauma and need mental health services. Action has been taken as regards undocumented migrants and healthcare in Ireland.
- Older people from minority ethnic groups can be more isolated, due to digital exclusion, fear of Covid 19, and / or a lack of extended family. This impacts on mental health.

#### **6C. Access to independent advice services and justice**

- Ensure the availability of high-quality independent advice services for those who need them.
- Ensure legal advice services, to enable access to justice, are available to everyone who needs them.
- Working with the independent advice sector and Consumer Council, develop a strategy to minimise the 'poverty premium,' loan sharks and high interest credit, targeted at those on low incomes

#### **Detail of proposals**

##### **Ensure the availability of high-quality independent advice services for those who need them, including:**

- Long term funding and job security for those in the independent advice sector.
- Improved awareness and training (trauma informed) of frontline staff regarding their understanding of the circumstances of those experiencing poverty.
- Capacity in frontline services for signposting to ensure those who need it can access advice services.

##### **Ensure legal advice services, to enable access to justice, are available to everyone who needs them, including:**

- Access to specialist legal advice, advocacy and tribunal representation services.
- Increased access to legal aid for Tribunal proceedings.
- Targeted assistance to meet service user needs, including language interpreters, and other reasonable adjustments. Specifically in relation to Migrants and Asylum Seekers: Encourage inclusion of protections for individuals with NRPF (No Recourse to Public Funds) and for those who may

be excluded from accessing their rights due to administrative hurdles, digital only systems or delays in immigration status confirmation.

**Working with the independent advice sector and Consumer Council, develop a strategy to minimise the ‘poverty premium,’ loan sharks and high interest credit, targeted at those on low incomes**, including:

- Strengthening enforcement of lending regulations.
- Preventing illegal lending.
- Supporting the development of low / no interest financial facilities.

### Impact of calls

- Northern Ireland has a strong independent advice sector that provides expert assistance to those who need it.
- Income generation and maximisation: In 2023/24, Advice NI and the independent advice network, a 66-member organisation, helped over 270,000 individuals access more than £107million in additional income, providing a crucial lifeline for those facing poverty and complex legal challenges.
- Individuals can more effectively access the benefits, etc. they are entitled to, and resolve problems at an early stage.
- Justice is accessible to those who cannot afford private legal advice.
- Those vulnerable to exploitation by providers of high interest credit are protected, including from illegal credit providers.

### Evidence base

Advice NI makes the following recommendations<sup>109</sup>:

- The nature, role, and principle of ‘independent’ advice to be promoted and valued.
- 3 – 5-year full cost recovery funding settlements with annual uplifts: to create a secure and stable funding mechanism; to attract, recruit and retain staff; to enhance job security and allow for long term planning, development and delivery of top-quality independent advice services, including a commitment to funding person-centred debt, budgeting support and welfare reform advice as part of the anti-poverty infrastructure.
- Certainty in terms of retaining current funding streams to enable effective, creative, strategic thinking and planning.
- A co-design approach in order to gain a consensus on what the independent advice sector should be doing, and exploring innovatively how best to do it.

Advice NI has also flagged the potential impact of the Pathways to Work Green Paper published in March 2025, with its particular focus on social security benefits and people with disabilities. In a Press Statement [Advice NI Urges NI Executive to](#)

<sup>109</sup>Advice NI (December 2021) [The APS and independent advice](#)

'Keep an Open Mind' on Protecting Sick and Disabled from Welfare Cuts | Advice NI and Briefing Paper Potential impact of 'Pathways to Work' Green Paper in NI | Advice NI included issues such as:

- Estimated financial impact of between £100m - £150m in cuts
- NI Assembly has agreed that withdrawing or cutting social security support for those most in need risks exacerbating poverty
- Figures highlight that 25% of claimants have already lost their disability benefit during DLA to PIP reassessment
- Over 82,000 PIP claimants (38%) are in receipt of the lower Standard Rate Daily Living and so possibly more likely to be affected by the proposed new rule (a minimum score of four on at least one of the daily living activities)
- Loss of the Daily Living component will also impact on carers as this component is a key eligibility criteria for Carers Allowance
- Over 58,000 UC claimants (37%) claim the limited capability for work element and so will be impacted by the freezing of this element for existing claimants (will be halved and frozen for future new claimants)
- Over 51,000 income-based ESA claimants are set to move to Universal Credit in the coming months and so will be affected by the limited capability for work element freeze
- Over 77,000 ESA claimants (84%) have been on benefit over 2 years, which evidences the potential detrimental impact of time-limiting on future new contribution-based ESA claimants.

Whilst the UK Government has paused plans to cut PIP and made several concessions at least in the short-term in relation to the Green Paper legislation (The Universal Credit and Personal Independence Payment (PIP) Bill), there remain significant changes ahead, in particular regarding the Universal Credit 'health element' and contribution-based ESA time-limiting.

The EAP recommended:

*"4.11 It is recommended that the Assembly prioritises and passes an Anti-Poverty Act enshrining in law the commitment of the Northern Ireland Executive to Sustainable Development Goal No.1 (2015) which is to 'end poverty in all its forms everywhere'. The Act should include*

- *A defined role and accountability for arms-length agencies including the community and voluntary sector in the provision of advice and other services supporting the implementation of APS.*
- *Plan to expand support for advice services in line with anti-poverty policies and targets, and the diminished claimant rights associated with online applications and payments.*
- *Design a new campaign for the take-up of Pension Credit involving advice services, sector stakeholders and political representatives, prioritising those areas where take-up rates are well below the average take-up level, and pensioner couples.*

- *In consultation with the Consumer Council, the advice sector and other bodies, develop strategies to minimise the ‘poverty premium’, exclusions arising from personal debts, the negative activities of ‘loan sharks’ and exposure to all forms of high interest credit targeted at those on low incomes. As a minimum, strengthen the enforcement of lending regulations and prevent illegal lending by establishing a NI inspectorate with enforcement powers. But also provide support to assist the development of low/no interest financial facilities.”*

It is accepted that independent advice services should comply with a number of basic standards.

**Independence** - Be independent of political parties, statutory organisations and free from other conflicts of interest.

**Impartiality** - Provide an impartial service open to everyone regardless of race, religion, politics, age, sex, sexual orientation, or disability.

**Accessibility** - Provide a free and accessible service to all members of the community which it serves.

**Confidentiality** - Provide a confidential service to all its clients and meet all data protection legislative requirements.

**Effectiveness** - Provide an effective service to all its clients and the community which it serves. The advice centre should be able to show its effectiveness through demonstrable and measurable outcomes.

**Accountability** - Provide a service which is accountable to users and others who work with the advice centre.

**Free** – all generalist advice should be provided at no cost to the client.

Looking at poverty through a human rights lens, with a foundational commitment to the recognition of human dignity, offers a way of thinking about poverty that goes beyond the material to embrace the psycho-social and the relational. The material is of course still crucially important – it is, after all, inadequate incomes and living standards which serve to define poverty, and which measures of poverty typically attempt to capture it is based on Maslow’s Theory of Need.

As evidenced in ‘the big idea: putting people first’<sup>110</sup> and in Advice NI’s annual reports, the fact that 75% of enquiries are in relation to social security benefit issues means that the advice services are involved in assisting people at the most basic, fundamental level of securing a basic income, basic employment rights, paying bills, putting food on the table, keeping a roof over your head, trying to achieve financial security. Advice services are crucial in bridging the gap between formal rights and actual rights that make a difference to people’s lives.

But the experience of poverty is about more than this. It’s not just a disadvantaged and insecure economic condition but also a shameful social relation, corrosive of

<sup>110</sup> [Systems Thinking Report the big idea March 2011 | Advice NI](#)



human dignity and flourishing, which is experienced in interactions with the wider society and in the way people in poverty are talked about and treated for example by politicians, officials, professionals, and the media.

A key role of independent advice services is empowerment: advisers do not tell people what to do; they explain their options and the possible outcomes of different courses of action. People are encouraged to make their own decisions and act on their own behalf. Advice providers enable people to manage their own problems by focusing on their needs as individuals.

The independent advice sector plays a fundamental role in tackling poverty in NI: the service underpins all other work including community, health, education and economic and social wellbeing. Providing advice and information at the right time for people who need it, in a range of formats and through a range of channels, with benefit entitlement checks, income maximisation, debt advice, tribunal representation, housing and immigration advice (with access to interpretation services as required), allows people to then go on and fully engage and participate in society.

### Focus Group Feedback

#### Women's Regional Consortium

There needs to be more work on letting people know what they are entitled to. People are living on the breadline because they don't know what they are entitled to. They should not have to chase Government bodies to pay them the money that they are entitled to and deserve.

#### Parents

Several participants highlighted how important it is that parents know what support may be available for them. There is a perception that, while those working in the advice or support sectors may be familiar with support and services this is not necessarily the case for parents and families –a lot of whom do not realise what support may be available, or even where to go for information. It can be the case that people do not want to ask for help so services and key contacts (GPs, social workers, midwives) need to be proactive in sharing this information and it must be accessible. Discussed importance of 'gateway' services that are trained to identify if someone is presenting with the symptoms of poverty, even if they do not state that they are living in poverty.

Several participants in both discussion groups highlighted the strong link between poverty and debt, with many participants emphasising how difficult it can be to end the cycle of debt which can escalate very quickly. Participants stressed how important it is for an APS to consider this and target funding to help people with debt awareness, support for paying back debts and also programmes to support people to better manage their money. Participants also raised the toll this can have on a person's mental and physical health and well-being, which in turn can lead to



chronic illness and stress preventing the individual from working and keeping them within a cycle of poverty and debt.

### **Ethnic minority groups**

With regards to funding, there is no consistency of funding, there is no job security in the community sector, and very often people leave for more secure jobs or are made redundant. Funding is also allocated to white led/well established organisations who have worked for years to 'increase capacity of BME'; there is no accountability structure reviewing the capacity of these organisations to achieve their aims and why these were not achieved.

Need practical ways to access support e.g. no point in translation services if they can only be booked via websites in English.

Need more advocacy work so that people know where they can get interpretation services. People are not aware of the help they can get. Capacity building work is needed so that people have the capacity to access services. Advocacy organisations are needed for this – so people can contact others in the community who they trust. Important to work from the community level up. This work needs to be funded adequately, and it can be difficult to get funding. For example, TBUC funding should be used for racial equality work.

Need to note that not all minority ethnic groups have advocacy groups representing them. Also, some groups have to rely on volunteers due to the lack of funding.

Need to have cultural competence to reach 'hard to reach' communities.

Access and services - Access is a recurrent issue, and language is a major issue in this. Need to have information about the services that are available, in an accessible way as regards language and finding it. Language is a major barrier to accessing the doctor. An example of good practice was an outreach vaccine clinic for a particular BME group.

## **6D. Actions to tackle specific types of poverty**

- Eradicate fuel poverty.
- Eliminate food banks when a suitable solution is in place.
- Eliminate period poverty, with the provision of easy and dignified access to period products in all public buildings and schools.

### **Detail of proposals**

**Eradicate fuel poverty** including:

- Introduce a plan for tackling fuel poverty, backed by a comprehensive funding and action plan.

- Introduce an energy social tariff to support low-income and vulnerable households with unaffordable energy bills.
- Support the Sustainable Energy Community collaborative approach to addressing the urgent challenges of rising energy costs, fuel poverty, and the climate emergency by engaging communities directly in creating and implementing local energy strategies.

**Eliminate food banks when a suitable solution is in place, including:**

- A commitment from the Northern Ireland Assembly to eradicate food poverty.
- Maximise opportunities created by local foodbanks, social supermarkets and other local support initiatives to facilitate access to a range of support services for people in crisis need.

**Eliminate period poverty, with the provision of easy and dignified access to period products in all public buildings and schools.**

**Impact of calls**

- People can afford to heat their homes as they need to.
- People can afford to feed themselves and their families, with food of their choice, without recourse to a foodbank.
- Free period products can be obtained easily and without stigma or embarrassment.

**Evidence base**

[LucidTalk polling](#) in September 2024, commissioned by NEA NI, found that 40% of households are spending at least 10% of their income on energy - meeting the definition of fuel poverty. There is a clear need for a cross-departmental and cross-sectoral approach to tackle fuel poverty, and it must be underpinned by a new Fuel Poverty Strategy.

Households remain in crisis over energy bills. An energy social tariff should be introduced to provide discounted, targeted energy bill support to those in the greatest need.

NI's transition to net zero will require local communities and households to change the way they heat their homes and energy behaviours. Greater provision of grants to low-income and vulnerable homes is needed to support the transition to decarbonised heat and power in a fair and just way.

The Trussell Cost of Hunger and Hardship – Headline findings for Northern Ireland (April 2025) ([Cost of Hunger and Hardship NI Summary Report](#)) highlights:

- 200,000 people facing hunger and hardship in NI;
- This includes 142,000 adults and 62,000 children;

- £2.0 billion: The amount public finances and the economy could benefit each year if people were protected from hunger and hardship in NI (employment & productivity, social security spending & tax revenue, impact on health, housing and education);

The EAP stated (p26) that ‘the APS must include policies aimed at eradicating destitution, hunger, and ‘severe’ poverty, including homelessness. No adult or child should be excluded from emergency funds or food provision because of a ‘hostile environment’ immigration policy. These policies must be strategic in nature, for example, hunger cannot be sustainably solved with the distribution of food parcels or emergency food aid. Food poverty can only be solved by a social security system which provides people with enough money to buy the food and essentials they need, by access to secure work, and wages that match the cost of living.’

It noted that: ‘In June 2020, the Trussell reported a year-on-year doubling of the numbers of children fed from foodbanks. Trussell (2020) Summary findings on the impact of the COVID-19 crisis on food banks.’

The National Institute for Economic and Social Research’s<sup>111</sup> UK Economic Outlook (November 2021) reported that “*The sharp rise in prices (food, petrol and energy) will disproportionately affect low-income households concentrated in some of the most deprived parts of the country, such as ... Northern Ireland*”.

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<sup>111</sup> National Institute for Economic and Social Research (November 2021) [UK-Economic-Outlook-Autumn-2021.pdf](https://www.niesr.ac.uk/wp-content/uploads/2021/11/UK-Economic-Outlook-Autumn-2021.pdf) (niesr.ac.uk), p38

## ANNEX A

### Details of the organisations who have contributed to and/or endorsed this report are:

Advice NI

Age NI

Barnardo's NI

Children in Northern Ireland (CiNI)

Children's Law Centre

Cookstown and Western Shores Area Network (CWSAN)

Disability Action

Irish Congress of Trade Unions, Northern Ireland Committee (NIC-ICTU)

Law Centre NI

MindWise

Northern Ireland Commissioner for Children and Young People (NICCY)

NICVA

Rural Community Network (RCN)

South Tyrone Empowerment Programme (STEP)

The Salvation Army

Triax - Neighbourhood Renewal Taskforce

Trussell

Women's Support Network (WSN)

## ANNEX B

### Additional Information and Evidence

#### Disability and Poverty

The Joseph Rowntree Foundation have highlighted that:

‘Disabled people face a higher risk of poverty and have done so for at least the last 20 years. This is driven partly by the additional costs associated with disability and ill-health, and partly by many disabled people being less able to access work. With potential for work often limited, disabled people and/or families where someone is disabled frequently rely on benefits as a source of income, which at current rates will almost inevitably lead to higher poverty rates’<sup>112</sup>.

Research by the Foundation (2020) found that in 2017/18, 31% of the 13 million people with disabilities in the UK lived in poverty – around 4 million people. By contrast, the poverty rate among the non-disabled population was 20% in 2017/18. This gap in poverty rates has persisted over time.<sup>113</sup> The Foundation record that among working-age adults, those who are disabled are more than twice as likely to live in poverty than those who are not (38% and 17% respectively).

An additional three million non-disabled people in poverty in the UK live in a household where someone is disabled, meaning that, overall, nearly half of the 14 million people in poverty in the UK are affected by disability. Poverty is especially high among families where there is a disabled adult at nearly 33%. If there is also a disabled child, the poverty rate is 40% – more than twice the rate where there is no disability. Disabled people are more likely than non-disabled people to face barriers to paid work. In 2017/18, 50% of working-age disabled people were not working compared with 18% of non-disabled people<sup>114</sup>.

The Equality Commission for Northern Ireland has consistently received the highest number of queries relating to discrimination from disabled people and most have these have related to discrimination in employment<sup>115</sup>. Northern Ireland has the lowest rate of employment for Deaf and disabled people in the UK. Figures for April-June 2021

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<sup>112</sup> Joseph Rowntree Foundation (2022): [UK Poverty 2022 - The essential guide to understanding poverty in the UK](#), page 57.

<sup>113</sup> Ibid.

<sup>114</sup> Joseph Rowntree Foundation (2022): [UK Poverty 2022 - The essential guide to understanding poverty in the UK](#), pages 57-63.

<sup>115</sup> For example, during the period April 2021 - March 2022, the Equality Commission NI received 1,339 disability-only enquiry/applications, out of a total of 3,138 enquiry/applications of enquiries received across all equality grounds (i.e. 43% of all enquiries).

report that 36.4% of Deaf and disabled people are in employment compared to 80.3% of people without a disability. This means that the Disability Employment Gap was 43.9%<sup>116</sup>.

Disabled people also work fewer hours on average and are more likely to be low paid. However, the poverty rate is still higher for disabled people with a given level of qualifications – they tend to be paid less than non-disabled people with the same qualification level, including a degree<sup>117</sup>.

Disability Action have highlighted that the disability payment gap is widening having increased by 20% between 2019 and 2020 from £1.65 to £2.10. This means that a Deaf and disabled worker working 35 hours per week could earn £3,822 per year less than a non-disabled worker. The pay gap for Deaf and disabled women is nearly nine percentage points higher than the gender pay gap. Deaf and disabled women are paid 36% less than nondisabled men<sup>118</sup>.

Among the contributory factors to the pay gap, the TUC have identified:

- a higher proportion of Deaf and disabled people are in part time work. Part-time work, particularly in the private sector is paid less per hour than full-time work;
- Deaf and disabled people are overrepresented in lower paid jobs including caring and leisure, sales, customer services, and other services<sup>119</sup>.

The Joseph Rowntree Foundation has identified several drivers of poverty for disabled people in the UK:

- disabled people face higher costs of living;
- there is a sizeable difference in the highest level of qualification between those who are disabled and those who are not: 19% of disabled adults have a degree or above, compared with 35% of non-disabled adults;
- disability, ill-health, and society's response to these conditions often prevent people from working. For example, disabled people tend to earn less than their non-disabled counterparts even if they have the same qualification levels<sup>120</sup>.

The Disability equality charity Scope UK has highlighted that 'Life costs more for disabled people and their families, spending more on essential goods and services like, heating, insurance, equipment, and therapies. These extra costs mean disabled people have less money in their pocket than non-disabled people, or go without. The

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<sup>116</sup> Toman, N. et al (2022): [Progress towards the implementation of the UNCRPD in Northern Ireland](#), page 463 (Disability Action for ECNI).

<sup>117</sup> Joseph Rowntree Trust (2020): [UK Poverty 2019/20](#), pages 54-60.

<sup>118</sup> Toman, N. et al (2022): [Progress towards the implementation of the UNCRPD in Northern Ireland](#), page 465 (Disability Action for ECNI).

<sup>119</sup> TUC (2020): [Disability pay and employment gaps](#)

<sup>120</sup> Ibid, page 57.

result is that disabled people are more likely to have a lower standard of living, even when they earn the same'<sup>121</sup>.

Scope's Disability Price Tag report 2019<sup>122</sup> found that disabled people:

- On average, face extra costs of £583 a month;
- On average, a disabled person's extra costs are equivalent to almost half of their income (not including housing costs);
- 1 in 5 disabled people face extra costs of more than £1,000 a month;
- Disabled people's money does not tend to go as far. On average, £100 for a non-disabled person is equivalent to £68 for a disabled person;

Families with disabled children:

- On average, face extra costs of £581 a month
- For almost a quarter (24%) of families with disabled children, extra costs amount to over £1,000 a month<sup>123</sup>.

JRF concur that life is more expensive when you are disabled.

To try to help with these additional expenses, disabled people are eligible for several 'extra-cost' benefits, for example, Disability Living Allowance (DLA) and Personal Independence Payment (PIP). These aim to contribute towards the additional costs associated with being disabled. They are distinct from the benefits that aim to enhance the income of those unable to work for health reasons, so can be claimed whether a

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<sup>121</sup> See: <https://www.scope.org.uk/campaigns/extra-costs/>

<sup>122</sup> Available at: <https://www.scope.org.uk/campaigns/extra-costs/disability-price-tag/>

<sup>123</sup> Scope make the following recommendations to Government at address the extra costs of disability:

#### **Universal Credit (UC)**

- Use the trial of 'managed migration' to ensure disabled people do not lose access to financial support as they move to UC;
- Work with disabled people and disability organisations to develop new components within UC to offset loss of support;
- Work with families and disability organisations to ensure disabled children receive support to help meet extra costs.

#### **Personal Independence Payments (PIP)**

- Reform the PIP assessment to accurately capture extra costs faced by disabled people.

#### **Warm Home Discount**

- Reform core eligibility criteria so that support can be more effectively targeted at disabled people.

#### **Early Intervention and Family Resilience fund**

- Set up an Early Intervention and Family Resilience Fund. Investing in emotional support for the whole family at the point of diagnosis.



person is in employment or not.

The inadequacy of existing social protection has been further exacerbated by the current costing of living crisis (commencing in 2021) which has been driven by a number of mainly global factors including the ongoing COVID-19 pandemic, an energy crisis in 2021–2022, a supply chain crisis in 2021–2022 and Russia's invasion of Ukraine in 2022<sup>124</sup>.

The crisis has seen the cost of everyday essentials like groceries and fuel bills rising faster than average household incomes.

In response to the crisis, the UK Government has provided for a number of one-off payments to assist people on certain benefits. For example, a payment of £650 is available to people claiming

- Income-based Jobseeker's Allowance (JSA);
- Income-related Employment and Support Allowance (ESA);
- Income Support;
- Pension Credit;
- Universal Credit.

However, the eligibility requirements for the £650 cost of living payment will exclude many disabled people. In contrast, a disability specific cost of living payment of £150 is payable to people in receipt of the following benefits:

- Attendance Allowance;
- Constant Attendance Allowance;
- Disability Living Allowance;
- Personal Independence Payment;
- Armed Forces Independence Payment;
- War Pension Mobility Supplement.

The Government has rejected calls to extend the £650 one-off cost of living payment to people on disability benefits as well as people on means tested benefits<sup>125</sup>.

Research carried out for the Leonard Cheshire Foundation found that many disabled

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<sup>124</sup> The Week (17 May 2022): [How the UK's cost of living crisis compares with the rest of the world](#)

<sup>125</sup> Disability Rights UK (13 July 2022): [Government rejects call for cost of living £650 to be given to all on disability benefits](#)

adults face financial difficulty, which leaves them struggling to pay essentials:

- A quarter (25%) of working-age disabled adults say they missed a meal because they couldn't afford it;
- Over a quarter (28%) say they have not been able to afford to keep their home warm;
- A third (33%) report having £50 or less per week, after housing and bill costs, to spend on food and other essentials. While 7% reporting having less than £10 a week<sup>126</sup>.

Food bank referral statistics from the Trussell have shown that 6 in 10 (62%) of working-age people referred to a food bank in early 2020 had a disability (as defined by the Equality Act 2010), more than three times more than the general population where 19% of working-age adults had a disability in 2017 to 2019<sup>127</sup>.

The Leonard Cheshire Foundation's UK-wide research has revealed that around 600,000 disabled people in the UK already have just £10 or less per week to pay for food and other essentials. Furthermore, around one in four working-age disabled people in the UK struggle to pay for essentials like food and heating, as their budgets get stretched to breaking point. The charity has warned that 'With food, energy and fuel cost rises set to skyrocket in the coming year, the impact on disabled people could be catastrophic'<sup>128</sup>.

A quarter of those polled (25%) in the nationally representative survey said they had missed a meal because they could not afford it. Meanwhile, over a quarter (28%) had not been able to afford to keep their home warm. A third (30%) had asked for financial help from friends or family.

The research highlights the mental health impact of financial pressures on disabled people is stark. Over half (55%) said they felt anxious, depressed, or hopeless about financial worries and problems.

A further finding from the research is that 7% of disabled people, which is the equivalent of more than half a million (612,710) disabled people if applied across the UK, had £10 or less left per week for food and other essentials after paying for housing, tax and other bills. In addition, a third (33%) of those surveyed reported having £50 or less per week left. Leonard Cheshire considers that by not increasing benefits in line with inflation this year and effectively cutting support in real terms, the government risks pushing disabled people below the breadline.

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<sup>126</sup> See: <https://comresglobal.com/polls/leonard-cheshire-disabled-adults-polling/>

<sup>127</sup> Joseph Rowntree Foundation (2022): [UK Poverty 2022 - The essential guide to understanding poverty in the UK](#), page 80.

<sup>128</sup> Leonard Cheshire Foundation (19 April 2022): [Rising costs are a catastrophe for disabled people](#)

The charity has also advised that changes to the Warm Home Discount will cut eligibility for almost 300,000 disabled people.

The Foundation has commented that the one-off payments offered by Government ‘will barely make a dent in the rising costs of food and energy – not to mention the additional costs that come with having a disability in the first place...A one-off payment is really just a drop in the ocean for a problem that is not going away. A problem that will ultimately costs lives’<sup>129</sup>.

The Foundation recommends that Government to increase benefits in line with inflation and to reverse proposed changes to the Warm Home Discount.

Article 28 of the United Nations Convention on the Rights of Persons with Disabilities – Adequate standard of living and social protection – requires that:

1. States Parties recognize the right of persons with disabilities to an adequate standard of living for themselves and their families, including adequate food, clothing, and housing, and to the continuous improvement of living conditions, and shall take appropriate steps to safeguard and promote the realization of this right without discrimination on the basis of disability.

2. States Parties recognize the right of persons with disabilities to social protection and to the enjoyment of that right without discrimination on the basis of disability, and shall take appropriate steps to safeguard and promote the realization of this right, including measures:

a) To ensure equal access by persons with disabilities to clean water services, and to ensure access to appropriate and affordable services, devices, and other assistance for disability-related needs;

b) To ensure access by persons with disabilities, in particular women and girls with disabilities and older persons with disabilities, to social protection programmes and poverty reduction programmes;

c) To ensure access by persons with disabilities and their families living in situations of poverty to assistance from the State with disability-related expenses, including adequate training, counselling, financial assistance, and respite care;

d) To ensure access by persons with disabilities to public housing programmes;

e) To ensure equal access by persons with disabilities to retirement benefits and

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<sup>129</sup> Leonard Cheshire Foundation (26 May 2022): [What do the new cost of living payments mean for disabled people](#)

programmes.

During 2015-16, the UN Committee on the Rights of Persons with Disabilities carried out an inquiry under Article 6 of the [Optional Protocol](#) to the Convention into allegations that serious and systematic violations of the provisions of the Convention were occurring against persons with disabilities as a result of implementation of a process of reforms of legislation and policies by the UK Government which it justified in the context of austerity measures to achieve fiscal and budgetary policy consolidation.

The Committee's (2016) [Inquiry Report](#) concluded that there was reliable evidence that the threshold of grave or systematic violations of the rights of persons with disabilities has been met and that a large number of persons with disabilities have been affected<sup>130</sup>.

The CRPD Committee reviewed evidence from across the UK that showed Deaf and disabled people are significantly disproportionately adversely impacted by the welfare reforms including:

- lower income for households with disabled people claiming benefits under the new welfare system;
- disabled people being the biggest single group adversely affected by the welfare reforms;
- more disabled people living in poverty;
- no account being taken of those people no longer eligible for benefit entitlements and services;
- risk of social isolation and more reliance on informal and family care;
- loss of eligibility for or reduction in entitlement under the assessment for the Personal Independence Payment;
- the negative impacts of the reduction on housing benefit.

Among the recommendations made by the Committee were that the State Party should:

(b) Ensure that any intended measure of the welfare reform is rights-based, upholds

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<sup>130</sup>United Nations Committee on the Rights of Persons with Disabilities (2016): [Inquiry concerning the United Kingdom of Great Britain and Northern Ireland carried out by the Committee under article 6 of the Optional Protocol to the Convention - Report of the Committee](#), paragraph 113, page 20.

the human rights model of disability and does not disproportionately and/or adversely affect the rights of persons with disabilities to independent living, an adequate standard of living and employment. To prevent adverse consequences, the States Party should carry out human rights-based cumulative impact assessments of the whole range of intended measures that would have an impact on the rights of persons with disabilities;

(c) Ensure that: any intended legislation and/or policy measure respects the core elements of the rights analysed in the present report; persons with disabilities retain their autonomy, choice and control over their place of residence and with whom they live; they receive appropriate and individualized support, including through personal assistance, and have access to community-based services on an equal basis with others; they have access to security social schemes that ensure income protection, including in relation to the extra cost of disability, that is compatible with an adequate standard of living and ensure their full inclusion and participation in society; and they have access and are supported in gaining employment in the open labour market on an equal basis with others;

(d) Ensure that public budgets take into account the rights of persons with disabilities, that sufficient budget allocations are made available to cover extra costs associated with living with a disability and that appropriate mitigation measures, with appropriate budget allocations, are in place for persons with disabilities affected by austerity measures; (e) Introduce all adjustments necessary to make all information, communications, administrative and legal procedures in relation to social security entitlements, independent living schemes and employment/unemployment-related support services fully accessible to all persons with disabilities;

(f) Ensure access to justice, by providing appropriate legal advice and support, including through reasonable and procedural accommodation for persons with disabilities seeking redress and reparation for the alleged violation of their rights, as covered in the present report;

(g) Actively consult and engage with persons with disabilities through their representative organizations and give due consideration to their views in the design, implementation, monitoring and evaluation of any legislation, policy or programme action related to the rights addressed in the present report;

(i) Ensure that, in the implementation of legislation, policies and programmes, special attention is paid to persons with disabilities living with a low income or in poverty and persons with disabilities at higher risk of exclusion, such as persons with intellectual, psychosocial, or multiple disabilities and women, children and older persons with disabilities. Those measures should be put in place within contributive and non-

contributive regimes;

(j) Set up a mechanism and a system of human rights-based indicators to permanently monitor the impact of the different policies and programmes relating to the access and enjoyment by persons with disabilities of the right to social protection and an adequate standard of living, the right to live independently and be included in the community and the right to work, in close consultation with persons with disabilities and their representative organizations in all regions and countries that constitute the State Party<sup>131</sup>.

The Disability Strategy Expert Advisory Panel (2020) appointed by the Department for Communities as part of the process of developing a Disability Strategy for Northern Ireland has drawn attention to the approach of the Scottish Government to social security law<sup>132</sup>.

The Social Security (Scotland) Act 2018 enshrined into law cardinal features of the Scottish social security system, including setting out the Scottish “social security principles”<sup>133</sup>. The social security principles include the recognition that social security is a human right, “essential to the realisation of other human rights”<sup>134</sup>, respect for the dignity of individuals is at the heart of the social security system<sup>135</sup>, and that the social security system is designed with the people of Scotland, since evidence<sup>136</sup>.

The 2018 Act further requires the creation of a Scottish social security charter, which will lay down standards for the provision of social security in Scotland that are aligned with the Scottish social security principles<sup>137</sup>.

Further to the enshrining of social security principles, the Social Security (Scotland) Act 2018 provides for the practical application of these principles. The 2018 Act requires Scottish Ministers to promote take-up of the Scottish social security system<sup>138</sup>. Further to this, the 2018 Act requires Scottish Ministers to have regard to

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<sup>131</sup> United Nations Committee on the Rights of Persons with Disabilities (2016): [Inquiry concerning the United Kingdom of Great Britain and Northern Ireland carried out by the Committee under Article 6 of the Protocol to the Convention - Report of the Committee](#), paragraph 114, pages 21-22.

<sup>132</sup> [The Social Security \(Scotland\) Act 2018](#)

<sup>133</sup> Social Security (Scotland) Act 2018, Part 1, section 1. The identified social security principles are: (a) social security is an investment in the people of Scotland; (b) social security is itself a human right and essential to the realisation of other human rights; (c) the delivery of social security is a public service, (d) respect for the dignity of individuals is to be at the heart of the Scottish social security system; (e) the Scottish social security system is to contribute to reducing poverty in Scotland; (f) the Scottish social security system is to be designed with the people of Scotland on the basis of evidence; (g) opportunities are to be sought to continuously improve the Scottish social security system in ways which— i) put the needs of those who require assistance first, and ii) advance equality and non-discrimination; and (h) the Scottish social security system is to be efficient and deliver value for money.

<sup>134</sup> Social Security (Scotland) Act 2018, Part 1, section 1, subsection (b).

<sup>135</sup> Social Security Scotland Act 2018, section 1, subsection (d).

<sup>136</sup> Social Security Scotland Act 2018, section 1, subsection (f).

<sup>137</sup> Social Security (Scotland) Act 2018, Part 1, sections 15-19.

<sup>138</sup> Social Security (Scotland) Act 2018, Part 1, section 3.

the importance of both inclusive communication<sup>139</sup> and accessible information<sup>140</sup> in the promotion of take-up, stipulating that information must be provided in a way that is accessible for individuals who “have a sensory, physical, or mental disability”<sup>141</sup>. The 2018 Act also includes a duty on Scottish Ministers to have regard to the importance of independent information, advice, and advocacy<sup>142</sup>.

The social security principles enshrined within the Social Security (Scotland) Act 2018 also apply to the assessment process. The 2018 Act provides for a restriction of assessments of applicants’ physical and mental health by individuals who not acting in the course of employment by a public body<sup>143</sup>. Scottish Ministers are required to ensure assessors are suitably qualified to conduct assessments<sup>144</sup>. Moreover, an assessment is only to be conducted when it is the only practicable means to obtain the information required to determine what assistance the individual is eligible for<sup>145</sup>, and the individual’s preferences for how and where the assessment is conducted must be considered by Scottish Ministers<sup>146</sup>.

The 2018 Act provided for the preparation and publication of a Scottish Social Security Charter<sup>147</sup>, with the preparation requiring Scottish Ministers to consult persons with a physical and/or mental impairment<sup>148</sup>, and in receipt of social security payments<sup>149</sup>. The Act provides for reporting requirements on Scottish Ministers and for the establishment of a Scottish Commission on Social Security in order to periodically assess the extent to which the expectations set out in the Social Security Charter are being fulfilled<sup>150</sup>. The Social Security Charter<sup>151</sup>, published in 2019, outlines what can be expected of Social Security Scotland, the Scottish Government, and of customers. These expectations include: a commitment from the Scottish Government to develop policy that seeks to advance the human right to social security, as well as equality, non-discrimination as defined in laws, treaties, and guidance and to publicly challenge the myths and stereotypes about social security so as to reduce stigma and negativity; to respect the dignity of people using the service; and to generally promote a more positive view of social security.

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<sup>139</sup> Social Security (Scotland) Act 2018, Part 1, section 4.

<sup>140</sup> Social Security (Scotland) Act 2018, Part 1, section 5.

<sup>141</sup> Ibid, at subsection (1).

<sup>142</sup> Social Security (Scotland) Act 2018, Part 1, section 6.

<sup>143</sup> Social Security (Scotland) Act 2018, Part 1, section 12.

<sup>144</sup> Social Security (Scotland) Act 2018, Part 1, section 13.

<sup>145</sup> Social Security (Scotland) Act 2018, Part 1, section 14, subsection (a).

<sup>146</sup> Social Security (Scotland) Act 2018, Part 1, section 14, subsection (b).

<sup>147</sup> Social Security (Scotland) Act 2018, Part 1, section 15.

<sup>148</sup> Social Security (Scotland) Act 2018, Part 1, section 16, subsection (3).

<sup>149</sup> Ibid, at subsection (4).

<sup>150</sup> Social Security (Scotland) Act 2018, Part 1, section 18.

<sup>151</sup> Social Security Scotland, ‘Our Charter’ (SSS, 2019).



The Independent Mechanism for Northern Ireland (IMNI)<sup>152</sup> has noted<sup>153</sup> that the provision for social security principles within the 2018 Act does not explicitly comply with the UN CRPD Committee's recommendations, but by recognising social security as a human right, which is also essential to the realisation of other human rights, it therefore ensures a rights-based approach to social security<sup>154</sup>. This, and the further recognition that respect for the dignity of individuals is to be at the centre of social security<sup>155</sup>, ensures the access and enjoyment of rights of claimants with disabilities, in accordance with the UN CRPD Committee's recommendations, thereby upholding a human rights model of disability.

IMNI recommends that the Department for Communities examines the principles-based approach enshrined in a social security charter implemented in Scotland, and further examines the case for adopting a similar approach in NI<sup>156</sup>.

The recommendation has also been supported by the Disability Strategy Expert Advisory Panel and the Disability Strategy Co-Design Group.

The Disability Strategy Expert Advisory Panel has also noted that that the Personal Independence Payment legislation is to be repealed by the Scottish Government as announced on 23rd October 2020 and that among the key changes in the alternative legislation are:

- the removal of medically based functionality type-based assessments; and
- the removal of private sector involvement in determining entitlement of individuals to disability related benefits.

The Panel's recommendations concerning adequate standard of living include:

- Repeal the Personal Independence Payment (PIP) benefit and associated assessment for a better alternative, based on the social security legislation in Scotland adopting human rights principles underlining that legislation;
- Repeal the Work Capability legislation, including the associated assessment and adopt a human rights approach to supporting disabled people into

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<sup>152</sup> The Equality Commission for Northern Ireland and the Northern Ireland Human Rights Commission have been designated under Article 33(2) of the United Nations Convention on the Rights of Persons with Disabilities, to promote, protect and monitor the implementation of the Convention in Northern Ireland. Together with the Scottish Human Rights Commission and the Equality and Human Rights Commission they comprise the UK Independent Mechanism.

<sup>153</sup> Independent Mechanism for Northern Ireland (2019): [Report on the Department for Communities Response to Independent Review of PIP Process and Compliance with Recommendations of the UN CRPD Committee](#), paragraph 5.50, page 59

<sup>154</sup> Social Security (Scotland) Act 2018, Part 1, section 1, subsection (b).

<sup>155</sup> Social Security (Scotland) Act 2018, Part 1, section 1, subsection (d).

<sup>156</sup> Independent Mechanism for Northern Ireland (2019): [Report on the Department for Communities Response to Independent Review of PIP Process and Compliance with Recommendations of the UN CRPD Committee](#), paragraph 5.52, page 59.

employment that does not conflict with their right to an adequate standard of living and entitlement to social security;

- Consider the abolition of Universal Credit in light of its disproportionate adverse impact on Deaf and disabled people and its replacement with a social security system that is compatible with a human rights approach;
- Extend and maintain the existing welfare mitigations package;
- Extend the scope for further mitigations, including the introduction of the Contingency Fund to support those on Universal Credit;
- Exclude Deaf and disabled people, children and families from the sanctions regime associated with Universal Credit;
- Research to consider the impact of welfare reforms on specific disability grounds e.g. mental health issues/Deaf people;
- Adopt the recommendations from the British Deaf Association for a separate benefit for Deaf people to access language interpretation services;
- Retention of the Covid 19 measure - £20 increase for claimants on Universal Credit;
- Amend the payment schedule associated with Universal Credit for Deaf and disabled people in line with fixed day fortnightly benefits of Employment Support Allowance and income support;
- New claimants on Universal Credit should be entitled to severe disability premiums on the same basis of eligibility and entitlement guaranteed in the legacy benefit system;
- A supplementary payment should be made available to mitigate the loss of disability premiums for children transferring from DLA to PIP;
- Remove private contracts in the delivery of social security as adopted by the Scottish government in the new social security legislation hitherto previously referred in earlier recommendations, and evaluate the economic benefits from this approach to the existing one;
- Advance payments to support Deaf and disabled people making an initial claim on Universal Credit should be provided in the form of a non-repayable grant;
- The discretionary support service should extend grant payments rather than loans to Deaf and disabled people on low income in particular for those d/ Deaf and disabled people not entitled to other disability related benefits;
- Restore the value of Carers' Allowance to 2010 levels;
- Restore the Sure Start maternity grant to all Deaf and disabled babies whose parents have low income;
- Develop a childcare strategy which includes priority consideration for the additional costs to childcare providers of caring for a disabled child;

- Remove the two-child limit which takes account of General Comment No. 3, Article 6 - Women and Girls with Disabilities (adopted 26 August 2016);
- Provide support needed by Deaf and disabled people to access appeals and complaints mechanisms related to social security entitlements and enforce effective remedies for any breach of entitlements identified<sup>157</sup>

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<sup>157</sup> Disability Strategy Expert Advisory Panel (2020): [Report and recommendations](#), pages 47-48