



CONSULTATION RESPONSE

Submitted: September 2025 | Contact: shannon.barber@nea.org.uk

NI Executive's Draft Anti-Poverty Strategy Public Consultation

About National Energy Action

National Energy Action (NEA), is the national fuel poverty charity, working across England, Wales and Northern Ireland, to improve the lives of people in fuel poverty. We support people with energy and income maximisation advice, and we advocate on issues such as the current energy crisis and the need to improve the energy efficiency of our homes.

We do not work alone. Partnerships and collaboration have been at our heart for over 40 years, helping us drive better health and wellbeing outcomes.

In Northern Ireland, we chair the [Fuel Poverty Coalition NI](#) and act as the secretariat to the [All-Party Group on Fuel Poverty](#). We advocate for policy and regulatory reforms to protect the most vulnerable, and we deliver accredited training to improve standards in energy advice.

Through the [Belfast Warm and Well Project](#), we provide advice and practical support to local people struggling to keep their homes warm.



Overall Assessment of the Draft Strategy

NEA NI believes this draft Anti-Poverty Strategy is not fit for purpose, as it fails to outline the necessary steps to meaningfully address poverty in Northern Ireland. While we fully support the vision to eradicate poverty, this document does not provide a clear pathway to achieve it.

NI requires the *right* Anti-Poverty Strategy, not just a strategy. We urge the Department for Communities and wider Executive to re-write this draft strategy and to do so at pace, drawing on the evidence-based policy recommendations produced by the [Expert Advisory Panel](#) (2020) and the [Anti-Poverty Strategy Group](#) (updated August 2025). We attach these to our response.

Furthermore, the strategy must coordinate with the forthcoming Fuel Poverty Strategy, to realise the shared vision of eradicating poverty in all its forms across NI.

Alongside over 75 community organisations, faith leaders, trade unions, and academics, NEA NI has signed an [open letter](#), coordinated by the NI Anti-Poverty Network (NIAPN), expressing disappointment that the draft does not meet the criteria of a reasonable strategy¹. It fails to fulfil what oversight bodies, including the NI Audit Office and Public Accounts Committee, outline as basic elements of any strategy, including clearly defined indicators and targets. The letter calls on the NI Executive to withdraw support for the draft and meaningfully engage with the huge volume of research already produced, including those from the Expert Advisory Panel and the Anti-Poverty Strategy Group (APSG).

Although the draft strategy acknowledges that *“few issues... are as important as addressing poverty”* (p. 8), its delay and lack of detail show that tackling poverty is not being prioritised by the Executive. Nearly two decades after the St Andrews Agreement created a legal duty for the Executive to produce a strategy to tackle poverty, social exclusion, and patterns of deprivation based on objective need, this draft is a missed opportunity. Instead of setting out a pathway to eradication, it reads as a collection of existing departmental commitments or programmes, and a broad summary of some of the causes and impacts of poverty here. It lacks the ambition, detail, and urgency required for real progress. Even the draft itself admits it offers only a *“high-level approach”* to each pillar (p. 13). The people of Northern Ireland deserve more than an aspirational overview - they deserve a credible, resourced plan of action.

The absence of detail and any action plan hinders meaningful consultation on this draft. NEA NI's response therefore remains high-level, with emphasis on fuel

¹ Northern Ireland Anti-Poverty Network, (2025). [‘Open Letter to the Executive: The draft Anti-Poverty Strategy is not fit for purpose’](#).



poverty, in line with our role as NI's leading fuel poverty charity. We endorse the APSG's updated Position Paper, to which we contributed recommendations (APSG, pp. 96–97), and strongly urge the Executive to use this as the basis for a fit-for-purpose Anti-Poverty Strategy.

Framework and Principles for an effective Anti-Poverty Strategy

The attached recommendations of the Expert Advisory Panel and the APSG, provide an evidence-based suite of proposals and framework for an effective Anti-Poverty Strategy, including a life-cycle approach.

We agree with NIAPN's assessment that *"The framework of this draft strategy is individualistic and not systemic. The three pillars do not reflect the lived experience of poverty. The Expert Advisory Panel and the Anti-Poverty Strategy Group (APSG) provided recommendations based on what the evidence shows has worked to reduce poverty. Nowhere is there any evidence that the "three pillar approach" the department has taken will work."*²

The following principles, which are set out by the APSG, are important for an effective Anti-Poverty Strategy:

- *"An overarching, comprehensive Anti-Poverty Strategy based on objective need which is evidence based and takes a rights-based approach.*
- *The strategy should have clear, time-bound targets and build upon the detailed work that has been carried out to date in order to ensure expedient delivery and implementation of actions.*
- *The vision for an Anti-Poverty Strategy for Northern Ireland should be the eradication of poverty. It is unacceptable that one person lives in poverty, or that one child grows up in poverty, so anything less than the goal of eradication will be unacceptable.*
- *A lifecycle approach, with additional themes of place-based interventions, and [that] address[es] cross-cutting issues, such as housing, employment inclusion and access to services.*
- *The Strategy should be fully resourced.*
- *Cross-departmental responsibility, delivery and accountability should be a key feature of the strategy. The Strategy should cover and interconnect Executive policy on addressing poverty. Cross-sectoral development and implementation.*

² Northern Ireland Anti-Poverty Network, (2025). ['Response to the draft Anti-Poverty Strategy'](#).



- *Incorporate the experience and expertise of people with lived experience. Understanding the lived experience of poverty through an intersectional lens is critical to designing effective, inclusive responses to poverty.”*

We urge the NI Executive to produce an Anti-Poverty Strategy that commits to the six high-level outcomes set out in the APSG paper:

- **Outcome 1** - The creation of an Anti-Poverty Act which will ensure that the rights of people experiencing or at risk of poverty are promoted, protected, and realised.
- **Outcome 2** - Working towards eradication by 2045, child poverty will be reduced by half over the lifetime of this Strategy.
- **Outcome 3** - No working age person shall live in poverty, regardless of whether they are in work, seeking work or unable to work. All those of working age will have sufficient income to participate fully in society and can access services and pathways to sustained and meaningful employment.
- **Outcome 4** - Working towards eradication by 2045, poverty among older people will be reduced by half over the lifetime of this Strategy. Older people experiencing or at risk of poverty will have adequate income and support in relation to their economic, physical, and mental wellbeing to ensure their equal participation in society.
- **Outcome 5** - We have attractive, safe, accessible, welcoming, and sustainable environments in the most deprived areas.
- **Outcome 6** - All people experiencing or at risk of poverty have equal access to high quality public services that meet their needs in a timely manner and are based on dignity, fairness, and respect.

Eradicating Fuel Poverty – Coordination between an Anti-Poverty Strategy and the forthcoming Fuel Poverty Strategy

Fuel poverty is both a driver and a consequence of wider poverty in Northern Ireland. It deepens financial hardship, worsens health inequalities, and contributes to social exclusion. Coordination between an Anti-Poverty Strategy and the forthcoming Fuel Poverty Strategy is therefore crucial. Policy coherence across strategies is vital if meaningful outcomes are to be achieved and if NI is to contribute to the Sustainable Development Goal 1: ending poverty in all its forms everywhere.



Official estimates suggest that 27% of NI households were in fuel poverty in 2022, based on modelling from the 2016 House Condition Survey. However, LucidTalk polling in September 2024, commissioned by NEA NI, found that 40% of households were spending at least 10% of their income on energy - meeting the definition of fuel poverty. This demonstrates the scale of the fuel poverty crisis and the urgent need for a coordinated response.

Section 6D (APSG, pp. 96-97) in APSG's Position Paper, calls for the eradication of fuel poverty. This section draws on NEA NI commissioned polling and sets out some of our key policy recommendations, including the development of a new Fuel Poverty Strategy for NI, the introduction of an energy social tariff, ensuring a Just Transition, and improving domestic energy efficiency.

NEA NI welcomes the inclusion in the draft Anti-Poverty Strategy of the Department for Communities' commitments to develop and deliver a Fuel Poverty Strategy and to design and deliver a new Fuel Poverty Energy Efficiency Scheme – Warm, Healthy Homes (p. 23). We also support the outcome that everyone should have access to good quality, affordable, and sustainable housing. These are commitments that we have long campaigned for, and we have engaged extensively in their development, including through the consultation on its draft earlier this year and as members of DfC's Fuel Poverty and Just Transition Reference Panel.

However, fuel poverty is only briefly mentioned in this draft Anti-Poverty Strategy. There is no detail on how progress will be measured or how departments will coordinate to deliver housing and energy outcomes. Disappointingly, the draft Fuel Poverty Strategy itself did not contain specific, measurable targets - in particular the absence of a statutory fuel poverty reduction target. NEA NI's [consultation response](#) called for the finalised strategy to be backed by comprehensive funding and a detailed action plan for effective implementation. This remains our position, and we urge the Executive to deliver on these priorities.

To effectively tackle fuel poverty in Northern Ireland, NEA NI recommends the following priority actions:

- Deliver a new, sufficiently resourced **Fuel Poverty Strategy for Northern Ireland**, supported by a comprehensive cross-departmental action plan.
- Establish a **statutory fuel poverty target** and introduce **minimum energy efficiency standards**, especially within the private rented sector.
- Utilise additional Barnett consequential funding from the UK Government's £13.2bn **Warm Homes Plan** to tackle fuel poverty in NI.



- Introduce an **energy social tariff** to provide discounted, targeted energy bill support to low-income and vulnerable households.
- Support a Just Transition by significantly **increasing investment in domestic energy efficiency**, including greater grant support for low-income and vulnerable households.

Action Plans and Delivery

The absence of an action plan is a fundamental weakness of this draft. The NI Audit Office's report on the Northern Ireland Child Poverty Strategy (2016–2022) stated clearly that an Anti-Poverty Strategy *"should include an action plan containing clearly defined indicators and targets aimed at quantifying and reducing poverty"* (APSG, p.13). It is not good enough for this draft to say a Programme for Delivery and action plans are coming (p.16). They should have accompanied the draft strategy itself and should be subject to public consultation.

Equally concerning is that many of the commitments in the draft strategy are simply reiterations of existing departmental programmes. Experience has shown these are not sufficient. For example, child poverty in NI increased from 18% in 2021–22 to 25% in 2023–24³. As the APSG Position Paper notes, *"the Anti-Poverty Strategy must prioritise new, targeted actions - backed by the necessary resources - to achieve meaningful progress. Relying solely on existing initiatives risks entrenching the status quo, offering continuity without delivering real change"* (APSG, p. 14).

Resourcing and the Cost of Inaction

We note the references in the draft strategy to fiscal constraints and the apparent limits they place on early delivery. However, the cost of inaction is far greater. Research by Trussell estimates that poverty costs NI between £825 million to £1 billion annually in additional public spending. It also estimates that public finances and the economy could benefit by £2 billion each year if people were protected from hunger and hardship.⁴

³ Department for Communities, (2025). ['Northern Ireland Poverty and Income Inequality report 2023-24'](#).

⁴ Trussell, (2025). ['The Cost of Hunger and Hardship: Headline findings for Northern Ireland'](#).



This evidence shows that failing to act is far more expensive than investing in the eradication of poverty. Tackling poverty is not only a moral imperative; it is fiscally responsible.

Governance and Accountability

While it is important that the Department for Communities acts as the lead department, ownership and delivery must not rest with it alone. This must be an all-of-Executive strategy with cross-departmental responsibility.

NEA NI believes that an independent Anti-Poverty Commission should be created to monitor and promote the eradication of poverty and income inequality.

Furthermore, people with lived experience of poverty must be at the centre of the development, implementation and continued assessment of the Anti-Poverty Strategy.

Conclusion

Alongside many others, NEA NI remains committed to working constructively with the NI Executive to eradicate poverty in NI. A critical step in this process is the development of an Anti-Poverty Strategy that is robust and fit for purpose.

We welcome the vision to eradicate poverty, but in its current form the draft Anti-Poverty Strategy falls short of what is required. It lacks detail, ambition, measurable targets, timeframes, and allocated resource to drive real change.

We therefore call on the Executive to withdraw this version and revisit the recommendations of the Expert Advisory Panel and the APSG, using them as the foundation for a robust, evidence-based Anti-Poverty Strategy. It should coordinate with the new Fuel Poverty Strategy, in order to realise the shared vision of eradicating poverty in all its forms across NI.