



**EQUALITY COMMISSION FOR NORTHERN IRELAND**  
**Response to Draft NI Executive Anti-Poverty Strategy**

September 2025

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## **Response to the NI Executive Consultation on the Anti-Poverty Strategy**

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### **Executive Summary**

- i. The Commission acknowledges that this is Northern Ireland's first Anti-Poverty Strategy and welcomes the publication of this draft for consultation.
- ii. The Commission is of the view, however, that the draft Strategy falls short of the levels of detail and ambition required to address the impact of poverty in Northern Ireland.
- iii. Poverty has a significant impact across all equality grounds in Northern Ireland. Whilst socio-economic disadvantage is not a specified ground under the equality legislation in Northern Ireland, the barriers and inequalities experienced by equality groups are exacerbated by poverty and social exclusion.
- iv. The Commission has longstanding policy recommendations to tackle poverty across various interconnected areas relevant to the Strategy, for example education, housing, welfare reform and others. We do not see these recommendations substantively reflected in the draft Strategy.
- v. The Anti-Poverty Strategy should be underpinned by the statutory duty to promote equality of opportunity and good relations, set out in Section 75 of the Northern Ireland Act 1998. Government actions to address poverty and social exclusion should positively impact across a range of equality groups.
- vi. We would have expected further detail within the Strategy on specific and targeted measures to address poverty experienced across the Section 75 groups. Section 75 groups experience poverty differently and will require specific measures to effectively reduce and eliminate poverty.

- vii. The final Strategy needs to include detailed targets, actions, timelines and progress milestones. While noting that the Department intends to develop an Action Plan to accompany the Strategy, which may provide further detail, we highlight that the Department's Section 75 equality scheme commitments applies at both strategic and implementation level of policy development, therefore any action plan(s) needed to implement the Strategy should also be subject to screening and /or EQIA.
- viii. While we acknowledge the benefit of highlighting existing initiatives and Government programmes within the context of the draft Strategy, in order to provide a full picture of all actions being taken to alleviate poverty, we are concerned at the lack of new actions or commitments proposed within this Strategy. Actions outlined are to be delivered "in the first years of the Strategy". This Strategy is to underpin anti-poverty efforts up to 2035, and should provide further detail on what actions will be taken throughout the next decade.
- ix. While an EQIA has been conducted in relation to the Strategy it is unclear how inequalities identified will be addressed. The mitigations outlined in the EQIA are mainly measures which are already being taken and focus on services and programmes being 'available to all'. The data and evidence identified by the EQIA should be used to shape the Strategy in order to target specific interventions and outcomes for those Section 75 groups most likely to experience poverty.
- x. The Department should satisfy itself that the final Strategy and/or action plans complies with the arrangements set out in its approved equality scheme.
- xi. We highlight the recommendations of the Anti-Poverty Strategy co-design group, of which the Commission was a member, along with the work of the Expert Panel, as the basis for a targeted, outcome-based approach for tackling poverty.
- xii. We welcome the Minister's comments that he will seek to incorporate a wide range of views in the final Strategy. We would expect to see substantial changes to the final document, taking on board the Commission's recommendations, fulfilling Section 75 requirements, and through engagement with the general public and the community and voluntary sector.

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# 1 Background

- 1.1 The Equality Commission for Northern Ireland is an independent non-departmental public body established under the Northern Ireland Act 1998.
- 1.2 Our statutory remit<sup>1</sup> includes to:
- Encourage public authorities to promote equality of opportunity and address inequalities in fulfilling their equality and good relations duties.
  - Ensure that equality considerations are central to decision-making by focusing particular attention in a number of key public policy areas.
  - Give advice and support to people with potential complaints under anti-discrimination laws.
  - Give guidance to employers and service providers about their obligations under the law and good practice advice.
- 1.3 The Commission has called for the publication of an Anti-Poverty Strategy for a number of years, including within our response to the draft Programme for Government.
- 1.4 The Commission was a member of Anti-Poverty Strategy Co-Design Group. The role of the group was to advise and support the Department in the development of an evidence-based Strategy to address objective need<sup>2</sup>.

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<sup>1</sup> For further details, see: <https://www.equalityni.org/AboutUs>

<sup>2</sup> The full terms of reference for the group can be found at [Anti-Poverty Strategy co-design group - terms of reference | Department for Communities](#)

The Group is being established to:

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

- 1.5 The Co-Design group’s work culminated in the publication of a Positions Paper highlighting key recommendations for consideration within the development of the anti-Poverty Strategy<sup>3</sup>.
- 1.6 The Anti-Poverty Strategy has been published within a context of a number of wider Strategies and Government actions intended to address poverty. The Commission has responded substantively to recent consultations on Gender Pay Gap Reporting, Fuel Poverty, raising the age of participation in education to 18, the cessation of the Employment Support Scheme, the Good Jobs Bill, the Community Involvement and Cohesion Strategy, the draft Programme for Government, among others<sup>4</sup>.
- 1.7 We further highlight that the four social inclusion strategies were intended to be launched by December 2021<sup>5</sup>. Despite this previous commitment, the only Strategy to have been published is the draft Anti-Poverty Strategy. We reiterate the need for commitment to all four social inclusion strategies, and a revised racial equality strategy.
- 1.8 The Commission’s full position on actions required to address poverty and socio-economic disadvantage can be found at: [Summary of policy positions relating to poverty and socio-economic disadvantage](#).

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

<sup>3</sup> For further details, see: [RECOMMENDATIONS ON THE DEVELOPMENT OF AN ANTI-POVERTY STRATEGY FOR NORTHERN IRELAND](#)

<sup>4</sup> The Equality Commission’s consultation responses can be found at: [ECNI - Consultation responses, Equality Commission Northern Ireland](#)

<sup>5</sup> DfC (2020) [Social Inclusion Strategies](#) (accessed 02/10/24).

## 2 Context

- 2.1 The deep, persistent, and intergenerational nature and impact of poverty in Northern Ireland has been long highlighted and acknowledged by many organisations working in Northern Ireland, and by Government.
- 2.2 We note the Minister’s assertion in the Foreword of the draft Strategy that “there are few issues we face as important as addressing poverty”, and we note the concerning statistics presented in the draft Strategy including that 15% of the population, and 21% of children, live in absolute poverty (after housing costs), and that 18% of the total population and 25% of children live in relative poverty.
- 2.3 We note data from the Trussell Trust that suggests that 200,000 people face hunger and hardship in Northern Ireland. This includes 130,000 working-age adults, 12,000 pensioners and 62,000 children<sup>6</sup>. We further note that some groups are significantly overrepresented in using food banks for support. This includes working age adults, especially those living alone, disabled people, people with caring responsibilities, women, and children<sup>7</sup>.
- 2.4 The Commission is concerned that many organisations working to prevent and address poverty have rejected the draft Strategy. We note the letter sent by over 75 organisations within the Northern Ireland Anti-Poverty Network (NIAPN) which calls upon the NI Executive to withdraw support for the draft Strategy in its current form<sup>8</sup>. While the Commission does not call for the withdrawal of the draft Strategy, instead calling for significant revisions, the strength of this response from expert and stakeholder organisations should be of significant concern to the Executive and the Department.
- 2.5 We continue to highlight that the impacts of inequality and poverty are experienced disproportionately across Section 75 groups.
- 2.6 For example, research indicates that disabled people in Northern Ireland are more likely to experience poverty than

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<sup>6</sup> For further details, see: [Cost of Hunger and Hardship Northern Ireland.pdf](#)

<sup>7</sup> For further details, see: [2023-Hunger-in-Northern-Ireland-report-web-updated-10Aug2023.pdf](#)

<sup>8</sup> For further details, see: [Open Letter to the Executive: The draft Anti-Poverty Strategy is not fit for purpose - NIAPN - Northern Ireland Anti-Poverty Network](#)

non-disabled people.<sup>9</sup> The Joseph Rowntree Foundation have highlighted that: ‘Disabled people face a higher risk of poverty and have done so for at least the last 20 years.’<sup>10</sup>

- 2.7 Disabled people often encounter higher everyday living costs due to medical equipment, energy, and specialist support needs. Scope UK estimate that disabled households need an extra £1,095 each month just to have the same standard of living as non-disabled households.<sup>11</sup>
- 2.8 Children from across Section 75 groups—such as those with special educational needs (SEN), disabilities, boys, and certain minority ethnic communities—as well as those eligible for free school meals, often face barriers that lead to poorer educational outcomes and limit their future opportunities.
- 2.9 We also have highlighted that women are more often employed with atypical contracts, particularly part time working, as well as in low paid jobs.
- 2.10 We note recent comments<sup>12</sup> from the Council of Europe Commissioner for Human Rights during his UK country-visit, in which he highlighted a range of recommendations including ending the two-child limit. We further note the Commissioner’s concern at the deep impact of child poverty on specific groups, including asylum seeking and migrant communities, and his view that the “No Recourse to Public Funds” policy is “entirely unsuitable” for families with children.
- 2.11 In England<sup>13</sup>, the Government has committed within its manifesto<sup>14</sup>, to implementing the socio-economic duty outlined in the Equality Act 2010. This duty requires certain public bodies to consider how their strategic decisions can help reduce inequalities linked to socio-economic disadvantage. However, it was not enacted alongside other provisions of the Act. In Northern Ireland, there is currently no equivalent to the

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<sup>9</sup> Reed & Portes (2019): [Cumulative impact assessment of tax & social security reforms in NI, p 101.](#)

<sup>10</sup> JRF (2022): [UK Poverty 2022 - the essential guide to understanding poverty in the UK.](#)

<sup>11</sup> Scope (2025): [Disability Price Tag 2025.](#)

<sup>12</sup> For further details, see: [United Kingdom: tackling poverty is crucial to protect children’s human rights; a number of other areas also call for attention - Commissioner for Human Rights](#)

<sup>13</sup> The socio-economic duty has previously been implemented by devolved Governments in Scotland (2018) and Wales (2021). For further information, see: [EHRC publishes new research on socio-economic duty implementation ahead of introduction in England | EHRC](#)

<sup>14</sup> See page 3 - [Labour Manifesto \(2023\) Mission-breaking-down-barriers](#)

socio-economic duty. The Commission continues to monitor the impact of enacting the socio-economic duty in Great Britain.

### **3 General Comments on the draft Anti-Poverty Strategy**

- 3.1 We welcome the publication of the draft Anti-Poverty Strategy, and that the consultation period has been extended to 14 weeks.
- 3.2 We welcome engagement between the Department for Communities and the Commission's officers since publication of the Strategy, and further welcome wider engagement planned by the Department. We understand that several engagement events are planned and recommend that these include events for the general public as well as with organisations representing the Section 75 groups.
- 3.3 We note that an easy read version of the draft Strategy was made available after the launch of the consultation and that other alternative formats are available on request. The Department should ensure that if there is a time delay in obtaining alternative formats that any consultees requiring alternative formats have equal time to respond.
- 3.4 We previously expressed concern at the lack of detailed action and commitment to addressing poverty within the draft Programme for Government<sup>15</sup>, and welcomed the inclusion of actions to commitment to bring forward an Anti-Poverty strategy and associated actions within the final version. The draft Strategy, however, falls well short of the levels of detail and ambition required to address the impact of poverty in Northern Ireland.
- 3.5 The Strategy lacks clearly defined, measurable targets and corresponding actions to achieve them. In light of ongoing financial constraints, it also fails to prioritise key, costed areas for intervention, provide analysis of which actions would deliver the greatest impact, and identify where efforts should be most strategically focused across Government.

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<sup>15</sup> For further details, see: <https://www.equalityni.org/pfg>

- 3.6 Actions highlighted in the Strategy are largely already progressed and have been previously committed to. While many of these actions are welcomed, and while there should be a place in the Strategy for outlining the full range of work being undertaken to address poverty, we are concerned that there is a lack of additional measures or detail outlined in the Strategy, particularly given that the Strategy will underpin anti-poverty work for the next ten years.
- 3.7 Given the Executive and cross-departmental nature of the Strategy, it is important to provide further clarity on how actions will be coordinated to implement the Strategy. The Executive should assume collective responsibility for the Strategy, ensuring that efforts to tackle poverty are implemented in a cohesive and systematic way rather than as isolated initiatives from individual Departments under the banner of poverty reduction.
- 3.8 The draft Strategy does not significantly reflect the recommendations of either the Expert Advisory Panel or the Anti-Poverty Strategy Co-Design group<sup>16</sup>.
- 3.9 We highlight the following recommendations of the Anti-Poverty Strategy co-design group, which was established to “advise DfC on the development and drafting of a new Anti-Poverty Strategy which is evidence-based and targeted to address objective need”, and which the Commission was a member:

*As a group we recognise the multi-dimensional nature of poverty and the intersectionality of poverty and other inequalities linked to age, disability, ethnicity, gender, race etc. We recommend that the Anti-Poverty Strategy clearly acknowledges that eradicating poverty requires addressing the intersectional realities of poverty, requiring measures that are mindful of the structural impacts of inequality which can disproportionately impact upon children, young people, women, deaf and disabled people, black and minority ethnic people, LGBTQI+ people, older people, people who live in insecure housing and/or are homeless, and those who live in rural and urban poverty. Development work undertaken by the*

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<sup>16</sup> We note the Committee on the Administration of Justice (CAJ) publication comparing the recommendations from the Co-Design group and the content of the draft Anti-Poverty Strategy - [CAJ \(2025\) Initial Comparator Paper– the draft Anti-Poverty Strategy for consultation 2025](#)

*Department for Communities (DfC) on disability and gender etc via the wider suite of social inclusion strategies and beyond, must further inform and shape the development of tailored and targeted responses to eradicating poverty and its impacts.*

- 3.10 We have consistently highlighted that Government actions to address poverty and social exclusion must positively impact across a range of equality groups. Section 75 equality screening data could be used to help shape Government plans, allowing the targeting of specific interventions and outcomes.
- 3.11 We would have expected further detail within the Strategy on specific and targeted measures to address poverty experienced across the Section 75 groups. Section 75 groups experience poverty differently and will require specific measures to effectively reduce and eliminate poverty. While noting the high-level ambitions within the Strategy for certain Section 75 groups, such as “We will take steps to ensure that Ethnicity will not increase a person’s risk of poverty”, there is little detail provided on what such steps will look like or commitment to resourcing.
- 3.12 Broadly, each Outcome highlighted within the Strategy, for example “Everyone has access to good quality, affordable and sustainable housing”, should be accompanied with specific, timebound, and resourced actions to address inequalities experienced by Section 75 groups. In the context of housing, that may be provision of disability related accommodation, resourcing affordable adaption services, ensuring housing needs of specific equality groups are provided for (e.g. Travellers), or initiatives to promote greater awareness of the rights, responsibilities and housing options relevant to minority ethnic groups.
- 3.13 The EQIA sets out some key data and evidence considered, however further consideration needs to be given to the needs and experiences of different groups within the Section 75 categories. For example, race/ethnicity is not a homogenous group. The needs and experiences of people from an ethnic minority background who were born or have resided in Northern Ireland for a longer period of time will be different to the needs and experiences of migrant workers who may face language barriers and lack of knowledge of services available,

or the needs and experiences of Irish Travellers, asylum seekers or refugees.

- 3.14 We highlight concern over the framing of the target outcome that “the benefits of a good family structure will be promoted”, given that such framing may increase the stigma experienced by lone parents, while also failing to acknowledge reasons for relationship breakdown such as violence and domestic abuse. While acknowledging challenges and interlinkages between relationship breakdown and poverty, any interventions and actions to address and support families in such circumstances should avoid language and framing that may stigmatise, and should be tailored to be in the best interests of the household and their particular circumstances.
- 3.15 While noting the Minister’s comments that an Action Plan will be developed to accompany the Strategy, the lack of detail, specific actions and measures, information on resourcing, targets, and the lack of timelines and progress milestones makes it difficult to assess the possible impacts of the Strategy, particularly for equality groups.
- 3.16 During a recent meeting with the Department, DfC officials referred to the Strategy being a ‘live’ document which will be amended over the 10 year period of the Strategy. We remind the Department that that Section 75 is a ‘continuing duty’ and that Section 75 equality scheme commitments will need to be applied, if any changes are made to the Anti-Poverty Strategy or associated action plans.
- 3.17 We note the NICS’ own guidance<sup>17</sup> on policy making that states: “At the strategic level, we ask ourselves what outcome we are seeking to achieve. What would that outcome be like to experience? What would its features be? We identify the measurable indicators we would look at to know that we are headed in the right direction.”
- 3.18 With a context of limited resources it is important to model the potential impact of proposed policies and provide estimated costs. This approach supports transparent decision-making,

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<sup>17</sup> For further details, see [NICS \(2023\) Making a Difference: The NICS guide to making policy that works](#)

identifying appropriate targets and priorities for the Strategy, and ensures that choices are guided by robust evidence.

- 3.19 We reiterate that The Department should satisfy itself that the final Strategy and/or action plans complies with the arrangements set out in its approved equality scheme.

## **4 Selected areas**

- 4.1 Specific actions could have been included in the Anti-poverty Strategy across a number of different areas. In addition to our general comments, which apply to all areas of policy-making, we have highlighted the following selected range of actions that we believe would reduce poverty if implemented.
- 4.2 These selected recommendations do not encompass the full range of actions the Commission has identified to address poverty, but rather serve as examples of the type of specific and targeted actions we would have hoped to see within the draft Anti-Poverty Strategy.

### ***Education***

- 4.3 Access to education and training is a key factor in determining an individual's life chances, playing a key role in a person's development and progression. It has significant benefits for those most at risk of underachievement and poverty and also has an important role in tackling disadvantage and in developing an understanding and respect for diversity.
- 4.4 We note the draft Strategy's goal of minimising the impact of poverty, and that "the costs of accessing and participating in education will be minimised, with particular consideration given to children from socio-economic disadvantaged families". While noting and broadly welcoming a number of actions highlighted within the draft Strategy, for example regarding affordable school uniforms and provision of free school meals, we are aware that work on many of these areas is already significantly progressed.
- 4.5 The Commission welcomed and responded to the Department of Education's consultation on eligibility criteria for Free School Meals and Uniform Grants, and the focus on seeking to address poverty and promote educational attainment and

healthy child development, as well as wider actions linked to poverty such as RAISE and work on SEN Reform<sup>18</sup>.

4.6 The Commission has developed a range of recommendations on addressing inequalities in education, relevant to the Anti-Poverty Strategy. This includes specific measures across different Section 75 groups. For example, we call for:

- Appropriate resourcing and actions to ensure that funding allocated to schools under the Common Funding Formula is used to support educational access and attainment of Newcomer, Traveller and Roma students. Consideration may be given to ringfencing this funding to ensure it is used for the purpose of supporting specific groups of students.
- Reform of SEN services that ensures the needs of different children with SEN are addressed. Children with SEN have different needs, challenges, experiences, and identities, and therefore require different and appropriate solutions. Specific and resourced support is needed for children with SEN who speak English as an additional language, as well as for Traveller children who experience disproportionately high levels of SEN.
- Ensuring that Childcare meets the specific needs of children from across the full range of equality groups through, for example, ensuring that disabled children have access to suitable facilities and trained staff, including appropriate access to specialists, such as speech therapists.
- A finalised and appropriately resourced new Traveller Education Strategy, given longstanding and unacceptable inequalities experienced by Traveller children and young people.
- Assistance for schools to make effective use of dual language resources to help Newcomer learners access the curriculum.
- Publication and delivery of a comprehensive Early Learning and Childcare Strategy.

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<sup>18</sup> For further details, see: <https://www.equalityni.org/SEN>

4.7 We continue to raise concern about the use of academic selection at eleven years old as a method for determining transfer to post-primary education. In this context we reiterate our overarching call to the Department to develop a system of post-primary transfer that enables all pupils to maximise their potential. Previous research on poverty in Northern Ireland has reported “strong evidence that selective systems of education, using examination methods such as the Transfer Test, have a negative impact upon the attainment of children from low-income backgrounds”<sup>19</sup>.

### ***Housing***

4.8 Housing is a basic human right and good quality, affordable housing in safe, sustainable communities is essential to ensuring health and well-being.

4.9 The Outcome within the draft Strategy that “Everyone has access to good quality, affordable and sustainable housing”, should be accompanied with specific, timebound, and resourced actions to address inequalities experienced by Section 75 groups. For example:

- Targets regarding the provision of disability related accommodation.
- Resourcing affordable adaption services.
- Targets and programmes to ensure housing needs of specific equality groups are provided for (e.g. Travellers).
- Initiatives to promote greater awareness of the rights, responsibilities and housing options relevant to minority ethnic groups.

4.10 We note there is little focus or specific actions regarding targeting homelessness. Everyone experiencing homelessness should be supported, and actions to address housing inequalities and homelessness must also meet the specific needs of different groups. For example, support is needed for single men and younger people who are most likely to present as homeless. Those who are single and under 35 are often only entitled to the lower shared accommodation rate within the

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<sup>19</sup> For further details, see: JRF (2016) [A Prosperous, poverty-free Northern Ireland](#), p. 9

housing element of Universal Credit. Due to the lack of one-bedroom properties, they are often placed in hostels or other temporary accommodation.

- 4.11 There is also an urgent need for available and suitable accommodation for older people. Three-quarters of those over 60 who present as homeless do so because their current accommodation is no longer suitable, often due to complex needs such as disability.

### ***Employment***

- 4.12 There is a complex relationship between poverty and employment, unemployment and economic inactivity. Over half of working-age adults in poverty in Northern Ireland live in working households. This means that having a job doesn't guarantee a route out of poverty, especially in sectors with low pay, insecure contracts, or part-time hours. Low-paid sectors like retail, hospitality, care, and agriculture dominate many local labour markets—especially in rural areas. Insecure jobs often lack career progression, pensions, and sick pay, all of which increase vulnerability to poverty.<sup>20</sup>
- 4.13 Unemployment and economic inactivity remain major drivers of poverty—especially for disabled people, carers, and those with health conditions. Those not in paid work are more likely to rely on social security, which has seen real-terms cuts over the past decade.
- 4.14 Economic inactivity in NI is higher than in the rest of the UK (approx. 26% vs UK average of 21% as of 2025), with many people not actively seeking work due to illness, disability, or caring responsibilities.<sup>21</sup>
- 4.15 In 2021, the employment rate for people with disabilities in NI was just 38%, while for those without disabilities it was 86%—a gap of 48 percentage points.<sup>22</sup>
- 4.16 We welcome the proposed actions in the draft anti-Poverty Strategy to develop and implement a Disability Employment Strategy and that people experiencing or at risk of poverty have

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<sup>20</sup> DFC (2023): [The Northern Ireland Poverty and Income Inequality Report 2021-22.](#)

<sup>21</sup> NISRA (2025): [Northern Ireland Labour Market Report March 2025.](#)

<sup>22</sup> NISRA (2024): [Disability employment gap in Northern Ireland 2021.](#)

access to free, quality-assured advice services, including on employment issues. This should be complemented with specific and resourced actions to address the persistent employment gap between people with and without disabilities, and address barriers experienced by lone parents, carers and women with dependants entering, progressing and remaining in employment.

- 4.17 We have consistently highlighted that action is required to eliminate occupational and industrial segregation; promote workplace equality, and encourage flexible working practices and sharing of family roles<sup>23</sup>. We highlighted that women are more often employed with atypical contracts, particularly part time working, as well as in low paid jobs.
- 4.18 The Commission has long-standing recommendations calling for Government to promptly implement a gender pay strategy<sup>24</sup> for Northern Ireland. We have called for a pay strategy and related action plan to address structural factors within society and the workplace which impact on employment equality.
- 4.19 A strategy should set out the actions that will be taken across government, public services and wider society to address these issues, and to ensure employers and others are supported to understand any pay reporting obligations, and related actions they can take to address any identified issues.
- 4.20 We welcomed<sup>25</sup> that the Department for Communities (DfC) is taking steps to advance the implementation of gender pay gap reporting, taking account of Section 19 of the Employment Act (Northern Ireland) 2016. Pay gap reporting will assist and support employers to identify where pay gaps may exist in their organisation and to develop action plans to address any issues identified.
- 4.21 Collating and publishing pay information will also inform the wider structural and/or employer specific actions required to address these gaps. By increasing transparency, it will also

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<sup>23</sup> For further details, see: [ECNI \(2016\) Gender Equality Priorities Paper](#)

<sup>24</sup> S19 (11) of the Employment Act (Northern Ireland) 2016 requires the publication of ‘a strategy including an action plan, on eliminating differences in the pay of male and female employees’.

<sup>25</sup> ECNI (2025) [Response to Consultation: Department for Communities: Gender Pay Gap Information Regulations](#)

make organisations more accountable for addressing pay inequalities in their workplaces.

- 4.22 However, we are concerned that DfC’s proposals do not give effect to the Pay Transparency Directive (PTD)<sup>26</sup>. The PTD includes, but is not limited to, provisions related to gender pay gap reporting.
- 4.23 We further note that the Mental Health Champion has raised concerns that the draft Anti-Poverty Strategy fails to include new or sufficiently funded welfare mitigations for those unable to participate in employment.<sup>27</sup>

### ***Social Protection and Welfare Reform***

- 4.24 As part of the Independent Mechanism for NI<sup>28</sup>, the Commission has repeatedly raised concerns about the adverse impact of welfare reform on disabled people and have also highlighted the ongoing need for mitigating measures to protect the most vulnerable in society from the adverse impact of welfare reform.<sup>29</sup>
- 4.25 While we welcome the commitments in the draft Anti-Poverty Strategy “to deliver a package of welfare mitigations, keeping the level of support under review as resources and evidence become available, whilst lobbying Westminster on reform as appropriate”, further detail regarding what this package will look like is required, ensuring that it supports people from across the equality groups.
- 4.26 In July 2025, we raised concerns regarding that the UK Government’s proposals and actions to advance measures that will in practice further erode disabled people’s rights to independent living and an adequate standard of living.<sup>30</sup>

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<sup>26</sup> Along with the NI Human Rights Commission (NIHRC), we have formed the view that, further to the dynamic alignment obligations arising out of Windsor Framework Article 2 in conjunction with WF Article 13 (3)2, the majority of the PTD must be transposed into NI law by 7 June 2026. For further information see ECNI and NIHRC (2024) [The EU Pay Transparency Directive: The UK Government’s dynamic alignment obligations relating to Windsor Framework Article 2](#)

<sup>27</sup> NI Mental Health Champion (2025): [Statement on the Draft Anti-Poverty Strategy](#).

<sup>28</sup> The Northern Ireland Human Rights Commission and Equality Commission for NI have a joint role as the Independent Mechanism for NI, which involves promoting, protecting and monitoring the implementation of the UN Convention on the Rights of Persons with Disabilities in Northern Ireland.

<sup>29</sup> ECNI: [Social Protection \(Welfare Reform\): Priorities and Recommendations](#).

<sup>30</sup> ECNI (2025): [Newly approved welfare reforms raise concerns](#).

- 4.27 An analysis by the social security information website Benefits and Work<sup>31</sup> estimates that a further 100,000 children and working age people with disabilities will be forced into poverty as a consequence by changes introduced by the Universal Credit and Personal Independence Payment Bill (2025).<sup>32</sup>
- 4.28 Such developments are especially troubling in the context that the United Nations Committee on the Rights of Persons with Disabilities recently highlighted the failure of the State to address grave and systematic violations of the human rights of persons with disabilities, and a failure to eliminate the root causes of inequality and discrimination.<sup>33</sup>
- 4.29 We have also consistently called for action to mitigate against the identified adverse impact of welfare reform proposals on women; improve access to social protection for certain groups of minority ethnic women; and protect women with smaller pension provision<sup>34</sup>.

## ***Health***

- 4.30 We have also consistently highlighted the deep and persistent links between poor health and poverty and welcome this acknowledgement in the draft Anti-Poverty Strategy.
- 4.31 Health and social care is fundamental to people's quality of life and general wellbeing. A number of factors can contribute to health inequalities including socio-economic and environmental circumstances; lifestyle and health behaviour; and access to effective health and social care.
- 4.32 We have highlighted the need to ensure investment in health care to address the specific needs of equality groups; for example, people with disabilities, including the sexual health and maternity needs of women with disabilities; as well as young people's mental health needs and to address the high suicide rates among men, Irish Travellers, and young people.
- 4.33 We have consistently called for the Department to identify and remove barriers to accessing health services, particularly those experienced across Section 75 groups. We have also called for

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<sup>31</sup> For further details, see: [Benefits and Work](#)

<sup>32</sup> See: Benefits & Work.co.uk | [Changes will still push 100,000 into poverty](#)

<sup>33</sup> ECNI (2024): [UN Committee publishes report on follow-up to 2016 Inquiry.](#)

<sup>34</sup> For further details, see: [ECNI \(2016\) Gender Equality Priorities Paper](#)

actions to address gendered health inequalities impacting on both men and women. Specific actions to address health inequalities experienced across the Section 75 groups should be included within the final Anti-Poverty Strategy.

### ***Budgets***

- 4.34 Addressing poverty in Northern Ireland will require significant financial resources. As such, the management of budgets will be important to consider across all Departments.
- 4.35 In setting the annual NI Budget, the NI Executive and NI Assembly should consider how to best support the implementation of the Anti-Poverty Strategy.
- 4.36 Regarding the management of budgets by Departments, we reiterate that duties under Section 75 will apply to the consequential spending plans and budgetary decisions that they may make in order to perform their statutory functions, including any functions that are allocated to them under the Anti-Poverty Strategy.
- 4.37 Budgets should be used to advance equality of opportunity across the full range of equality categories, including addressing the impacts of poverty across the Section 75 groups. In the preparation of budget proposals, Departments and other public authorities should ensure that they are fulfilling their statutory equality and good relations duties. This includes decisions on resourcing the Anti-Poverty Strategy, and the different actions outlined within it.
- 4.38 Given the cross-Departmental nature of the Anti-Poverty Strategy, commitment should be made that Departments, in allocating their budgets, do so in a manner cognisant of their commitments within the Strategy. As previously noted, there is a risk that actions taken by individual Departments under the Strategy may lack coordination. It is important that Departments recognise their shared responsibility to address poverty and that budgets are strategically aligned and, where appropriate, ringfenced to support coordinated actions aimed at reducing poverty.

- 4.39 Further advice for public authorities on complying with Section 75 when managing their budgets is available at [Equality Commission: Budgets and Section 75 - A Short Guide](#)

## **5 Article 2 of the Windsor Framework**

- 5.1 The Equality Commission, and the Northern Ireland Human Rights Commission (NIHRC), are mandated in accordance with Article 2(1) of the Windsor Framework,<sup>35</sup> formerly known as the Protocol on Ireland/Northern Ireland of the UK-EU Withdrawal Agreement<sup>36</sup> to oversee the UK Government's commitment to rights and equality in Northern Ireland (NI) after UK Withdrawal from the EU. The Commissions can exercise these functions separately or jointly.<sup>37</sup>
- 5.2 The EU (Withdrawal Agreement) Act 2020<sup>38</sup> empowers the Commissions, to monitor, advise, report on, promote, and enforce the implementation of Article 2(1) of the Windsor Framework to the UK-EU Withdrawal Agreement.
- 5.3 The UK Government has committed under Windsor Framework Article 2 to ensuring there is no diminution of rights, safeguards and equality of opportunity as set out in the relevant part of the Belfast (Good Friday) Agreement as a result of Brexit. There is also a commitment to ensuring that certain equality laws in Northern Ireland will keep pace with any future changes the EU

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<sup>35</sup> Decision No 1/2023 of the Joint Committee established by the Agreement on the Withdrawal of the United Kingdom of Great Britain and Northern Ireland from the European Union and the European Atomic Energy Community of 24 March 2023 laying down arrangements relating to the Windsor Framework; Joint Declaration No 1/2023 of the European Union and the United Kingdom in the Joint Committee established by the Agreement on the Withdrawal of the United Kingdom of Great Britain and Northern Ireland from the European Union and the European Atomic Energy Community of 24 March 2023.

<sup>36</sup> Agreement on the Withdrawal of the United Kingdom of Great Britain and Northern Ireland from the European Union and the European Atomic Energy Community, 24 January 2020.

<sup>37</sup> Section 78E, Northern Ireland Act 1998. The EU (Withdrawal Agreement) Act 2020 amended the Northern Ireland Act 1998 to empower the NIHRC and ECNI with functions to monitor, advise, report on, promote, and enforce the implementation of Windsor Framework Article 2 (Sections 78A-78E, Northern Ireland Act 1998). These new powers took effect from 1 January 2021. In July 2020, the Commissions were provided with additional funds to undertake their respective roles as part of the dedicated mechanism.

<sup>38</sup> [European Union \(Withdrawal Agreement\) Act 2020](#).

may make to amend or replace the EU equality laws, set out in Annex 1 to the Windsor Framework<sup>39,40</sup>

- 5.4 In addition to the ‘keeping pace’ commitment of the EU laws set out in Annex 1, the UK Government and NI Executive must consider case law of the Court of Justice of the European Union in the application and interpretation of the rights and safeguards in Windsor Framework, particularly as regards the rights underpinned by the Annex 1 equality directives.<sup>41</sup>
- 5.5 It should be noted that neither the Northern Ireland Assembly, nor the Northern Ireland Executive, can act in a way that is incompatible with the UK Government’s commitment. If they do, those actions can be challenged in courts, by way of judicial review proceedings<sup>42</sup>.
- 5.6 The Commission, together with the NIHRC, has been given additional powers and responsibilities, as the ‘dedicated mechanism’, to ensure that the UK Government’s commitment under Windsor Framework Article 2 is met.<sup>43</sup>
- 5.7 The Commission, both jointly with and separately from NIHRC, has powers to bring a legal action in its own name (own motion power) in relation to breach (or potential future breach) of Article 2 Windsor Framework or intervene in other legal action that engages Article 2 Windsor Framework. The Commissions

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<sup>39</sup> Windsor Framework Annex 1 Directives: [Gender Goods and Services Directive \(Gender\)](#): Directive 2004/113/EC of 13 December 2004; [Recast Directive \(Gender\)](#): Directive 2006/54/EC of the European Parliament and of the Council of 5 July 2006; [Race Equality Directive \(Race\)](#): Directive 2000/43/EC of 29 June 2000; [Framework Directive \(religion and belief; age; sexual orientation; and disability\)](#): Directive 2000/78/EC of 27 November 2000; [Equal Treatment Directive: Self-employment \(Gender\)](#): Directive 2010/41/EU of the European Parliament and of the Council of 7 July 2010; [Equal Treatment Directive: Social security \(Gender\)](#): Directive 79/7/EEC of 19 December 1978.

<sup>40</sup> In addition, UK courts when considering the interpretation of any of the equality directives listed in Annex 1, including the Gender Directives, must do so in conformity with any relevant case law of the Court of Justice of the EU (CJEU). UK Government, [Explainer Document](#): UK Government commitment to “no diminution of rights, safeguards and equality of opportunity” in Northern Ireland, 7 August 2020.

<sup>41</sup> Article 13(3), Windsor Framework.

<sup>42</sup> Section 6 (2)(ca) of the Northern Ireland Act 1998<sup>42</sup> as amended by Schedule 3 to the European Union (Withdrawal Agreement) Act 2020<sup>42</sup>, makes clear that legislation created by the Northern Ireland Assembly in contradiction to the Article 2 obligations would be outside its legislative competence

<sup>43</sup> Schedule 3 of the European Union (Withdrawal Agreement) Act 2020 amended the Northern Ireland Act 1998 to confer these additional powers on the Commissions – to monitor, advise, report on and enforce the UK Government’s adherence to its commitment in Article 2 Protocol. More information on our role can be found in our publication ‘A Short Guide: Equality and Human Rights after Brexit: The UK Government’s commitment under the Ireland/Northern Ireland Protocol Article 2(1) of the Protocol’.

can also assist persons in legal proceedings in respect of a breach (or potential future breach) of Article 2 Windsor Framework.<sup>44</sup>

### ***Recommendation for draft NI Anti-Poverty Strategy***

- 5.8 We recommend that Department for Communities conducts an Impact Assessment and ensures that the strategy and any policy, legislative developments and/or law reform progressed under this strategy do not reduce equality and human rights, in a manner that is contrary to the UK Government commitment under Windsor Framework Article 2.
- 5.9 In producing its Impact Assessment for the draft Anti-Poverty Strategy, we recommend that the Department for Communities should consider all provisions of EU law engaged under the Windsor Framework Article 2 relevant to the legislation or policy being assessed, including EU law which underpins relevant ECHR rights.
- 5.10 We consider that carrying out a WF Article 2 impact assessment, incorporating Equality Commission guidance and advice, would be helpful in embedding Article 2 Windsor Framework considerations into the new Anti-Poverty Strategy. We also note that the Executive Office has produced guidance and training on the assessment of Article 2 considerations.

## **6 Data and Monitoring**

- 6.1 We welcome the commitment in the draft Strategy to create a Anti-Poverty Strategy Board, given the need for collaborative and joined-up working across different Government Departments.
- 6.2 We strongly advocate for the inclusion of wider expertise and engagement with a range of stakeholders throughout the implementation, delivery, and monitoring of the Strategy.
- 6.3 We note with concern, the lack of detail or hard commitment, regarding including people with lived experience in proposed Governance structures. We note that “Consideration will also be given to how best to involve those with lived experience of

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<sup>44</sup> Sections 78C - 78D of the Northern Ireland Act 1998.

Poverty and supporting organisations” and emphasise this should be amended to include a firm commitment with further detail on how this will be achieved within the final Strategy.

- 6.4 We welcome the commitment to monitor across various indicators of poverty (e.g. number living in poverty, healthy life expectancy, housing stress etc.) and the commitment that the Department will report annually on the progress of each indicator. We emphasise the importance of ensuring data is disaggregated across Section 75 grounds to be able to assess the impact of the Strategy across the equality groups.
- 6.5 Some data gaps have been identified within the EQIA, for example in relation to sexual orientation. The Stage 6 EQIA report should set out within the Section 75 monitoring arrangements section how any gaps in data will be addressed so that evidence and data is available when the Strategy is next reviewed.
- 6.6 We also welcome the commitment that a “formal mid-point review of the Anti-Poverty Strategy will be carried out by the Department for Communities and other Executive departments during its fifth year of operation”, and that the review will be published. The Department should also commit, within the final Strategy, to ensuring this review engages widely with various experts, stakeholders, statutory bodies, and those with lived experience.
- 6.7 We note there is reference in the EQIA to a formal mid-point review of the Strategy at five years. The Department will be aware that equality scheme commitments also require a review of the EQIA Section 75 monitoring after 2 years, reporting on this, and reviewing the policy/strategy if any adverse impacts are greater than anticipated.
- 6.8 We further note that arrangements set out in the Section 75 monitoring section of the EQIA appear to be generic monitoring of the overall impact of the Strategy. The Department should set out arrangements that will be put in place to assess the actual impact of the Strategy once implemented across the Section 75 groups<sup>45</sup>.

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<sup>45</sup> Further advice relating to establishing appropriate Section 75 monitoring arrangements is available here: [S75 Monitoring guidance](#), [Addendum to S75 monitoring guidance](#).

## 7 Recommendations for Government Strategies

7.1 The Commission has a number of cross-cutting recommendations that it considers important to see implemented across all Government strategies, programmes and plans, including the Anti-Poverty Strategy.

- Ensure specific actions and targets to advance equality and good relations.
- Provide leadership in promoting positive attitudes and challenging stereotypes and discrimination across the equality grounds.
- Mainstream collaborative approaches across Departments and with stakeholders to improve the design, delivery and review of legislation and public policy.
- Include outcome targets that are specific, measurable, resourced, and time-bound to ensure effective and timely delivery.
- Ensure that outcomes measures are not only tracked in aggregate, but also for impact across the equality grounds.
- Ensure resources are adequately allocated, so that priority actions tackle inequalities, and so that stakeholder organisations and the Equality Commission can better support individuals, organisations, and government.

7.2 The Government should ensure alignment between the Anti-Poverty Strategy and related strategies across various areas, for example the social inclusion strategies, and strategies in education and housing.

## 8 Further Information

8.1 Further information on the Commission's policy positions and recommendations on addressing poverty can be found at: [Summary of policy positions relating to poverty and socio-economic disadvantage](#)

8.2 Please contact our Public Policy team for further detail on the specific recommendations for different equality groups and across different areas.

**Equality Commission for Northern Ireland**

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