

1.0 Introduction

Belfast City Council (“the Council”), welcomes the opportunity to respond to the DfC consultation on the draft Anti-Poverty Strategy for Northern Ireland. The emerging draft strategy presents an opportunity to reset this critical agenda and to introduce a new urgent focus to continue to bear down on a problem which too many low-income households and vulnerable groups continue to suffer from. Poverty is a significant factor contributing to the cost-of-living crisis in Belfast, which impacts on health, wellbeing, education, social mobility, and community cohesion.

The response is set out in two parts; the first is an overview of the key strategic and cross-cutting issues which the Council would recommend be considered when finalising the Strategy. The second part sets out detailed comments in respect of the specific questions posed.

(i) A time of challenge but also opportunity

The Council believes that the draft Anti-Poverty Strategy is presented at a time of both significant challenges faced by many households but also opportunity for all partners to come together to develop new integrated and sustainable approaches to supporting most vulnerable in our society.

There is little doubt that the scale and complexity of challenges, with a dangerous combination of rising living costs, stagnant wages, insecure employment, and inadequate access to essential services, could create the perfect storm and push many households further into poverty. These pressures come at a time when many household budgets are already stretched thin, exacerbated by factors such as the two-child limit on benefits, long health service waiting times, and barriers for groups like ethnic minorities, asylum seekers with no recourse to public funds, disabled people, informal carers, and single mothers.

As part of the recent refresh of the Belfast Agenda (City’s Community Plan), a key and immediate area of concern emerging from key stakeholder groups, community and voluntary sector representatives, citizens, communities of interest and elected Members, was the growing poverty crisis facing the city and communities. There was a strong call to action for community planning partners to work with NICS Departments to move quickly to bring forward immediate and integrated measures to support vulnerable people alongside helping inform the development of long-term and sustainable approaches and underpinning strategies, policies and programmes.

Living in poverty can severely affect a person’s life in a wide range of ways, on physical and mental health, household finances, the economy and ultimately on people’s quality of life. While we understand and embrace the fact that its causes are complex and its consequences are multiple, there is an opportunity through community planning to create the environment and bring the key stakeholders together to develop achievable actions. Whilst immediate and practical interventions and support can be brought forward to help mitigate the effects of poverty, we would commend that a broader and integrated programme and longer-term policy levers are required to seek to eradicate poverty within Belfast and the wider region.

The Council supports the overall vision of eradicating poverty sustainably and commends the recognition that this can only be achieved through collaboration with agencies, partners, and communities most affected. This aligns broadly with our Inclusive Growth agenda and actions over the last five years to foster a more compassionate city.

However, the strategy lacks specificity on how the vision will be achieved, reiterating existing policy commitments without clear time-bound poverty reduction targets or bespoke interventions. The absence of an associated action plan with deliverables, timelines, and a robust performance

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management framework undermines its potential effectiveness, as it prevents assessing the impact of actions or making evidence-informed decisions to best support those in poverty.

As you will appreciate, a number of city partners including elected members and community sector representatives have raised significant concerns in relation to the adverse impact that poverty is having on communities and vulnerable people and families across the city. Despite the hard work of many agencies and organisations, the impact of poverty is intensifying within Belfast and wider region. Households and vulnerable individuals are experiencing the perfect storm. Growing pressures on household incomes and unprecedented increases in the price of essential goods including food, gas and electricity is adversely impacting upon those most in need and widening existing inequalities. Many families are having to make difficult choices as it becomes impossible to meet basic needs of their families, in particular, children.

The Council recommends embedding specific measurable targets, assigning departmental responsibilities, and ensuring multi-year budget commitments. For example, other regions like Scotland have seen success by prioritising child poverty with specific measures, such as the Scottish Child Payment and mitigating the two-child limit, backed by measurable targets (e.g., reduce child poverty by x% by 2030). Consideration should also be given to a dynamic analysis of poverty types (e.g., persistent poverty, destitution) and key risk factors, informed by research such as the Joseph Rowntree Foundation's UK Poverty 2025 report, focusing on higher-risk groups like families with children, minority ethnic groups, disabled people, and those facing in-work poverty. Adopting a “poverty mainstreaming” approach with an intersectional equality lens would help identify targeted actions, assess cost-effectiveness, and align local and regional efforts for better outcomes.

(ii) Enhancing collaboration and accountability

By challenging traditional silos, the draft strategy provides a platform for a ‘whole system approach’, strengthening ties between regional and local government to facilitate joint sustainable support. The Council is fully committed to working with the NI Executive, the voluntary and community sector, and those with lived experience to co-design and deliver programmes achieving the strategy’s ambitions.

To ensure delivery, both tiers of government must partner on policy and frameworks addressing entrenched issues. We highlight past collaborations with the Department and community partners to secure funding for poverty-impacted groups, demonstrating the impact of joint efforts.

However, we recommend structured formal delivery partnerships between Executive Departments and the Council, given Belfast’s high deprivation levels, alongside ring-fenced, multi-year funding for agreed interventions.

The Council believe that strengthening the relationship between central and local government and adopting a cross-government and multi-agency approach to supporting those in poverty is what is needed. We would encourage that consideration is given to how we can work together to co-design a transformative, placed-based, prevented and integrated approach to supporting people who are impacted by poverty. The intent would be to test, adopt and scale which would be aligned with NICS transformation and service reform ambitions as set out in the programme for government.

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Whilst acknowledging the intention to convene an Anti-Poverty Strategy Board and sub-committees, we suggest establishing an independent Poverty and Inequality Commission for long-term scrutiny, similar to models in other UK regions and as recommended by the Anti-Poverty Expert Advisory Panel. Strengthening commitments to involve those with lived experience—through approaches like Scotland's Experience Panels—would ensure dignity, inclusion, and respect underpin development, informing policy, branding, and language.

(iii) Utilising new technologies and promoting inclusive innovation

The Council would encourage that consideration be given to how emerging technologies can be used to better understand and seek to address the challenges impacting those in poverty or marginalised groups in society. It can help understand the multi-dimensional nature of poverty, bringing together sectors and partners to develop and bring forward new technology and digital solutions to address poverty and reduce inequalities.

The Council would refer to the work being taken forward through Smart Belfast, a key initiative for Belfast's urban innovation, which aims to address poverty and reduce inequalities through technology and digital solutions. The initiative focuses on inclusive growth, ensuring that the benefits of technological advancements and economic development are shared across all communities, including those most vulnerable to poverty

Our focus on creating and supporting the conditions for inclusive innovation within the city has shown the importance of involving communities, marginalised groups and those with lived experiences in the innovation process and tailoring solutions to their specific needs. We believe inclusive innovation provides an opportunity to understand and address the root causes of poverty and create more equitable opportunities. At a local level, this strong bottom-up approach focuses on increasing the beneficiaries' own agency and capability rather than passively relying on others to act on their behalf.

The Council would highlight the following key aspects of inclusive innovation and its role in poverty reduction:

- **Participation and co-creation:** emphasises the active involvement of those experiencing poverty in the design and development of solutions. This ensures that innovations are relevant, accessible, and address the specific challenges faced by marginalized communities.
- **Addressing structural barriers:** acknowledges and actively works to dismantle the systemic barriers that prevent certain groups from participating in and benefiting from innovation. This includes addressing issues like lack of access to education, healthcare, financial services, and technology.
- **Focus on local needs and contexts:** recognises that solutions must be adapted to the specific needs and contexts of the communities they are intended to serve. This may involve adapting existing technologies or developing entirely new approaches that are relevant to local conditions.
- **Sustainable and scalable solutions:** creating solutions that are not only effective in the short term but also sustainable and scalable over the long term. This requires careful consideration of financial viability, social impact, and environmental sustainability.

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Smart Belfast emphasizes collaboration with citizens, stakeholders, and different council departments to identify challenges, develop solutions, and ensure that the initiative effectively addresses the needs of those experiencing poverty.

By focusing on inclusive growth, addressing digital exclusion, and fostering collaboration, Smart Belfast is working to leverage technology and innovation to improve the lives of all residents, including those most vulnerable to poverty.

(iv) Adopting a whole-system approach

In responding, the Council would highlight the need for a whole-system approach to be brought forward to support people in poverty across the region with a focus on new innovative technologies and financial models to support this. It is important that the NI Executive ensures that related policies, strategies and schemes recently consulted upon (e.g. draft Fuel Poverty Strategy) and are brought forward and aligned within any finalised Northern Ireland Anti-Poverty Strategy.

The Council would highlight the collaboration which has taken place with DfC, and the role of Council working closely with community partners to get significant funding (in excess of £3million over last three years) to support those impacted by poverty across the city.

We look forward to continuing to work closely with DfC colleagues to identify opportunities to bring forward prototype delivery models and test and learn demonstrator initiatives which can be scaled up across the region. This would include bringing forward immediate and practical support initiatives, alongside co-designing an integrated and longer-term strategy to help alleviate all aspects of poverty being experienced across the city and wider region.

(v) Refining pillars, outcomes, and protections

The three-pillar structure (Minimising Risks, Minimising Impacts, Exiting Poverty) provides a logical framework mirroring good practice in prevention, support, and exit strategies. We agree the pillars and outcomes are broadly appropriate, with strong recognition of disabilities, health inequalities, and community-specific challenges, applicable to Section 75 groups. However, Pillars 2 and 3 appear similar at a high level; re-wording could clarify distinctions.

Many listed programmes are existing, not new, and without resourcing details, targets, or evaluation frameworks, assessing impact is challenging. We recommend detailed action plans with SMART targets and clear responsibilities to avoid duplication.

Suggestions include:

- Adding a fourth pillar on prevention/eradication for long-term cost-effectiveness.
- Including outcomes for the working poor, carers, children in care, dual diagnosis services (mental health/substance use), transport poverty, access to green space/air quality, and civic engagement/voice.
- Move health outcomes to Pillar 1 as a preventative factor.
- For ethnicity, clarify steps to reduce risks beyond language barriers.
- Re-word family structure benefits to specify disadvantage definitions.
- Given our inclusive growth commitment, we urge strong engagement with vulnerable groups, robust protections, and empowerment via local networks.

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- Support approaches involving people in decision-making for better cohesion and resource allocation.
- Align initiatives like the Good Jobs Charter with our Belfast Business Promise for synergies, and include priority groups in social value procurement.
- Actions must integrate with other strategies (e.g., Disability Strategy, People & Place Strategy) for aligned delivery and monitoring.
- Research on the two-child limit should include sub-regional analysis.
- Co-design actions with lived experience to address barriers, especially for women, carers, ethnic minorities, disabled people, and those with no recourse to public funds.

(iv) Strengthening monitoring, indicators, and impact assessment

Council agrees in principle with proposed indicators aligning to the Programme for Government, but further detail on priorities and commitments is needed for appropriate measures. We welcome future indicator development and urge engagement with councils, JRF, and others to include destitution, deep poverty, and qualitative insights for real-life impact tracking.

We would suggest that you disaggregate indicators by Section 75 groups and geography (as low-level as possible) to understand variations and target interventions, aligning with local community/development plans. Emphasise household incomes, affordability (childcare, transport, housing), and access rates (e.g., rehabilitation for substance issues, long-term health outcomes).

More detail is required in the impact statement to identify mitigations, especially for minority ethnic groups. Regular monitoring/review is essential, with socio-economic duty considerations like those in Scotland/England, or poverty proofing via commissions.

The introduction of any new duties impacting on local government would need to be consulted on and budget defined so as to have no financial impact to ratepayers.

Detailed response to questions set out in consultation.

Vision

The overall vision of the draft Anti-Poverty Strategy is "Working together, poverty and its impacts will be effectively and sustainably eradicated across our communities".

*To what extent do you agree or disagree with the vision included in the draft Anti-Poverty Strategy? (**Please highlight your answer**)*

AGREE

Please tell us why.

- The Council welcomes the publication of the NI Executive's Anti-Poverty Strategy and the commitment to a consultation period. Belfast City Council supports the vision of eradicating poverty sustainably and commends the recognition that poverty can only be tackled effectively by working in collaboration with many agencies, partners and importantly the communities who are affected the most. This vision broadly aligns with our Inclusive Growth agenda in Council and a number of the actions we have implemented over the last 5 years have been with the aim of creating more inclusive growth and a more compassionate city.
- However, we have some concerns that the Strategy lacks specificity regarding how this vision will be achieved. The Strategy largely reiterates existing policy commitments without establishing clear time-bound poverty reduction targets, requiring bespoke interventions. The absence of measurable poverty reduction targets in key areas (eg. For child poverty; in work-poverty) and the lack of specific detailed action plans and associated timelines could be seen to undermine the effectiveness of the Strategy. It is important that the strategy is also clearly underpinned by strong principles of dignity, inclusion and respect and that this message is reinforced throughout further development and engagement.
- Other jurisdictions (such as Scotland), where The First Minister has said that the eradication of child poverty is the single most important policy objective for the Scottish Government, have had some success by focusing on Child Poverty and the implementation of specific measures to alleviate this. For example the introduction of the Scottish Child Payment and the commitment to mitigate the impact of the two child limit by 2026 - Child Poverty Delivery Plan progress 2024-2025: Scrutiny by the Poverty and Inequality Commission).

Need to focus on action

- The production of an associated action plan with deliverables and timelines would also allow for full involvement and engagement of partners and intended beneficiaries, which is in line with the Executive's commitment to collaboration and learning from those with lived experience and would clarify around where responsibility lies.

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- The Council would recommend embedding specific measurable targets (e.g. Reduce child poverty by x% by 2030), assign departmental responsibilities and ensure multi-year budget commitments to key programmes/actions.
- All communities have different challenges in terms of poverty, and we would agree that different communities may require different and appropriate intervention strategies to prevent and overcome challenges with poverty. There may be specific intervention strategies that can address poverty issues that can support more than one community. We would agree that this would apply to all or some Section 75 groups.

Poverty mainstreaming/ intersectional equality lens

- It may be prudent to give consideration to looking in detail at different types of poverty from a more dynamic rather than static point in time – examples – persistent poverty/destitution and an analysis of the key risk factors assessed and this evidence used to inform focused actions, rather than a “catch-all” approach. In addition analyzing poverty by groups who face higher risk and/or incidence may lead to more focused programmes and improved outcomes. As outlined by recent research ([UK Poverty 2025: The essential guide to understanding poverty in the UK | Joseph Rowntree Foundation](#)) this includes families with children, minority ethnic groups, disabled people, informal carers and the increasing risk of in-work poverty, particularly for single mothers.
- The NI Executive could consider adopting a “poverty mainstreaming” approach, using an intersectional equalities lens, identifying targeted action that is needed to address specific barriers faced by different groups/ household types and ensuring that estimations are made about the potential impact each could contribute towards achieving the overall objectives and associated targets. This would allow for the assessment of the cost effectiveness of policies and actions in delivering intended outcomes. If national targets were set then this could better ensure alignment with local activity, at a council and VCSE level and improve outcomes and efficiency/effectiveness.

Governance structures and resources

- Whilst BCC acknowledges the intention to convene the Anti-Poverty Strategy Board and associated sub-committees, consideration could be given to also setting up an independent Poverty and Inequality Commission to scrutinize plans and progress, to ensure long-term structural accountability across all actors. This is similar to other bodies set up in other parts of the UK and reflects recommendations made by the Anti-Poverty Expert Advisory Panel ([Recommendations for an Anti-Poverty Strategy](#)).
- The Council would also recommend structured formal delivery partner structures between the Executive Departments and BCC, given the level of poverty and deprivation in Belfast. Linked to this Belfast City Council would also support the creation of ring-fenced, multi-year funding for the agreed poverty action plan/ interventions.

4.0 Lived Experience

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- Whilst the Strategy acknowledges the importance of co-design and states “consideration will also be given to how best to involve those with lived experience of Poverty and supporting organisations” the Council would recommend that this commitment is strengthened and that best practice from elsewhere is taken into account. The approach of developing “ Experience Panels” ,as happened on Scotland in 2017, could be given attention. They resulted in 2400 members of the public registered who had lived experience of being in receipt of various welfare payments. The Legacy Report ([Social Security Experience Panels: legacy report - gov.scot](#)) found these panels had made a significant contribution to service design and informed policy decisions. They also shaped the design of client facing processes, branding and the language used in Social Security Scotland.

Pillars - The vision is underpinned by three key pillars

- **Pillar One - Minimising Risks**
We will minimise the risks and root causes of people and their families falling into poverty.
We will work with people to maximise their chances of avoiding these risks and lower their chances of falling into poverty.
- **Pillar Two - Minimising Impacts**
Where people find themselves in poverty, we will support them and ensure that inequalities are minimised and life opportunities are maximised.
- **Pillar Three - Exiting Poverty**
We will support people experiencing poverty and through working together we will provide routes out of poverty.

*To what extent do you agree or disagree with the importance of the three pillars included in the draft Anti-Poverty Strategy? **(Please highlight your answers)***

- Pillar 1 - Minimising Risks - **AGREE**
- Pillar 2 - Minimising Impacts - **AGREE**
- Pillar 3 - Exiting Poverty- **AGREE**

COMMENTS

- The Council would support the three pillars set out and believe that focuses on addressing different stages in an individual journey in poverty including focusing on prevention, support and longer-term exit strategies
- In considering the current definition of Pillar 2 and 3 (as set out below), there is a risk of people being confused as they appear somewhat similar. Important that there the definitions reflect the distinct outcomes set out later in the strategy. Consideration to be given to Pillar 3 referring to providing wrap-around support as a pathway out of poverty.

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- The Council would commend that consideration be given to adding a fourth pillar focused on prevention/eradication of poverty, highlighting the long-term cost-effectiveness of preventative measures.
- The Council would be concerned of the lack of detail in relation to specific actions, resources and measures of success. This will prevent any meaningful assessment of how the vision our ambitions underpinning the draft Strategy is delivered.
- The Council would recommend that consideration be given to developing detailed action plans, with SMART targets and clear areas of responsibility for lead departments and partners. This should be underpinned by a robust monitoring and evaluation framework .

Pillar 1 Outcomes - Minimising Risks

There are a wide range of risk factors for falling into poverty and every individual story is unique. However, following widespread consultation with stakeholders and analysing the existing research, we have identified a number of key factors which must be addressed in order to effectively tackle poverty. Each of these factors has an associated outcome.

1. **Childhood Education** - All children will have maximised opportunities in relation to education, addressing socio-economic gaps in educational attainment.
2. **Family / Childhood Factors** - The benefits of a good family structure will be promoted. Families and young people experiencing disadvantage will be supported, helping them to have fulfilling and complete home and family lives.
3. **Debt** - People will be supported to maximise their financial wellbeing.
4. **Disability** - People with disabilities will be supported to be economically independent, maximising their potential in relation to education and employment.
5. **Substance Use** - Government and key partners will work to support people - and reduce the harms associated with alcohol and drugs.
6. **Ethnicity** - We will take steps to ensure that ethnicity will not increase a person's risk of poverty.

*To what extent do you agree or disagree with each of the six outcomes supporting Pillar One of the draft Anti-Poverty Strategy? **(Please highlight your answers)***

- Childhood education - **AGREE**
- Family / Childhood factors - **AGREE**
- Debt- **AGREE**
- Disability - **AGREE**
- Substance use - **AGREE**
- Ethnicity- **AGREE**

*Q. Do you have any further comments to make on any of the outcomes listed? **(Please reference the outcome)***

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- As highlighted above it is difficult to disagree with any of the factors outlined above in relation to potentially being able to have a positive impact on minimising the risks of falling into poverty. However, it is also difficult to make a clear statement as to their relevance or scale of impact over other factors as the level of detail required is not yet presented.
- The Council would highlight the following points for consideration in finalising the Strategy:-
- Need for dual diagnosis services (mental health + substance use).
- Recognition of barriers faced by people with disabilities including access to support services and advice.
- Support for ethnic minorities, especially asylum seekers with no recourse to public funds.
- Further clarity needed around the statement – we will take steps to ensure ethnicity will not increase a person's risk of poverty

Q. Are there any other outcomes you feel should be included under this pillar?

- The Council would recommend that consideration be given to the possible inclusion of an outcome relating to reducing the numbers of **'children in care'** as a key vulnerable group, given the extent of inequalities they face. The benefits of a good family structure will be promoted should be re-worded to be more specific and the definition of disadvantage in this context provided.
- Explore possible inclusion of an outcome linked to the **'working poor'** and those with caring responsibilities.
- Explore possible transfer of the outcome 'physical and mental health' from pillar 1 into pillar 2 as good health and well-being is a key preventative factor of reducing the risk of poverty and can have a huge impact on people's future opportunities.

Pillar 2 Outcomes - Minimising Impacts

The impacts of poverty are felt across our society and can have devastating impacts on people's health, education and economic outcomes. While this Strategy focuses on how we improve long term outcomes for individuals and society more broadly, it is also essential that we take steps to address the immediate issues and impacts felt by people experiencing poverty. Each of these immediate issues and impacts has an associated outcome.

1. **Access to Resources** - Appropriate and effective financial support will be provided to those in our society who are socio-economically disadvantaged. Older people, children and adults with disabilities will be helped to access appropriate support.
2. **Access to Education** - The costs of accessing and participating in education will be minimised, with particular consideration given to children from socio-economic disadvantaged families.
3. **Physical and Mental Health** - Everyone will be supported in improving their mental and physical well-being, with a focus on driving down health inequalities related to socio-economic disadvantage.
4. **Exposure to Crime / Safety** - We will have safe environments, including in the most deprived areas.

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5. **The Impact of Place** - We will have strong communities with improved physical infrastructure, particularly in areas suffering the highest levels of deprivation.
6. **Housing (including Fuel Poverty)** - Everyone has access to good quality, affordable and sustainable housing.
7. **The Lived Experience of those in Poverty** - Policies that are brought forward as part of this Strategy are focused on addressing the real life impacts of poverty and based on a range of evidence including lived experience.
8. **Advice Services** - People experiencing or at risk of poverty have access to free, quality-assured advice services.

Q. To what extent do you agree or disagree with each of the eight outcomes supporting Pillar Two of the draft Anti-Poverty Strategy?

1. Access to resources - **AGREE**
2. Access to education - **AGREE**
3. Physical and mental health - **AGREE**
4. Exposure to crime / safety - **AGREE**
5. Impact of place- **AGREE**
6. Housing- **AGREE**
7. Lived experience - **AGREE**
8. Advice services - **AGREE**

Q. Do you have any further comments to make on any of the outcomes listed? (Please reference the outcome)

The Council would highlight the following comments for consideration in finalising any draft strategy.

- It is difficult to disagree with any of the factors outlined above in relation to potentially being able to have a positive impact on minimising the risks of falling into poverty. However, it is also difficult to make a clear statement as to their relevance or scale of impact over other factors as the level of detail required is not yet presented.
- Outcome 1 (Access to resources)
 - would refer to the Council's **Cost-of-Living Guide** as a useful signposting to available services and support available.
 - important seek to address the significant challenges facing the health service including waiting times.
 - important to recognise the significant role of the advice service network, including crisis prevention, and the need for adequate and sustainable funding.
- Outcome 5 (Impact of Place)
 - Consideration should be given to how we address the challenges and opportunities presented by the peace walls and interfaces and the need to build good relations and shared spaces.

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Q. Are there any other outcomes you feel should be included under this pillar?

The Council would recommend that consideration be given to the possible inclusion of an outcome and associated actions in relation to

- **Transport Poverty** – this came out strongly when Belfast City Council recently consulted on their draft Inclusive Growth Index. In particular it was seen as a barrier for children attending school, those facing economic hardship and those with a disability. Also has an impact on accessing work and better jobs and was raised as a key issue in helping create safe environments, which is another outcome listed in Pillar 2.
- **Access to green and open space** – impacts upon an individual's health and wellbeing and access to employment
- **Access to good air quality** – impacts upon an individual's health and wellbeing and access to employment
- **Enabling civic engagement/voice** – encourages effective civic engagement and confidence in decision making processes and bodies is often highlighted as key to inclusive places for all.

Pillar 3 Outcomes - Exiting Poverty

In order to tackle poverty in a long term and sustainable way, it is essential that we work with people experiencing socio-economic disadvantage in order to help them 'exit poverty'. This can be achieved by government working together with support services and families in a truly collaborative and complementary way. Through this approach we can tackle the long term consequences of poverty. Each of these long term consequences has an associated outcome.

1. **Employment / Economic Conditions** - A strong and growing economy with a wide range of good jobs across both the public and private sector providing opportunities that are accessible to those in poverty.
2. **Gaining employment** - People will be able to access clear pathways to work and be supported in developing the skills and behaviours they need to access and prosper in the workplace.
3. **Training and further Education** - Young people and adults will be able to develop their skills and careers through a range of supported educational initiatives beyond school.
4. **Childcare** - We will identify ways to assist socio-economically disadvantaged families in addressing gaps in childcare provision to ensure they can maximise their potential in the workplace.

Q. To what extent do you agree or disagree with each of the four outcomes supporting Pillar Three of the draft Anti-Poverty Strategy? **(Please highlight your answer)**

1. Employment / Economic Conditions - **AGREE**
2. Gaining employment- **AGREE**
3. Training and further education - **AGREE**
4. Childcare- **AGREE**

Q. Do you have any further comments to make on any of the outcomes listed?

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- It is difficult to disagree with any of the factors outlined above in relation to potentially being able to have a positive impact on minimising the risks of falling into poverty. However, it is also difficult to make a clear statement as to their relevance or scale of impact over other factors as the level of detail required is not yet presented.
- It is important that Section 75 groups in particular to those with a disability receive required accessibility support when pursuing employment, in employment and during training. This would include an Access to Work package in the workplace and financially supporting employers including those in the private sector and voluntary sector to meet accessibility requirements for job interviews, during employment and training.
- **Outcome 2** (Gaining employment) – the Council would highlight the work which has been undertaken through the Belfast Business Promise in helping to create better employment opportunities including the promotion of the real living wage.

Q. Are there any other outcomes you feel should be included under this pillar?

- The Council would recommend that consideration be given to the possible inclusion of an outcome and associated actions in relation to creating '**inclusive and accessible pathways**'.

Pillar 1 Actions - Minimising Risks

Outcomes under each of the pillars will be supported by strategic commitments which are to be delivered in the first years of the Strategy.

Minimising the Risk of Falling into Poverty

- We will continue to deliver the Extended Schools Programme which provides a range of support in the form of breakfast clubs, after school activities, parental engagement, literacy and numeracy support, healthy eating etc.
- We will undertake research to understand the impact of Westminster's two child limit on poverty indicators, and call on the government to remove Westminster's Two Child Limit.
- We will deliver the RAISE Programme, a new initiative which aims to raise achievement to reduce educational disadvantage. Funding of £20 million is being provided through the Shared Island Fund for a period of 2 years and a Memorandum of Understanding between Departments of Education north and south has been agreed.
- We will work with delivery partners to scope an NI Debt Respite Scheme.
- We will work with the Money and Pension Service to implement a local delivery plan for the UK Financial Wellbeing Strategy.
- We will develop and implement an Executive Disability Strategy.
- We will develop and implement the Disability Employment Strategy.
- We will deliver a refreshed Healthy Child Healthy Future (HCHF) Programme - the universal child health promotion programme for NI 0-19 years. This will have a strong focus on ensuring every child is given the best start in life with increased support for those families who are most in need because of factors relating to disadvantage. HCHF assesses the child and family holistically and within the wider community and tailors support or signposts accordingly to help address need.

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Q. To what extent do you agree or disagree that these actions will deliver the outcomes of Pillar One as laid out in the draft Strategy document?

- **AGREE** – The Council would agree that the areas set out are important in minimising the risks of falling into poverty, but further detail is needed on the of delivery of strategic commitments and actions, including clearer timeframes, to understand the level of resource and priority attached.

Q. Do you have any further comments to make on any of the actions listed under this pillar? (**Please reference the action**)

- The draft Strategy refers to a number of related strategies which are still to be brought forward. It will be important that any such strategies are clear measurable actions and targets with resources attached to ensure delivery (e.g. the Executive Disability Strategy, the Disability Employment Strategy). It is essential that any commitments to action contained within these strategies are co-ordinated and integrated with the draft anti-poverty strategy and outcomes to ensure appropriate alignment of strategic intent, delivery and monitoring of progress and impact on anti-poverty.

Q. Are there any other actions you feel should be included under this pillar?

- The draft strategy highlights an outcome to “take steps to ensure that ethnicity will not increase a person’s risk of poverty” and refers to language barriers, negotiating support services etc. However, there are no specific strategic actions or commitments identified to address this. We would recommend that actions are co-designed and developed with those with lived experience to ensure relevant and impactful commitments are included. This can also have the added impact of empowering and building capacity amongst those involved and to better inform programme design and delivery to help minimise the risk of people falling into poverty.

Pillar 2 Actions - Minimising Impacts

Outcomes under each of the pillars will be supported by strategic commitments which are to be delivered in the first years of the Strategy.

Minimising the Impacts of Poverty

- We will continue 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.
- We will lobby Westminster to maintain the triple lock guarantee in relation to pension payments.
- We will develop and deliver a Fuel Poverty Strategy. We will also design and deliver a new Fuel Poverty Energy Efficiency Scheme – Warm, Healthy Homes.
- We will implement agreed changes that are designed to improve access to and delivery of Discretionary Support.
- We will continue to provide assistance with the payment of upfront childcare costs through the Adviser Discretion Fund.
- We will provide advice, increase awareness and provide focused support to ensure that older people, and children and adults with disabilities can access their full benefit entitlement. This will include a programme of work to promote Pension Credit uptake and delivery of the Make the Call wraparound service.

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- The Executive will continue its commitment to ensure the Civil Service is a Living Wage employer. We will ensure that payment of the Living Wage must be included as a condition of contract for all tenders.
- Through a range of actions we will minimise the cost of school attendance, this will include continued provision of free school meals (FSM) and Uniform Grants (UG).
- We will introduce legislation to ensure that school uniforms are affordable for all families.
- We will develop and deliver a new Safer Communities Strategic Approach, based on Trauma Informed and Public Health approaches, with the aim of increasing community safety and confidence.
- We will develop and deliver a new People and Place Strategic Framework to deliver an effective and more integrated place-based approach to target deprivation, based on objective need.
- We will continue to deliver the Tackling Rural Poverty and Social Isolation (TRPSI) Framework, which invests in a range of collaborative initiatives to tackle rural poverty, isolation, loneliness and health and wellbeing issues.
- We will deliver the NI Food Strategy Framework to help focus collective efforts addressing significant societal challenges directly and indirectly linked to food. This will have impacts in relation to both people's health and food poverty.
- We will ensure that everyone, including those in or at risk of poverty, has access to good quality, affordable and sustainable homes. This will include work to tackle a range of issues including revitalisation of the Housing Executive and transformation of the Private Rented Sector. We will oversee the development of action plans as part of the implementation of the Executive Housing Supply Strategy.
- We will work with the Transforming Medication Safely NI (TMSNI) programme to support implementation of the Community Development Health Network "Our Lives, Our Meds, Our Health" report to improve safe practices with medicines through addressing health inequalities.
- We will continue the Healthy Start Scheme in Northern Ireland, which provides pre-paid cards for pregnant women and families with young children to access nutritious healthy food. This improves long term health for mothers and children and frees up household income for other needs and addresses health inequalities.
- We will continue to work with the Community Development and Health Network (CDHN) through the Building the Community Pharmacy Partnership (BCPP) programme to strengthen links between community groups and their local pharmacies, with actions targeted at the most deprived and impoverished communities in order to address health inequalities and the social determinants of health.
- We will continue to support the advice sector to ensure that good quality, free, independent, advice is available to those living in or at risk of poverty. We will refresh the policy framework for delivery of advice to enhance collaboration and provide more integrated independent advice and debt services.

Q. To what extent do you agree or disagree that these actions will deliver against the outcomes of Pillar Two as laid out in the draft Anti-Poverty Strategy document?

- **AGREE** – The Council agree that it is essential that steps are taken to address the immediate issues and impacts felt by people experiencing poverty and recognise the broad areas as being important in minimising the impact of poverty. However, further detail is needed on the of delivery of strategic commitments and actions, including clearer timeframes to understand the level of resource and priority attached.

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Q. Do you have any further comments to make on any of the actions listed under this pillar? **(Please reference the action)**

- The Council welcomes the NI Executive's ongoing commitment to ensure the Civil Service is a Living Wage employer and that this will be included as a condition of contract for all tenders. We would suggest that this action should go further and must be seen in conjunction with the commitment under Pillar 3 in relation to 'improve the quality of employment', with the NI Civil Service leading by example. Belfast City Council has been working with the Labour Relations Agency, in the development and implementation of the Belfast Business promise, an inclusive growth charter, which the Department for Economy has committed to. We would encourage all government departments to refer to and adopt the Belfast Business promise standards, which acts as a forerunner to the proposed good employment Charter proposed in the Programme for Government and Good Employment. We would be happy to discuss this further.
- As per Pillar 1 comments, this Pillar also refers to the development and delivery of a number of other strategies, (e.g. People & Place Strategy). As these strategies may be at different stages of development, we would stress the importance of ensuring that the commitments to action are co-ordinated and integrated with the draft anti-poverty strategy and outcomes to ensure appropriate alignment of strategic intent, delivery and monitoring of progress and impact.

Q. *Are there any other actions you feel should be included under this pillar?*

- The draft anti-poverty strategy highlights the importance of understanding the lived experience of those in poverty and the commitment to take steps to involve those experiencing or at risk of poverty by taking forward policies and programmes within the strategy. However, it is not clear how this will be factored into the strategic commitments/actions outlined.
- We would propose the inclusion of a commitment and actions to embed poverty considerations into policy and programme development. To support this, we would refer to practices and developments elsewhere such as the socio-economic duty in England and Scotland, poverty proofing, the work that has been done in some of the UK's core cities to establish poverty and inequalities commissions such as Edinburgh, as well as the work of the Poverty Truth Network. We would also be willing to share our emerging work on the development and testing of a framework to support a practical approach to embedding inclusive growth in policies, programmes and projects.

Pillar 3 Actions - Exiting Poverty

Outcomes under each of the Pillars will be supported by strategic commitments which are to be delivered in the first years of the Strategy.

Supporting People to Exit Poverty

- We will prepare and deliver a programme which will offer inclusive pathways to work.
- We will address regional imbalance in our economy through the Sub-Regional Economic Plan to ensure that people have access to quality employment regardless of where they live.
- We will improve the quality of employment across the economy through a new Employment Rights Bill, a Good Jobs Charter and by increasing uptake of the Real Living Wage through funding the NI franchise of the Living Wage Foundation.
- We will implement the all age Careers Action Plan.

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- We will deliver high quality, industry relevant skills and training programmes. We will implement the Skills, Careers and Apprenticeship Action Plans.
- A budget of £23m has been allocated in 2025/26 to provide a 15% childcare subsidy for working parents eligible to Tax Free Childcare.
- We will bring forward a draft Early Learning and Childcare Strategy for public consultation to Executive colleagues in autumn 2025.

Q. To what extent do you agree or disagree that these actions will deliver against the outcomes of Pillar Three as laid out in the draft Anti-Poverty Strategy document?

- **AGREE** – The Council agree that it is essential that proactive steps are taken to create sustainable pathways out of poverty. However, further detail is needed on the delivery of strategic commitments and actions, including clearer timeframes to understand the level of resource and priority attached.

Q. Do you have any further comments to make on any of the actions listed under this pillar?

- The Council would commend that consideration is given to specific actions which seek to support vulnerable individuals who may be experiencing complex challenges including mental health and substance misuse.
- The Council welcomes the proposed development of a Childcare Strategy and commends that this is brought forward as a matter of urgency. We believe that this is a vital part of the social and economic infrastructure to support people into good jobs, education and training.
- The Council welcomes the focus on improving the quality of employment and the provision of the Real Living Wage as a means of helping to reduce in-work poverty. We would also encourage the NI Executive to take account of the Belfast Business Promise, our inclusive growth city charter, and the standards it sets to inform the approach to improving the quality of employment and the development and delivery of a good jobs charter.

Q. Are there any other actions you feel should be included under this pillar?

- The Council would highlight the adverse impact of spiralling inflation rates on many individuals and families across the city and wider region. The impact is normally intensified disproportionately on lower income households. Statistics would highlight the growing trend in relation to in-work poverty levels. It is important that we seek to maximise household incomes, through the creation of key part of good jobs alongside enabling people to access these opportunities through appropriate inclusive pathways, training and education. We would also note the research by ESRI (2024) that highlights access to training and education as being vital to avoiding low paid employment, particularly a risk for lone parents and those with a disability.

Headline Indicators

To track the overall progress of the Strategy, a number of headline indicators will be used to monitor progress over time.

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- The percentage of individuals living in relative poverty after housing costs (AHC)
- The percentage of children living in relative poverty (AHC)
- The percentage of working age adults living in relative poverty (AHC)
- The percentage of pensioners living in relative poverty (AHC)
- To complement these chosen indicators we will continue to publish or monitor a range of poverty measures including relative poverty before housing costs (BHC), absolute poverty before and after housing costs, children in low income and material deprivation, persistent poverty and food poverty. This will allow the overall story behind the trends to be identified.
- Indicators will be reviewed regularly to ensure they remain relevant and appropriate, to identify and address any potential gaps, and to improve or replace existing measures as necessary.

Q. To what extent do you agree or disagree with these headline indicators as laid out in the draft Anti-Poverty Strategy document?

- **AGREE** – The Council would agree in principle with the headline indicators as set out, however, would suggest that when further detail is brought forward around specific actions and programmes of work that such indicators need to be reassessed for fitness.
- The Council welcomes the commitment within the draft Strategy to bring forward ‘Future Development’ of indicators and would encourage the Department to engage with local councils and key stakeholders such as JRF in this process. We would also suggest that consideration be given to understanding good practice benchmarks and research including, for example, Joseph Rowntree Foundation.

Q. Do you have any further comments to make on any of the headline indicators? (Please reference the indicator)

- The Council recognise the need for any indicators and measures being aligned with the Programme for Government and Wellbeing Framework. We would encourage that consideration is given to how data can be captured and made available at as low a geographical level as possible. This would enable a deeper understanding of places and the possible concentration of poverty at a local level. This will help inform how future policy and interventions should be targeted.
- Given the multi-faceted nature of poverty and its impact, it would also be beneficial for the indicators to be disaggregated based on Section 75 characteristics, where possible, to enable a fuller understanding of changes /progress by population groups.
- Tackling the persistent levels of poverty requires a sustained, dedicated resource and, based on previous trend data, it is expected that the headline indicators will not change substantially in the short term. The Council would therefore encourage the adoption of regular reporting of qualitative insights and data to substantiate these measures to support analysis of the real-life impacts of poverty as well as demonstrate progress over time.

Q. Are there any other headline indicators you feel should be included here?

- We welcome the commitment to the future development of data and the ongoing work with DWP and colleagues to develop broader measures of poverty. We would emphasise the importance of reflecting the cost-of-living pressures on households and consider issues such as household

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disposable income and affordability of key services such as childcare, transport, housing which are critical in terms of managing the risks, impacts of poverty and being able to secure a sustainable route out of poverty.

- The Council has been developing an inclusive Growth Index containing a basket of proposed measures which includes a number of contextual, or system indicators, to provide the overall frame of reference within which the progress indicators can be tracked. This is an emerging tool providing a means to track our progress and inform future decision-making in order to deliver on the city's ambitions for inclusive growth. We would welcome the opportunity to discuss further to explore how these measures and approaches could interact with the anti-poverty ambitions.

Pillar 1 Indicators - Minimising Risks

To track the Strategy's progress against Pillar One - Minimising the Risk of Falling into Poverty, a number of indicators will be used to monitor progress over time.

- Educational Attainment Gap - difference between the percentage of non-free school meal entitled (non-FSME) school leavers and the percentage of free school meal entitled (FSME) school leavers achieving at level 2 or above including GCSE English and Maths.
- Disability Employment Gap - percentage in employment by disability status.
- Standardised Admission Rate - Alcohol related / drug related causes.

Q. To what extent do you agree or disagree that these pillar level indicators appropriately monitor progress towards the Pillar One outcomes as laid out in the draft Anti-Poverty Strategy document?

- **AGREE** - As per our previous comments, the Council believe that the current set of indicators are relevant, however would highlight that further detail is needed on the outworkings of the strategic commitments/actions in order to fully consider whether they would serve to appropriately monitor the progress. We would be keen to explore the process to support the outcome monitoring and to understand how the strategic commitments will be aligned to the proposed outcomes. We would also suggest that qualitative insights and data should be considered to help tell the story of progress.

Q. Do you have any further comments to make on any of the pillar one indicators? (Please reference the indicator)

- The Council would commend that consideration be given to capturing data at the lowest level to enable greater focus on place-based approaches.
- The Council would commend that the data is disaggregated by Section 75 groupings and made available at as low a geographical levels as possible in order to understand the issues and barriers that people may face and support appropriate targeting of programmes and resources.

Q. Are there any other indicators you feel should be included here?

- The Council would have no further comments at this stage.

Pillar 2 Indicators - Minimising Impacts

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To track the Strategy's progress against Pillar Two - Minimising the Impacts of Poverty, a number of indicators will be used to monitor progress over time.

- Healthy Life Expectancy - gap between the most and least deprived.
- Percentage of people who were victims of any NI safe community survey crime.
- Number of households in housing stress.

Q. To what extent do you agree or disagree that these pillar level indicators appropriately monitor progress towards the Pillar Two outcomes as laid out in the draft Anti-Poverty Strategy document?

- **AGREE** - As per our previous comments, the Council believe that the current set of indicators are relevant, however would highlight that further detail is needed on the outworkings of the strategic commitments/actions in order to fully consider whether they would serve to appropriately monitor the progress. We would be keen to explore the process to support the outcome monitoring and to understand how the strategic commitments will be aligned to the proposed outcomes. We would also suggest that qualitative insights and data should be considered to help tell the story of progress.

Q. Do you have any further comments to make on any of the pillar two indicators?

- The Council would commend that consideration be given to capturing data at the lowest level to enable greater focus on place-based approaches.
- The Council would commend that the data is disaggregated by Section 75 groupings and made available at as low a geographical levels as possible in order to understand the issues and barriers that people may face and support appropriate targeting of programme

Q. Are there any other indicators you feel should be included here?

- The Council would have no further comments at this stage.

Pillar 3 Indicators - Exiting Poverty

To track the Strategy's progress against Pillar Three - Supporting People to Exit Poverty, a number of indicators will be used to monitor progress over time.

- Percentage of employees earning on or above the Real Living Wage (aged 18 and over).
- Percentage who are economically inactive for any reason other than being a student (aged 16 to 64).
- Proportion of 16 to 24 year olds not in Education, Employment or Training (NEET).

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Q. To what extent do you agree or disagree that these pillar level indicators appropriately monitor progress towards the Pillar Two outcomes as laid out in the draft Anti-Poverty Strategy document?

- **AGREE** - As per our previous comments, the Council believe that the current set of indicators are relevant, however would highlight that further detail is needed on the outworkings of the strategic commitments/actions in order to fully consider whether they would serve to appropriately monitor the progress. We would be keen to explore the process to support the outcome monitoring and to understand how the strategic commitments will be aligned to the proposed outcomes. We would also suggest that qualitative insights and data should be considered to help tell the story of progress.

Q. Do you have any further comments to make on any of the pillar two indicators?

- The Council would commend that consideration be given to capturing data at the lowest level to enable greater focus on place-based approaches.
- The Council would commend that the data is disaggregated by Section 75 groupings and made available at as low a geographical levels as possible in order to understand the issues and barriers that people may face and support appropriate targeting of programme

Q. Are there any other indicators you feel should be included here?

- The Council would commend that consideration be given to possible indicators in relation to working poor, childcare access, and long-term health outcomes.

Equality Impact Assessment

The Department has also included an Equality Impact Assessment (EQIA) alongside the draft Anti-Poverty Strategy. The full EQIA is available on the consultation website.

The Equality Impact Assessment is carried out to ensure that the two statutory duties on public authorities carrying out functions relating to Northern Ireland, as contained within Section 75 of the Northern Ireland Act 1998 are met.

The first duty requires public bodies, in carrying out their functions in relation to Northern Ireland, to have due regard to the need to promote equality of opportunity between –

- people with different religious beliefs
- people from different racial groups
- people of different ages
- people with different marital status
- people with different sexual orientations
- men and women generally
- people with or without a disability

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- people with or without dependants
- people with different political opinions

The second statutory duty requires that in addition and without prejudice to the above duty, the Department should also have due regard to the desirability of promoting good relations between people with different religious beliefs, different political opinions or from different racial groups. The EQIA on the Executive's draft Anti-Poverty Strategy has been completed to identify if adverse differential impacts may occur as a result of its implementation.

Q. Are there any data, needs or issues in relation to any of the Section 75 equality categories that have not been identified in the EQIA consultation document? If so, what are they and can you provide details?

- The Council would commend that further consideration is given to understanding the data and possible impacts in relation to women (especially carers), ethnic minorities, people with disabilities and newcomer communities who may not have recourse to public funds.

Q. Are there any adverse impacts in relation to any of the Section 75 equality groups that have not been identified in the EQIA Consultation document? If so, what are they?

Q. Please state what action you think could be taken to reduce or eliminate any adverse impacts emerging from implementation of the draft Anti-Poverty Strategy.

- The Council would highlight that the *Assessment of Impacts* as undertaken does not fully *detail the likely impacts and associated mitigating actions*. Whilst we would note the commitment set out in *relation to the People & Place Strategy* in terms of "*further work to ensure inequalities are addressed in this work will be taken forward as appropriate*" it is not clear *what steps or mitigating actions will be put in place to enable those from minority ethnic groups to access more of the interventions/programmes proposed*.
- More broadly, we accept that there are also limitations in the depth and breadth of poverty-related data that would enable a more in-depth understanding and analysis of the issues and nature of poverty experienced geographically and by certain groups, for example, in relation to those with caring responsibilities/dependants, minority ethnic groups. This reinforces the need for a strong data development agenda that supports better targeting of resources and delivery of policies/programmes.

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- Research, and experience in Scotland, has highlighted the importance of taking an intersectional approach to understanding complex issues such as poverty and structural inequalities¹. This approach would provide a deeper understanding of the nature of the issues and experiences of poverty as well as the specific barriers faced by certain groups more likely to be at risk or in poverty.
- The Council would commend that a robust monitoring and reporting framework and process is put in place to enable regular monitoring of progress and assessment of the impacts.

Final comments

Is there anything further you'd like to add or comment on in relation to the draft Anti-Poverty Strategy?

- The Council looks forward to continuing to work with the Department for Communities and other NICS Departments to bring forward impact programmes and activities which help eradicate poverty within Belfast and wider region.

¹IPPR (2021) [Intersectionality-Revealing-the-Reality-of-Poverty-and-Inequality-in-Scotland-May-2021.pdf](#)