

Response ID ANON-S1YV-W77S-B

Submitted to Draft Anti-Poverty Strategy Public Consultation
Submitted on 2025-09-04 11:15:01

Introduction

Please indicate whether you are responding on behalf of a:

Community / Voluntary Group

Name of group / business / organisation if relevant (please DO NOT include personal names/personal data):
Extern NI

Vision

To what extent do you agree or disagree with the vision included in the draft Anti-Poverty Strategy?

Strongly agree

Please tell us why.:

Extern welcomes the vision to eradicate poverty and its impacts across communities. The emphasis on collaboration and sustainability is commendable. However, we recommend strengthening the vision by explicitly referencing human rights, intersectionality, and the lived experience of poverty, as proposed by the Anti-Poverty Strategy Co-Design Group. A rights-based framing would better reflect the dignity and agency of those affected.

Pillars

Expand the link below to view further details on the three key pillars underpinning the draft Anti-Poverty Strategy

To what extent do you agree or disagree with the importance of the three pillars included in the draft Anti-Poverty Strategy?

Q3 - Pillar 1 - Minimising Risks:
Strongly agree

Q3 - Pillar 2 - Minimising Impacts:
Strongly agree

Q3 - Pillar 3 - Exiting Poverty:
Strongly agree

Pillar 1 Outcomes - Minimising Risks

To view further details on each of the outcomes under Pillar One of the draft Anti-Poverty Strategy please use the link below or view page 14 of the draft Strategy.

To what extent do you agree or disagree with each of the six outcomes supporting Pillar One of the draft Anti-Poverty Strategy?

Q4 - Childhood education:
Strongly agree

Q4 - Family / Childhood factors:
Strongly agree

Q4 - Debt:
Strongly agree

Q4 - Disability:
Strongly agree

Q4 - Substance use:
Strongly agree

Q4 - Ethnicity:
Strongly agree

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

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

Extern agrees with the outcomes but recommends the following enhancements:

- Minimising Risks: Include targeted support for care-experienced young people and people leaving custody.

Pillar 2 Outcomes - Minimising Impacts

To view further details on each of the outcomes under Pillar Two of the draft Anti-Poverty Strategy please use the link below or view page 18 of the draft Strategy.

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

Q4 - Access to resources:

Strongly agree

Q4 - Access to education:

Strongly agree

Q4 - Physical and mental health:

Strongly agree

Q4 - Exposure to crime / safety:

Strongly agree

Q4 - Impact of place:

Strongly agree

Q4 - Housing:

Strongly agree

Q4 - Lived experience:

Strongly agree

Q4 - Advice services:

Strongly agree

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

Mental Health - Embedding mental health across all pillars: Recognise poor mental health as both a cause and consequence of poverty.
Investing in trauma-informed services: Especially for people with lived experience of poverty, addiction, homelessness, or justice involvement.
Improving access to community-based mental health support: Reduce waiting times and ensure services are culturally competent and inclusive.
Linking mental health to employment and education: Support people with mental health challenges to access and sustain work or training.

Housing - Expanding regulation of the private rented sector: Introduce rent controls, enforce minimum standards, and protect tenants from eviction and poor conditions.

Accelerating social housing investment: Commit to clear, realistic targets for new builds, especially in rural areas and for vulnerable groups (e.g. care leavers, disabled people).

Addressing homelessness explicitly: Include dedicated actions for prevention, rapid rehousing, and wraparound support for people at risk or experiencing homelessness.

Recognising housing as a health and poverty issue: Link housing quality directly to health outcomes and poverty reduction.

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

Strengthen commitments/outcomes could be made more ambitious, specific, and better resourced to reflect the scale and urgency of the challenges. As cited above.

Digital Exclusion -

Developing a cross-departmental digital inclusion strategy: Address infrastructure, affordability, and skills.

Providing free public Wi-Fi and devices: Especially in deprived and rural areas.

Ensuring non-digital access to services: So people who are digitally excluded aren't locked out of benefits, healthcare, or education.

Targeting support to older people, disabled people, and low-income households: Who are disproportionately affected by digital exclusion

Pillar 3 Outcomes - Exiting Poverty

To view further details on each of the outcomes under Pillar Three of the draft Anti-Poverty Strategy please use the link below or view page 25 of the draft Strategy.

To what extent do you agree or disagree with each of the four outcomes supporting Pillar Three of the draft Anti-Poverty Strategy?

Q6 - Employment / Economic Conditions:
Strongly agree

Q6 - Gaining employment:
Strongly agree

Q6 - Training and further education:
Strongly agree

Q6 - Childcare:
Strongly agree

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

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

Ensure pathways to employment are inclusive of those furthest from the labour market, including people with convictions, disabilities, and long-term health conditions.

Pillar 1 Actions - Minimising Risks

To view further details on each of the actions under Pillar One of the draft Anti-Poverty Strategy please use the link below or view page 17 of the draft Strategy.

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

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

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

Justice-Informed Poverty Prevention - Introduce targeted support for people leaving custody or youth justice settings, including housing, employment pathways, and mental health services. People exiting the justice system face high risks of poverty, homelessness, and exclusion. Early intervention can prevent reoffending and support reintegration.

Trauma-Informed Early Intervention - Embed trauma-informed practice across education, health, and social services, especially for children and families in disadvantaged areas. Trauma is a key driver of poverty and poor outcomes. Early support can reduce long-term risks and improve resilience.

Care-Experienced Young People - Develop a cross-departmental strategy to support care-experienced children and young people, including housing, education, and mentoring. This group is disproportionately at risk of poverty, homelessness, and poor mental health. Tailored support is essential.

Digital Inclusion for Families - Provide free or subsidised access to devices, broadband, and digital literacy training for low-income families. Digital exclusion is a growing barrier to education, employment, and accessing services. It compounds poverty risks.

Youth Participation and Empowerment - Establish youth-led advisory panels to inform anti-poverty policy and programme design. Young people are experts in their own experience. Empowering them builds agency and ensures policies are relevant.

Support for Migrant and Ethnic Minority Families Ensure culturally competent services and targeted outreach to families facing language, legal, or systemic barriers. These groups often face hidden poverty and exclusion. Inclusive services reduce risk and improve access.

Pillar 2 Actions - Minimising Impacts

To view further details on each of the actions under Pillar Two of the draft Anti-Poverty Strategy please use the link below or view page 23 of the draft Strategy document.

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

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

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

Expand Mental Health and Addiction Support - Embed mental health and addiction services within poverty alleviation programmes, particularly for those experiencing homelessness, justice involvement, or trauma. Mental ill-health and addiction are both causes and consequences of poverty. Integrated support reduces crisis escalation and improves long-term outcomes.

Address the Poverty Premium - Develop a strategy to tackle the “poverty premium” (e.g. higher costs for energy, credit, transport, and insurance). Low-income households often pay more for essential services. Tackling this improves disposable income and financial resilience.

Enhance Support for Carers - Increase Carer's Allowance, provide respite care, and ensure carers can access benefits and employment support. Unpaid carers are at high risk of poverty and burnout. Supporting them improves wellbeing and economic participation.

Introduce a Social Tariff for Energy - Implement a discounted energy tariff for low-income and vulnerable households. Fuel poverty remains a major issue. A social tariff would reduce energy costs and improve health outcomes.

Strengthen Period Poverty Measures - Ensure free, dignified access to period products in all public buildings and schools. Period poverty affects education, health, and dignity. Universal provision removes barriers and stigma.

Pillar 3 Actions - Exiting Poverty

To view further details on each of the actions under Pillar Three of the draft Anti-Poverty Strategy please use the link below or view page 27 of the draft Strategy.

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

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

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

Justice-Informed Employment Pathways - Develop tailored employment and training programmes for people leaving custody or youth justice settings. This group faces significant barriers to employment and is at high risk of poverty and exclusion. Targeted support can reduce reoffending and promote reintegration

Inclusive Apprenticeships and Skills Development - Ensure apprenticeships and skills programmes are accessible to care-experienced young people, people with convictions, and those with additional needs. These groups are often excluded from mainstream opportunities. Inclusive design improves equity and outcomes.

Community-Based Enterprise and Social Economy Support - Provide funding and mentoring for community-led enterprises and social economy organisations in areas of high deprivation. Local enterprise can create jobs, build resilience, and retain wealth within communities

Address Transport Poverty as a Barrier to Employment - Provide subsidised or free transport for people accessing training, education, or employment, especially in rural areas. Transport costs and availability are major barriers to work, particularly for young people and those in isolated areas.

Headline Indicators

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

Agree

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

Extern welcomes the inclusion of headline indicators to track progress on poverty reduction, particularly the use of relative poverty after housing costs (AHC) across key population groups. These are important measures that reflect lived experience more accurately than before housing costs (BHC) alone. However, we recommend the following enhancements to ensure the monitoring framework is robust, inclusive, and responsive. Expand the Indicator Set to Reflect Intersectionality, include disaggregated data by disability, ethnicity, gender, age, rural/urban location, and justice involvement. Poverty is not experienced equally. Without intersectional data, key inequalities may be masked.

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

Commit to Transparent, Regular Reporting - Publish accessible, plain-language updates on progress, including successes and challenges. Transparency builds trust and accountability.

Pillar 1 Indicators - Minimising Risks

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

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

Educational Attainment Gap - This is a vital indicator of inequality. Our recommendation is that this is disaggregate by ethnicity, gender, disability, care experience, and rural/urban location to better understand intersectional barriers. An additional indicator could include school attendance, suspension/exclusion rates, and access to digital learning to capture broader educational risks.

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

Additional Indicators to Consider

Housing Stability - Risk of homelessness, evictions, and housing affordability (especially in the private rented sector).

Early Years Development - Access to early learning and childcare, developmental milestones, and Sure Start engagement

Digital Exclusion - Access to devices, broadband, and digital skills—especially for low-income families and rural communities.

Lived Experience Feedback - Regular qualitative data from people with lived experience of poverty to contextualise trends and identify emerging risks.

Pillar 2 Indicators - Minimising Impacts

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

Do you have any further comments to make on any of the pillar two indicators? (Please reference the indicator) :

Extern recommends the following enhancement to ensure the monitoring framework is comprehensive, and inclusive.

Healthy Life Expectancy – Gap Between Most and Least Deprived: This is a strong indicator of inequality and long-term health outcomes. Our recommendation is to disaggregate by gender, ethnicity, disability, and rural/urban location. Include indicators on mental health prevalence, access to community-based services, and preventable hospital admissions and track health inequalities linked to housing, addiction, and trauma.

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

Fuel Poverty - Track percentage of households spending more than 10% of income on energy.

Include uptake of energy efficiency schemes and social tariffs.

Food Insecurity - Monitor food bank usage, school meal uptake, and household food insecurity.

Digital Exclusion - Track access to broadband, devices, and digital skills—especially among older people, disabled people, and rural communities.

Lived Experience Feedback - Include qualitative data from people experiencing poverty to contextualise trends and identify emerging issues.

Pillar 3 Indicators - Exiting Poverty

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

Agree

Do you have any further comments to make on any of the pillar three indicators? (Please reference the indicator):

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

Supported Employment Uptake - Number of people with disabilities, long-term health conditions, or justice involvement participating in supported employment programmes. These groups face systemic barriers and need tailored support to exit poverty.

Barriers to Employment - Percentage of economically inactive individuals citing mental health, addiction, justice involvement, or caring responsibilities as barriers. Understanding why people are not working helps tailor interventions and measure progress.

Access to Childcare - The percentage of low-income families accessing affordable, flexible childcare.

Childcare is a key enabler for parents to enter and stay in work or education.

Equality Impact Assessment

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?:

No

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?:

No

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.

AdverseImpactReductionActions:

N/A

Final comments

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

APS other comments:

Extern welcomes the establishment of an Anti-Poverty Strategy Board and pillar sub-committees. However, we recommend:

- Independent oversight: Establish an Anti-Poverty Commission to monitor progress, as proposed by the Co-Design Group.
- Lived experience representation: Ensure people with direct experience of poverty are meaningfully involved in governance structures.
- Transparent reporting: Publish regular, accessible updates on progress, including disaggregated data by equality categories.
- Budget & Resource Clarity: While the strategy acknowledges fiscal constraints, it lacks detailed financial planning or costed action planes. More transparency on funding sources and allocations would strengthen confidence in delivery.
- Implementation Timelines: Many actions are listed, but without specific deadlines or milestones. A phases implementation plan with timelines would improve clarity and accountability.
- Local Authority and Community Roles; the strategy could better define the role of local councils and community organisations in delivery. More emphasis on devolving decision making and funding to local levels would enhance responsiveness.
- Ensure long-term resourcing: Without sustained investment, the Strategy risks becoming aspirational rather than transformational.
- Embed trauma-informed practice: Poverty is often rooted in trauma; services must be designed accordingly.
- Recognise the role of civil society: Organisations like Extern are essential partners in delivery and innovation. Funding models must reflect this, moving away from short-term, transactional approaches.

Are there any other comments you would like to make in regard to the consultation process more generally?

General other comments:

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