

Housing Rights

Executive Summary

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Housing Rights' response to the Anti-Poverty Strategy Consultation

September 2025

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Housing Rights is Northern Ireland's leading independent provider of specialist housing advice, with over 60 years' experience working to prevent homelessness in Northern Ireland. In the year ending March 2025 alone, Housing Rights advice services dealt with queries from 13,162 households on 67,828 housing issues. Our response is informed by the views and experiences of the people who contact us for advice, and our wealth of policy experience. Our aim is to provide constructive feedback to shape the development of an ambitious and effective Anti-Poverty strategy.

Housing Rights shares the sector's concerns that the Draft Strategy has significant shortcomings that make it unfit for purpose. It is our intention, in engaging constructively with this consultation, to offer solution-focused, pragmatic comment which is informed by our client experience and best practice. We recognise the legal requirement on the Executive to produce an Anti-Poverty Strategy and are committed to ensuring it best delivers for the people of Northern Ireland, too many of whom face serious and entrenched poverty.

Policy Context

Housing Rights is concerned that the Draft Strategy does not sufficiently situate itself within the relevant policy context. This undermines its relevance to recognised NI Executive priorities and weakens its robustness as a ten year strategic document. There are three primary reasons for this concern.

1. There is a lack of strategic interaction with the Programme for Government and other key Government strategies linked to addressing poverty, including the draft Fuel Poverty Strategy, the Housing Supply Strategy and the Northern Ireland Housing Executive's Homelessness Strategy. The Anti-Poverty strategy could be strengthened if it were redesigned to support the objectives of the Programme for Government and complement other existing strategies. Doing so would provide a strong strategic driver for effective cross-departmental working, helping to achieve shared goals and ensure long-term cost-saving opportunities are identified and delivered.
2. Elements of the evidence base cited throughout the draft strategy are out of date. Additionally, significant and more recently published evidence including those published by the Department itself, in relation to e.g. Welfare Mitigations, is not relied upon and should be. A number of the cited references under the Housing Section of the document draw upon pre-pandemic reports and data sets, which fail to recognise significant changes and pressures facing the housing sector. Reliance on these outdated datasets calls into question the robustness of the analysis used to inform the development of the

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draft strategy. The housing analysis in the strategy could be strengthened with the inclusion of the findings in NIHE's recently published Housing Market Review & Perspectives¹.

3. The draft strategy does not sufficiently consider future challenges that will directly impact poverty in Northern Ireland. Given the significance of the strategy and the ten-year timeframe it is set to cover, Housing Rights' view is that an effective Anti-Poverty Strategy must seek to pre-empt and proactively adapt to emerging challenges. Examples of significant emerging challenges that should be proactively considered include: the challenge associated with an ageing population, the potential impacts of AI on the employment market and the need to decarbonise all sectors of the NI economy (including housing) to achieve the net zero targets set out in the Climate Change Act.

Ambition and Language

The draft strategy is not as ambitious as it could and should be. Poverty is a problem that can be solved, but the draft strategy does not present this impression. The choice of language conveys that poverty is unavoidable and should be managed or minimised rather than prevented or eradicated. The Anti-Poverty Strategy presents an opportunity to reframe how we talk about poverty in Northern Ireland, tackle its root causes, and lay the foundations that will ultimately help eradicate poverty from our society. One way to convey this ambition and drive would be through the adoption of the Joseph Roundtree Foundation and Frame Works Institute's 'Framing Toolkit' recommendations². In doing so, the Executive has an opportunity to produce a first-in-class strategy that sets out an ambitious but achievable course to tackling poverty in Northern Ireland.

The vision outlined in the Draft Strategy, *'working together, poverty and its impacts will be effectively and sustainably eradicated across our communities,'* could be strengthened if it were amended to reflect measurable and tangible commitments. A suitably ambitious Anti-Poverty Strategy must prioritise prevention, and where poverty cannot be prevented, commit to ensuring that it is rare, brief and non-recurrent. This precise language has been adopted in relation to homelessness in Northern Ireland and in other governments across the UK – which indicates its suitability for adoption by government in relation to socio-economic societal problems.

Delivery and Resourcing

The strategy's vision is underpinned by three key pillars, supported by a range of work areas and key actions. While these pillars are helpful in informing the development of future action plans, it is overly simplistic and doesn't, for example,

¹ [The Housing Executive - Housing Market Data Hub](#)

² [Framing toolkit: Talking about poverty | Joseph Rowntree Foundation](#)

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adequately capture the interconnected relationship between housing, health, education and poverty. There is concrete evidence which shows the appropriateness of the prevention, rare/brief/ non-recurrent approach – the so-called SHARE framework³, and we would recommend its adoption in an anti-poverty context.

Housing has a significant role to play across each of the three pillars identified in the draft strategy. Limiting the scope of housing to the 'minimising impacts' pillar fails to recognise its strategic importance and limits the ability to leverage housing policy in a positive and proactive way to prevent poverty and help lift people out of poverty. The strategy could therefore be improved by recognising and addressing the need for a holistic approach.

The draft strategy outlines several strategic commitments to be delivered in the first years of the strategy. These commitments are not time-bound, and it is not clear how they link with the stated outcomes. There is also no indication of the resources available for delivery, which limits our ability to assess their feasibility. Housing Rights acknowledges that the draft strategy states that outcomes will be achieved through a programme of delivery, including a range of actions that will be included across several action plans updated on a rolling basis. It would be helpful for these initial action plans to be included within the consultation process, as this would provide stakeholders with an opportunity to examine the technical details and lend their expertise to help shape deliverable and impactful actions.

Monitoring, Reporting and Governance

It is encouraging that the Executive recognises the need for meaningful and sustainable cooperation across society to address poverty. The Executive must lead by example by encouraging and facilitating effective cross-departmental working in the delivery of the anti-poverty strategy. This should be driven by the Anti-Poverty Strategy Board.

Housing Rights considers the governance structures outlined in the draft strategy appropriate for a document of this importance. However, to ensure improved transparency, the strategy should commit to publishing a timetable of anti-poverty strategy board meetings, along with meeting agendas, minutes, and agreed-upon action points.

With regards to monitoring Housing Rights don't agree that housing stress is in itself an appropriate indicator of poverty. This is because:

1. The nature and scale of the housing crisis in Northern Ireland means that housing stress can no longer be considered an indicator of relative need.

³ <https://www.homelessnessimpact.org/share-framework>

2. Housing stress does not consider social tenants, private tenants and homeowners who are not on the waiting list but are in poverty.

It is our experience that housing costs and affordability contribute to poverty in Northern Ireland across all tenures. A better indicator would be Housing Cost as a Proportion of Household Income. This data is currently collected under the Programme for Government Wellbeing Framework using data from the Family Resources Survey. Critically this dataset allows disaggregation by tenure which can assist in targeting anti-poverty support where it is most needed and most absent.

Relationship between poverty and housing

The draft strategy fails to sufficiently recognise the relationship between housing and poverty in the post-pandemic context. The consultation's scoping report refers to research by Tunstall et al, which states that *"low incomes prevent access to many potential housing options, or make them hard to sustain, with those living in poverty having lower rates of home-ownership. However, they express that social housing, housing benefits and support for homeless people act as a buffer against the effects of poverty, so that although people living in poverty have a higher risk of bad housing conditions, they generally avoid them."*

While this may be theoretically true, in practice, its application in the current housing crisis means that many people in poverty cannot access social housing, and the rate of housing benefit paid to many renting in the Private Rented Sector (PRS) is insufficient to meet their housing needs, which entrenches poverty for low-income households in this tenure. This is reflected in research by the Joseph Roundtree Foundation, which found that housing costs are a major driver of poverty in the PRS⁴.

Research by the Institute for Fiscal Studies shows that housing costs take up three-and-a-half times as much of the budgets of low-income households, compared to those on a high income, with significant implications for living standards⁵.

The Institute for Health Equity (IHE) has noted that despite improvements in housing insulation since 2011, just over half of all households in the UK are living in energy-inefficient housing. IHE states that, together with excessive fuel costs and increasing poverty, more of the population is at risk from the poor health and mortality associated with cold homes⁶.

In Northern Ireland, the top reasons for homelessness presentations are:

- Accommodation not reasonable (which explicitly includes financial hardship)
- Sharing breakdown/family dispute

⁴ <https://www.jrf.org.uk/housing/stop-the-freeze-permanently-re-link-housing-benefits-to-private-rents#-housing-costs-are-a-major-driver-of-poverty>

⁵ <https://ifs.org.uk/news/housing-costs-take-three-and-half-times-much-budgets-poor-rich-significant-implications-their>

⁶ <https://www.instituteofhealthequity.org/resources-reports/left-out-in-the-cold-the-hidden-impact-of-cold-homes/copy-of-read-the-report.pdf>

- Loss of rented accommodation (which explicitly includes both loss of private rented accommodation because it is unaffordable and loss of housing association accommodation because of rent arrears)

Affordability issues are therefore a common thread throughout the most common reasons for homelessness.

The Involvement of Experts by Experience

Housing Rights welcomes the strategy's commitment to involve those with lived experience in the policies and programmes that flow from the Anti-Poverty strategy. However, more information is required on how this will be done and how the Executive will demonstrate what action has been taken following their involvement.

Housing Rights recommends that the Strategy could be strengthened by adopting the following three principles:

1. Participation is meaningful, makes a difference and is transparent
2. Participation is accessible
3. Participation is valued and recognised

The Executive should consider partnering with organisations that have expertise in participation to help facilitate this element of the Strategy. The Northern Ireland Housing Executive recently adopted this model by partnering with housing charities to facilitate the involvement of experts with experience in the design and development of the NIHE Homelessness Strategy through a Lived Experience Programme. This is a good example of best practice.

Recommendations

Housing Rights has identified several recommendations that, if adopted, would support the development and implementation of an effective strategy.

1. Reshape the Anti-poverty strategy to ensure alignment with the objectives of the Programme for Government and other existing strategies that seek to tackle poverty, including the development of cross-departmental time-bound and measurable actions to address the root causes of poverty.
2. Carry out an additional literature review and data gathering exercise that considers new and up-to-date data. The focus should be specifically on research and data from the post-pandemic period, where possible.
3. Update the housing analysis within the strategy with the inclusion of the findings in NIHE's recently published Housing Market Review & Perspectives.

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4. Carry out a thorough, meaningful, and cross-cutting policy context exercise that includes all relevant Executive, Departmental, and Arms-Length Body Strategies already in existence.
5. Position the Anti-Poverty strategy so that it can adapt to emerging challenges by undertaking a horizon scanning exercise to assess future challenges that will impact upon poverty in Northern Ireland.
6. Alongside bold strategic change, implement the Joseph Rowntree Foundation/Frame Works Institute Framing Toolkit^[1] into the writing of the Anti-Poverty Strategy.
7. Amend the vision to prioritise prevention. Where poverty cannot be prevented, commit to ensuring that it is rare, brief and non-recurrent.
8. Further develop the strategic commitments to ensure they are targeted, time-bound, and linked to outcomes that clearly support the vision of the strategy.
9. Consult on the Programme for Delivery and the initial action plans that will support the delivery of the Anti-Poverty Strategy. This should include providing information on the reporting structure and any plans to review and update action plans throughout the strategy's lifespan.
10. Develop cross-departmental strategic commitments with shared accountability.
11. Commit to publishing a timetable of anti-poverty strategy board meetings, along with meeting agendas, minutes, and agreed-upon action points.
12. Review the selected indicators in partnership with experts, experts by experience and the community and voluntary sector.
13. Adopt Housing Cost as a Proportion of Household Income as one of the indicators of poverty.
14. Undertake a thorough review of recent literature and evidence examining the relationship between poverty and housing.

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15. Ensure the draft strategy recognises that the current housing climate in Northern Ireland contributes to poverty for a significant proportion of the population.
16. Adopt the three principles of meaningful participation.

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