



NORTHERN
IRELAND
HUMAN
RIGHTS
COMMISSION

**Submission to the Department for Communities'
Consultation on the NI Executive's Anti-Poverty
Strategy 2025-2035**

September 2025

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Summary of Recommendations

The NIHRC recommends that:

- 2.5 the NI Executive, working with Department for Communities, commits to incorporating a human rights based approach within the Anti-Poverty Strategy, including a list of relevant human rights standards and ensures that the obligations flowing from these human rights standards are reflected throughout the Strategy. The Ending Violence Against Women and Girls Strategic Framework 2024-2031 provides a starting point for how this can be achieved.**
- 2.13 the NI Executive ensures that views expressed during the public consultation process are meaningfully considered and that the Anti-Poverty Strategy is amended, as is necessary and reasonable, to ensure that it is effective in practice and human rights compliant.**
- 2.14 the NI Executive, working with the Department for Communities, engages with former members of the Co-Design Group and Expert Advisory Panel on the Anti-Poverty Strategy to ascertain the nature of their concerns regarding the co-design process and use this as the basis for a formalised policy for future participation processes. This includes taking learning from this process and considering examples of best practice of other processes of effective participation. The principle of effective participation should be at the core of any such policy.**
- 2.21 the NI Executive, working with the Department for Communities, ensures that the monitoring and accountability structures set out in the proposed Anti-Poverty Strategy are robust, effective and independent.**
- 2.24 the NI Executive, working with the Department for Communities, includes within the Anti-Poverty Strategy a commitment to either introduce or explore introducing an Anti-Poverty Act, in line with the Expert Advisory Panel on the Anti-Poverty Strategy's recommendations. This should include a commitment to**

meaningfully engage with relevant civil society and representative organisations.

- 2.31 the NI Executive, working with the Department for Communities, includes specific reference to women and migrants as groups at high risk of poverty within the proposed Anti-Poverty Strategy, and commits to taking a gender-sensitive and trauma-informed approach to tackling disadvantage.**
- 2.32 the NI Executive, working with the Department for Communities, should commit within the Anti-Poverty Strategy to adopting an intersectional approach to measures aimed at tackling poverty and deprivation, where relevant. This includes implementing a firm understanding across the NI Executive Departments and wider society on the effects of multiple intersectional discrimination in relation to poverty in NI.**
- 2.47 the NI Executive ensures that any provisions taken forward under the Anti-Poverty Strategy to tackle rates of unemployment or improve access to good jobs does so in a manner which addresses identified barriers to work and poor working conditions or practices. This includes committing to considering and effectively addressing the specific experiences, barriers and needs of particular groups of individuals, including carers, women, d/Deaf and disabled people, migrant workers, and racial and ethnic minorities. Such measures should be developed, implemented and monitored through meaningful and effective engagement with affected individuals and their representative organisations.**
- 2.52 the NI Executive, working with Department for Communities, includes within the Anti-Poverty Strategy concrete steps aimed at providing the necessary financial support, debt relief and education to ensure individuals in NI are financially resilient and not at risk from illegal lenders. This includes making a commitment to a gender-sensitive approach to debt vulnerability measures and supporting individuals in NI to safely extract themselves from illegal lending and to prosecute the illegal lenders.**

- 2.56 the NI Executive, working with the Department for Education, introduces within the Anti-Poverty Strategy robust measures to tackle costs associated with education for families that go beyond food and uniform costs. This would include, for example, the costs associated with school trips, extra-curricular activities and travel, with the view to making access to school, particularly at primary level, free of charge.**
- 2.57 the NI Executive, working with the Department for Education, introduces within the Anti-Poverty Strategy a commitment to ensure that children with specific needs are guaranteed affordable, accessible, of high quality and inclusive, and that reasonable accommodations are made as necessary.**
- 2.60 the NI Executive, working with the Department for Communities, ensures that a full Human Rights Impact Assessment is or has been conducted in respect of the proposed Anti-Poverty Strategy. This assessment should consider the full range of human rights obligations that the UK Government has ratified and the NI Executive is bound by. The Human Rights Impact Assessment should also be published.**
- 3.7 the NI Executive ensures that the Anti-Poverty Strategy is effectively funded to the maximum of its available resources and includes an express commitment to the principles of progressive realisation and non-retrogression. The NI Executive should conduct a cost/benefit analysis (or similar study) of current preventative measures to tackle poverty in NI and carefully consider the long-term budgetary implications of inaction or ineffective action.**
- 4.7 the NI Executive, working with the Department for Communities, creates a fourth strategic pillar dedicated to measures to end child poverty, which includes concrete and measurable targets.**
- 4.8 the NI Executive, working with the Department for Communities, reassess its positions on ending child poverty to ensure that the NI Executive is meeting its obligation to end child poverty to the maximum of its available resources. This includes reengaging with the Expert Advisory Panel and the Co-Design Group on an**

Anti-Poverty Strategy to establish the most effective approach.

1.0 Introduction

- 1.1 The Northern Ireland Human Rights Commission (the NIHRC), pursuant to section 69(1) of the Northern Ireland Act 1998, reviews the adequacy and effectiveness of law and practice relating to the protection of human rights in Northern Ireland (NI). The NIHRC is also required, under section 78A(1) of the Northern Ireland Act 1998, to monitor the implementation of Article 2 of the Windsor Framework, to ensure there is no diminution of rights protected in the “Rights, Safeguards and Equality of Opportunity” chapter of the Belfast (Good Friday) Agreement 1998 as a result of the UK’s withdrawal from the EU.¹ In accordance with these functions, the following advice is submitted to the Department for Communities’ consultation on the NI Executive Anti-Poverty Strategy.
- 1.2 The NIHRC bases its advice on the full range of internationally accepted human rights standards, including the European Convention on Human Rights (ECHR), as incorporated by the Human Rights Act 1998, and treaty obligations of the Council of Europe (CoE) and United Nations (UN). The relevant regional and international treaties in this context include:
- European Convention on Human Rights 1950 (ECHR);²
 - European Social Charter 1961;³
 - UN Convention on the Elimination of Racial Discrimination 1965 (UN CERD);⁴
 - UN International Covenant on Civil and Political Rights 1966 (UN ICCPR);⁵
 - UN International Covenant on Economic, Social and Cultural Rights 1966 (UN ICESCR);⁶
 - UN Convention on Elimination of Discrimination against Women 1981 (UN CEDAW);⁷

¹ The Windsor Framework was formerly known as the Protocol on Ireland/Northern Ireland to the UK-EU Withdrawal Agreement and all references to the Protocol in this document have been updated to reflect this change. (see Decision No 1/2023 of the Joint Committee established by the Agreement on the Withdrawal of the United Kingdom of Great Britain and Northern Ireland from the European Union and the European Atomic Energy Community of 24 March 2023 laying down arrangements relating to the Windsor Framework).

² Ratified by the UK 1951. Further guidance is also taken from the body of case law from the European Court of Human Rights (ECtHR).

³ Ratified by the UK in 1962.

⁴ Ratified by the UK in 1969.

⁵ Ratified by the UK in 1976.

⁶ Ratified by the UK in 1976.

⁷ Ratified by the UK in 1986.

- UN Convention Against Torture 1981 (UN CAT);⁸
- UN Convention on the Rights of the Child 1989 (UN CRC);⁹ and
- UN Convention on the Rights of Persons with Disabilities 2006 (UN CRPD);¹⁰
- CoE Convention on Preventing and Combating Violence Against Women and Domestic Violence 2011 (Istanbul Convention);¹¹ and
- CoE Convention on the Protection of Children Against Sexual Exploitation and Sexual Abuse 2007 (Lanzarote Convention).¹²

1.3 In addition to these treaty standards, the following declarations and principles provide further guidance in respect of specific areas:

- UN Human Rights Committee General Comment No 18;¹³
- UN CEDAW Committee General Recommendation No 13;¹⁴
- UN ICESCR Committee General Comment No 3;¹⁵
- UN ICESCR Committee General Comment No 4;¹⁶
- UN Human Rights Committee General Comment No 20;¹⁷
- UN CERD Committee General Recommendation No 20;¹⁸
- UN Human Rights Committee General Comment No 25;¹⁹
- UN ICESCR Committee General Comment No 7;²⁰
- UN CEDAW Committee General Recommendation No 24;²¹
- UN ICESCR Committee General Comment No 11;²²
- UN ICESCR Committee General Comment No 12;²³
- UN ICESCR Committee General Comment No 13;²⁴
- UN ICESCR Committee General Comment No 14;²⁵
- UN CERD Committee General Recommendation 27;²⁶

⁸ Ratified by the UK in 1988.

⁹ Ratified by the UK in 1991.

¹⁰ Ratified by the UK in 2009.

¹¹ Ratified by the UK in 2022.

¹² Ratified by the UK in 2018.

¹³ 'UN Human Rights Committee General Comment No 18: Non-Discrimination', 1989.

¹⁴ 'UN CEDAW Committee General Recommendation No 13: Equal Remuneration for Work of Equal Value', 1989.

¹⁵ E/1991/23, 'UN ICESCR Committee General Comment No 3: Nature of State Parties' Obligations', 1990.

¹⁶ E/1992/23, 'UN ICESCR Committee General Comment No 4: The Right to Adequate Housing', 1991.

¹⁷ 'UN Human Rights Committee General Comment No 20: Prohibition of torture, or other cruel, inhuman or degrading treatment or punishment', 1992.

¹⁸ 'UN CERD Committee General Recommendation No 20: Non-Discrimination in the Implementation of Rights', 1996;

¹⁹ CCPR/C/21/Rev.1/Add.7, 'UN Human Rights Committee General Comment No 25: Right to Participate in Public Affairs, Voting Rights and the Right of Equal Access to Public Service', 12 July 1996.

²⁰ E/1998/22, 'UN ICESCR Committee General Comment No 7: The Right to Adequate Housing - Forced Evictions' 1997.

²¹ 'UN CEDAW Committee General Recommendation No 24: Women and Health', 1999.

²² E/C.12/1999/4, 'UN ICESCR Committee General Comment No 11: Plans of Actions for Primary Education', 10 May 1999.

²³ E/C.12/1999/5, 'UN ICESCR Committee General Comment No 12: The Right to Adequate Food', 12 May 1999.

²⁴ E/C.12/1999/10, 'UN ICESCR Committee General Comment No 13: The Right to Education', 8 December 1999.

²⁵ E/C.12/2000/4, 'UN ICESCR Committee General Comment No 14: The Right to the Highest Attainable Standard of Health', 11 August 2000.

²⁶ A/55/18/Annex V, 'UN CERD Committee General Recommendation XXVII: Discrimination Against Roma', 16 August 2000.

- UN CRC Committee General Comment No 1;²⁷
- UN ICESCR Committee General Comment No 15;²⁸
- UN CRC Committee General Comment No 5;²⁹
- UN ICESCR Committee General Comment No 18;³⁰
- UN CRC Committee General Comment No 7;³¹
- UN CAT Committee General Comment No 2;³²
- UN ICESCR Committee General Comment No 19;³³
- UN ICESCR Committee General Comment No 20;³⁴
- UN CEDAW Committee General Recommendation No 28;³⁵
- UN CRC Committee General Comment No 15;³⁶
- UN CRC Committee General Comment No 19;³⁷
- UN CRPD Committee General Comment No 4;³⁸
- UN CRPD Committee 2017 Concluding Observations to the UK of Great Britain and NI;³⁹
- UN CRPD Committee Inquiry Concerning the UK of Great Britain and NI;⁴⁰
- UN CRPD Committee General Comment No 6;⁴¹
- UN CRPD Committee General Comment No 7;⁴²
- UN Human Rights Committee General Comment No 36;⁴³
- UN CEDAW Committee 2019 Concluding Observations to the UK of Great Britain and NI;⁴⁴
- UN CRPD Committee General Comment No 8;⁴⁵

²⁷ CRC/GC/2001/1, 'UN CRC Committee General Comment No 1: The Aims of Education', 17 April 2001.

²⁸ E/C.12/2002/11, 'UN ICESCR Committee General Comment No 15: The Right to Water', 20 January 2003.

²⁹ CRC/GC/2003/5, 'UN CRC Committee General Comment No 5: General Measures of Implementation', 27 November 2003.

³⁰ E/C.12/GC/18, 'UN ICESCR Committee General Comment No 18: The Right to Work', 6 February 2006.

³¹ CRC/C/GC/7/Rec.1, 'UN CRC Committee General Comment No 7: Implementing Child Rights in Early Childhood', 20 September 2006.

³² CAT/C/GC/2, 'UN CAT Committee General Comment No 2: Implementation of Article 2', 24 January 2008.

³³ E/C.12/GC/19, 'UN ICESCR Committee General Comment No 19: The Right to Social Security', 4 February 2008.

³⁴ E/C.12/GC/20, 'UN ICESCR Committee General Comment No 20: Non-Discrimination in Economic, Social and Cultural Rights', 2 July 2009.

³⁵ CEDAW/C/GC/28, 'UN CEDAW Committee General Recommendation No 28: Core Obligations under Article 2', 16 December 2010.

³⁶ CRC/C/GC/15, 'UN CRC Committee General Comment No 15: The Right of the Child to the Highest Attainable Standard of Health', 17 April 2013.

³⁷ CRC/C/GC/19, 'UN CRC Committee General Comment No 19: Public Budgeting for the Realisation of Children's Rights', 20 July 2016.

³⁸ CRPD/C/GC/4, 'UN CRPD Committee General Comment No 4: The Right to Inclusive Education', 25 November 2016.

³⁹ CRPD/C/GBR/CO/1, 'UN CRPD Committee Concluding Observations on the Initial Report of the UK of Great Britain and NI', 3 October 2017.

⁴⁰ CRPD/C/15/4, 'UN CRPD Committee Inquiry Concerning the UK of Great Britain and NI Carried Out by the UN CRPD Committee Under Article 6 of the Optional Protocol to the UN CRPD', 24 October 2017.

⁴¹ CRPD/C/GC/6, 'UN CRPD Committee General Comment No 6: Equality and Non-Discrimination', 26 April 2018.

⁴² CRPD/C/GC/7, 'UN CRPD Committee General Comment No 7: Participation of Persons with Disabilities Including Children with Disabilities, Through Their Representative Organisations, In the Implementation and Monitoring of the UN CRPD', 9 November 2018.

⁴³ CCPR/C/GC/36, 'UN Human Rights Committee General Comment No 36: The Right to Life', 3 September 2019.

⁴⁴ CEDAW/C/GBR/CO/8, 'UN CEDAW Committee Concluding Observations on the Eighth Periodic Review of the UK of Great Britain and NI', 14 March 2019.

⁴⁵ CRPD/C/GC/8, 'UN CRPD Committee General Comment No 8: the Right of Persons with Disabilities to Work and Employment', 7 October 2022.

- UN CRC Committee 2023 Concluding Observations to the on the UK of Great Britain and NI;⁴⁶
- UN CERD Committee 2024 Concluding Observations to the UK of Great Britain and NI;⁴⁷
- UN CEDAW Committee General Recommendation No 40;⁴⁸ and
- UN ICESCR Committee 2025 Concluding Observations to the UK of Great Britain and NI.⁴⁹

- 1.4 The Commission notes several positive aspects of the proposed Anti-Poverty Strategy. For example, it acknowledges that poverty is cyclical, frequent and intergenerational.⁵⁰ It acknowledges the need to address the root causes of poverty and includes a focus on exiting poverty.⁵¹ It also acknowledges the far-reaching effects of poverty and the cross-departmental nature of the duties and responses regarding poverty by being a NI Executive strategy.⁵² However, there are many gaps and omissions, which are set out in detail below.
- 1.5 The anti-poverty strategy is long awaited and has been highly anticipated by civil society.⁵³ The Commission recalls that several interested stakeholders invested time and effort participating in the Department's co-design process. However, it is not evident how views expressed during the co-design process have informed the final strategy.⁵⁴ The Commission welcomed the proactive approach taken by the Department in the development of the strategy. When stakeholders participate in public policy making processes it is only right and proper that they anticipate that their efforts will inform the outcome of the process.

⁴⁶ CRC/C/GBR/CO/6-7, 'UN CRC Committee on the Sixth and Seventh Reports of the UK of Great Britain and NI', 2 June 2023.

⁴⁷ CERD/C/GBR/CO/24-26, 'UN CERD Committee Concluding Observations on the Combined Twenty-Fourth to Twenty-Sixth Periodic Reports of the UK of Great Britain and NI', 24 September 2024.

⁴⁸ CEDAW/C/GC/40, 'UN CEDAW Committee General Recommendation No 40: Equal and Inclusive Representation of Women in Decision-Making Systems', 25 October 2024.

⁴⁹ E/C.12/GBR/CO/7, 'UN ICESCR Committee Concluding Observations on the Seventh Periodic Report of the UK of Great Britain and NI', 28 February 2025.

⁵⁰ NI Executive, 'The Executive's Anti-Poverty Strategy (2025-2035)' (NIE, 2025), at 13.

⁵¹ Ibid, at 12.

⁵² Ibid.

⁵³ *Brian Gormally's Application* [2015] NIQB 59; *In the Matter of an Application by the Committee on the Administration of Justice for Judicial Review* [2025] NIKB 16; Equality Coalition, 'Seminar on Progressing an Anti-Poverty Strategy in NI', 28 June 2023.

⁵⁴ Anti-Poverty Strategy Co-Design Group, 'A Position Paper on the Development of an Anti-poverty Strategy for NI From Members of the Anti-poverty Strategy Co-Design Group' (NICVA, 2022); Committee on the Administration of Justice, 'Initial Comparator Paper – The Draft Anti-Poverty Strategy for Consultation 2025 Against Previous Recommendations' (CAJ, 2025).

- 1.6 NI persistently has some of the highest levels of poverty and deprivation in the UK.⁵⁵ The proposed ten-year strategy has clearly been designed with a focus on current financial constraints. Unfortunately, this appears to have stifled discussion of more innovative programmes which could potentially alleviate poverty in the long term. An Anti-Poverty Strategy that is practical, progressive and effective is necessary for the NI Executive to meet its obligations under a number of international human rights treaties. This advice sets out several considerations for improvement from a human rights perspective.

2.0 Human Rights Based Approach

Human Rights Framework

- 2.1 Human rights standards provide the baseline for human rights compliance. They set the minimum standards which can be built upon, which should not be subject to regression. Having a clear understanding of the minimum standard expected helps to ensure that the NI Executive's human rights obligations are adhered to. For example, the Human Rights Act 1998 requires that "it is unlawful for a public authority to act in a way which is incompatible with a [ECHR]... right",⁵⁶ this includes the NI Executive. Furthermore, by the UK Government ratifying a human rights treaty of the UN or CoE, it is binding itself and devolved governments (including the NI Executive) to adhere to the obligations contained within.⁵⁷ Thus, express reference to the relevant human rights standards within government strategies is useful for ensuring public policy is effective and lawful. It offers a reminder to public authorities of their duties and responsibilities. It also provides guidance for individuals and their representative organisations as to what human rights are involved and offers a clear basis for advocating for these rights to be promoted and protected. This is particularly relevant for cross-cutting issues, such as poverty, that engage an array of human rights.
- 2.2 The relevant rights in this context come from the across the suite of human rights treaties ratified by the UK Government, with implementation of these obligations often devolved to the NI Executive. The proposed Anti-

⁵⁵ Stephen Orme, 'Income and Inequality: How Does NI Compare with the UK as a Whole?' (HoC, 2023); NI Statistics and Research Agency, 'NI Poverty and Income Inequality Report 2023/2024' (DfC, 2025).

⁵⁶ Section 6(1), Human Rights Act 1998.

⁵⁷ Article 14, Vienna Convention 1969; Section 26, NI Act 1998.

Poverty Strategy primarily engages economic, social and cultural rights, such as the right to an adequate standard of living.⁵⁸ These include, but are not limited to, the right to education,⁵⁹ right to highest attainable standard of health,⁶⁰ right to work,⁶¹ and freedom from discrimination.⁶² The threat or actual experience of poverty can have far-reaching consequences that also interfere with civil and political rights. For example, it can affect the ability to access justice⁶³ and expose individuals to experiences of exploitation.⁶⁴ It can also hinder the ability to enjoy

⁵⁸ Article 11, UN Covenant on Economic, Social and Cultural Rights 1966; Article 27, UN Convention on the Rights of the Child 1981; Article 28, UN Convention on the Rights of Persons with Disabilities 2006; Article 14(2)(h), UN Convention on the Elimination of Discrimination against Women 1979; Article 5(e)(iii), UN Convention on the Elimination of Racial Discrimination 1965; Article 31, European Social Charter 1961; E/1992/23, 'UN ICESCR Committee General Comment No 4: The Right to Adequate Housing', 1991, at para 7; E/1998/22, 'UN ICESCR Committee General Comment No 7: The Right to Adequate Housing - Forced Evictions' 1997, at para 8; E/C.12/1999/5, 'UN ICESCR Committee General Comment No 12: The Right to Adequate Food', 12 May 1999, at paras 14-20; E/C.12/2002/11, 'UN ICESCR Committee General Comment No 15: The Right to Water', 20 January 2003, at paras 17-29.

⁵⁹ Article 13, UN Covenant on Economic, Social and Cultural Rights 1966; Articles 28 and 29, UN Convention on the Rights of the Child 1989; Article 10, UN Convention on the Elimination of Discrimination Against Women 1979; Article 5(e)(v), UN Convention on the Elimination of Racial Discrimination 1965; Article 24, UN Convention on the Rights of Persons with Disabilities 2006; E/C.12/1999/10, 'UN ICESCR Committee General Comment No 13: The Right to Education', 8 December 1999, at paras 43-46; CRC/GC/2001/1, 'UN CRC Committee General Comment No 1: The Aims of Education', 17 April 2001; CRPD/C/GC/4, 'UN CRPD Committee General Comment No 4: The Right to Inclusive Education', 25 November 2016, at paras 39-43; Article 2 of the Protocol 1, European Convention on Human Rights 1950 (Protocol 1 was adopted in 1952).

⁶⁰ Article 12, UN Covenant on Economic, Social and Cultural Rights 1966; Article 24, UN Convention on the Rights of the Child 1989; Article 12, UN Convention on the Elimination of Discrimination against Women 1979; Article 25, UN Convention on the Rights of Persons with Disabilities 2006; Article 5(e)(iv), UN Convention on the Elimination of Racial Discrimination 1965; E/C.12/2000/4, 'UN ICESCR Committee General Comment No 14: The Right to the Highest Attainable Standard of Health', 11 August 2000, at paras 30-33; CRC/GC/15, 'UN CRC Committee General Comment No 15: The Right of the Child to the Highest Attainable Standard of Health', 17 April 2013, at paras 71-74; 'UN CEDAW Committee General Recommendation No 24: Women and Health', 1999.

⁶¹ Article 6, UN International Covenant on Economic, Social and Cultural Rights 1966; Article 5(e)(i), UN Convention on the Elimination of Racial Discrimination 1965; Article 11(1), UN Convention on the Elimination of Discrimination against Women 1979; Article 32, UN Convention on the Rights of the Child 1989; Article 27, UN Convention on the Rights of Persons with Disabilities 2006; Article 1, European Social Charter 1961; E/C.12/GC/18, 'UN ICESCR Committee General Comment No 18: The Right to Work', 6 February 2006, at para 31; 'UN CEDAW Committee General Recommendation No 13: Equal Remuneration for Work of Equal Value', 1989; CRPD/C/GC/8, 'UN CRPD Committee General Comment No 8: the Right of Persons with Disabilities to Work and Employment', 7 October 2022, at paras 63-64.

⁶² Article 2(2), UN Covenant on Economic, Social and Cultural Rights 1966; Article 2(1), UN Covenant on Civil and Political Rights 1966; Article 2, UN Convention on the Elimination of Racial Discrimination 1965; Article 2, UN Convention on the Elimination of Discrimination against Women 1979; Article 2, UN Convention on the Rights of the Child 1989; Article 5, UN Convention on the Rights of Persons with Disabilities 2006; Article 14, European Convention on Human Rights 1950. See also E/C.12/GC/20, 'UN ICESCR Committee General Comment No 20: Non-Discrimination in Economic, Social and Cultural Rights', 2 July 2009, at para 7; 'UN Human Rights Committee General Comment No 18: Non-Discrimination', 1989, at para 3; 'UN CERD Committee General Recommendation No 20: Non-Discrimination in the Implementation of Rights', 1996, at para 1; CEDAW/C/GC/28, 'UN CEDAW Committee General Recommendation No 28: Core Obligations under Article 2' 16 December 2010, at paras 8-13; CRC/GC/2003/5, 'UN CRC Committee General Comment No 5: General Measures of Implementation', 27 November 2003, at para 12; CRPD/C/GC/6, 'UN CRPD Committee General Comment No 6: Equality and Non-Discrimination', 26 April 2018, at paras 4-7.

⁶³ Articles 5 and 6, European Convention on Human Rights 1950; Articles 14-16, UN International Covenant on Civil and Political Rights 1966; Article 5(a), UN Convention on the Elimination of All Forms of Racial Discrimination 1965; Article 15, UN Convention on the Elimination of Discrimination Against Women 1981; Article 13, UN Convention on the Rights of Persons with Disabilities 2006.

⁶⁴ Article 4, European Convention on Human Rights 1950; Article 8, UN International Covenant on Civil and Political Rights 1966; Article 6, UN Convention on the Elimination of Discrimination Against Women 1981; Articles 32, 34, 36 and 39, UN Convention on the Rights of the Child 1989; Articles 16 and 27(2), UN Convention on the Rights of Persons with Disabilities 2006; CoE Convention on the Protection of Children Against Sexual Exploitation and Sexual Abuse 2007.

freedom of expression,⁶⁵ religion⁶⁶ and assembly.⁶⁷ In more extreme scenarios, the effects of poverty can also engage the right to life,⁶⁸ freedom from inhumane or degrading treatment⁶⁹ and the right to respect for family and private life.⁷⁰ The effects for each individual can be different and there is a need to consider any specific needs that may be involved and require reasonable accommodation. Consideration of these can be guided by the more specialised human rights treaties, particularly those regarding women,⁷¹ children,⁷² racial discrimination,⁷³ persons with disabilities⁷⁴ and violence against women and girls.⁷⁵

- 2.3 It is noted that the Expert Advisory Panel for the Anti-Poverty Strategy and Co-Design Group on the Anti-Poverty Strategy also recommended that the Strategy should be based on human rights.⁷⁶
- 2.4 Yet, there is a notable absence of reference to the NI Executive's domestic, regional and international human rights obligations regarding poverty alleviation in the proposed Anti-Poverty Strategy. This contrasts with several strategies, typically overseen by the Executive Office, that expressly recognise and set out the relevant human rights standards. For example, the Racial Equality Strategy 2015-2025 sets out an expansive list

⁶⁵ Article 10, European Convention on Human Rights 1950; Article 19, UN International Covenant on Civil and Political Rights 1966; Article 5(d)(viii), UN Convention on the Elimination of All Forms of Racial Discrimination 1965; Article 13, UN Convention on the Rights of the Child 1989; Article 21, UN Convention on the Rights of Persons with Disabilities 2006.

⁶⁶ Article 9, European Convention on Human Rights 1950; Article 18, UN International Covenant on Civil and Political Rights 1966; Article 5(d)(vii), UN International Covenant on the Elimination of All Forms of Racial Discrimination 1965; Article 14, UN Convention on the Rights of the Child 1989.

⁶⁷ Article 11, European Convention on Human Rights 1950; Article 21, UN International Covenant on Civil and Political Rights 1966; Article 5(d)(ix), UN Convention on the Elimination of All Forms of Racial Discrimination 1965; Article 15, UN Convention on the Rights of the Child 1989.

⁶⁸ Article 2, European Convention on Human Rights 1950; *Nencheva and Others v Bulgaria* (2013) ECHR 554; Article 6, UN Covenant on Civil and Political Rights 1966; Article 6, UN Convention on the Rights of the Child 1989; Article 10, UN Convention on the Rights of Persons with Disabilities 2006; CCPR/C/GC/36, 'UN Human Rights Committee General Comment No 36: The Right to Life', 3 September 2019, at para 26.

⁶⁹ Article 3, European Convention on Human Rights 1950; *Moldovan and Others v Romania (No 2)* (2007) 44 EHRR 16; *Budina v Russia* (2009) ECHR 1104; *MSS v Greece and Belgium* (2011) 53 EHRR 2; Article 7, UN Covenant on Civil and Political Rights 1966; Article 16, UN Convention Against Torture and Other Cruel, Inhumane and Degrading Treatment or Punishment 1984; Article 37(a), UN Convention on the Rights of the Child 1989; Article 15, UN Convention on the Rights of Persons with Disabilities 2006; 'UN Human Rights Committee General Comment No 20: Prohibition of torture, or other cruel, inhuman or degrading treatment or punishment', 1992; CAT/C/GC/2, 'UN CAT Committee General Comment NO 2: Implementation of Article 2', 24 January 2008, at para 3.

⁷⁰ Article 8, European Convention on Human Rights 1950; *Wallova and Walla v Czech Republic* (2006) ECHR 1027; *Anufrijeva v Southwark* [2003] EWCA Civ 1406; Article 17, UN International Covenant on Economic, Social and Cultural Rights 1966; Article 16, UN Convention on the Rights of the Child 1989; Article 23, UN Convention on the Rights of Persons with Disabilities 2006.

⁷¹ UN Convention on the Elimination of Discrimination Against Women 1981.

⁷² UN Convention on the Rights of the Child 1989.

⁷³ UN Convention on the Elimination of All Forms of Racial Discrimination 1965.

⁷⁴ UN Convention on the Rights of Persons with Disabilities 2006.

⁷⁵ CoE Convention on Preventing and Combating Violence Against Women and Domestic Violence 2011; CoE Convention on the Protection of Children Against Sexual Exploitation and Sexual Abuse 2007.

⁷⁶ Expert Advisory Panel on the Anti-Poverty Strategy, 'Recommendations for an Anti-Poverty Strategy' (DfC, 2021); Co-Design Group on the Anti-Poverty Strategy, 'Position Paper on Recommendations for an Anti-Poverty Strategy' (DfC, 2022).

of relevant human rights standards in relation to racial equality.⁷⁷ The Ending Violence Against Women and Girls Strategic Framework 2024-2031 also expressly incorporates relevant international human rights standards.⁷⁸

- 2.5 **The NIHRC recommends that the NI Executive, working with Department for Communities, commits to incorporating a human rights based approach within the Anti-Poverty Strategy, including a list of relevant human rights standards and ensures that the obligations flowing from these human rights standards are reflected throughout the Strategy. The Ending Violence Against Women and Girls Strategic Framework 2024-2031 provides a starting point for how this can be achieved.**

PANEL Principles

- 2.6 In addition to specific rights set out within relevant human rights standards, the PANEL Principles offer guidance on what a human rights-based approach requires in practice.
- 2.7 Taking such an approach ensures that law and policy are as effective as possible regarding the realisation of human rights. This is critical in relation to matters of preventing poverty, given that the experience of poverty affects the enjoyment of many human rights, as set out above.
- 2.8 In summary, a human rights-based approach is a conceptual framework informed by international human rights standards, which aims to put “human rights and corresponding State obligations at the heart of policy making”.⁷⁹ Thus, applying a human rights-based framework is important to safeguard rights for rights-holders, who can be individuals or social groups that have entitlements in relation to duty bearers. Duty bearers are State, or delegated non-State actors, that have an obligation to ensure that the human rights of rights-holders are respected, protected and fulfilled. The PANEL principles offer guidance on how to achieve a human rights-based approach. These are:

⁷⁷ The Executive Office, ‘Racial Equality Strategy 2015-2025’ (TEO, 2015), at Annex 1.

⁷⁸ The Executive Office, ‘Ending Violence Against Women and Girls Strategic Framework 2024-2031’ (TEO, 2024), at 10.

⁷⁹ European Network of National Human Rights Institutions, ‘Human Rights-Based Approach’. Available at: [Human Rights-Based Approach - ENNHRI](#)

- Participation – everyone is entitled to active participation in decision-making processes which affect the enjoyment of their rights.
- Accountability – duty-bearers are held accountable for failing to fulfil their obligations towards rights-holders. There should be effective remedies in place when human rights breaches occur.
- Non-discrimination and equality – all individuals are entitled to their rights without discrimination of any kind. All types of discrimination should be prohibited, prevented and eliminated.
- Empowerment – everyone is entitled to claim and exercise their rights. Individuals and communities need to understand their rights and participate in the development of policies which affect their lives.
- Legality – approaches should be in line with the legal rights set out in domestic and international laws.

2.9 The NIHRC notes with concern the lack of reference to, or obvious engagement with, a human rights-based approach in the proposed Anti-Poverty Strategy. Each principle is considered in turn below.

Participation

2.10 The right to participation is protected in several international human rights instruments.⁸⁰ These provisions make it clear that affected individuals, including children, should be involved in decision-making, policy making, and the preparation of laws at all stages (including design, implementation, monitoring and evaluation). The UN CRPD promotes the principle of “nothing about us, without us”. The UN Committee on the Rights of Persons with Disabilities (UN CRPD Committee) also elaborates that any participation should be “meaningful” and occur in a “timely

⁸⁰ Article 25, UN Convention on Civil and Political Rights 1966; CCPR/C/21/Rev.1/Add.7, ‘UN Human Rights Committee General Comment No 25: Right to Participate in Public Affairs, Voting Rights and the Right of Equal Access to Public Service’, 12 July 1996; Article 12(1), UN Convention on the Rights of the Child 1989; Article 4(3), UN Convention on the Rights of Persons with Disabilities 2006; CRPD/C/GC/7, ‘UN CRPD Committee General Comment No 7: Participation of Persons with Disabilities Including Children with Disabilities, Through Their Representative Organisations, In the Implementation and Monitoring of the UN CRPD’, 9 November 2018, at paras 11 and 22; A/55/18/Annex V, ‘UN CERD Committee General Recommendation XXVII: Discrimination Against Roma’, 16 August 2000, at paras 41-46; CEDAW/C/GC/40, ‘UN CEDAW Committee General Recommendation No 40: Equal and Inclusive Representation of Women in Decision-Making Systems’, 25 October 2024.

manner”.⁸¹ This includes that participation “should not be merely symbolic”.⁸²

2.11 The NI Executive states that “the core values of collaboration and partnership-working were embedded at the heart of the process [regarding the Anti-Poverty Strategy] and have enabled an informed and joined up approach”.⁸³ It is true that an Expert Advisory Panel and a Co-Design Group made up of community and voluntary organisations were established, engaged in discussions with the Department for Communities and produced reports with clear recommendations for consideration.⁸⁴ However, organisations involved in the engagement process do not view the outcome as true to the co-design model. For example, there was a lack of clarity around whether a draft of the Anti-Poverty Strategy was in existence and when it would be shared with representative organisations.⁸⁵ It was only after a further judicial review was brought and won by campaigning organisations that the proposed Anti-Poverty Strategy was shared.⁸⁶ Additionally, both the Expert Advisory Panel’s report and the Co-Design Group’s recommendations have been largely disregarded in the proposed Anti-Poverty Strategy.⁸⁷ Consequently, the organisations involved in the Anti-Poverty Strategy co-design process have stated that “our co-design work was carried out with lived experience of poverty from the work we do day to day at its core; to not see this reflected in this current draft [of the proposed Anti-Poverty Strategy] is very disappointing”.⁸⁸ There is such a strength of feeling that the proposed Anti-Poverty Strategy is failing in its current form, that fifty charities that work on poverty-related issues in NI have stated that it is “more harmful to

⁸¹ CRPD/C/GC/7, ‘UN CRPD Committee General Comment No 7: Participation of Persons with Disabilities Including Children with Disabilities, Through Their Representative Organisations, In the Implementation and Monitoring of the UN CRPD’, 9 November 2018, at paras 11 and 22.

⁸² CRPD/C/15/4, ‘UN CRPD Committee Inquiry Concerning the UK of Great Britain and NI Carried Out by the UN CRPD Committee Under Article 6 of the Optional Protocol to the UN CRPD’, 24 October 2017.

⁸³ NI Executive, ‘The Executive’s Anti-Poverty Strategy 2025-2035’ (DfC, 2025), at 9.

⁸⁴ Expert Advisory Panel on the Anti-Poverty Strategy, ‘Recommendations for an Anti-Poverty Strategy’ (DfC, 2021); Anti-Poverty Strategy Co-Design Group, ‘Recommendations on the Development of an Anti-Poverty Strategy for NI’ (NICVA, 2022).

⁸⁵ In June 2023, the Department for Communities stated that a draft Anti-Poverty Strategy was sitting waiting to go the NI Executive and that there was no intention to share with the Anti-Poverty Co-Design Group in advance of this. In February 2024, the Department for Communities stated that it was “some months away” from being presented to the NI Executive. See Equality Coalition, ‘Seminar on Progressing an Anti-Poverty Strategy in NI’, 28 June 2023; NI Assembly Committee for Communities, ‘Briefing by Department for Communities Permanent Secretary, Colum Boyle, on Departmental Priorities’, 29 February 2024; David Thompson, ‘Gordon Lyons says he won’t “outsource” Stormont policies to lobby groups – as Sinn Féin’s “co-design” scheme scrapped’, *Newsletter*, 19 March 2025.

⁸⁶ *In the Matter of an Application by the Committee on the Administration of Justice for Judicial Review* [2025] NIKB 16; Equality Coalition, ‘Seminar on Progressing an Anti-Poverty Strategy in NI’, 28 June 2023.

⁸⁷ Anti-Poverty Strategy Group, ‘Press Release: Media statement from the Anti-Poverty Strategy Group following the publication of the draft Anti-Poverty Strategy’, 18 June 2025; Committee on the Administration of Justice, ‘Initial Comparator Paper – The Draft Anti-Poverty Strategy for Consultation 2025 Against Previous Recommendations’ (CAJ, 2025).

⁸⁸ Anti-Poverty Strategy Group, ‘Press Release: Media statement from the Anti-Poverty Strategy Group following the publication of the draft Anti-Poverty Strategy’, 18 June 2025.

have a strategy that will not address poverty, than no strategy at all” and called for the NI Executive to withdraw the proposed Strategy.⁸⁹

- 2.12 The NIHRC is concerned that the NI Executive is stipulating that the proposed Anti-Poverty Strategy was developed through a policy of co-design, yet the participants in that process have been very vocal that, in their view, the process was not meaningful or effective in practice.⁹⁰ While it should be the aim to do so where reasonable, co-design does not require the NI Executive to reflect all the views and recommendations made. However, it does require the NI Executive to give due consideration to the views and recommendations expressed, with an open dialogue on what can and cannot be included and why. It has been raised with the Commission that this did not occur during the co-design process, particularly in the latter stages when a draft Anti-Poverty Strategy was available and remained unshared with the co-design group for an extensive period of time. The public consultation stage is an opportunity to remedy this.
- 2.13 **The NIHRC recommends that the NI Executive ensures that views expressed during the public consultation process are meaningfully considered and that the Anti-Poverty Strategy is amended, as is necessary and reasonable, to ensure that it is effective in practice and human rights compliant.**
- 2.14 **The NIHRC recommends that the NI Executive, working with the Department for Communities, engages with former members of the Co-Design Group and Expert Advisory Panel on the Anti-Poverty Strategy to ascertain the nature of their concerns regarding the co-design process and use this as the basis for a formalised policy for future participation processes. This includes taking learning from this process and considering examples of best practice of other processes of effective participation. The principle of effective participation should be at the core of any such policy.**

⁸⁹ Jayne McCormack, 'Charities call for executive to drop harmful anti-poverty strategy', *BBC News NI*, 30 June 2025.

⁹⁰ Anti-Poverty Strategy Group, 'Press Release: Media statement from the Anti-Poverty Strategy Group following the publication of the draft Anti-Poverty Strategy', 18 June 2025; Committee on the Administration of Justice, 'Initial Comparator Paper – The Draft Anti-Poverty Strategy for Consultation 2025 Against Previous Recommendations' (CAJ, 2025).

Accountability

- 2.15 The proposed Anti-Poverty Strategy sets out how the strategy will be monitored.⁹¹ The proposed Strategy is to be overseen by a single Anti-Poverty Board at NI Civil Service level, which is to be chaired by the Head of the Civil Service, and attended by senior Civil Service representatives from all NI Departments.⁹² It is proposed that the Anti-Poverty Board will be supported by three sub-committees that will oversee and monitor each strategic pillar and the accompanying action plan. The sub-committees are to be chaired by a representative nominated by the Permanent Secretary from the relevant Department.⁹³
- 2.16 Systems for monitoring and accountability in relation to anti-poverty mechanisms are required across several human rights instruments. In general, these should involve “robust monitoring and accountability mechanisms” that “set verifiable benchmarks” and aim to “monitor progress towards the realisation of” human rights.⁹⁴
- 2.17 Specific to tackling poverty, the UN ICESCR Committee has recommended that the UK Government and NI Executive “develop or enhance measures to address the multidimensional determinants of poverty... and ensure sufficient resources for effective monitoring and implementation”.⁹⁵ The UN CRPD Committee has also recommended that the UK Government and NI Executive set up a “mechanism and a system of human rights-based indicators to permanently monitor the impact of the different policies and programmes relating to the access to and enjoyment by persons with disabilities of the right to... an adequate standard of living”.⁹⁶
- 2.18 The NIHRC welcomes that this is a cross-departmental strategy, however, it is concerning that the NI Executive is stipulating that it requires “meaningful and sustainable co-operation across all of society” to deliver on the proposed Strategy.⁹⁷ Ultimately, the NI Executive are the duty bearers in implementing the Anti-Poverty Strategy, not wider society.

⁹¹ NI Executive, ‘The Executive’s Anti-Poverty Strategy 2025-2035’ (DfC, 2025), at Chapter 6.

⁹² Ibid.

⁹³ Ibid.

⁹⁴ CRC/C/GBR/CO/6-7, ‘UN CRC Committee Concluding Observations on the Combined Sixth and Seventh Periodic Reports of the UK of Great Britain and NI’, 22 June 2023, at para 46(b); E/C.12/1999/5, ‘UN ICECSR Committee General Comment No 12 on the Right to Adequate Food’, 12 May 1999, at para 31.

⁹⁵ E/C.12/GBR/CO/7, ‘UN ICESCR Committee Concluding Observations on the Seventh Periodic Report of the UK of Great Britain and NI’, 12 March 2025, at para 45(a).

⁹⁶ CRPD/C/15/4, ‘UN CRPD Committee Inquiry Concerning the UK of Great Britain and NI Carried Out by the UN CRPD Committee Under Article 6 of the Optional Protocol to the UN CRPD’, 24 October 2017, at para 114(j).

⁹⁷ NI Executive, ‘The Executive’s Anti-Poverty Strategy 2025-2035’ (DfC, 2025), at 28.

Wider society can and should play a participatory role, including providing specialised support where sufficiently remunerated, but its role cannot be contingent on the success of the proposed Strategy, as it is not accountable for the fulfilment of the NI Executive's human rights obligations.

- 2.19 The monitoring structure set out in the proposed Anti-Poverty Strategy differs considerably from the monitoring mechanism outlined in the Expert Advisory Panel report, which recommended that accountability for the progressive realisation of the proposed Strategy's intended outcomes should be evidenced by a "poverty truth" process and considered by an Anti-Poverty Commission.⁹⁸ This monitoring mechanism is based on a Scottish model.⁹⁹
- 2.20 The system for monitoring set out in the proposed Anti-Poverty Strategy is currently untested and it is not clear how a monitoring body made up of NI Executive Departments can effectively and robustly hold itself to account. Additionally, the relevant Department to lead on each strategic pillar has not yet been determined.¹⁰⁰ It would have been useful to comprehensively set out the proposed monitoring structure for the Anti-Poverty Strategy, including the relevant lead Department, in advance of consultation. As a result, it is difficult to ascertain whether this monitoring system is robust and effective. A monitoring system, which is independent of the NI Executive would be better able to evaluate the proposed Anti-Poverty Strategy in an objective manner and hold the NI Executive accountable.
- 2.21 **The NIHRC recommends that the NI Executive, working with the Department for Communities, ensures that the monitoring and accountability structures set out in the proposed Anti-Poverty Strategy are robust, effective and independent.**
- 2.22 The proposed Anti-Poverty Strategy does not commit to introducing an Anti-Poverty Act, which was recommended by both the Expert Advisory Panel and the Co-Design Group on the Anti-Poverty Strategy.¹⁰¹ The Expert Advisory Panel recommended that the Anti-Poverty Act should include a duty to reduce child poverty, setting targets and timetables for 2030 and

⁹⁸ Expert Advisory Panel on the Anti-Poverty Strategy, 'Recommendations for an Anti-Poverty Strategy' (DfC, 2021), at 24.

⁹⁹ Ibid.

¹⁰⁰ NI Executive, 'The Executive's Anti-Poverty Strategy 2025-2035' (DfC, 2025), at 28.

¹⁰¹ Expert Advisory Panel on the Anti-Poverty Strategy, 'Recommendations for an Anti-Poverty Strategy' (DfC, 2021), at 64; Anti-Poverty Strategy Co-Design Group, 'Recommendations on the Development of an Anti-Poverty Strategy for NI' (NICVA, 2022), at 15.

beyond, and that this duty is reviewed every five years.¹⁰² It was also proposed that the Anti-Poverty Act should make discrimination in the provision of goods and services on the grounds of socio-economic status and age unlawful. Furthermore, that the Anti-Poverty Act should include “a ‘socio-economic duty’ requiring public bodies to take account of socio-economic disadvantage when making strategic decisions”.¹⁰³

- 2.23 The NI Executive has not publicly indicated its reasoning for rejecting this recommendation. Introducing a piece of legislation which includes duties to reduce child poverty is an efficient way to hold relevant NI Departments accountable for outcomes relating to child poverty and poverty more generally.
- 2.24 **The NIHRC recommends that the NI Executive, working with the Department for Communities, includes within the Anti-Poverty Strategy a commitment to either introduce or explore introducing an Anti-Poverty Act, in line with the Expert Advisory Panel on the Anti-Poverty Strategy’s recommendations. This should include a commitment to meaningfully engage with relevant civil society and representative organisations.**

Non-discrimination and equality

- 2.25 The proposed Anti-Poverty Strategy recognises that people from a racial or ethnic minority backgrounds and d/Deaf and disabled people disproportionately experience poverty in NI.¹⁰⁴ This is a welcome inclusion. Non-discrimination is an important facet of a human rights-based approach and integral in the realisation of economic, social and cultural rights.¹⁰⁵ However, there are additional protected characteristics that are at high risk of poverty which have not been included in the proposed Strategy.
- 2.26 For example, human rights standards also refer to grounds of sex, gender, language, religion, political or other opinion, national or social origin, property, birth or other status.¹⁰⁶ Furthermore, the protection of non-

¹⁰² Expert Advisory Panel on the Anti-Poverty Strategy, ‘Recommendations for an Anti-Poverty Strategy’ (DfC, 2021), at 7.

¹⁰³ Ibid.

¹⁰⁴ NI Executive, ‘The Executive’s Anti-Poverty Strategy 2025-2035’ (DfC, 2025), at 15-16.

¹⁰⁵ E/C.12/GC/20, ‘UN ICESCR Committee General Comment No 20 on Non-Discrimination and Equality’, 2 July 2009, at para 2.

¹⁰⁶ Article 2(2), UN Covenant on Economic, Social and Cultural Rights 1966; Article 2(1), UN Covenant on Civil and Political Rights 1966; Article 2, UN Convention on the Elimination of Racial Discrimination 1965; Article 2, UN Convention

discrimination includes consideration of direct and indirect discrimination.¹⁰⁷

- 2.27 Specific to poverty, the UN ICESCR Committee has recommended that the UK Government and NI Executive take measures to address the multi-dimensional determinants of poverty, “paying particular attention to groups disproportionately affected, including migrants, ethnic minorities, persons with disabilities, female-headed households, and lesbian, gay, bisexual, transgender and intersex persons”.¹⁰⁸ The UN CEDAW Committee and NI-specific research has also identified the disproportionate effect that changes can have on women, particularly women in domestic violence situations.¹⁰⁹ Specifically in NI, it has been identified that a rising cost of living has had a disproportionate effect on women.¹¹⁰ Additionally, women in NI can act as “shock absorbers” of poverty in the home, meaning they are more likely to go without essentials to protect other family members from the effects of poverty.¹¹¹
- 2.28 Additionally, in NI, data on migrant workers is insufficient. However, there is evidence that migrant workers are at high risk of precarious, low paid work and taking up zero hour contracts.¹¹² Additionally, partners in domestic violence relationships who come to NI on spousal visas have no recourse to public funds if they exit their abusive relationship and, are therefore, at greater risk of destitution if they choose to leave their partner.¹¹³ Furthermore, situations where migrants have experienced threats, intimidation and violence can result in the individuals and families affected having to pay for both emergency accommodation and the

on the Elimination of Discrimination against Women 1979; Article 2, UN Convention on the Rights of the Child 1989; Article 5, UN Convention on the Rights of Persons with Disabilities 2006; Article 14, European Convention on Human Rights 1950. See also E/C.12/GC/20, ‘UN ICESCR Committee General Comment No 20: Non-Discrimination in Economic, Social and Cultural Rights’, 2 July 2009, at para 7; ‘UN Human Rights Committee General Comment No 18: Non-Discrimination’, 1989, at para 3; ‘UN CERD Committee General Recommendation No 20: Non-Discrimination in the Implementation of Rights’, 1996, at para 1; CEDAW/c/GC/28, ‘UN CEDAW Committee General Recommendation No 28: Core Obligations under Article 2’ 16 December 2010, at paras 8-13; CRC/GC/2003/5, ‘UN CRC Committee General Comment No 5: General Measures of Implementation’, 27 November 2003, at para 12; CRPD/C/GC/6, ‘UN CRPD Committee General Comment No 6: Equality and Non-Discrimination’, 26 April 2018, at paras 4-7.

¹⁰⁷ E/C.12/GC/20, ‘UN ICESCR Committee General Comment No 20: Non-Discrimination and Equality’, 2 July 2009, at para 7.

¹⁰⁸ E/C.12/GBR/CO/7, ‘UN ICESCR Committee Concluding Observations on the Seventh Periodic Report of the UK of Great Britain and NI’, 28 February 2025, at paras 45(a) and 45(d).

¹⁰⁹ CEDAW/C/GBR/CO/8, ‘UN CEDAW Committee Concluding Observations on the Eighth Periodic Review of the UK of Great Britain and NI’, 14 March 2019, at paras 51-52; ‘UN CEDAW Committee General Recommendation No 24: Women and Health’, 1999, at para 25; Women’s Support Network and Ulster University, ‘Women’s Experiences of the Cost of Living Crisis in NI’ (WSN and UU, 2023).

¹¹⁰ Women’s Support Network and Ulster University, ‘Women’s Experiences of the Cost of Living Crisis in NI’ (WSN and UU, 2023).

¹¹¹ Ibid.

¹¹² Irish Congress of Trade Union, ‘Migrant Workers and Their Families in NI: A Trade Union Response’ (ICTU, 2023), at 46.

¹¹³ Law Centre NI, ‘How to Pay the Bills and Rent? Advising Migrants who are Subject to No Recourse to Public Funds’. Available at: [How to pay the bills and rent? Advising migrants who are subject to NRPF | Law Centre Northern Ireland](#)

accommodation that they have been forced to leave.¹¹⁴ This particularly affects migrants with No Recourse to Public Funds.¹¹⁵ These scenarios can lead to or exacerbate poverty and deprivation.

- 2.29 The proposed Anti-Poverty Strategy currently does not make provision for women or migrants who disproportionately experience poverty and are confronted with barriers to accessing support to help alleviate that poverty. The proposed Strategy references family separation as a driver of poverty and identifies in its outcome that “the benefits of a good family structure will be promoted”.¹¹⁶ This outcome seemingly has no strategic priority linked to it, and it could be viewed as stigmatising to single parents, particularly women who leave abusive relationships. The phrase “good family structure” is also subject to interpretation and it is unclear what the NI Executive views as a good family structure. This is one example of an issue that could be addressed by taking gender-sensitive and trauma-informed approaches to policy.
- 2.30 Additionally, the UN ICESCR Committee has identified the need to be cognisant of intersectional discrimination, where someone is discriminated against on multiple prohibited grounds, for example, based on both sex and disability.¹¹⁷ The proposed Anti-Poverty Strategy does not acknowledge the intersectional nature of discrimination pertaining to poverty.
- 2.31 **The NIHRC recommends that the NI Executive, working with the Department for Communities, includes specific reference to women and migrants as groups at high risk of poverty within the proposed Anti-Poverty Strategy, and commits to taking a gender-sensitive and trauma-informed approach to tackling disadvantage.**
- 2.32 **The NIHRC recommends that the NI Executive, working with the Department for Communities, should commit within the Anti-Poverty Strategy to adopting an intersectional approach to measures aimed at tackling poverty and deprivation, where relevant. This includes implementing a firm understanding across**
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¹¹⁴ Law Centre and Housing Rights, ‘Homelessness Assistance for Migrant Victims of Racist Intimidation: Proposals to Improve Support Response’ (LCNI, 2025); Daniel Logan and Niall Glynn, ‘Families in emergency accommodation after days of unrest’, *BBC News*, 13 June 2025.

¹¹⁵ Law Centre and Housing Rights, ‘Homelessness Assistance for Migrant Victims of Racist Intimidation: Proposals to Improve Support Response’ (LCNI, 2025); Daniel Logan and Niall Glynn, ‘Families in emergency accommodation after days of unrest’, *BBC News*, 13 June 2025.

¹¹⁶ NI Executive, ‘The Executive’s Anti-Poverty Strategy 2025-2035’ (DfC, 2025), at 15.

¹¹⁷ E/C.12/GC/20, ‘UN ICESCR Committee General Comment No 20: Non-Discrimination and Equality’, 2 July 2009, at para 27.

the NI Executive Departments and wider society on the effects of multiple intersectional discrimination in relation to poverty in NI.

Empowerment

- 2.33 Empowerment and effective participation are intertwined, with an understanding of rights and how to use them key to individuals and representative organisations enjoying and advocating for the promotion and protection of human rights.¹¹⁸
- 2.34 The NIHRRC welcomes the NI Executive's focus on exiting poverty in the proposed Anti-Poverty Strategy.¹¹⁹ This includes proposed commitments aimed at supporting people to exit poverty. In addition to support, empowerment is key to enabling people to understand potential avenues out of poverty. In a human rights context, this is supporting people to understand their rights and how to use them. As set out above, this starts with expressly identifying what the relevant human rights and their guiding principles are. It is also linked to effective participation, to establish what the main barriers are and how to overcome them. Notably, the Anti-Poverty Strategy focuses solely on employment as the way out of poverty.¹²⁰ It also mentions further education and childcare provision, but this is from the perspective of enhancing individual employment opportunities. Employment is an important factor in exiting poverty, but it is not the sole solution for all people. This requires recognition to ensure that the empowerment aspect that is crucial in supporting people to exit poverty is effectively addressed. This is explored further below.

Right to work

- 2.35 There have been several UK-specific recommendations from international experts on how to improve compliance with the right to work and right to just and favourable work conditions.¹²¹ In general, the UN ICESCR Committee recommended that the UK Government and NI Executive:

¹¹⁸ European Network of National Human Rights Institutions, 'Human Rights-Based Approach'. Available at: [Human Rights-Based Approach - ENNHRI](#)

¹¹⁹ NI Executive, 'The Executive's Anti-Poverty Strategy 2025-2035' (NIE, 2025), at 25-27.

¹²⁰ Ibid.

¹²¹ Article 6, UN International Covenant on Economic, Social and Cultural Rights 1966; Article 5(e)(i), UN Convention on the Elimination of Racial Discrimination 1965; Article 11(1), UN Convention on the Elimination of Discrimination against Women 1979; Article 32, UN Convention on the Rights of the Child 1989; Article 27, UN Convention on the Rights of Persons with Disabilities 2006; Article 1, European Social Charter 1961; E/C.12/GC/18, 'UN ICESCR Committee General Comment No 18: The Right to Work', 6 February 2006, at para 31; 'UN CEDAW Committee General Recommendation No 13: Equal Remuneration for Work of Equal Value', 1989; CRPD/C/GC/8, 'UN CRPD Committee General Comment No 8: the Right of Persons with Disabilities to Work and Employment', 7 October 2022, at paras 63-64.

prevent and combat discrimination, racism, stereotypes and inequalities faced by persons with disabilities, ethnic minorities - including Gypsies, Roma and Travellers; persons of African and Asian descent; and members of Jewish, Muslim, and Hindu communities - as well as migrants, refugees and asylum-seekers, by implementing and targeting awareness-raising campaigns and affirmative action measures in areas such as decent work, social security, adequate housing, healthcare, and education, to ensure that all persons fully enjoy [UN ICESCR] rights without discrimination.¹²²

- 2.36 Concerning working conditions, the UN ICESCR Committee recommended that the UK Government and NI Executive “enhance gender-responsive budgeting to guarantee women’s equal access to employment”.¹²³ The UN ICESCR Committee further recommended that the UK Government and NI Executive should:

strengthen measures to guarantee equal pay for work of equal value, particularly for women, persons with disabilities, and ethnic minorities, by enforcing mandatory pay transparency reporting, establishing cross-sectoral job valuation, and introducing binding measures with appropriate sanctions with a view to closing the pay gap.¹²⁴

- 2.37 Furthermore, the UN ICESCR Committee recommended that the UK Government and NI Executive should “intensify efforts to address precarious working conditions, including part-time, self-employment, temporary and zero-hour contracts, and create decent work opportunities, with particular focus on women from ethnic minority groups and persons with disabilities”.¹²⁵
- 2.38 The UN ICESCR Committee recommended that the UK Government and NI Executive “increase the budget allocated for... employment services” and “take all measures necessary to reverse the adverse impact of austerity measures, particularly on employment services”.¹²⁶

¹²² E/C.12/GBR/CO/7, ‘UN ICESCR Committee Concluding Observations on the Seventh Periodic Report of the UK of Great Britain and NI’, 28 February 2025, at para 25(c).

¹²³ Ibid, at para 31(c).

¹²⁴ Ibid, at para 37.

¹²⁵ Ibid, at para 35.

¹²⁶ Ibid, at paras 19(c) and 23(b).

- 2.39 In the context of disability, the UN ICESCR Committee has identified the persistent issue of pay disparity for d/Deaf and disabled people in the UK and NI, recommending that the UK Government and NI Executive “strengthen measures to guarantee equal pay for work of equal value, particularly for ... persons with disabilities”.¹²⁷
- 2.40 The UN CRPD Committee has also noted concerns with “insufficient affirmative action measures and provision of reasonable accommodation to ensure that persons with disabilities can access employment on the open labour market”.¹²⁸ The UN CRPD Committee recommended that the UK Government and NI Executive:
- ensure that reasonable accommodation is provided to all persons with disabilities who require it in the workplace, that regular training on reasonable accommodation is available to employers and employees without disabilities, and that dissuasive and effective sanctions are in place in cases of denial of reasonable accommodation.¹²⁹
- 2.41 In NI, disability-related discrimination complaints represent the highest number of enquiries in respect of employment to the Equality Commission NI.¹³⁰
- 2.42 Accessible workplaces also remain an issue for d/Deaf and disabled people in NI, with research indicating that many workplaces contain a number of unnecessary physical barriers.¹³¹ Access to accessible transport is also an important factor to consider when addressing systemic barriers to employment for persons with disabilities, particularly for individuals living in rural areas.¹³² Recruitment practices are a key barrier to the workplace for d/Deaf and disabled people, with online platforms, lengthy job descriptions and a lack of advertised jobs with flexible work or job-sharing options.¹³³

¹²⁷ Ibid, at paras 36-37.

¹²⁸ CRPD/C/GBR/CO/1, ‘UN CRPD Committee Concluding Observations on the Initial Report of the UK of Great Britain and NI’, 3 October 2017, at para 56(b).

¹²⁹ Ibid, at para 57(b).

¹³⁰ Equality Commission for NI, ‘Key Inequalities in Employment’ (ECNI, 2018).

¹³¹ NI Statistics and Research Agency, ‘Disability Within the NI Labour Market’ (NISRA, 2022), at 13.

¹³² Ibid, at 13-14.

¹³³ NI Statistics and Research Agency, ‘Disability Within the NI Labour Market’ (NISRA, 2022), at 14.

- 2.43 Regarding racial discrimination, the UN CERD Committee identified its concerns at the high levels of unemployment, wage disparities and over-representation in precarious and low paid work among racial and ethnic minority communities in the UK and NI.¹³⁴ The UN CERD Committee recommended that the UK Government and NI Executive effectively address “unemployment, occupational segregation and discriminatory practices with regard to recruitment, salaries, promotions and other conditions of employment”.¹³⁵
- 2.44 In NI, racial prejudice has been identified as a barrier to racial and ethnic minority people’s participation in employment, affecting access to employment and being met with harassment and intimidation in the workplace.¹³⁶ Migrant workers in NI continue to be at high risk of exploitation, including by being unaware of their employment rights in NI.¹³⁷ It has been reported that individuals who rely on sponsorship visas are at particular risk, including being charged by their employer if they try to leave before their contract is finished.¹³⁸ This is a particular issue regarding non-unionised sectors, agriculture, the care home sector, and zero-hour contract employers.¹³⁹ Additionally, it is difficult to establish the demography of migrant workers in NI because data is not always available.¹⁴⁰ The different groups within the category of racial and ethnic minorities should be considered, including but not limited to, Travellers, Roma and migrant workers.
- 2.45 Furthermore, concerning carers, the UN ICESCR Committee recommended that the UK Government and NI Executive “adopt legislative measures to establish a comprehensive, inclusive care and support system that promotes shared caregiving responsibilities for... persons with disabilities and older persons and integrates a gender-sensitive, intersectional,

¹³⁴ CERD/C/GBR/CO/24-26, ‘UN CERD Committee Concluding Observations on the Combined Twenty-Fourth to Twenty-Sixth Periodic Reports of the UK of Great Britain and NI’, 24 September 2024.

¹³⁵ Ibid, at para 38.

¹³⁶ Equality Commission for NI, ‘Key Inequalities in Employment: Statement’ (ECNI, 2018); Irish Traveller Workshop, 14 May 2025.

¹³⁷ Irish Congress of Trade Union, ‘Migrant Workers and Their Families in NI: A Trade Union Response’ (ICTU, 2023), at 46; Law Centre NI, ‘Law Centre NI publishes ‘Guide to Employment Rights for Migrant Workers in the Health and Social Care Sector’’. Available at: <https://www.lawcentreni.org/news/law-centre-ni-publishes-guide-to-employment-rights-for-migrant-workers-in-the-health-and-social-care-sector/>.

¹³⁸ Jane Starling, “‘If you want a reference, pay up.’ How UK care homes are exploiting overseas nurses”, *UNISON Magazine*, 24 February 2022; NI Human Rights Commission, ‘Submission to the UN ICESCR Committee: Parallel Report for the List of Issues in Relation to the Seventh Periodic Report of the UK’ (NIHRC, 2022).

¹³⁹ NI Human Rights Commission, ‘Submission to the UN ICESCR Committee: Parallel Report for the List of Issues in Relation to the Seventh Periodic Report of the UK’ (NIHRC, 2022).

¹⁴⁰ Irish Congress of Trade Union, ‘Migrant Workers and Their Families in NI: A Trade Union Response’ (ICTU, 2023), at 46.

intercultural, and human rights-based approach”.¹⁴¹ The UN CRC Committee also recommended that the UK Government and NI Executive “strengthen measures to enable... caregivers to balance their professional and family responsibilities”.¹⁴² The UN CEDAW Committee has also noted concerns that the lack of support for carers is having a disproportionate effect on women.¹⁴³ The UN CEDAW Committee recommended that the UK Government and NI Executive “undertake a comprehensive assessment on the impact of austerity measures on the rights of women and adopt measures to mitigate and remedy the negative consequences without delay”.¹⁴⁴ Unpaid carers are particularly affected. In 2025, the care provided by unpaid carers in NI was worth £5.8 billion per year.¹⁴⁵ In the 2021 census, there were 222,000 unpaid carers in NI, representing one in eight adults in NI.¹⁴⁶ Of these, one in four unpaid carers in NI live in poverty.¹⁴⁷ The lack of support for carers, particularly unpaid carers, in NI is creating “barriers to entering or remaining in employment” and a main driver of poverty.¹⁴⁸ For many carers, particularly women, it is a choice between fulfilling caring responsibilities and having a career due to the lack of available support.¹⁴⁹

- 2.46 The proposed Anti-Poverty Strategy states that it will deliver a programme offering inclusive work, address regional imbalances in the economy through a Sub-Regional Economy Plan, introduce an Employment Rights Bill, a Good Jobs Charter, increase the uptake of the Real Living Wage and deliver high quality, industry relevant skills.¹⁵⁰ The NIHRC notes that there is no allocated budget for any of these measures, nor is there a provisional timeframe for their introduction. While the principle of inclusion is an important one, the proposed Strategy does not identify the barriers to inclusion in the workplace, nor does it set out how these inclusive work programmes will counter these barriers. Well documented, consideration of the specific experiences, barriers and needs of particular groups of individuals is also missing.

¹⁴¹ E/C.12/GBR/CO/7, ‘UN ICESCR Committee Concluding Observations on the Seventh Periodic Report of the UK of Great Britain and NI’, 28 February 2025, at para 42(c).

¹⁴² CRC/C/GBR/CO/6-7, ‘UN CRC Committee Concluding Observations on the Combined Sixth and Seventh Reports of the UK of Great Britain and NI’, 2 June 2023, at para 36(a).

¹⁴³ CEDAW/C/GBR/CO/8, ‘UN CEDAW Committee Concluding Observations on the Eighth Periodic Report of the UK of Great Britain and NI’, 14 March 2019, at para 17.

¹⁴⁴ Ibid, at para 18.

¹⁴⁵ Carers NI, ‘Tackling Poverty Amongst Unpaid Carers: Carer Poverty Commission NI 2023-2025’ (CNI, 2025), at 4.

¹⁴⁶ Ibid, at 9.

¹⁴⁷ Ibid, at 4.

¹⁴⁸ Ibid, at 6 and 10.

¹⁴⁹ Carers NI, ‘Career or Care: Women, Unpaid Caring and Employment in NI’ (CNI, 2025).

¹⁵⁰ NI Executive, ‘The Executive’s Anti-Poverty Strategy 2025-2035’ (DfC, 2025), at 27.

- 2.47 **The NIHRC recommends that the NI Executive ensures that any provisions taken forward under the Anti-Poverty Strategy to tackle rates of unemployment or improve access to good jobs does so in a manner which addresses identified barriers to work and poor working conditions or practices. This includes committing to considering and effectively addressing the specific experiences, barriers and needs of particular groups of individuals, including carers, women, d/Deaf and disabled people, migrant workers, and racial and ethnic minorities. Such measures should be developed, implemented and monitored through meaningful and effective engagement with affected individuals and their representative organisations.**

Debt vulnerability

- 2.48 The proposed Anti-Poverty Strategy touches on the issue of debt vulnerability. The proposed Strategy identifies debt as a risk factor for falling into poverty.¹⁵¹ It proposes that “people will be supported to maximise their financial wellbeing” by scoping a NI Debt Respite Scheme and, through supporting the advice sector, refreshing “the policy framework for delivery of advice to enhance collaboration and provide more integrated independent advice and debt services”.¹⁵² However, the proposed Strategy fails to consider the gendered aspects of debt vulnerability and the need to eradicate illegal lending, including by paramilitaries. While a risk factor for poverty, debt vulnerability and its outworkings are also key considerations for exiting poverty, this is not identified within the proposed Strategy.
- 2.49 In 2023, research by the Women’s Support Network and Ulster University identified that the rising cost of living was having a disproportionate effect on women in NI.¹⁵³ The research attributed this to rising costs affecting low-income households in NI more, with women more likely to live in poverty across their lifetime.¹⁵⁴ The research also identified that women can act as “shock absorbers” of poverty in the home, meaning they are more likely to go without essentials to protect other family members from the effects of poverty.¹⁵⁵

¹⁵¹ Ibid, at 15.

¹⁵² Ibid.

¹⁵³ Women’s Support Network and Ulster University, ‘Women’s Experiences of the Cost of Living Crisis in NI’ (WSN and UU, 2023).

¹⁵⁴ Ibid.

¹⁵⁵ Ibid.

- 2.50 Individuals experiencing debt vulnerability can turn to illegal money lending in an attempt to remedy the situation in the short-term. The persistent rise in the cost of living in NI has likely worsened the issue of debt vulnerable people borrowing money from illegal money lenders. However, stigma and fear often keeps victims hidden, so the true extent of the issue is not known.¹⁵⁶ In 2022, 25 per cent of adults in NI had low financial resilience as of 2022, with 14 per cent of adults in NI finding it hard to keep up with bills and loans and six per cent of adults in NI in financial difficulty.¹⁵⁷ Additionally, 37 per cent of adults in NI were coping financially, but their financial situation had worsened.¹⁵⁸
- 2.51 The Police Service of NI has described illegal money lending as “a manipulative process, which starts with the lender supposedly ‘helping’ those who are struggling to make ends meet... when loan repayments, with inevitable hefty interest rates, are not met the lenders will use threats and violence”.¹⁵⁹ In NI, illegal money lending can have an added dimension, with paramilitary groups often involved.¹⁶⁰ The Police Service of NI has reported that when individuals cannot pay back loans, they are often required to pay them off by other means, which has led to criminal and sexual exploitation of individuals.¹⁶¹
- 2.52 **The NIHRC recommends that the NI Executive, working with Department for Communities, includes within the Anti-Poverty Strategy concrete steps aimed at providing the necessary financial support, debt relief and education to ensure individuals in NI are financially resilient and not at risk from illegal lenders. This includes making a commitment to a gender-sensitive approach to debt vulnerability measures and supporting individuals in NI to safely extract themselves from illegal lending and to prosecute the illegal lenders.**

¹⁵⁶ Police Service NI, ‘Press Release: Exposing the dangers of predatory money lending’, 13 May 2024.

¹⁵⁷ Financial Conduct Authority, ‘Financial Lives 2022: Key Findings from the Financial Conduct Authority Lives May 2022 Survey’ (FCA, 2023), at 35 and 124.

¹⁵⁸ *Ibid*, at 151.

¹⁵⁹ Police Service of NI, ‘Press Release: Exposing the dangers of predatory money lending’, 13 May 2024.

¹⁶⁰ House of Commons NI Affairs Committee, ‘The Effect of Paramilitary Activity and Organised Crime on Society in NI: Second Report of Session 2023-2024’ (NIAC, 2024), at para 30; Jordan Moats, ‘Fears energy payments could be taken by paramilitary loan sharks in NI’, *ITV News*, 24 January 2023; Consortium for the Regional Support for Women in Disadvantaged and Rural Areas ‘Women Living with Debt’ (CRSWDRA, 2022); ‘Spotlight: Paramilitary loan sharks targeting food bank users’, *BBC News*, 13 December 2022.

¹⁶¹ Police Service NI, ‘Press Release: Exposing the dangers of predatory money lending’, 13 May 2024.

Education

- 2.53 The proposed Anti-Poverty Strategy recognises that education is key to poverty prevention and that living in poverty can affect participation in education. However, the proposed Anti-Poverty Strategy only commits to ensuring that the costs of accessing education will be “minimised, with particular consideration given to children from socio-economic disadvantaged families”.¹⁶² Among other recommendations on education, the Expert Advisory Panel on the Anti-Poverty Strategy recommended that the Strategy should remove barriers to education by “ensuring that participation in school is cost-free”.¹⁶³ This recommendation was echoed by the Co-Design Group on the Anti-Poverty Strategy.¹⁶⁴
- 2.54 The right to education is well recognised within human rights standards.¹⁶⁵ This includes that education should be affordable, accessible, of high quality and inclusive, with particular consideration of the needs of children and d/Deaf and disabled people.¹⁶⁶ Also that primary education is compulsory and free of charge¹⁶⁷ and that secondary and further education can take different forms with a view to it being available, accessible and affordable.¹⁶⁸ In terms of barriers to education, as an example, the UN ICESCR Committee has identified that indirect costs, such as the obligation to wear relatively expensive school uniforms are regressive.¹⁶⁹ The UN CRPD Committee has also noted that the additional cost for reasonable adjustments should not entail additional costs for the individual d/Deaf and disabled learner.¹⁷⁰

¹⁶² NI Executive, ‘The Executive’s Anti-Poverty Strategy 2025-2035’ (DfC, 2025), at 19.

¹⁶³ Expert Advisory Panel on the Anti-Poverty Strategy, ‘Recommendations for an Anti-Poverty Strategy’ (DfC, 2021), at 41.

¹⁶⁴ Anti-Poverty Strategy Co-Design Group, ‘Recommendations on the Development of an Anti-Poverty Strategy for NI’ (NICVA, 2022).

¹⁶⁵ Articles 13 and 14, UN Covenant on Economic, Social and Cultural Rights 1966; Articles 28 and 29, UN Convention on the Rights of the Child 1989; Article 10, UN Convention on the Elimination of Discrimination against Women 1979; Article 5(e)(v), UN Convention on the Elimination of Racial Discrimination 1965; Article 24, UN Convention on the Rights of Persons with Disabilities 2006; E/C.12/1999/10, ‘UN ICESCR Committee General Comment No 13: The Right to Education’, 8 December 1999, at paras 43-46; CRC/GC/2001/1, ‘UN CRC Committee General Comment No 1: The Aims of Education’, 17 April 2001; CRPD/C/GC/4, ‘UN CRPD Committee General Comment No 4: The Right to Inclusive Education’, 25 November 2016, at paras 39-43; Article 2 of the Protocol 1, European Convention on Human Rights 1950 (Protocol 1 was adopted in 1952).

¹⁶⁶ E/C.12/GBR/CO/7, ‘UN ICESCR Committee Concluding Observations on the Seventh Periodic Report of the UK of Great Britain and NI’, 28 February 2025, at para 57; Article 28, UN Convention on the Rights of the Child 1989; Article 24, UN Convention on the Rights of Persons with Disabilities 2006; CRPD/C/GC/4, ‘UN CRPD Committee General Comment No 4: Right to Inclusive Education’, 25 November 2016, at paras 20 and 24.

¹⁶⁷ Article 14, UN International Covenant on Economic, Social and Cultural Rights 1966; E/C.12/1999/4, ‘UN ICESCR Committee General Comment No 11: Plans of Actions for Primary Education’, 10 May 1999, at para 7.

¹⁶⁸ Article 28, UN Convention on the Rights of the Child 1989.

¹⁶⁹ E/C.12/1999/4, ‘UN ICESCR Committee General Comment No 11: Plans of Actions for Primary Education’, 10 May 1999, at para 7.

¹⁷⁰ CRPD/C/GC/4, ‘UN CRPD Committee General Comment No 4: Right to Inclusive Education’, 25 November 2016, at para 24.

- 2.55 The proposed Anti-Poverty Strategy lists in its commitments the intention to continue to provide free school meals and uniform grants. These are not new provisions.¹⁷¹ It would seem that if these provisions had not minimised education costs to families enough by 2025, they are not likely to further decrease costs post-2025. The only new commitment to minimising costs associated with education in the proposed Strategy is to introduce legislation to make uniforms affordable.¹⁷² This is to be welcomed, but details on affordability are not yet public, and so it is difficult to assess the effectiveness of this provision.
- 2.56 **The NIHRC recommends that the NI Executive, working with the Department for Education, introduces within the Anti-Poverty Strategy robust measures to tackle costs associated with education for families that go beyond food and uniform costs. This would include, for example, the costs associated with school trips, extra-curricular activities and travel, with the view to making access to school, particularly at primary level, free of charge.**
- 2.57 **The NIHRC recommends that the NI Executive, working with the Department for Education, introduces within the Anti-Poverty Strategy a commitment to ensure that children with specific needs are guaranteed affordable, accessible, of high quality and inclusive, and that reasonable accommodations are made as necessary.**

Legality

- 2.58 Expressly grounding the proposed Anti-Poverty Strategy in human rights standards is dealt with above. This needs to be considered from a legality standpoint. Furthermore, it is notable that a publicly available Human Rights Impact Assessment of the proposed Anti-Poverty Strategy is lacking, if one was conducted at all.
- 2.59 While there is no statutory requirement to conduct a Human Rights Impact Assessment, it is pertinent to conduct one to ensure that the proposed Strategy is effective in practice and adheres to the NI Executive's legal obligations, as required by the Human Rights Act 1998, NI Act 1998 and ratification of relevant human rights treaties.¹⁷³ The NI Civil Service has also noted the importance of examining whether this is the case for a

¹⁷¹ NI Executive, 'The Executive's Anti-Poverty Strategy 2025-2035' (DfC, 2025), at 23.

¹⁷² Ibid.

¹⁷³ Section 6(1), Human Rights Act 1998; Section 26, NI Act 1998; Article 14, Vienna Convention 1969.

proposed policy solution.¹⁷⁴ In the interests of transparency and demonstrating respect for human rights, it is also useful if the Human Rights Impact Assessment is published.

- 2.60 **The NIHRC recommends that the NI Executive, working with the Department for Communities, ensures that a full Human Rights Impact Assessment is or has been conducted in respect of the proposed Anti-Poverty Strategy. This assessment should consider the full range of human rights obligations that the UK Government has ratified and the NI Executive is bound by. The Human Rights Impact Assessment should also be published.**

3.0 Funding

- 3.1 For an Anti-Poverty Strategy to be effective, it must have sufficient resources attached. No additional funding has been made available by the NI Executive to implement the proposed Anti-Poverty Strategy.¹⁷⁵ The NI Executive identifies within the proposed Strategy that the current fiscal climate has “placed limitations on how far we have been able to go on a number of areas, particularly in the first years of the [Anti-Poverty] Strategy”.¹⁷⁶ While it should be acknowledged that the NI Executive is facing considerable budgetary constraints, it is disappointing that after a considerable wait, ambition and delivery within the proposed Anti-Poverty Strategy is limited because of a lack of funding.
- 3.2 When it comes to economic, social and cultural rights, the human rights obligations are clear, but they also acknowledge the resource-intensive nature of these rights. There will be certain aspects that require immediate implementation, such as non-discrimination,¹⁷⁷ but human rights standards

¹⁷⁴ NI Civil Service, ‘Making a Difference: The NICS Guide to Making Policy that Works’ (NICS, 2023), at 16.

¹⁷⁵ Action for Children, ‘Action for Children NI Responds to Draft Anti-Poverty Strategy’. Available at: [Action for Children Northern Ireland responds to the Anti-Poverty Strategy | Action For Children](#)

¹⁷⁶ NI Executive, ‘The Executive’s Anti-Poverty Strategy 2025-2035’ (DfC, 2025), at 9.

¹⁷⁷ Article 2(2), UN Covenant on Economic, Social and Cultural Rights 1966; Article 2(1), UN Covenant on Civil and Political Rights 1966; Article 2, UN Convention on the Elimination of Racial Discrimination 1965; Article 2, UN Convention on the Elimination of Discrimination against Women 1979; Article 2, UN Convention on the Rights of the Child 1989; Article 5, UN Convention on the Rights of Persons with Disabilities 2006; Article 14, European Convention on Human Rights 1950. See also E/C.12/GC/20, ‘UN ICESCR Committee General Comment No 20: Non-Discrimination in Economic, Social and Cultural Rights’, 2 July 2009, at para 7; ‘UN Human Rights Committee General Comment No 18: Non-Discrimination’, 1989, at para 3; ‘UN CERD Committee General Recommendation No 20: Non-Discrimination in the Implementation of Rights’, 1996, at para 1; CEDAW/c/GC/28, ‘UN CEDAW Committee General Recommendation No 28: Core Obligations under Article 2’, 16 December 2010, at paras 8-13; CRC/GC/2003/5, ‘UN CRC Committee General Comment No 5: General Measures of Implementation’, 27 November 2003, at para 12; CRPD/C/GC/6, ‘UN CRPD Committee General Comment No 6: Equality and Non-Discrimination’, 26 April 2018, at paras 4-7.

allow for a practical approach to the broader aspects. This applies to such rights as to an adequate standard of living (including food, clothing and housing),¹⁷⁸ social security,¹⁷⁹ highest attainable standard of health,¹⁸⁰ and education.¹⁸¹

- 3.3 In terms of the practical approach, Article 2(1) of UN ICESCR requires that the UK Government and NI Executive take steps to “the maximum of its available resources, with a view to achieving progressively the full realisation of the rights recognised in the [UN ICESCR]”.
- 3.4 While realisation of the rights set out in UN ICESCR can be achieved progressively, this should not be seen as “depriving the obligation [under Article 2(1) of UN ICESCR] of all meaningful content”.¹⁸² Rather, it imposes an obligation to move as “expeditiously and effectively as possible” to advance this realisation,¹⁸³ and any steps taken “should be deliberate, concrete and targeted as clearly as possible”.¹⁸⁴ The UN ICESCR Committee notes that, where a State attributes its failure to secure rights under UN ICESCR on limited resources, it must demonstrate that every effort has been made to use all resources in its disposition.¹⁸⁵ The UN ICESCR Committee emphasises that “even where the available resources

¹⁷⁸ Article 11, UN Covenant on Economic, Social and Cultural Rights 1966; Article 27, UN Convention on the Rights of the Child 1981; Article 28, UN Convention on the Rights of Persons with Disabilities 2006; Article 14(2)(h), UN Convention on the Elimination of Discrimination against Women 1979; Article 5(e)(iii), UN Convention on the Elimination of Racial Discrimination 1965; Article 31, European Social Charter 1961; E/1992/23, ‘UN ICESCR Committee General Comment No 4: The Right to Adequate Housing’, 1991, at para 7; E/1998/22, ‘UN ICESCR Committee General Comment No 7: The Right to Adequate Housing - Forced Evictions’ 1997, at para 8; E/C.12/1999/5, ‘UN ICESCR Committee General Comment No 12: The Right to Adequate Food’, 12 May 1999, at paras 14-20; E/C.12/2002/11, ‘UN ICESCR Committee General Comment No 15: The Right to Water’, 20 January 2003, at paras 17-29.

¹⁷⁹ Article 9, UN Covenant on Economic, Social and Cultural Rights 1966; Article 26, UN Convention on the Rights of the Child 1989; Article 28, UN Convention on the Rights of Persons with Disabilities 2006; Articles 11(1)(e) and 13(a), UN Convention on the Elimination of Discrimination against Women 1979; E/C.12/GC/19, ‘UN ICESCR Committee General Comment No 19: The Right to Social Security’, 4 February 2008, at paras 40-51; CRC/C/GC/7/Rec.1, ‘UN CRC Committee General Comment No 7: Implementing Child Rights in Early Childhood’, 20 September 2006, at paras 9-14; CRC/C/GC/19, ‘UN CRC Committee General Comment No 19: Public Budgeting for the Realisation of Children’s Rights’, 20 July 2016, at paras 21-24.

¹⁸⁰ Article 12, UN Covenant on Economic, Social and Cultural Rights 1966; Article 24, UN Convention on the Rights of the Child 1989; Article 12, UN Convention on the Elimination of Discrimination against Women 1979; Article 25, UN Convention on the Rights of Persons with Disabilities 2006; Article 5(e)(iv), UN Convention on the Elimination of Racial Discrimination 1965; E/C.12/2000/4, ‘UN ICESCR Committee General Comment No 14: The Right to the Highest Attainable Standard of Health’, 11 August 2000, at paras 30-33; CRC/C/GC/15, ‘UN CRC Committee General Comment No 15: The Right of the Child to the Highest Attainable Standard of Health’, 17 April 2013, at paras 71-74; ‘UN CEDAW Committee General Recommendation No 24: Women and Health’, 1999.

¹⁸¹ Article 13, UN Covenant on Economic, Social and Cultural Rights 1966; Articles 28 and 29, UN Convention on the Rights of the Child 1989; Article 10, UN Convention on the Elimination of Discrimination against Women 1979; Article 5(e)(v), UN Convention on the Elimination of Racial Discrimination 1965; Article 24, UN Convention on the Rights of Persons with Disabilities 2006; E/C.12/1999/10, ‘UN ICESCR Committee General Comment No 13: The Right to Education’, 8 December 1999, at paras 43-46; CRC/C/GC/2001/1, ‘UN CRC Committee General Comment No 1: The Aims of Education’, 17 April 2001; CRPD/C/GC/4, ‘UN CRPD Committee General Comment No 4: The Right to Inclusive Education’, 25 November 2016, at paras 39-43; Article 2 of the Protocol 1, European Convention on Human Rights 1950 (Protocol 1 was adopted in 1952).

¹⁸² E/1991/23, ‘UN ICESCR Committee General Comment No 3: Nature of State Parties’ Obligations’, 1990, at para 9.

¹⁸³ *Ibid.*

¹⁸⁴ *Ibid.*, at para 2.

¹⁸⁵ *Ibid.*, at para 10.

are demonstrably inadequate, the obligation remains for a State Party to strive to ensure the widest possible enjoyment of the relevant rights under the prevailing circumstances”.¹⁸⁶ The requirement of progressive realisation presumes that there will be no retrogression. The UN ICESCR Committee note that “any deliberately retrogressive measures ... would require the most careful consideration and would need to be fully justified by reference to the totality of the rights provided for in [UN ICESCR] and in the context of the full use of the maximum available resources”.¹⁸⁷

- 3.5 In 2025, the UN ICESCR Committee noted its concern that the UK Government and NI Executive were not “effectively addressing income inequality or reducing poverty, while also hindering the mobilisation of its maximum available resources for the implementation of [UN ICESCR]... rights”.¹⁸⁸ The UN ICESCR Committee recommended that the UK Government and NI Executive “increase the budget allocated to food programmes, social security, housing, health, education, employment services and other areas related to [UN ICESCR]... rights”.¹⁸⁹
- 3.6 While progressive realisation is an important facet of economic, social and cultural rights, the NI Executive should consider the cost of inaction or ineffective action regarding poverty. For example, costs associated with child poverty are estimated at £825 million per annum.¹⁹⁰ Research indicates that preventative work to end child poverty is often the first to be targeted by budget cuts, which has been viewed by the NI Audit Office to be short sighted.¹⁹¹ Instead, the NI Audit Office advocates that investment in long-term preventative measures regarding poverty will save public money in the future.¹⁹² It is also no exaggeration to state that it is costing individuals (including children) their mental health, physical health and, in extreme circumstances, lives.¹⁹³ This has both moral, legal and financial consequences for the NI Executive.
- 3.7 **The NIHRC recommends that the NI Executive ensures that the Anti-Poverty Strategy is effectively funded to the maximum of its**

¹⁸⁶ Ibid.

¹⁸⁷ Ibid, at para 9.

¹⁸⁸ E/C.12/GBR/CO/7, ‘UN ICESCR Committee Concluding Observations on the Seventh Periodic Report of the UK of Great Britain and NI’, 28 February 2025.

¹⁸⁹ Ibid, at para 19(c).

¹⁹⁰ NI Audit Office, ‘Child Poverty in NI’ (NIAO, 2022).

¹⁹¹ Ibid.

¹⁹² Ibid.

¹⁹³ Mental Health Foundation, ‘Press Release: Cost-of-living is still causing widespread mental distress in NI’, 29 November 2023; Marie Curie, ‘Dying in Poverty in NI 2024’ (MC, 2024); Mental Health Champion NI, ‘Press Release: Mental Health Champion Statement on the Draft Anti-Poverty Strategy’ 27 June 2025.

available resources and includes an express commitment to the principles of progressive realisation and non-retrogression. The NI Executive should conduct a cost/benefit analysis (or similar study) of current preventative measures to tackle poverty in NI and carefully consider the long-term budgetary implications of inaction or ineffective action.

4.0 Child Poverty

- 4.1 The proposed Anti-Poverty Strategy sets out several strategic commitments relating to children and young people's experience of poverty. These include maximising opportunities and minimising costs in relation to education, and continuing free school meals and uniform grants.¹⁹⁴ It is also particularly welcome that the proposed Anti-Poverty Strategy connects child poverty to vulnerability to child criminal exploitation.¹⁹⁵
- 4.2 However, the Expert Advisory Panel on the Anti-Poverty Strategy's recommendations in relation to child poverty are considerably more robust than what is proposed within the Anti-Poverty Strategy. For example, the Expert Advisory Panel recommended that a non-taxable weekly child payment of between £12.50 and £15 for all 0-4 year olds and for 5-15 year olds who are in receipt of free school meals. The Expert Advisory Panel also recommended that this child payment should be extended to d/Deaf and disabled children and young people until the age of 20.¹⁹⁶ The Expert Advisory Panel further recommended removing the two-child limit, ensuring that education is cost free and introducing an up-to-date childcare strategy.¹⁹⁷ Of these recommendations by the Expert Advisory Panel, the proposed Anti-Poverty Strategy only commits to "undertake research to understand the impact of Westminster's two child limit on poverty indicators" and "call on the [UK] Government to remove Westminster's two-child limit".¹⁹⁸ The NIHRC has long recommended that the two child limit is repealed.¹⁹⁹ It is within the NI Executive's gift to introduce mitigating measures that would effectively disapply the two-child limit in NI, as its repeal by Westminster is awaited. It is also notable that

¹⁹⁴ NI Executive, 'The Executive's Anti-Poverty Strategy 2025-2035' (DfC, 2025).

¹⁹⁵ Ibid, at 20.

¹⁹⁶ Expert Advisory Panel, 'Recommendations for an Anti-Poverty Strategy' (DfC, 2020), at 37.

¹⁹⁷ Ibid, at 40-41.

¹⁹⁸ NI Executive, 'The Executive's Anti-Poverty Strategy 2025-2035' (DfC, 2025).

¹⁹⁹ See for example, NI Human Rights Commission, 'Annual Statement 2024' (NIHRC, 2024), at 407.

the extension of child payments and free school meals have been omitted from this proposed Strategy. This is also contrary to the recommendation by the UN CRC Committee that the UK Government and NI Executive “ensure that measures to combat poverty comply with a child rights-based approach and include a particular focus on children in disadvantaged situations”.²⁰⁰

- 4.3 The need for effective monitoring and evaluation measures have also long been recommended by international experts. For example, the UN ICESCR Committee recommended to the UK Government and NI Executive that it:

expedite the adoption or enhancement of measures, including necessary fiscal reforms and increased budget allocations, to end child poverty... ensuring they comply with a child rights-based approach, setting clear targets, timelines, reporting obligations, oversight and participatory mechanisms and adequate resources for implementation.²⁰¹

- 4.4 The UN CRC Committee also recommended that the UK Government and NI Executive:

develop or strengthen existing policies, with clear targets, measurable indicators and robust monitoring and accountability mechanisms, to end child poverty and ensure that all children have an adequate standard of living.²⁰²

- 4.5 It is notable that targets for tackling poverty in NI in general, but particularly child poverty, are missing from the proposed Anti-Poverty Strategy. The levels of child poverty in NI have fluctuated slightly over the years, but have maintained persistent concerning levels. In 2023/2024, there were approximately 104,000 children in NI (23 per cent) living in relative poverty, while approximately 90,000 children (20 per cent) were recorded as living in absolute poverty.²⁰³ The long-term trend shows that children are at a higher risk of living in poverty than the overall NI population.²⁰⁴ The estimated percentage of children in combined low

²⁰⁰ CRC/C/GBR/CO/6-7, ‘UN CRC Committee on the Sixth and Seventh Reports of the UK of Great Britain and NI’, 2 June 2023, at para 46(d).

²⁰¹ E/C.12/GBR/CO/7, ‘UN ICESCR Committee Concluding Observations on the Seventh Periodic Report of the UK of Great Britain and NI’, 28 February 2025, at para 45(b).

²⁰² CRC/C/GBR/CO/6-7, ‘UN CRC Committee on the Sixth and Seventh Reports of the UK of Great Britain and NI’, 2 June 2023, at para 46(a).

²⁰³ Department for Communities, ‘NI Poverty and Income Inequality Report 2023/2024’ (DfC, 2025), at Figures 6 and 7.

²⁰⁴ Department for Communities, ‘NI Poverty and Income Inequality Report 2022/2023’ (DfC, 2024), at Figure 8.

income and material deprivation was 11 per cent in 2023/2024.²⁰⁵ Strikingly, while the rest of the UK has abandoned targets for child poverty, Scotland has reintroduced them and seen a reduction in child poverty levels as a result.²⁰⁶

- 4.6 The fiscal circumstances of the NI Executive are noted above, and the proposed Anti-Poverty Strategy has clearly been limited as a result. However, child poverty remains a persistent issue in NI and the NIHRC is concerned that the measures set out in the proposed Anti-Poverty Strategy do not go far enough to reverse this pervasive problem. It is also difficult to ascertain which measures are specific drivers to tackle child poverty. Given that NI will no longer have a dedicated Child Poverty Strategy, it would be useful to collate all measures aimed at tackling child poverty together under one heading.
- 4.7 **The NIHRC recommends that the NI Executive, working with the Department for Communities, creates a fourth strategic pillar dedicated to measures to end child poverty, which includes concrete and measurable targets.**
- 4.8 **The NIHRC recommends that the NI Executive, working with the Department for Communities, reassess its positions on ending child poverty to ensure that the NI Executive is meeting its obligation to end child poverty to the maximum of its available resources. This includes reengaging with the Expert Advisory Panel and the Co-Design Group on an Anti-Poverty Strategy to establish the most effective approach.**

²⁰⁵ Respondents are asked whether they have access to a list of 21 goods and services including for example, affording to go on school trips or affording a warm winter coat. If they cannot afford a given item, this is scored in the material deprivation measure, with items more commonly owned in the population given a higher weighted score. See NI Statistics and Research Agency, 'NI Poverty and Income Inequality Report 2022/2023' (DfC, 2024), at Figure 8.

²⁰⁶ 'Drop in child poverty in Scotland since targets introduced, report says', *STV News*, 25 June 2025.

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