



Consultation Response

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Response to the Housing (Amendment) Bill Call for Evidence

August 2026

1.0. Introduction

1.1. About Housing Rights

Housing Rights is Northern Ireland's leading independent provider of specialist housing advice. For over 60 years, we have been helping people to find and keep a home. We believe that prevention is better than cure. Our work seeks to ensure that individuals and families living in Northern Ireland do not reach this crisis point. We recognise, however, that this is not always possible, and we also provide advice and assistance to help ensure that the experience of homelessness is rare, brief and non-recurrent. Housing Rights passionately believes that no one should be without a home and works towards the goal that every citizen in Northern Ireland has a good quality, affordable and sustainable home that meet their needs. In particular, the organisation's services are targeted at people who need help to:

- Prevent them from becoming homeless;
- Find suitable rented accommodation;
- Sustain their tenancies;
- Explore their housing options;
- Avoid repossession and eviction;
- Tackle disrepair or poor conditions in their homes; and
- Meet their housing costs;
- Repay mortgage and/or rent arrears;
- Resolve disputes with their landlord and/or lenders.

In the year ending March 2026, our advice services dealt with enquiries from over 14,000 households on over 71,000 housing issues. We provide a specialist housing helpline open Monday to Friday, complemented by a digital Live Chat service accessible through a comprehensive and user-led advice website www.housingrights.org.uk. Our busy frontline advice service is supported by an advocacy and representation service staffed by dedicated caseworkers and a small legal team who prevent and alleviate homelessness by liaising with landlords, lenders and other agencies, as well as provide representation for County and High Court.

In addition to preventing homelessness, our services also assist in promoting access to justice by providing an emergency court representation service (Housing Possession Court Duty Scheme) which assists households at risk of homelessness due to mortgage or rent arrears who are unrepresented in court proceedings. Since December 2019, we have also administered a Housing Mediation Service to address and avoid the escalation of disputes to prevent homelessness.

The reach and expertise of our advisers also extends to Northern Ireland's prisons to assist those entering or leaving custody to safeguard tenancies and/or to access appropriate support to prevent homelessness on release.

We work to support communities and other frontline advisers across Northern Ireland by providing a well-established practitioner support programme, through our Community Housing Advice Partnership and through a comprehensive training and legal information service.

In addition to our frontline specialist advice, representation, and support services, Housing Rights has a policy and participation service that influences government policy decisions to improve housing and homelessness in Northern Ireland. Our policy work is informed by the views and experiences of the people who contact us for advice and aims to support the identification of evidence-based, informed solutions.

1.2. The Nature of our Response

This briefing is intended to inform the development of the Housing (Amendment) Bill, also referred to as the Homelessness Prevention Bill. The Homelessness Prevention Bill is a Private Members' Bill (PMB) which was introduced by Sinn Féin MLA Colm Gildernew. At the time of writing, the Communities Committee has issued a Call for Evidence to inform the Bill's development. The Bill proposes to extend the 'threatened by homelessness period' – the time period in which the Northern Ireland Housing Executive (NIHE) is legally obliged to support anyone who is likely to become homeless – from 28 days to 60 days. This briefing paper will make specific recommendations to inform these proposals.

Housing Rights' work supporting people in housing need and at risk of homelessness in Northern Ireland means that we are expertly placed to comment on the increasing difficulties many individuals and families face in securing and maintaining suitable housing. Every day, we support people who are threatened with homelessness, giving us first-hand insight into the realities of housing insecurity and the increasing pressures affecting households across the region.

As a housing advice charity, Housing Rights aims to realise a society where everyone has a home. Our policy and advocacy work is informed by our frontline advice services and the experiences of the people who contact us each day for help, support and advice. These insights, drawn directly from those experiencing housing need and homelessness, inform the content of this briefing paper.

This paper will follow a similar structure to the call to evidence survey¹, which is live at the time of writing to assist with data and evidence gathering.

2.0. Survey Questions

2.1. Do you support the overall purpose of the Housing (Amendment) Bill?

Housing Rights supports the overall purpose of the Bill and welcomes the proposal to extend the period during which a person is *considered threatened with homelessness* from 28 to 60 days.

In Housing Rights' view, extending the timeframe would strengthen NIHE's homelessness prevention efforts by enabling earlier intervention and providing additional time to take steps to sustain existing accommodation or secure suitable alternative housing for households at risk of homelessness.

The extension from 28 to 60 days would also provide individuals and households with a longer period in which to access support once they become aware that they are at risk of homelessness. This would include private renters who receive a 12-week notice to quit from their landlord under the current regulations, or homeowners who are subject to enforcement proceedings and where

¹ [Housing \(Amendment\) Bill - Call for Evidence - Northern Ireland Assembly - Citizen Space](#)

previous prevention interventions have failed. In addition, increasing the timeframe to 60 days would align with longer notice-to-quit periods, currently being developed by the Department.

Extending the Threatened by Homelessness period may also provide additional security and reduce anxiety for those households whose homelessness cannot ultimately be prevented. By allowing more time for the NIHE to assess and determine their homelessness status, affected households would have greater certainty about the support available to them before they lose their accommodation. In particular, this would help ensure that individuals and families know in advance whether they will be entitled to temporary accommodation, reducing the risk of rooflessness and the uncertainty associated with an impending homelessness crisis.

Housing Rights supports the idea that consideration should be given to replicating measures in Scotland and Wales to extend the 'threatened with homelessness' period to six months, **but stress the fact that extending the window to six months in both jurisdictions formed a part of wider homelessness prevention reforms in both jurisdictions. In Northern Ireland, consideration should also be given to undertaking a strategic, expert-led review of the housing and homelessness systems, similar to those conducted in Scotland and Wales, which generated a wide range of prevention-focused recommendations that are now being implemented by both governments.** The extension of the threatened homelessness period should therefore not be considered in isolation, but as part of a wider programme of reform to ensure that Northern Ireland's housing and homelessness prevention systems are adequately equipped to respond to the challenges posed by the ongoing housing crisis.

Homelessness and the risk of homelessness often arise from a range of interconnected factors, including poor health, poverty and complex support needs. **Effective prevention, therefore, requires a coordinated, whole-system approach** that enables agencies to work together to identify risks at an early stage, respond appropriately, and prevent individuals and families from falling through gaps in service provision.

Housing Rights therefore believes that Northern Ireland should introduce a statutory duty on all relevant public authorities to cooperate in preventing homelessness. This duty would extend beyond the NIHE and apply across a range of public bodies whose functions have a direct impact on the risk of homelessness, including those in health, social care, justice, education, and other relevant sectors. A duty to prevent homelessness would place a legal obligation on public bodies to work together to prevent homelessness, fostering a more coordinated and collaborative approach across government and enabling earlier, more effective interventions.

Housing Rights recognises that implementation of the Bill may give rise to financial, logistical and administrative challenges for the NIHE. As the body responsible for delivering these functions, the NIHE is best placed to identify and assess any operational pressures arising from the proposed changes and to determine how these can be most effectively managed. It is therefore essential that the NIHE is appropriately resourced and supported to address these challenges and successfully implement the measures contained within the Bill.

Housing Rights also recognises that the nature of the housing crisis we face in Northern Ireland makes it challenging to predict the Bill's impact but believes it is a building block for strengthening homelessness prevention measures in Northern Ireland, which is a strategically sound approach. Housing Rights therefore views the proposal within the PMB to extend the 'threatened by homelessness' period as a useful first step on the path to wider homelessness prevention reforms. These include reforms to security of tenure in the private rented sector to ban no-fault evictions, as

well as measures to introduce a statutory duty to cooperate on the prevention of homelessness, as outlined in Housing Rights' recently published discussion paper.²

2.2. Do you consider that the current 28-day period provides adequate protection for people who are threatened with homelessness?

Under the current legislation, a person in Northern Ireland can only be defined as threatened with homelessness if it is 'likely that he will become homeless within 28 days from the day on which he gives written notice to the Executive that he is threatened with homelessness.'³ **This is out of step with other UK jurisdictions, and in our view doesn't provide adequate protection.**

In Wales, for example, from April 2015, the timeframe for an applicant to be threatened with homelessness was doubled, from 28 to 56 days.⁴ For any household found to be threatened with homelessness, local authorities in Wales now also have a 'prevention duty' to help sustain current accommodation, if the accommodation is suitable.⁵ The measures were broadly intended to facilitate the operation of the Housing Solutions model in Wales: by being required to take up to 56 days in which to attempt to prevent homelessness, the capacity of local authorities to prevent homelessness was increased.

In 2017, a report which examined Welsh homelessness prevention in the year following the implementation of the Housing (Wales) Act 2014 was published by Cardiff University and Shelter Cymru.⁶

The paper found that *'services have been successfully reoriented towards prevention, creating a more supportive environment, reducing the number of people in temporary accommodation and decreasing the number who remain homeless after seeking help.'*

In the year following the implementation of the Act, 7,128 households were given help to prevent them from becoming homeless, and in 65% of cases, this help was successful in its goal. 6,891 households were given help to relieve homelessness, with a far lower success rate of 45%. The difference in these success rates emphasises the value of prevention work at the earliest opportunity.

The year following the implementation of the Act saw an 18% reduction in the use of temporary accommodation compared to the previous year.

There are, however, caveats to this success. Firstly, the Housing (Wales) Act 2014 also removed priority need from people leaving prison, who had constituted 17% of households in temporary accommodation. Secondly, in Wales, there was no duty to provide temporary accommodation to single homeless people. In Northern Ireland, this duty does exist and for the most recent time period for which data is published in Northern Ireland (October 2025 – March 2026), single males made up over half of the total allocations to temporary accommodation.⁷

² ['A discussion Paper to Support Homeless Prevention in Northern Ireland' 1.pdf](#)

³ [The Housing \(Northern Ireland\) Order 1988](#), Section 3(6)

⁴ [Housing \(Wales\) Act 2014](#), Section 55(4)

⁵ [Housing \(Wales\) Act 2014](#), Section 66(1)

⁶ [Homelessness Prevention: Reflecting on a Year of Pioneering Welsh Legislation in Practice](#)

⁷ [ni-homelessness-bulletin-oct-mar-2026-tables.xlsx](#) Table 3_1

The paper also identifies some issues with the implementation of the legislation, as some Councils demonstrated a better understanding than others, which led to inconsistencies in approach and effective joined-up working with partners from one local authority to another.

However, the fact that NIHE is the single strategic housing authority in Northern Ireland should provide an advantage for consistency of implementation and practice, whereas lessons could be learned from Wales that partnerships and cooperation with voluntary sector organisations and fellow public authorities are key to homelessness prevention efforts. NIHE already work in partnership with many organisations across Northern Ireland, partnerships which could be strengthened with the additional time the proposals within this PMB allow.

In recent years, the Welsh Government have continued to iterate on and improve their reforms. These reforms arise from a report from the Expert Review Panel⁸, commissioned by the Welsh Government to consider how legislative change could end homelessness in Wales. The report made several recommendations, all of which were accepted and implemented by the Welsh Government. Examples include extending the threatened by homelessness period to six months, removing the Priority Need test, and establishing a statutory duty on Public Authorities to prevent homelessness.

In Scotland, the Housing (Scotland) Act 2025 received Royal Assent on 6th November 2025 and made several changes to reorient Scotland's homelessness services away from crisis intervention and toward prevention.⁹ Included in the Act are additional protections for victims of domestic abuse, powers for Scottish Ministers to introduce rent-controlled areas, and an 'Ask and Act' duty on Scottish relevant bodies, including health boards, the police and registered social landlords. However, as the PMB is focused on extending the 'threatened with homelessness' period, the most relevant item of the Act to this consultation is that it will ensure that an assessment can be made of whether a household is 'threatened with homelessness up to six months before homelessness appears imminent. This is up from two months, and the Act clarifies 'reasonable steps' local authorities should take to prevent homelessness.¹⁰

The current 28-day period in Northern Ireland is insufficient in a number of circumstances where individuals are aware of the risk of homelessness well in advance of losing their accommodation. This includes private tenants who have received a 12-week notice to quit and homeowners who are subject to enforcement proceedings, both of whom are likely to know they are threatened with homelessness long before the current threshold is met. **Extending the *threatened with homelessness* period would enable earlier intervention and provide greater opportunities to prevent homelessness before a crisis point is reached.** The proposed extension would also better align with longer notice-to-quit periods currently being developed by the Department for Communities as part of Phase Two of private rented sector reform.

There is, however, additional reasoning for our belief that the current period is insufficient. As the housing crisis has worsened, our advisers have experienced a rise in the number of cases of people who are threatened with homelessness, or are homeless, who are not having a decision made on their full duty applicant status within the 28-day period. While cognisant of the fact that at Housing Rights we tend to be confronted with the problem cases, there has nonetheless been an increase in people who, having informed the NIHE that they were threatened with homelessness at 28 days before the date they were likely to become homeless, have reached that day without a decision

⁸ [ending-homelessness-in-wales-a-legislative-review.pdf](#)

⁹ [Housing \(Scotland\) Act 2025](#)

¹⁰ [Housing \(Scotland\) Act 2025 - Explanatory Notes](#) Part 5

having been made on their homelessness status. It is our experience that some people are being advised to present to the NIHE on the day they become homeless for allocation to temporary accommodation, and in some cases, people are waiting in an office until 5 pm before being allocated. This is obviously a stressful experience for people threatened with homelessness, which would be lessened if they had certainty on their homelessness status within a reasonable time period.

Housing Rights therefore agrees that the current 28 days is insufficient, and supports the extension of the 'threatened with homelessness period' to 60 days.

2.3. Would extending the period to 60 days make it more likely that homelessness can be prevented before a person or household reaches crisis point?

Housing Rights believes that extending the threatened with homelessness period from 28 to 60 days would strengthen the NIHE's ability to prevent homelessness by allowing more time to sustain existing accommodation or secure suitable alternative housing for households at risk of becoming homeless.

Given the record levels of homelessness and people on the social housing waiting list, it is likely that situations such as last-minute temporary accommodation placements are arising because of stretched capacity. Increasing the 'threatened with homelessness' period from 28 to 60 days would provide the NIHE with more time and capacity to attempt to prevent homelessness cases through tenancy sustainment.

Where homelessness cannot be prevented, the additional time would support more timely homelessness assessments and enable more effective planning for the allocation of temporary or settled accommodation. Maximising the period during which support can be provided to households threatened with homelessness would also be consistent with the preventative ethos underpinning the Housing Solutions approach, helping to ensure that homelessness is addressed at the earliest possible stage.

Having said that, to take advantage of the additional time afforded for intervention, the NIHE must be supported in meeting that challenge. The benefits of being given more time to build housing plans for applicants, to access mediation, or to assist in finding alternative accommodation before the point of homelessness can only be maximised if the NIHE are resourced and supported to do so.

In short, the NIHE must be adequately supported to take reasonable steps to prevent homelessness.

This support must include resourcing to enable the NIHE to meet staff capacity demands. To maximise the impact of the preventative approach, the NIHE's Housing Solutions teams must be adequately resourced and equipped to undertake meaningful homelessness prevention work, tenancy sustainment activities and early intervention measures.

2.4. Could the Bill increase demand for temporary accommodation, including non-standard accommodation such as hotels or B&Bs?

As the owner of the relevant data and modelling capabilities, the NIHE is best placed to assess with certainty whether the Bill is likely to increase demand for temporary accommodation, including the use of non-standard accommodation such as hotels and B&Bs.

Housing Rights does not anticipate that the Bill will lead to an increase in underlying demand for temporary accommodation. The proposed extension does not broaden the categories of people who may be considered homeless or owed a homelessness duty; rather, it provides an earlier opportunity for intervention and support for those already at risk of homelessness.

While there is a possibility that implementation may initially create additional demand on services as households become eligible for assistance at an earlier stage, it is our view that such pressures could be mitigated through a combination of effective operational planning, appropriate resourcing, or a phased implementation of the extended timeframe.

In Housing Rights' view, the vast majority of households who would be considered threatened with homelessness under a 60-day period would also become eligible for assistance under the existing 28-day period. The key difference is that support and intervention could be provided earlier, giving the NIHE greater opportunity to prevent homelessness before a household reaches the point of requiring temporary accommodation.

Theoretically, if the NIHE is sufficiently funded and adequately staffed to meet the expanded duty, the demand for temporary accommodation should decrease.

Unfortunately, Housing Rights has observed that it is commonplace for an applicant, once given Full Duty Applicant status, to be told to present to their local NIHE office on the day they are made homeless, to be allocated temporary accommodation at the last minute. It is possible that, under this Bill, this practice could remain commonplace, but if the Bill is to have an impact, it is in enabling the NIHE to minimise these instances, rather than creating increased demand.

2.5. Clause 2 provides that the Act would come into operation 6 months after Royal Assent. Is this an appropriate period to allow for preparation and implementation?

It is likely that the Bill will, in the short- to medium-term, create some administrative and operational challenges for the NIHE. Although we do not believe the Bill will increase demand for Temporary Accommodation, expanding the duty to 60 days will create an additional, immediate caseload for the NIHE. This immediate shock would likely ease over time, as many of the new cases would have become 28-day cases under current regulations anyway. Housing Rights believe that through a combination of effective operational planning, appropriate resourcing, or a phased implementation of the extended timeframe the impacts of the initial shock can be mitigated. To support the transition and facilitate the necessary planning requirements, including budgetary considerations, we believe it might be more appropriate for clause 2 to provide that the act comes into operation within 12 months of receiving royal assent.

With more time for intervention, each case would require a higher level of caseload management from NIHE caseworkers. There will likely be more cases, more follow-ups and more interventions per case, something which the NIHE will need to be sufficiently prepared for and resourced to manage.

The NIHE will need sufficient support from the Department in order to meet the challenge and sufficient time to increase staffing levels to prepare and manage an increased caseload. Housing Rights believes these are manageable costs and creates employment opportunities.

2.6. Please identify any specific amendments you would suggest, including the relevant clause where possible.

None.