



Comments from Intac about the consultation on the NI Executive Anti-Poverty Strategy

(September 2025)

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All our documents are available in hard copy in 14pt type size as standard. We also provide word and pdf versions of our documents on our website – www.imtac.org.uk. In addition we will provide information in a range of other formats including:

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About Imtac

The Inclusive Mobility and Transport Advisory Committee (Imtac) is a committee of disabled people and older people as well as others including carers and key transport professionals. Its role is to advise Government and others in Northern Ireland on issues that affect the mobility of Deaf people, disabled people and older people.

The aim of Imtac is to ensure that Deaf people, disabled people and older people have the same opportunities as everyone else to travel when and where they want.

Imtac receives support from the Department for Infrastructure (herein after referred to as the Department).

Comments about the consultation process

The Committee has two specific comments about the consultation process which we would like the Department to use to inform future consultations.

Firstly, the bulk of the consultation period was over the two summer months when members and staff are less available due holidays and other commitments. It is poor practice to issue such important consultations in the mouth of the summer period. We received several other consultations at the same time, limiting our capacity to respond in the detail we would like to each. Consultation undertaken under such circumstances is counterproductive as Government diminishes the opportunity to gain valuable feedback from stakeholders.

Secondly, several Imtac members require documentation in other formats including hard copies of the consultation documents. Alternative formats must be made available as soon as possible following requests, otherwise the recipient is disadvantaged compared to other potential responders. We have made several recent requests for consultation documents in other formats where the speed of response was unacceptably slow. We recommend that all Departments review how they process all such requests for alternative formats and make changes to ensure requests are met and documents are issued within a reasonable timescale.

Comments on the NI Executive Anti-Poverty Strategy

Intac has a specific interest in the Anti-Poverty Strategy as Deaf, disabled and older people are amongst the groups most impacted by poverty. It is also the first of the Executive's social inclusion strategies to be published. The Committee was not involved in the Co-Design process for the Anti-Poverty Strategy but our members were part of, and co-chaired, the Co-Design Group for the proposed Disability Strategy. In responding to the current consultation, the Committee is conscious of how the approach taken by the Executive the current Strategy may be replicated in a future Disability Strategy.

Intac joins the collective voices of the multiple organisations¹ that believe that the Northern Ireland Executive's draft Anti-Poverty 'Strategy' does not meet the criteria of a reasonable strategy. We are joining the collective ask that the Department for Communities completely re-write this draft Anti-Poverty Strategy (APS) and do so at pace. In the Committee's opinion this draft Anti-Poverty Strategy is not fit for purpose.

The Committee fully supports the analysis of others closely involved in the Anti Poverty Strategy co-design process. Key concerns include:

- The draft Strategy fails to fulfil what oversight bodies, including the NI Audit Office and Public Accounts Committee, outline as the basic elements of any strategy.
- The Strategy has no dedicated resources.
- The public has not had an opportunity to scrutinise or comment on either the Programme of Delivery nor the action plans.
- The framework of the draft strategy is individualistic and not systemic. The three pillars do not reflect the lived experience of poverty.
- The language within the draft Anti-Poverty Strategy reinforces the stigmatisation of people experiencing poverty, making it an individual problem which can be solved by changes to 'lifestyle' – while ignoring the systemic causes of poverty.

¹ <https://niapn.org/open-letter-to-the-executive-the-draft-anti-poverty-strategy-is-not-fit-for-purpose/>

Imtac supports and endorses the Expert Advisory Panel² and the Anti-Poverty Strategy Group's³ life-cycle approach to addressing poverty, and agrees with the following principles set out by the Anti-Poverty Strategy Group:

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

Whilst Imtac agrees with the vision of the draft Strategy to eradicate poverty, the draft Strategy does not provide a pathway to reach that vision. The Committee's position reflects that of the majority of other stakeholders, the Department cannot just amend this draft Strategy, it needs to be completely rewritten using the evidence-based recommendations from the Expert Advisory Panel and Anti-Poverty Strategy Group.

The Committee has two further recommendations in relation to a rewritten Strategy. Firstly, the Department must engage with people experiencing poverty as part of developing a new draft strategy. This

² <https://www.communities-ni.gov.uk/publications/report-anti-poverty-strategy-expert-advisory-panel>

³ <https://www.nicva.org/sites/default/files/2025-09/Final%20Anti-Poverty%20Strategy%20Recommendations%20Paper%20-%20Updated%20August%202025.pdf>

must include engagement with Deaf, disabled people and older people and organisations including Imtac. Secondly, the revised strategy must look in more detail at the specific linkages between access to transport and poverty and include specific actions to address such as extending free concessions on transport to all eligible groups of disabled people.

Conclusion

Imtac welcomes the opportunity to comment on the current consultation. Unfortunately, the Committee can only agree with most others, this draft Strategy is not fit for purpose and must be withdrawn and rewritten. We would welcome the opportunity to support the Department in rewriting the strategy including strengthening actions that tackle the link between access to transport and poverty.