



Commissioner for Older People
for Northern Ireland

03 September 2025

Department for Communities,
Poverty Policy Branch,
Level 7 Causeway Exchange,
1-7 Bedford Street,
Belfast,
BT2 7EG

By email: AntiPovertyConsultation@communities-ni.gov.uk

Dear Sir/Madam,

Re: Consultation on Anti-Poverty Strategy

The publication of an Anti-Poverty Strategy by The Executive Office is something to be celebrated. Poverty is arguably the most important social issue that any community can experience, and any steps taken to control, reduce, and eventually eradicate its harmful effects are not only positive, but a fundamental duty of Government.

Poverty is an issue that affects older people in distinct ways. Older people's income is usually lower, as reaching pension age reduces income levels. While many are protected from the risks of low income because they own their homes and have fewer expenses, many others still experience the economic hardship that comes with retirement. Poverty and its related issues also tend to hit harder later in life. Experiencing poverty in old age often goes hand in hand with challenges such as multimorbidity and disability, and overcoming these issues is harder than at other stages of life due to limited opportunities to improve income.

I welcome the Executive's commitment to working together—cross departmentally—to address poverty. COPNI has repeatedly advocated for the need for departments to work together to address the challenges faced by our public services and strained financial resources, and this Strategy is a positive step towards the necessary collaboration across departments

However, beyond these positive aspects, the Strategy is insufficient, providing only an inadequate framework to create the conditions to address older people's poverty in the coming years. The reasons for this assessment are detailed below.

Facts and figures: older people's poverty

The Strategy is ambitious in its proposed Outcomes. It states that its ultimate goal is to eradicate poverty in Northern Ireland, a goal that must be applauded and celebrated. However, eradicating poverty is only possible after a thorough examination of the many factors linked to poverty has been conducted—clearly defining, clarifying, and analysing them. The Strategy is disappointing in this respect, especially regarding older people.

Considering the capabilities of the Executive, my office believes that there is a clearly insufficient use of data and literature in the Strategy. When it comes to older people, the analysis conducted is shallow. Only one reference to data aimed at understanding older people's poverty is made in the Strategy—specifically, in the Equality Impact Assessment (EQIA). In the EQIA, statistics from the Northern Ireland Income and Inequality Report are used to claim that

9% of pensioners were in absolute poverty and 12% of pensioners were in relative poverty (AHC) in 2023/24. (Compared to 15% of total population in absolute poverty and 18% in relative poverty (AHC - 2023/24)). Over the last ten years pensioners have generally been at a lower risk of being in poverty (AHC) than the population as a whole.¹

While this is true, it presents an overly generalised picture of the older population in Northern Ireland and lacks the depth of analysis expected from an Anti-Poverty Strategy. To understand the risk factors and impacts of poverty, it is essential to explore its prevalence in detail, yet the Strategy fails to do so in relation to older people. By simply portraying them as “at lower risk of poverty,” the Strategy risks overlooking the factors that actually contribute to poverty among older people. For an issue as complex as poverty, the above paragraph falls far short of providing the understanding needed to identify and address the specific risks and needs of older people.

Pensioner poverty is lower in statistical terms due to two main factors: smaller households² and lower housing costs.³ However, data on absolute and relative poverty should not hide the fact that **older people are—under many metrics—at a high risk of poverty**. Many of these metrics are likely to worsen in coming years.

In addition, “people older than 65” or “pensioners” represent large and diverse groups, each with their own specific circumstances. While data for the overall population aged over 65 may suggest a relatively positive picture, with lower levels of poverty, a closer analysis reveals that certain groups are particularly at risk—**especially older pensioners, women, private renters, and those on low incomes**. Examining poverty among older people highlights the need for targeted support in specific areas, particularly for these vulnerable socioeconomic groups.

To begin with, older people's income tends to experience a hit whenever they reach retirement age. According to the Family Resources Survey, the average weekly individual income by age in Northern Ireland peaks at the ages of 35 to 44 (£535) and 45 to 54 (£499). Individual earnings of pensioners are significantly lower—£391 for

¹ Department for Communities (2025) [Northern Ireland Executive's Anti-Poverty Strategy \(Equality Impact Assessment\)](#); page 22.

² According to the NISRA Census 2021, approximately 80% of individuals older than 65 live in households of 1 or 2 persons. This contrasts with those aged 15-39 (27.5%) and those aged 40-64 (42.9%). Source, NISRA Census 2021, [Household: Size - 4 Categories by Age - 4 Categories](#).

³ According to the NISRA Census 2021, approximately 70% of people older than 65 live in homes that own outright. This contrasts with those aged 15-39 (18.5%) and those aged 40-64 (32.9%). Source, NISRA Census 2021, [Age - 4 Categories by Household: Tenure - 8 Categories](#).

those aged 65-74 and £336 for those of 75 and older.⁴ Similarly, **the net weekly income of working age households (£1203) is 67% higher than pensioner households (£718).**⁵

The Strategy aims to maintain the income levels of pensioners and proposes—as its top action to improve pensioner poverty—that the Executive and the Department for Communities will lobby Westminster to maintain the triple lock. However, while the triple lock is essential for older people, it is by no means an infallible protection against poverty.

The average pension in the UK is among the lowest of the OECD countries. A UK pensioner earns on average (from all sources) 41.2% of pre-retirement earnings. This makes the UK pension's system one of the least efficient in the OECD, far from the EU average (57.8%), and the OECD average (55.2%).⁶

This is partly due to the fact that the UK public pensions' system is among the least generous in developed countries, offering a replacement rate of about 21.7% of pre-retirement earnings. This contrasts with countries like Spain (80.4%), Italy (76.1%), France (57.6%), Sweden (49%), Germany (43.9%), or even the United States (39.1%).⁷ In these countries, pensioners receive a much higher proportion of their pre-retirement earnings from mandatory public pensions. Therefore, while UK pensioners that receive income from occupational pensions, shares or other sources of income may be protected from poverty, **a pensioner that only receives a public pension may struggle due to their low replacement rate.**

This is the case for at least the poorest 40% of pensioners in Northern Ireland. Public benefits make up 94.6% of the total income for pensioners in the bottom quintile, and 92.7% for those in the second quintile. This means that four out of every ten pensioners—the poorest in Northern Ireland—rely almost entirely on public pensions, with little or no other sources of income. Consequently, **the average income of the richest 40% of pensioners is 2.7 times higher than that of the poorest 40%.**⁸
TABLE 1. Pensioner's gross income by income quintiles (individual pensioner)⁹

⁴ Source: Family resources survey (Individual Dataset, Department for Work and Pensions). Retrieved through Stat-Xplore. Weighted mean total income by individual in Northern Ireland, in latest prices (weekly, CPI adjusted in real terms) by age bands and financial year (2023-24).

⁵ Source: Family resources survey (Individual Dataset, Department for Work and Pensions). Retrieved through Stat-Xplore. Weighted mean total income by household in Northern Ireland, in latest prices (weekly, CPI adjusted in real terms) by type of individual (working-age, pensioner) and financial year (2023-24).

⁶ Source: OECD (2023) [Pensions at a Glance 2023: OECD and G20 Indicators](#), OECD Publishing, Paris; Table 4.2.

⁷ Source: OECD (2023) [Pensions at a Glance 2023: OECD and G20 Indicators](#), OECD Publishing, Paris; Table 4.2.

⁸ Source: Pensioners' Income, Department for Work and Pensions. Retrieved through Stat-Xplore. Weighted mean of gross income of pensioner couples in Northern Ireland by source and financial year. "Benefit income" includes State Pension, Income-related benefits and Disability benefit income.

⁹ Source: Pensioners' Income, Department for Work and Pensions. Retrieved through Stat-Xplore. Weighted mean of gross income of pensioner couples in Northern Ireland by all sources and financial year.

Bottom quintile	£192.43
Second quintile	£258.40
Third quintile	£331.43
Fourth quintile	£439.84
Top quintile	£775.51

Therefore, the average pensioner on the top two quintiles of earnings may not struggle with poverty, but **those in the lowest quintiles, which receive on average £192.43 and £258.40 per week, are at high risk**. This again signals that older people and pensioners are not a homogeneous group, and any assumptions made for older people “as a whole” risk excluding those individuals that are in extremely vulnerable positions.

To continue, **poverty levels among older people tend to increase with age**. As pensioners grow older, their income typically declines, leading to a rise in poverty among older age groups. In addition, ageing is often accompanied by increasing health problems and disabilities.¹⁰ As a result, not only do material levels of poverty worsen, but the stress and anxiety associated with the risk of falling into poverty also increase significantly with age. While relative poverty levels may be lower at younger ages, they are consistently higher than 17% for pensioners older than 80 (see Table 2).

TABLE 2. Pensioner relative poverty by age¹¹

75 to 79	15.9%
80 to 84	17.0%
85 or over	18.4%
65+	11.6%

Similarly, **gender plays a significant role in pensioner poverty**. Data shows that female pensioners are significantly more likely to experience relative poverty (13%) compared to their male counterparts (10%). This factor also correlates with age, meaning that older female pensioners are particularly vulnerable to poverty. For example, **the proportion of women aged 80 to 84 living in relative poverty is as high as 22%**.¹²

Another factor that affects pensioner poverty is tenure type. The analysis conducted in the “Scoping Review of the Literature on Poverty in Northern Ireland” states the following:

¹⁰ In Northern Ireland, 57% of people older than 65 have a long-term condition that limits their day-to-day activities. See NISRA Census 2021, [Health Problem or Disability \(Long-term\) - 2 Categories by Age - 4 Categories](#).

¹¹ Source: Households Below Average Income (Department for Work and Pensions). Retrieved through Stat-Xplore. Pensioner households in low income calculated as lower than 60% of median net household income in Northern Ireland, in latest prices by financial year (2023-24) and age (three-year averages).

¹² Source: Households Below Average Income (Department for Work and Pensions). Retrieved through Stat-Xplore. Pensioner households in low income calculated as lower than 60% of median net household income in Northern Ireland, in latest prices by financial year (2023-24), age and gender (three-year averages).

When looking at pensioner poverty the AHC analysis is the Government's preferred measure, because 77% of pensioners live in homes that are owned outright (compared to approximately 31% of the working age population).¹³

This is true but again misleading. While rates of relative poverty are low among homeowners (10.4%), they increase for those that do not own their homes—15.6% for social rented sector tenants and 21.2% for private renters.¹⁴ Therefore, **the poverty rates of nearly a quarter of NI pensioners that do not own their homes—a substantial proportion—range from 15% to 21%**, something that has been overlooked by the Strategy's analysis.

These are only examples of the heterogeneity, complexities and dangers of poverty for older adults in Northern Ireland. A more thorough analysis could be done, especially considering the capabilities and access to data of The Executive Office. Such analysis would be expected of a Strategy that aims for the eradication of poverty.

This also raises important questions about the Executive's plans to support pensioners who are older, female, and living in the private rented sector, as they experience worryingly high levels of poverty. Measures such as maintaining the triple lock or continuing to fund existing advice services are unlikely to bring meaningful improvement for these groups, whose poverty rates remain as high as 20% despite the availability of such services and benefits.

My office is well aware of these circumstances and believes that they must be fully considered and carefully addressed if the Strategy is to have a meaningful impact on the lives of vulnerable older people.

Strategic commitments

There is only one Outcome in the Strategy that focuses on supporting older people, along with other groups:

Outcome: Appropriate and effective financial support will be provided to those in our society who are socio-economically disadvantaged. Older people, children and adults with disabilities will be helped to access appropriate support.¹⁵

This outcome is supplemented by a strategic commitment, that is, a specific action plan that is meant to support the effective delivery of the Strategy in order to achieve the desired Outcome. The strategic commitment states that

We will provide advice, increase awareness and provide focused support to ensure that older people, and children and adults with disabilities can access their full benefit entitlement. This will include a programme of work to promote Pension

¹³ Department for Communities (2021) [A Scoping Review of the Literature on Poverty in Northern Ireland](#); page 15.

¹⁴ Source: Households Below Average Income (Department for Work and Pensions). Retrieved through Stat-Xplore. Pensioners in low income calculated as lower than 60% of median net household income in Northern Ireland, in latest prices by financial year (2023-24), and tenure type (three-year averages).

¹⁵ Department for Communities (2025) [The Executive's Anti-Poverty Strategy \(2025-2035\)](#); page 18.

Credit uptake and delivery of the Make the Call wraparound service. (Department for Communities)¹⁶

These actions are already in place. Officials from the DfC, along with organisations supported by this department, are already engaged in providing advice on benefit entitlement, and the Make the Call service has been operating for over a decade. Therefore, these are not new or additional actions to supporting older people, but simply a commitment to maintain the existing level of service.

The other specific strategic commitment that aims to support older people is the following:

We will lobby Westminster to maintain the triple lock guarantee in relation to pension payments. (Department for Communities)¹⁷

While this is in principle a positive measure, it does not represent a concrete action taken by any department or by the Executive to improve the circumstances of pensioners. The triple lock is beyond the Executive's control and, therefore, cannot be considered a practical or enforceable commitment with tangible impact. Furthermore, maintaining the triple lock does not increase pension income in real terms but merely preserves it at its current level. As such, it remains unclear how this measure will support pensioners who are already living in poverty despite the triple lock—precisely the pensioners that the Strategy should support to “eradicate poverty.”

In essence, the present Strategy does not increase the support to older people, and that in the best case scenario it will simply keep their benefits and services at the current level.

Accountability

The monitoring and accountability plans outlined in the Strategy are also inadequate. In relation to older people, there are no specific measures proposed to evaluate the success or failure of the strategic commitments—such as tracking pensioners' income levels, uptake of Pension Credit, or the volume and effectiveness of advice provided by relevant organisations. The Strategy evades any form of accountability for its actions regarding support for older people.

This issue is not limited to older people alone. The Strategy lacks proposed monitoring mechanisms for key outcomes such as debt levels, family structure, neglect and abuse, poverty by ethnicity, and the condition of physical infrastructure, to name a few. Some of the indicators that are included are also insufficient or poorly aligned with their intended goals. For example, using the number of households in housing stress as a measure for “access to good quality, affordable and sustainable housing” is deeply flawed, as it only captures the circumstances of those on social housing waiting lists. This excludes other groups, such as homeowners and private renters, who may also face significant financial strain due to housing costs.

¹⁶ Department for Communities (2025) [The Executive's Anti-Poverty Strategy \(2025-2035\)](#); page 23.

¹⁷ Department for Communities (2025) [The Executive's Anti-Poverty Strategy \(2025-2035\)](#); page 23.

A serious, well-thought strategy should not overlook the importance of monitoring its outcomes—either through the effective use of existing data or the development and collection of new, targeted data. On this basis, the Strategy falls significantly short of its accountability obligations.

Conclusion

The launch of a cross-departmental Anti-Poverty Strategy published by The Executive Office is welcome news.

This said, the Strategy pays little to no attention to older people's poverty. Older people are a highly vulnerable section of the population that live with lower financial resources and are constantly impacted by cuts in essential services. This lack of attention from the Executive, regrettably, mirrors the approach or lack of approach to older people in the Programme for Government.

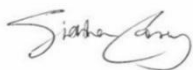
This Strategy and some of its supporting documents (EQIA and literature review) misrepresent the phenomenon of pensioner poverty, providing an inaccurate and overly simplified description of a phenomenon that is of great relevance to society.

There is potential for a much more ambitious and impactful strategy, even within the current financial environment. Previous strategies published by public bodies demonstrate that an adequate roadmap to address issues can be done even if the economic circumstances are not favourable—such is the case with the Fuel Poverty Strategy¹⁸.

The present Anti-Poverty Strategy does not provide such a roadmap. The Strategy seems uncommitted and poorly researched. Therefore, while this office applauds the intention to advance on a cross-departmental strategy to address poverty, it does not find in the contents of the present Strategy any reassurance that the Executive is taking this issue seriously—particularly in relation to older people.

With regard to older people's poverty, the Strategy represents a good starting point, but much more is needed.

Yours sincerely,



Siobhan Casey
Commissioner for Older People for NI

¹⁸ Department for Communities (2025) [Consultation on a draft Fuel Poverty Strategy](#).