

## **Initial Comparator Paper– the draft Anti-Poverty Strategy for consultation 2025 – against previous recommendations**

The Executive Office and Communities Minister [held a press conference](#) on the 15 May 2025 to announce that a draft anti-poverty strategy had been agreed by the NI Executive for consultation. This document was not published at the time but after a months further delay [the draft Anti Poverty Strategy was released for consultation on the 17 June 2025](#) (until 19 September 2025).

Under the previous mandate considerable work was undertaken by the Department for Communities (DfC) leading to the following three documents providing a blueprint framework for the anti-poverty strategy:

- A DfC-commissioned Expert Advisory Panel - DfC published their report '[recommendations for an anti-poverty strategy](#)' in March 2021.
- A DfC established Co-Design Group – members of which published [their own position paper on recommendations for an Anti-Poverty Strategy](#), (September 2022).
- DfC, having established a cross-departmental group, comprising of high level officials from each NI department, produced a draft Anti-Poverty Strategy in 2022-3.

In relation to the 2022 draft anti-poverty strategy, which would provide a key comparator to the present proposals, DfC in the present mandate have declined to release this document into the public domain. The 2025 draft Anti-Poverty Strategy (hereafter 'draft 2025 APS') in an introductory section on 'how the strategy was developed' references the Expert Advisory Panel and Co-Design Group and Cross Departmental Working Group, acknowledging and drawing upon their 'significant contribution' to the development of the draft 2025 APS. The draft 2025 APS also states that it is 'built on the co-design work and evidence.' This reference makes even more relevant the comparator of the past recommendations with the content of the draft 2025 APS.

### **Structure of draft 2025 APS**

The draft 2025 APS, which has a ten year timeframe, is structured into three pillars:

- 1: Minimizing risk (of falling into poverty)
- 2: Minimising Impacts (of poverty on people in poverty)
- 3: Exiting Poverty (routes out of poverty)

Each pillar has a series of outcomes. Under the first pillar it states that:

“these outcomes will be delivered through a Programme of Delivery which will include a range of actions, to be included in action plans”

Neither the Programme of Delivery or its actions, nor action plans are included in the draft APS 2025.

This limits the ability to assess the likely effectiveness of proposed actions against the outcomes.

What are set out under each pillar are a number of 'strategic commitments' to be delivered in the first years of the strategy, numbering (pillar 1: eight commitments; Pillar 2: 18; Pillar 3: (7).

The foreword to the draft APS 2025 also states:

“Some strategic actions can and will be delivered immediately while others will be kept under review and delivered as evidence and budget allows.”

It is not entirely clear however at present which of the 'strategic commitments' fall into this category.

The following table will provide some initial analysis draft APS 2025 against the previous recommendations. The table is largely structured under the six outcomes in the co-design report.

## 1: Legislative Underpinning of the Anti Poverty Strategy – Anti Poverty Act

The Expert Panel and Co-Design Group recommend an Anti-Poverty Act:

The Expert Panel recommend it includes:

- duty to reduce child poverty with targets and timetables.
- duty to review plans and progress against targets every 5 years.
- Making discrimination in GFS unlawful on grounds of socio-economic status & age.
- A ‘poverty proofing’ ‘socio-economic’ statutory duty on public bodies when making strategic decisions (as per Equality Act in Britain).
- An Anti-Poverty Commission (on the Scottish model) to: a) monitor progress on reducing poverty and income inequality; b) promote the reduction of poverty and income inequality; and c) advise the Executive on any matters relating to poverty.
- Strategy to regularly quantify total ‘objective need’ by auditing the ‘costs of poverty’ and estimating the expenditure required to end household poverty.

The Co-design group lists the Act as their first outcome, recommending:

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.

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.

The draft 2025 APS abandons this recommendation, and contains:

- No legislative framework for the APS.
- No Anti-Poverty Commission or alternative mechanism to independently monitor and promote eradication of poverty.
- No targets for poverty reduction
- No poverty proofing socio-economic statutory duty.
- No quantification of objective need nor the costs of poverty.

The structures to deliver the APS in the draft APS 2025 are an Anti-Poverty Strategy Board, Chaired by Head of Civil Service and senior Departmental representatives, to meet regularly, assess effectiveness, and agree changes/updates to action plans. Along with Sub-groups for each of three pillars.

A formal review of the APS would be carried out in five years and approved by Executive and published by DfC.

## 2: Child Poverty

Co-design group sets a target to work towards eradication by 2040 and reducing child poverty over the lifetime of this Strategy. Recommendations Co-Design group:

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 Childcare Strategy providing all parents with accessible, affordable, high quality, flexible and sustainable childcare.

2.5 Provide targeted interventions for children with specific additional vulnerabilities.

A core recommendation of the Expert Panel was also the introduction of a **weekly Child Payment** of £12.50-1£5 for 0-4 yr olds & 5-15 yrs with FSME;

Other recommendations included

- Permanently **‘two child rule.’**

- Make participation in **school cost free** to reduce family outgoings including: free school meals over holidays; expanding breakfast & homework clubs and Sure Start provision.

-**Childcare Strategy providing for affordable, accessible, diverse and quality care.**

The draft 2025 APS:

-Abandons the recommendation for **Child Payments**.

- Commits to an Early Years **& Childcare Strategy**, to be consulted on in Autum 2025 and references the 2024/5 allocation of £9m for the current childcare subsidy. (DE) DfC also references existing Advisor Discretion Fund.

- Does not commit, even as an aspiration when resources allow, to mitigating the **Two Child Rule**, but commits asking the UK Government to do so (and impacts research) (DfC). There is also no commitment to social security benefits for children restoration, beyond a general commitment to review welfare mitigations and lobby Westminster.

Schools, no commitment to **cost-free education** –commitment to continue ‘Extended Schools Programme’, Free School Meals and Uniform Grants, which are existing programmes as well as legislation on affordable school uniforms (DE) DE also commits to the controversial RAISE programme on educational disadvantage, which may not be based on objective need.

The Department of Health (DoH) commits to continuing the existing **Healthy Start Scheme** in Northern Ireland (a pre-paid card for pregnant women and families with young children to access nutritious healthy food.) and to deliver a refreshed Healthy Child Healthy Future (HCHF) programme (the universal child health promotion programme for NI 0-19 years.)

## 3 Working Age Poverty

The Co-Design Group set an objective of eliminating poverty among working age persons, and in summary set out specific measures to:

3.1 Address low pay and precarious work, reducing poverty and the risk of poverty.

In relation to measures on **low pay and precarious work**, the Dept for Economy (DfE) commits to the new Employment Rights Bill, a Good Jobs Charter and by increasing uptake of the real Living Wage; to implementing the all-age Careers and the Skills, Careers and Apprenticeship Action Plans. DfC commits to

<p>3.2 Ensure people do not live in poverty through a robust, transparent and human rights-based benefits and social security system.</p> <p>The Expert Panel recommended that</p> <ul style="list-style-type: none"> <li>○ Implement NDNA commitment on addressing low pay by NI Government adopting Real Living Wage and being a Executive ‘Living Hours’ employer.</li> <li>○ Permanently end ‘bedroom tax’, benefit cap &amp; five-week wait.</li> <li>○ Other welfare changes recommendations; including increasing uptake of certain benefits.</li> <li>○ 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.</li> <li>○ Specified interventions to increase the employment of disabled, young and older persons;</li> </ul>	<p>preparing and delivering a programme which will offer inclusive pathways to work.</p> <ul style="list-style-type: none"> <li>• The Executive continue its commitment to ensure the Civil Service is a Living Wage employer, and ensure payment of the Living Wage must be included as a condition of contract for all tenders. (Executive/DoF)</li> </ul> <p><b>In relation to measures on the social security system</b> there is no commitment to ending, even when resources allow, the bedroom tax or benefit cap, there is a general commitment to review welfare mitigations and lobby Westminster; and a commitment to implement agreed changes to improve access to Discretionary Support; and advice and awareness to increase benefit uptake, and to the existing funding of advice, along with ‘refreshing the policy framework’ for the delivery of advice (DfC).</p> <p><b>Other measures</b></p> <p>DfC commits to a scoping exercise for an NI Debt Respite Scheme, and to work with the Money and Pension Service to implement a local delivery plan for the UK Financial Wellbeing Strategy. (DfC)</p> <p>Commitments to an Executive Disability Strategy and Disability Employment Strategy are also referenced.</p>
<p><b>4: Older Persons</b></p>	
<p>Co-design group sets a target for elimination with a reduction of 30% in lifetime of APS, calling for:</p> <p>4.1 Press UK government to maintain and improve financial support: protect social welfare benefits, re-instate Triple Lock, review adequacy of State Pension.</p> <p>4.2 The NI Executive should ensure addressing poverty in later life is identified as a priority in Programme for Government and associated delivery plans and actions.</p> <p>4.3 Maximise and improve access to benefits, advice, and support.</p>	<p>No target set in draft APS 2025.</p> <p>DfC commit to lobbying Westminster to maintain the triple lock guarantee in relation to pension payments. Reference also made to DfC advice to increase benefit entitlement.</p> <p>DfC also commit to Fuel Poverty Strategy, and a new Fuel Poverty Energy Efficiency Scheme.</p>

<p>4.4 Address financial disadvantage and material deprivation.</p> <p>4.5 Support measures for older people of “working age”.</p> <p>4.6 Improved data collection and research on poverty and older people.</p>	
<p><b>5 Tackling Area based Deprivation</b></p>	
<p>Co-Design Group seeks an outcome of “attractive, safe, accessible, welcoming, and sustainable environments in the most deprived areas” including calls for:</p> <p>5.1 Investment for the 20% most multi-deprived communities to move people and communities out of poverty.</p> <p>5.2 Tackle rural poverty.</p> <p>5.3 Communities must be part of the decision-making process to break the cycle of poverty.</p> <p>5.4 Investment in Community Wealth Building.</p> <p><b>The Expert Panel is critical</b> of past investment decisions – e.g. lasting effects of citing UU at Coleraine; critical of InvestNI for prioritising ‘wealth creation’ over jobs – and not investing in the West of NI; citing audit office findings over investments in ‘disadvantaged areas’ were not assessed for their impact on the actual employment of people living in those areas. References Strategic Investment Board not evaluating ‘social clauses’ either. They recommend specifically:</p> <ul style="list-style-type: none"> <li>- Require the Strategic Investment Board and InvestNI to have plans and targets for addressing geographical inequalities in employment and unemployment.</li> </ul>	<p>In the draft 2025 APS:</p> <p>DfE commits to addressing “regional imbalance in our economy through the Sub-Regional Economic Plan to ensure that people have access to quality employment regardless of where they live.” (There are no express provision relating to duties on the Strategic Investment Board and Invest NI).</p> <p>DfC will develop and deliver a new People and Place Strategic Framework to deliver an effective and more integrated place-based approach to target deprivation, based on objective need. (DfC)</p> <p>DoJ (Justice) will develop and deliver a new Safer Communities Strategic Approach.</p> <p>DAERA – commits to its existing Tackling Rural Poverty and Social Isolation (TRPSI) Framework, and delivering the NI Food Strategy Framework.</p> <p>DoH commits to its Building the Community Pharmacy Partnership (BCPP) programme to strengthen links between community groups and their local pharmacies, with actions targeted at the most deprived and impoverished communities in order to address health inequalities and the social determinants of health. (DoH).</p>
<p><b>6. Public Services for those in or at risk of poverty</b></p>	
<p>The Co-Design group had an outcome for the APS that “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.”</p>	<p>In the draft APS 2025 DfC commits to ensuring “that everyone, including those in or at risk of poverty, has access to good quality, affordable and sustainable homes.”</p> <p>Referencing ‘revitalisation of the Housing Executive and transformation of the Private Rented Sector’ without further detail, but</p>

<p>There were then a range of specific action measures (not set out here) under the following headings</p> <p>6A. Housing provision and support 6B. Access to online services and transport 6C. Access to independent advice 6D. Actions to tackle specific types of poverty</p> <p>The Expert Panel also recommended a range of specific cross cutting measures - particularly in housing relating to reversing trend of families in poverty in private rented sector- regulation of same; invest in social housing, end ‘right to buy’; and recommended drawing up and passing legislation in the Assembly enabling NIHE to set up a Mutual Trust to build social housing.</p>	<p>deferring to the Executive Housing Supply Strategy.</p> <p>DoH makes reference to working on an initiative to improve safe practices with medicines through addressing health inequalities. (DoH)</p>
Monitoring measures and Objective need	
<p>The Expert Panel recommended over a dozen changes to the measurement of poverty and indicators to monitor progress;</p> <p>On ‘objective need’ advocates “a definition of poverty that refers to social as well as material needs. The definition should be easily expressed as a measurable standard of living below which no-one should fall. For example: <i>People are living in poverty if their income and other resources are so low that they are unable to meet their basic needs, including participation in society.</i> Here, objective need includes deprivation of income, set at an agreed level, and indicators demonstrating that basic needs and social activities are lacking because they are unaffordable. The Family Resources Survey is capable of measuring objective need on this basis.</p>	<p>The Draft APS 2025, defines poverty as:</p> <p><i>Poverty means that a person or family's income and other resources are not sufficient to meet their basic needs. This includes paying for essentials such as housing, heating, food, clothing and social activities.</i></p> <p>With reference to Objective Need it states:</p> <p><i>“Interventions will aim to target objective need. This means that actions delivered as part of the Strategy will be based on a broad evidence base and targeted at an identified need. The evidence base used to assess objective need will be dependent on the subject area and the underlying need to be addressed. Evidence considered in assessing objective need for the purposes of this Strategy may include, but is not limited to, data published in the annual poverty bulletin, administrative data held by departments, and the population-level indicators assigned to Anti-Poverty Strategy outcomes. In making decisions on objective need, due regard will be had to section 75 categories.”</i></p>