



Briefing Note Anti-Poverty Strategy Response to Consultation Document: Equality Coalition, Anti-Poverty Strategy Group, Northern Ireland Anti-Poverty Network.

The following representatives will appear before the Communities Committee on 14 May 2026 on the above matter:

- Kellie Turtle, UNISON, for Anti-Poverty Strategy Group
- Daniel Holder, Committee on the Administration of Justice (CAJ) as Co-convenor of the Equality Coalition, and
- Rebecca Bor, Northern Ireland Anti-Poverty Network (NIAPN).

The Equality Coalition, along with member groups NIAPN and Barnardo's previously gave evidence to the Committee on the 25 April 2024 and provided written evidence.¹

This briefing note is split into sections on background, our views on the *Summary of Public Consultation* document published by the Department for Communities (DfC) on the 8 April 2026², and key priorities for the way forward.

1. Background:

- The duty on the NI Executive to adopt an Anti-Poverty Strategy on the basis of objective need, has remained unfulfilled despite being a clear domestic legal obligation further to the St Andrews Agreement 2006.
- For our sector the Anti-Poverty Strategy has become a touchstone issue and litmus test as to whether the current institutional arrangements at Stormont are capable of delivering on even the basic legal obligations on fundamental socio-economic rights of the peace agreements.
- During the previous mandate necessary work was completed, including an Expert Advisory Panel Report and Co-Design process, to produce a blueprint for a strategy. Officials consequently produced a draft Anti-Poverty Strategy that was ready to be expeditiously taken forward when the Executive was reconstituted in 2024.
- No strategy was adopted, however, in the first year. On 5 March 2025, in a case taken by CAJ with support from Public Interest Litigation Support (PILS NI), the High Court

¹ [Equality-Coalition-Written-Evidence-Communities-Committee-Anti-Poverty-Strategy-April-2024.pdf](#)

² [Consultation on the Executive's Anti-Poverty Strategy \(2025-2035\) - summary of public consultation | Department for Communities](#)

ruled that the Executive had acted unlawfully in failing to adopt an Anti-Poverty Strategy in breach of 28E(1) of the Northern Ireland Act 1998.³

- Among the periods of time given ‘particular significance’ by the High Court in finding the Executive in breach its duties were that over 12 months passed since the reconstitution of the Executive without a strategy being adopted. Since this ruling a further 14 months have passed without the Anti-Poverty Strategy being adopted.⁴
- It became clear during the course of legal proceedings that the DfC Minister, who leads on the Strategy for the Executive, had unilaterally disregarded the draft Strategy, Expert Advisory Panel and Co-Design blueprints from the previous mandate.
- DfC consulted on a new draft Anti-Poverty Strategy from June to September 2025. There was broad concern that the new draft strategy was minimalistic and dispensed with many of the recommendations from the previous mandate.⁵ A further seven months passed before a high-level summary report of the consultation was published.
- CAJ presently considers that the Executive has failed to respond to the High Court ruling expeditiously and is now again in breach of its statutory duties. DfC has not provided any clarity on the timetable for submitting a revised strategy to the Executive. DfC correspondence to CAJ in January 2026 set out no timetable and stated that this was ultimately a matter for the Executive. DfC also made reference to a planned ‘Anti-Poverty Symposium’ being scheduled in early March 2025 (*sic* - presumably 2026). Whilst it is not clear why such a Symposium if designed to help finalise the strategy could not have been held much earlier, there is nevertheless no further indication that such an event took place.⁶ Following the DfC letter, CAJ wrote to the executive in February 26 asking for confirmation of the date for adoption of the strategy, but received no response. Following legal correspondence the Executive Committee in response recently stated that “agreeing an effective Anti-Poverty Strategy must now proceed urgently.”⁷ There remains however no timetable.

³ CAJ application for judicial review [2025] NIKB 16

<https://www.judiciaryni.uk/files/judiciaryni/2025-03/HUM12723%20Final%20-%20Approved.pdf>

⁴ CAJ application for judicial review [2025] NIKB 16 [12, 22] Reiterating that there was a ‘particular requirement’ on the Executive ‘to act with alacrity’ in light of previous ‘egregious failings’, the Court stressed that a delay of 12 months was unreasonable, and hence unlawful

⁵ CAJ published a comparator paper contrasting the provisions in the DfC draft strategy for consultation against the blueprints published by DfC in the previous mandate: <https://caj.org.uk/wp-content/uploads/2025/06/S588-Initial-Comparator-Paper-Draft-Anti-Poverty-Strategy-June-2025.pdf>

⁶ Correspondence to CAJ from DfC, 26 January 2026.

⁷ Correspondence to CAJ from DSO, 23 April 2026 ref 29889060.

- Whilst the approach in the current mandate of DfC towards the Strategy has been regressive and minimalistic, this in itself does not prevent other Departments from insisting that content within their remits is now reinstated into the draft Strategy.

2. Response of civil society to the *Anti-Poverty Strategy Summary of Public Consultation* document:

This document was published on the DfC website in April. None of our organisations have had any specific communication from the Department regarding the document.

It is important to first note the disappointment from across civil society that there is still no Anti-Poverty Strategy in place and that the publication of this consultation report was not accompanied by a finalised Strategy, Action Plan or any information about the timeline for producing these documents.

We have highlighted to DfC that Recommendation 1 of the 2024 NI Audit Office Report on the Child Poverty Strategy states that:

‘An integrated, cross-departmental anti-poverty strategy is urgently needed. As coordinating department in this area, **when the Department 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.’ *(emphasis added)*

It is therefore concerning that the draft presented to the Executive in June 2025 and subsequently consulted on, did not meet the requirements of this recommendation. Whilst DfC has been seeking to assure us that an Action Plan is forthcoming and will contain indicators, targets and measures, no such document has yet been produced and DfC has been unable to confirm if or how it will be consulted on.

The content of the consultation summary report has, however, been broadly welcomed by civil society organisations working to tackle poverty. This is primarily because it appears to provide an objective, comprehensive account of the full range of issues raised during the consultation process. Key observations on the content of the report include:

- The report demonstrates the strength of feeling from the public and civil society that the draft Strategy was not fit for purpose and establishes a clear mandate for the Executive to reject the forthcoming Strategy and Action Plans if substantial improvements have not been made.
- The Executive Summary focuses on the key elements that were missing from the draft, as articulated by the Anti-Poverty Strategy Group and other stakeholders. These include the need for a lifecycle structure, stronger governance mechanisms (including a legislative duty and an independent commission), measurable targets, lived experience involvement, cross-departmental responsibility, equality, intersectionality and place-based analysis. These are all evidence-based elements that should form the basis of an Anti-Poverty Strategy and it is important to see them given prominence in the consultation report’s Executive Summary.
- The Executive Summary does not, however, reference the fact that consultation respondents called for more ambitious funded interventions to tackle poverty, despite the fact that such suggestions appear frequently throughout the report, particularly in relation to tackling child poverty. In addition to calling for

improvements in how the strategy will be structured, governed and measured, the consultation has also demonstrated that the public and civil society are seeking a strategy with actions that can make a material difference to people's lives.

- The report itself is split into two sections, the first analysing the responses received through the online survey and the second undertaking a qualitative analysis of the written submissions and outreach events. Whilst the report indicates that the survey data was easier to analyse, the authors have gone to considerable lengths to present a thorough overview of the longer written responses. This is important as civil society organisations were more likely to use this open-ended mechanism for engaging rather than the more restrictive parameters offered by the survey.
- The qualitative analysis in the second section of the report is in-depth and comprehensive, setting out the information under thematic headings that capture the breadth of issues raised. The report authors have not shied away from highlighting the critical feedback received, and they have taken the time to explore the complexity of many of the recommendations raised, using substantive quotes to ensure the voices of community groups, charities, trade unions, and rights and equality organisations are directly heard in the discussion.
- The consultation report is a clear and uncompromising account of the public response to the draft Anti-Poverty Strategy. Despite containing a broad and complex range of feedback, it also provides a roadmap for the work that needs to be done to course-correct in the production of a Strategy that will be legally compliant, meaningful, and have the support of the people it is designed to help.

3. Key Priorities for a Way Forward

The following are among key priorities for anti-poverty campaigners for a revised strategy.

Targets: Reduction of poverty by 50% over the course of the strategy⁸

- The Anti-Poverty Strategy needs clear agreed upon targets. This is **essential** so that progress can be measured throughout the Strategy. Targets need to be ambitious to help focus the minds of politicians and civil servants and to establish a clear driver for investment. For example, the Strategy should aim to reduce child poverty from 19% After Housing Costs (AHC)⁹ to 10% AHC.

Anti-Poverty Act:¹⁰

- Civil society is committed to the need for an Anti-Poverty Act that will place an explicit duty on public bodies to tackle poverty and to recognise the relevance of equality characteristics on the experience of and response to poverty. Whilst there may be time constraints in the current mandate, the Anti-Poverty Strategy should enable the process of developing a legislative framework.

Measuring Poverty:

⁸ *Anti Poverty Strategy Group Recommendation (APSG)*

⁹ *HBAI 2024/2025*

¹⁰ *Recommendation from Expert Panel and APSG*

- DfC and NISRA should align with the indicators that the UK Child Poverty Strategy uses, including Relative Low Income AHC and Deep Material Poverty. DfC and NISRA should use AHC in their headline poverty data as the measure that is most commonly used to understand income poverty across the UK.
- The NI Executive and public bodies should also prioritise qualitative data as an effective measurement of progress and a tool to understand the experience of people in poverty. Independent research should be facilitated at community level through government funding.

Monitoring:

- The Executive should establish an Anti-Poverty Commission.¹¹ The composition of the Commission should include only persons who have experienced poverty, who have worked with persons experiencing poverty or who are experienced poverty researchers and policy makers.
- As part of the Strategy's monitoring and evaluation process, the NI Executive should appoint a panel of Experts by Experience from communities across the North to provide feedback on implementation of the Strategy and to suggest improvements at the highest levels of Government.
- A custom Dashboard should be developed that includes a greater number of poverty specific indicators to enable ongoing monitoring of progress. Action specific indicators should be included in this.

To move the dial on poverty, the Executive needs to fund *multiple* new headline policy initiatives that focus on early intervention.

Rather than using the three pillar framework proposed by the Department in the draft Anti-Poverty Strategy, there is consensus across civil society and amongst those with lived experience of poverty that a "lifecycle approach" is a structure that supports more meaningful interventions. Therefore the Executive should agree to focus the first funded policy initiatives within the anti-poverty strategy on where the biggest impact can be felt: tackling child poverty.

Children are at a higher risk of living in poverty than the overall population.¹² Additionally, there is ample evidence in from the NI Audit Office¹³, PAC reports that Stormont currently spends upwards of £850 mil to £1bn per year addressing the consequences of child poverty throughout the lifecycle. Early intervention will therefore provide long-term savings and have the best possible impact on people's lives.

There is established consensus across civil society networks and coalitions that the following key policy interventions would be most effective at reducing child poverty:

1. Continue the mitigation of the Bedroom Tax and the Benefit Cap

The NI Executive decision to continue to mitigate the Benefit Cap and the Bedroom Tax has protected thousands of people from falling into poverty. The Benefit Cap mitigation is

¹¹ Recommendation from Expert Panel and APSG

¹² NISRA March 2026 https://datavis.nisra.gov.uk/communities/PII_report_2425.html

¹³ <https://www.niauditoffice.gov.uk/publications/child-poverty-northern-ireland>

particularly important in protecting children in larger families, who are more at risk of poverty. The combination of the reversal of the two-child limit and NI's commitment to mitigating the Benefit Cap ensures that **no child is left behind**.

2. A Child Payment

Joseph Rowntree Foundation (JRF) modelling¹⁴ recommends a child payment of £28.20 per week per eligible child in 2026/2027. This would benefit families on the lowest incomes as well as those in the middle third of incomes, creating a crucial buffer against poverty. It is estimated that 150,000 children and their families would feel the positive impact of this measure. The JRF modelling showed that this intervention alone could achieve a 4-percentage point drop in child poverty. The evidence demonstrates that the Scottish Child Payment is working, with Oxford Geographer, Danny Dorling saying that the 'Scottish Child Payment is the single intervention that produced the largest fall in child poverty anywhere in Europe in the last 40 years.'

3. Roadmap towards Universal Free School Meals (FSM)

The provision of Universal FSM has been recognised as an important anti-poverty and public health intervention. Due to the low eligibility threshold, 41% of children living in poverty are currently not eligible for FSMs¹⁵ and others face barriers to access. The recent increase in the cost of school dinners has significant implications for those who are on a low income, but ineligible for FSMs. Every other jurisdiction on these islands has introduced some level of universal provision of FSMs in recognition that these policies improve educational attainment, health and wellbeing, and school attendance. The NI Executive should commit to rolling out Universal FSMs in line with the expansion of standardised full-time education for all pre-school children, in both statutory and non-statutory settings by 2028; and to households in receipt of Universal Credit. The aim should be that all primary school children are in receipt of a FSM by the end of the lifetime of the Anti-Poverty Strategy (2035).

4. NI Executive policies must have an anti-poverty lens and commit to preventative measures and early intervention aligned with the Anti-Poverty Strategy

The Anti-Poverty Strategy delegates responsibility for tackling poverty to other Departmental and Executive Strategies and legislative proposals, some of which have recently been published for consultation or have been launched within the past few years. However, in a number of cases these Strategies do not sufficiently prioritise anti-poverty measures. The Executive should ensure that consistent anti-poverty measures, such as targeted early intervention policies to low incomes households, are embedded across all strategies. For example, the Early Learning and Childcare Strategy, the Employment Rights (Good Jobs) Bill, the Northern Ireland Housing Supply Strategy, the Disability Strategy and the Disability at Work Strategy, the Warm Healthy Home Strategy and Rural NI.

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¹⁴ <https://www.jrf.org.uk/poverty-in-northern-ireland-2025>

¹⁵ <https://www.niccy.org/news/study-shows-41-of-children-living-in-poverty-missing-out-on-free-school-meals/>