

Housing Rights

Consultation Response
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**Housing Rights' response to the Anti-Poverty
Strategy Consultation**

September 2025

1.1. About Housing Rights

Housing Rights is Northern Ireland's leading independent provider of specialist housing advice. For over 60 years, we have been helping people to find and keep a home. We believe that prevention is better than the cure. Our work seeks to ensure that individuals and families living in Northern Ireland do not reach this crisis point. We recognise, however, that this is not always possible, and we also provide advice and assistance to help ensure that the experience of homelessness is rare, brief and non-recurrent.

Housing Rights passionately believes that no one should be without a home and work towards the goal that every citizen in Northern Ireland has a good quality, affordable and sustainable home that meets their needs. In particular, the organisation's services are targeted at people who need help to:

- Prevent them from becoming homeless;
- Find suitable rented accommodation;
- Sustain their tenancies;
- Explore their housing options;
- Avoid repossession and eviction;
- Tackle disrepair or poor conditions in their homes; and
- Meet their housing costs;
- Repay mortgage and/or rent arrears;
- Resolve disputes with their landlord and/or lenders.

In the year ending March 2025, our advice services dealt with queries from 13,162 households on 67,828 housing issues. We provide a specialist housing helpline open Monday to Friday, complemented by a digital Live Chat service accessed through a comprehensive user-led advice website www.housingrights.org.uk. Our busy frontline advice service is supported by an advocacy and representation service staffed by dedicated caseworkers and a small legal team who prevent and alleviate homelessness by liaising with landlords, lenders, and other agencies, as well as providing representation for County and High Court.

In addition to preventing homelessness, our services also assist in promoting access to justice by providing an emergency court representation service (Housing Possession Court Duty Scheme), which assists households at risk of homelessness due to mortgage or rent arrears who are unrepresented in court proceedings. Since December 2019, we have also administered a Housing Mediation Service to address and avoid the escalation of disputes to prevent homelessness.

The reach and expertise of our advisers also extends to Northern Ireland's prisons to assist those entering or leaving custody to safeguard tenancies and/or to access appropriate support to prevent homelessness on release.

We work to support communities and other frontline advisers across Northern Ireland by providing a well-established practitioner support programme, through our Community Housing Advice Partnership and through a comprehensive training and legal information service.

In addition to frontline specialist advice, representation and support services, Housing Rights has a policy and participation service that influences government policy decisions to improve housing and homelessness in Northern Ireland. Our policy work is framed by the views and experiences of the

people who contact us for advice and aims to support the identification of evidence-based, informed solutions.

1.2. The nature of this response

This response aims to inform the NI Executive's draft Anti-Poverty Strategy, which represents the Executive's commitment to a *'joined-up, long-term approach to addressing poverty.'*¹

Housing Rights shares the sector's concerns that the draft strategy has significant shortcomings that make it unfit for purpose. In engaging constructively with this consultation, we intend to offer solution-focused, pragmatic comments 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 severe and entrenched poverty.

As a specialist housing advice charity, Housing Rights is particularly concerned with the relationship between poverty and housing. Therefore, much of this response will focus on how the Anti-Poverty Strategy can better consider this key relationship, develop appropriate indicators to provide an accurate reflection of poverty across all housing tenures, and put in place effective long-term solutions to address poverty across Northern Ireland as a whole.

2.0. Executive Summary

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 draft strategy. The housing

¹ [Consultation on NI Executive Anti-Poverty Strategy | Department for Communities](#)

analysis in the strategy could be strengthened with the inclusion of the findings in NIHE's recently published Housing Market Review & Perspectives.²

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' recommendations.³ 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, 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 framework,⁴ 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

² [The Housing Executive - Housing Market Data Hub](#)

³ [Framing toolkit: Talking about poverty | Joseph Rowntree Foundation](#)

⁴ [SHARE Framework](#)

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 do not 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.
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 Rowntree Foundation, which found that housing costs are a major driver of poverty in the PRS.⁵

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 standards.⁶

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 homes.⁷

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

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

⁵ [Stop the freeze: permanently re-link housing benefits to private rents | Joseph Rowntree Foundation](#)

⁶ [Housing costs take up three-and-a-half times as much of the budgets of the poor as of the rich, with significant implications for their standard of living | Institute for Fiscal Studies](#)

⁷ [Left Out in the Cold: The Hidden Health Costs of Cold Homes](#)

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.
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^[3] 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.

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.

3.0. Response

Housing Rights acknowledges the strength of feeling among colleagues and fellow organisations in the community and voluntary sector. Over 75 organisations and individuals from across Northern Ireland signed an open letter addressed to Executive Ministers, and agreed that '*the draft anti-poverty strategy does not meet the criteria of any reasonable strategy*.'⁸ We share the sector's legitimate concerns and are firm in our belief that the draft strategy, as written, is not fit for purpose.

Housing Rights' organisational principles compel us to take a solution-focused and constructive approach, which is informed by the people who use our services, many of whom are experiencing poverty. Their insight and experience, along with best practices from elsewhere, have informed this response.

3.1. 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. The lack of Strategic interaction with the Programme for Government

Housing Rights is aware that the Executive's obligation to produce an Anti-Poverty Strategy arises from s28E of the Northern Ireland Act 1998.⁹ Since then, a number of relevant Executive and Departmental strategies have been released and implemented, including the Programme for Government.¹⁰

The draft Anti-Poverty Strategy, as currently written, lacks strategic interaction with the Programme for Government and other key Government strategies linked to addressing poverty, including the draft Fuel Poverty Strategy,¹¹ the Housing Supply Strategy¹² and the Northern Ireland Housing Executive's Homelessness Strategy.¹³ Interaction between these strategies is vital to the success of the Anti-Poverty Strategy. For example, the Housing Supply Strategy intends to build an adequate number of high-quality homes in Northern Ireland. This would have the dual effect of delivering good quality, affordable housing and take pressure off the housing and private rental markets. Both markets are undergoing an extended period of high inflation, resulting in homeowners and private

⁸ [Open Letter to the Executive: The draft Anti-Poverty Strategy is not fit for purpose - NIAPN - Northern Ireland Anti-Poverty Network](#)

⁹ [Northern Ireland Act 1998](#)

¹⁰ <https://www.northernireland.gov.uk/articles/programme-government-2024-2027-our-plan-doing-what-matters-most>

¹¹ [Consultation on a new Fuel Poverty Strategy for Northern Ireland | Department for Communities](#)

¹² [Housing Supply Strategy 2024 - 2039 | Department for Communities](#)

¹³ [The Housing Executive - Homelessness strategy](#)

renters having to spend more on housing costs, which is directly contributing to poverty and which make it more difficult for people in poverty.

Housing Rights acknowledges that both the draft Fuel Poverty Strategy and Housing Supply Strategy are referenced in the '*Minimising the Impacts of Poverty*' section of the consultation. However, the actions identified in relation to these strategies are not supported with sufficient detail to explain how they will complement the delivery of the Anti-Poverty Strategy, facilitate effective cross-working between the strategies, or support development of any shared goals or actions.

Within housing alone, there are a number of opportunities to pursue cross-departmental working to address poverty. For example, there is significant scope for collaboration between the Department for Communities' (DfC) Fuel Poverty team, the Department for the Economy's (DfE) Energy team, and the Department for Agriculture, Environment and Rural Affairs (DAERA) in the identification and retrofit of poor-quality private rented stock. Doing so would contribute to addressing poverty in the Private Rented Sector (PRS), where fuel poverty is more common than in other tenures, while simultaneously contributing to emissions reduction targets.

Similarly, the Anti-Poverty strategy could support the Housing Supply Strategy by reinforcing the importance of meeting housing targets and by committing to working in partnership with the Housing Supply team, NIHE and Housing Associations to strategically and proactively identify and target areas of high need, and ensure planning permission and resourcing are in place to follow through. These actions would be strategic, measurable and accountable and demonstrate the Executive's commitment to cross-departmental, and the development of strategies that complement and reinforce one another.

In summary, the Anti-Poverty strategy could be strengthened by being 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 ensuring long-term cost-saving opportunities are identified and delivered.

Recommendations:

- 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. Elements of the evidence base cited throughout the draft strategy are out of date

Housing Rights is concerned about the quality of the evidence base used in the draft strategy. While we are unable to review every reference in the document, we are concerned that the housing section relies on several outdated 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 draft strategy. Additionally, significant and more recently published evidence, including those published by the Department for Communities, in relation to e.g. Welfare Mitigations, is not relied upon and should be.

While it is true that social renters remain at the highest risk of poverty before and after housing costs, there is emerging evidence that a greater proportion of private renters are being pushed into

poverty *specifically because* of their housing costs. Recent UK-wide Joseph Rowntree Foundation research found that three in ten social renters were only in poverty after housing costs, whereas half of private renters are only in poverty after housing costs.¹⁴ This research points to the impact that rising rents are having on private renters. As rents in Northern Ireland continue to increase,¹⁵ more people will subsequently be pushed into poverty. This is despite recent evidence from comparable jurisdictions that indicates that a high proportion of private renters are in work and full-time education.¹⁶

This should substantially influence the policy response that the Draft Strategy sets out, as it is evidence that employment alone is not enough to combat the rising cost of renting, which, although has slowed recently from a record high, remains rapid.¹⁷ In Northern Ireland, the poorest quarter of renters in the cheapest quarter of housing are spending 43.1% of their income on their rent alone, this rises to 49.8% of income in Belfast.¹⁸ This is undoubtedly highly influential in pushing renters into poverty after housing costs, and should be considered alongside the important context that Private Renters in Northern Ireland occupy the poorest standard of housing and are therefore paying more to heat their homes.¹⁹

The Draft Strategy does not recognise this, which is a shortcoming that must be corrected. This could be achieved by undertaking an additional literature review and a renewed evidence-gathering exercise to include regularly published and up-to-date data, some of which is collected by the Department for Communities.²⁰

The Northern Ireland Housing Executive has recently published a new Northern Ireland Housing Market Review and Perspectives Report,²¹ which gives an up-to-date picture of the housing landscape in Northern Ireland. This would be a useful tool to inform the housing-related policymaking which arises from the Anti-Poverty Strategy.

Recommendations:

- 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.
- Update the housing analysis within the strategy with the inclusion of the findings of relevant material and government datasets including those in NIHE's recently published Housing Market Review & Perspectives.
- 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.

3. The draft strategy does not sufficiently consider future challenges that will directly impact poverty in Northern Ireland.

¹⁴ [UK Poverty 2025: The essential guide to understanding poverty in the UK | Joseph Rowntree Foundation](#)

¹⁵ [Private rent and house prices, UK - Office for National Statistics](#)

¹⁶ [Chapter 1: Profile of households and dwellings - GOV.UK](#)

¹⁷ [Private rent and house prices, UK - Office for National Statistics](#)

¹⁸ [Performance of the Private Rental Market in Northern Ireland, H2 2024](#)

¹⁹ [Consultation on a draft fuel Poverty Strategy](#)

²⁰ [Northern Ireland Poverty and Income Inequality report 2023-24 | Department for Communities](#)

²¹ [The Housing Executive - Housing Market Data Hub](#)

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. Unfortunately, the draft strategy does not consider future strategic challenges, such as Northern Ireland's ageing population, the impacts of Artificial Intelligence (AI) on the employment market, the impacts of fluctuating economies, or the inability to meet housing targets out of the public purse.

A specific issue that poses both future and existing challenges to the prevention and alleviation of poverty is the challenge associated with achieving decarbonisation, the Just Transition, and the required emissions reduction targets as outlined in the Climate Change Act (Northern Ireland) 2022.²² This is important as residential properties in Northern Ireland make up 14% of total emissions. The Housing Executive²³ and Housing Associations²⁴ have recognised this and have begun to invest in retrofitting, and the building of efficient new stock. However, there is limited support for low-income homeowners or tenants in the PRS, who, in Northern Ireland, often occupy the worst standard of housing. The direct relationship between the efficiency of a home and fuel poverty is set out in the Fuel Poverty Strategy.

Failure to invest sufficiently to assist private renters and low-income homeowners to improve their energy efficiency means that it is unlikely they will be able to avail of low-carbon technologies and energy efficiency improvements for their homes. This scenario increases the risk of private renters and low-income homeowners disproportionately sponsoring the energy transition, as they will likely continue to pay higher energy costs, with less opportunity to access the benefits, such as cheaper, cleaner fuels and warmer homes. This could entrench the higher rates of fuel poverty within these tenures and contribute to increasing social inequality.²⁵

Increasing social inequality can lead to a myriad of deeply undesirable and destabilising consequences, such as reduced life expectancy, poorer health outcomes, lower educational attainment, decreased social mobility, decreased trust in institutions and a breakdown in social cohesion.²⁶ Each can contribute to entrenching poverty and present challenges to eradicating it from our society.

It is Housing Rights' view that the inclusion of a horizon scanning exercise to identify challenges and opportunities would significantly strengthen the strategy. A horizon scanning exercise would support the Executive to target resources to strategic actions such as implementing Minimum Energy Efficiency Standards of Grade C or higher, or investing in the Affordable Warmth Scheme²⁷ to ensure it can carry out whole-house retrofits on scale.

Recommendations:

- 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.

²² [Climate Change Act \(Northern Ireland\) 2022](#)

²³ [Housing Executive progress 300 Low Carbon Programme toward Net Zero](#)

²⁴ [Choice Housing completes energy efficiency retrofits in Belfast : Housing Digital](#)

²⁵ [Rising inequality: A major issue of our time | Brookings](#)

²⁶ [Inequality – Bridging the Divide | United Nations](#)

²⁷ <https://www.nihe.gov.uk/housing-help/affordable-warmth/affordable-warmth-scheme>

3.2. 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 language used in the delivery of any strategy can define its success or failure as much as the quality of outcomes. One way to convey this ambition and drive would be through the adoption of the Joseph Rowntree Foundation and Frame Works Institute's 'Framing Toolkit' recommendations.²⁸ 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 draft strategy's vision, *'working together, poverty and its impacts will be effectively and sustainably eradicated across our communities'*, could be strengthened by amending it to reflect measurable and tangible commitments. It is difficult to understand what is meant by *'effectively and sustainably'* when these terms are not paired with key measurables elsewhere in the strategy. By comparison, the Homelessness Strategy,²⁹ which states *'wherever possible homelessness should be prevented; but if homelessness cannot be prevented it should be rare, brief, and non-recurring'*, sets out key, measurable commitments from the outset. The Homelessness Strategy goes on to clearly link the vision to strategic outcomes, indicators and key measurables. Adopting a similar approach would strengthen the vision of the Anti-Poverty Strategy.

Another strength of the Homelessness Strategy is its commitment to prevention. A suitably ambitious Anti-Poverty Strategy must also prioritise prevention in the context of poverty. Where poverty cannot be prevented, the strategy should commit to ensuring that it is rare, brief and non-recurrent. With that in mind, Housing Rights believes that the Draft Strategy could be strengthened by the replacement of the 'minimising risks' pillar with a 'prevention' pillar. This pillar would encompass any action the Executive would take to minimise the risk of poverty in the first instance, while rooting the Strategy in the belief and strategic purpose that it can, and should, be prevented. Where it cannot be prevented, poverty should be rare, brief and non-recurring.

The section which, in general, fails to reframe thinking on policy is the *Exiting Poverty* section. This section, read in its totality, appears to indicate that parent employment will raise the child out of poverty, while gathering a pension which will, in turn, prevent pensioner poverty. It does not, however, recognise societal challenges such as parents in poverty are less likely to have enjoyed the opportunity of access to degrees and qualifications, and so opportunities for well-paying jobs are severely limited, while housing and other essential costs continue to rise at levels that outstrip wage increases.³⁰ This infers blame on the person in poverty for not attaining high enough wages. The result is a set of strategic commitments that focuses entirely on spending power and makes no commitment, outside of an already existing but undelivered commitment to tackle child care costs, to tackle the root of the issue, the rising costs of living.³¹

Recommendations:

²⁸ [Framing toolkit: Talking about poverty | Joseph Rowntree Foundation](#)

²⁹ [Ending Homelessness Together Homelessness Strategy 2022-27](#)

³⁰ [Annual Survey of Hours and Earnings | Northern Ireland Statistics and Research Agency](#)

³¹ [Rising cost of living in the UK - House of Commons Library](#)

- Alongside bold strategic change, implement the Joseph Rowntree Foundation/Frame Works Institute Framing Toolkit³² into the writing of the Anti-Poverty Strategy.
- Amend the vision to prioritise prevention. Where poverty cannot be prevented, commit to ensuring that it is rare, brief, and non-recurrent.

3.3. Delivery and Resourcing

The three-pillar model

The strategy's vision is underpinned by three key pillars, supported by a range of work areas and key actions. While this three-pillar model is helpful in informing the development of future action plans, it is overly simplistic and doesn't, for example, 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 framework,³³ 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 both prevent and help lift people out of poverty. The strategy could therefore be improved by recognising and addressing the need for a holistic approach.

There are three interconnected policy areas with a causal and cyclical relationship with poverty that should sit above the pillars to provide strategic direction to the commitments and action plans within the strategy. These policy areas are education, health, and housing. Each of these three policy areas are heavily interconnected and have the potential to directly perpetuate or mitigate poverty in Northern Ireland.

Education can be seriously disrupted by the experience of poverty, thereby increasing the chances of poverty into adulthood.³⁴ Research points to the connection between poor housing and educational attainment,³⁵ and linkages between poverty, poor health and educational attainment.³⁶ Health and poor housing are innately linked and a major driver of poverty in the UK. Recent research from the Faculty of Public Health is explicit in drawing a direct line between poor housing, poor health and poverty,³⁷ and the *Marmot Review: 10 Years On*, draws an equally direct line in the relationship between housing, health and poverty.³⁸ Furthermore, the Building Research Establishment estimate that poor housing costs the NHS in England £1.5 billion per year.

Raising these key policy areas to a higher strategic positioning within the strategy's three-pillar model would better capture the interconnected relationship between housing, health, education, and poverty. Doing so would better position the Anti-Poverty Strategy to develop holistic approaches that

³² [Framing toolkit: Talking about poverty | Joseph Rowntree Foundation](#)

³³ [SHARE Framework](#)

³⁴ [State of education: child poverty | National Education Union](#)

³⁵ [linkages between poor housing and education uk - Google Search](#)

³⁶ [Poorest children have worse health and educational outcomes in adolescence | UCL News - UCL – University College London](#)

³⁷ [fph-poverty-housing-and-health-briefing.pdf](#)

³⁸ [Health Equity in England The Marmot Review 10 Years On full report.pdf](#)

target the root causes of poverty while supporting the delivery of multiple Programme for Government objectives.

Resourcing

There is no discussion of resources being set aside to achieve the strategic commitments outlined in the draft strategy. Housing Rights is cognisant of the current economic and financial position facing the NI Executive and realises that there are significant pressures on public funds across all Departments. The Anti-Poverty Strategy, however, represents an opportunity for the Executive to agree the key strategic priorities in the context of eliminating poverty, commit to addressing those priorities in an Executive-owned Strategy, and foster agreement on priorities for future budget allocations.

It is important to emphasise that resourcing a strategy of this importance should be viewed as an investment in the future. If we take the three policy spheres outlined above—education, health, and housing—and their relationship with poverty, we can examine how investment in each can secure long-term savings and put Northern Ireland on a more secure footing going forward.

The Marmot Review: 10 Years on, highlights that 'poor quality housing harms health and evidence shows that exposure to poor housing conditions (including damp, cold, mould, noise) is strongly associated with poor health, both physical and mental. The longer the exposure to poor conditions, including cold, the greater the impact on mental and physical health. Specific physical effects are morbidity including respiratory conditions, cardiovascular disease and communicable disease transmission, and increased mortality. In terms of mental health impacts, living in non-decent, cold or overcrowded housing and in unaffordable housing has been associated with increased stress and a reduction in a sense of empowerment and control over one's life and with depression and anxiety. Children living in overcrowded homes are more likely to be stressed, anxious and depressed, have poorer physical health, attain less well at school and have a greater risk of behavioural problems than those in uncrowded homes.'³⁹

The review goes on to say that housing affordability was the single most commonly stated reason for poor mental health, even in instances where a person had no previous mental health issues. It also found that private renters have been disproportionately hardest hit. It is therefore evident that sufficient investment in secure, sustainable and affordable housing can lead to significant savings on healthcare.

Investment in housing provides for short-term savings elsewhere in the public purse. In 2015, Housing Rights commissioned Fiona Boyle Associates to calculate the cost of homelessness in Northern Ireland. The report calculated that the average cost of homelessness in Northern Ireland in 2015 was £15,470.40 per year per homeless client. The cost will have certainly risen in the meantime, as the cost of temporary accommodation was the most significant contributor to this calculation, and temporary accommodation costs have since spiralled.

Strategic Commitments

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

³⁹ Ibid. page 108

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.

Recommendations:

- Further develop the strategic commitments to ensure they are targeted, time-bound, and linked to outcomes that clearly support the vision of the strategy.
- 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.

3.4. Monitoring, Reporting and Governance

The opening paragraph of Section 6 of the draft strategy, *Monitoring, Reporting and Governance*, acknowledges that dealing with poverty is *'not something that can be taken forward by one Department, or even the Executive, acting in isolation. It is only through the meaningful and sustainable co-operation across all of society that we will be able to deliver on our strategic vision.'*⁴⁰

It is encouraging that the Executive recognises the need for meaningful and sustainable cooperation across society to address poverty. It is important that the Executive 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.

The EQIA document, which accompanied the Draft Strategy⁴¹ lists the pillars alongside relevant strategic commitments and designates ownership of these commitments to a department. These designations are, however, absent from the draft strategy itself. Ownership of any commitment should be made clear in the draft strategy document for purposes of clarity and accountability.

The draft strategy states that the *three pillar sub-committees will likely be made up of the Departments for whom actions sit under one of the pillars, and likely chaired by the dominant Department*. Housing Rights' view is that a better approach would be to use this as an opportunity to identify commitments that have shared responsibility between Departments, which would encourage cross-departmental working, rather than simply assigning each commitment to a single Department. An example of this could be a shared commitment for the Department for Communities, Department for Infrastructure and Department for Finance to co-develop and implement a plan to address water infrastructure issues, identify opportunities for new build homes,

⁴⁰ [*DfC Anti Poverty Report-2025.pdf](#), page 28

⁴¹ [Anti-Poverty Strategy Equality Impact Assessment](#)

and resource house building to meet housing targets. Such a shared commitment would require three Departments working together, with equal accountability.

Indicators

Housing Rights does not feel that the number of households in housing stress is an appropriate indicator of poverty. This is for two reasons;

The first is that 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. 'Housing Stress' refers to households on the housing waiting list who have over 30 points under the housing selection scheme. For context, 77.2% of the 49,129 households on the waiting list are in housing stress.⁴² The sheer numbers make this an ineffective indicator upon which to target need.

Second, even if we were in an environment where housing stress was a key indicator of people in poverty on the social housing waiting list, it ignores most social tenants, private tenants and homeowners who are not on the waiting list but are in poverty.

It is our experience, across all tenures, that housing costs and affordability are contributors to poverty across Northern Ireland. We therefore strongly believe that the draft strategy should include more appropriate housing-related indicators. At a minimum, the Draft Strategy should include an indicator for Housing Cost as a Proportion of Household Income. This data is already collected under the Programme for Government Wellbeing Framework⁴³ and the Family Resources Survey.⁴⁴

We recommend that the Draft Anti-Poverty Strategy further strategically interrogate this data by disaggregating based on housing tenure and by income band, as there is clear evidence that private rented tenants, for example, particularly those on lower incomes, are spending almost half of their incomes on rent alone.⁴⁵

Recommendations:

- Develop cross-departmental strategic commitments with shared accountability.
- Commit to publishing a timetable of anti-poverty strategy board meetings, along with meeting agendas, minutes, and agreed-upon action points.
- Review the selected indicators in partnership with experts, experts by experience and the community and voluntary sector.
- Adopt Housing Cost as a Proportion of Household Income as one of the indicators of poverty.

3.5. The Relationship Between Poverty and Housing

Housing Rights is concerned that the draft strategy fails to sufficiently recognise the relationship between housing and poverty in the post-pandemic context. This will lead to the development of ineffective commitments that won't adequately address the causal relationship between housing and poverty in the current housing climate in Northern Ireland.

⁴² [Northern Ireland Housing Bulletin April - June 2025](#)

⁴³ [PfG Wellbeing Framework - Housing costs as a proportion of household income](#)

⁴⁴ [Family Resources Survey | Northern Ireland Statistics and Research Agency](#)

⁴⁵ [Performance of the Private Rental Market in Northern Ireland, H2 2024](#)

There appears to be an overreliance on evidence from Tunstall et al., which is over a decade old. The scoping review acknowledges that:

'Tunstall et al. (2013) state that the evidence that poverty affects housing circumstances is generally stronger than evidence that housing circumstances affect poverty. They affirm 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 homeownership. However, they express that social housing, housing benefits and support for homeless people acts 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 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 Rowntree Foundation, which found that housing costs are a major driver of poverty in the PRS⁴⁶ and that half of all private renters in receipt of housing benefits are in poverty, as the benefit system has failed to protect them from the rising cost of rent.⁴⁷

Northern Ireland has failed to consistently build enough social homes over the past decade to meet need or significantly reduce the waiting list.⁴⁸ Due to a lack of investment in social and affordable housing, an over-reliance on the PRS has developed, and it has grown in size to exceed that of the social sector.⁴⁹ This means that private landlords now have responsibility for housing a similar number of households as the State.

Whereas previously, people in poverty may have been able to present to the Housing Executive and be allocated a social home to act as a buffer against the worst impacts of poverty, this is no longer an option for a sizeable number of people experiencing poverty. People are aware that the only realistic option they may be presented with is temporary accommodation, with no guarantees that the accommodation will be suitable or near their support network. Consequently, people are forced to remain in private rented accommodation despite serious affordability challenges. These challenges are directly pushing them into poverty after housing costs.

As previously highlighted, the lowest quartile income of private renters in Northern Ireland spends almost half of their income on rent alone.

Housing Rights conducted research in 2020 at the height of the pandemic, which showed that private renters prioritise paying their rent over all other expenses, meaning they are going without elsewhere.⁵⁰ This means that they will cut back on fuel, food, hygiene products, spending on their children, etc., and this is a major indicator of poverty in the household.

⁴⁶ <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>

⁴⁷ [Stop the freeze: permanently re-link housing benefits to private rents | Joseph Rowntree Foundation](#)

⁴⁸ [Housing Supply Strategy 2024 - 2039 | Department for Communities](#)

⁴⁹ [census-2021-ms-e15.xlsx](#)

⁵⁰ [The Perfect Storm: The impact of Covid-19 on renters | Housing Rights](#)

Further, research from the Institute of 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 standards.⁵¹

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 homes.⁵²

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

- Accommodation not reasonable (which explicitly includes financial hardship)
- Sharing breakdown/family dispute
- 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 prominent thread throughout the most common reasons for homelessness. There is clear and expert evidence that housing circumstances are significantly affecting poverty in the current housing climate. Housing Rights does not feel that the current draft strategy acknowledges this sufficiently, and it would urge the Executive to reconsider its evidence base and reorient its strategic commitments accordingly.

Recommendations:

- Undertake a thorough review of recent literature and evidence examining the relationship between poverty and housing.
- Ensure the draft strategy recognises that the current housing climate in Northern Ireland contributes to poverty for a significant proportion of the population.

3.6. The Involvement of Experts by Experience

Housing Rights strongly believes that the expertise and insights of experts by experience (people who have first-hand experience of poverty) are crucial in addressing poverty, both in terms of identifying the issues and in identifying the solutions that will work in practice. It is therefore crucial that experts by experience are meaningfully involved in the design and development of the Anti-Poverty Strategy.

Housing Rights welcomes the draft strategy's recognition that *"Lived experience...must be used to inform our actions to address poverty and its effects."* However, the current draft Strategy does not demonstrate any evidence that people with experience of poverty have been meaningfully involved in its development.

Housing Rights welcomes the strategy's commitment to "involve those experiencing or at risk of poverty by taking forward policies and programmes within this strategy," including in the strategy's monitoring, reporting, and governance. However, we see it as crucial that more information is

⁵¹ [Housing costs take up three-and-a-half times as much of the budgets of the poor as of the rich, with significant implications for their standard of living | Institute for Fiscal Studies](#)

⁵² instituteofhealthequity.org/resources-reports/left-out-in-the-cold-the-hidden-impact-of-cold-homes/copy-of-read-the-report.pdf

provided on how this will be done and how the Department will demonstrate what action has been taken as a result of their involvement.

To ensure the effectiveness of the strategy, Housing Rights recommends that the Executive commit to the following 3 principles of participation and that the strategies accompanying Action Plans outline how Departments will meet these commitments as per our recommendations below:

1. Participation is meaningful, makes a difference and is transparent

The Department should identify concrete opportunities for experts by experience to be involved in a way that is meaningful and makes a difference. This should include:

- Identifying areas where there is scope for experts by experience to influence the development and delivery of the strategy
- Ensure that Experts by Experience have a clear understanding of the opportunities that exist to make a difference through their involvement
- Ensure that experts by experience are provided with feedback and follow-up information from the Department, which clearly outlines what happened as a result of their involvement (for example, through a 'You said – We did' update report)

2. Participation is accessible

The Department should ensure opportunities for experts by experience to be involved are accessible by addressing barriers to involvement. This should include:

- Covering travel costs incurred for those involved
- Covering childcare costs incurred for those involved
- Providing translators where needed

3. Participation is valued and recognised:

The Department ensures the unique expertise brought by experts by experience to this work is valued and recognised. This should include:

- Paying experts by experience for their time, either via a monetary payment or gift vouchers

It may be useful for the Department to consider partnering with organisations working with people experiencing poverty, who have expertise in participation, in order to help facilitate this element of the Strategy. Indeed, the Northern Ireland Housing Executive have recently adopted this model by partnering with housing charities in order to facilitate the involvement of experts by experience in the design and development of the NIHE Homelessness Strategy through a Lived Experience Programme.

Recommendation:

- Adopt the three principles of meaningful participation.

4.0 Summary of Recommendations

17. 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.

18. 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.
19. Update the housing analysis within the strategy with the inclusion of the findings in NIHE's recently published Housing Market Review & Perspectives.
20. 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.
21. 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.
22. Alongside bold strategic change, implement the Joseph Rowntree Foundation/Frame Works Institute Framing Toolkit^[1] into the writing of the Anti-Poverty Strategy.
23. Amend the vision to prioritise prevention. Where poverty cannot be prevented, commit to ensuring that it is rare, brief and non-recurrent.
24. Further develop the strategic commitments to ensure they are targeted, time-bound, and linked to outcomes that clearly support the vision of the strategy.
25. 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.
26. Develop cross-departmental strategic commitments with shared accountability.
27. Commit to publishing a timetable of anti-poverty strategy board meetings, along with meeting agendas, minutes, and agreed-upon action points.
28. Review the selected indicators in partnership with experts, experts by experience and the community and voluntary sector.
29. Adopt Housing Cost as a Proportion of Household Income as one of the indicators of poverty.
30. Undertake a thorough review of recent literature and evidence examining the relationship between poverty and housing.
31. Ensure the draft strategy recognises that the current housing climate in Northern Ireland contributes to poverty for a significant proportion of the population.
32. Adopt the three principles of meaningful participation.

For further information on this policy consultation response, please contact Housing Rights' Policy Lead, Stephen Morrison by email at stephen.morrison@housingrights.org.uk.

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