



Renters' Voice!

Housing (Amendment) Bill - Call for Evidence

Closing date: 3 September 2026.

About Renters' Voice

Renters' Voice is a group for people who rent from a private landlord or through a letting agent in Northern Ireland. Our experience of renting motivates us to create change by campaigning for improvements across the private rental sector:

- we **speak out** to influence public and political discussions.
- we ask to be **involved** in relevant decision-making.
- we **empower** other renters to create change.

As well as being a strong voice for renters in NI, we want to embed a culture of tenant participation among decision makers.

Renters' Voice is supported by Housing Rights and funded by the Community Foundation Northern Ireland, but our voice is our own.

General views on the Bill

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

Yes

Please explain your answer, including any areas where you believe the Bill should be amended.

Yes, Renters' Voice supports amending the definition of "threatened with homelessness" in the Housing (Northern Ireland) Order 1988 from 28 days to 60 days. Currently, the "threatened with homelessness" definition of 28 days is too short, which can create issues for those at risk of homelessness. Applicants in the private rented sector are left to apply for homelessness support only at the very end of their tenancy, when they are at their most stressed. This assessment process can be delayed, causing further problems and postponing statutory duties of temporary accommodation or storage. The final 4-week crunch assessment can be a distraction for applicants who are urgently seeking a new private rented home, especially if they are working full-time. If applicants can be assessed much earlier, they are likely to be less stressed during the final stages of their notice to quit, and they will have a better understanding of their statutory rights (and may have already been able to avail of them). Further, the amendment lines up with proposed changes to notice to quit periods within the Private Tenancies Act 2022

As outlined below, Renters' Voice supports the bill's purpose and believes that if the NIHE can resource itself to meet the obligations outlined, it will help private renters whose tenancies have been ended.

Current 28-day period

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

No

Please explain your answer, including any practical examples or evidence.

Renters' Voice believes that the current 28-day protection does not reflect the difficulties faced by private renters in Northern Ireland when threatened with homelessness, nor will it reflect future changes to notice-to-quit periods under the Private Tenancies Act 2022. In Renters' Voice experience, the Private Rental Sector (PRS) has become increasingly harder to access, for example, due to the lack of available properties, rising rents and accessibility issues. This means it often takes much longer than 28 days for tenants to find another private rental that meets their needs.

Currently, 28 days or roughly 4 weeks represents half the time the majority of private renters will receive in a notice to quit. For tenancies lasting between 1 and 10 years, landlords must provide a written notice period of 8 weeks, and if a tenancy is periodic, then this notice can be issued at any time for any reason. While the Private Tenancies Act 2022 is set to introduce longer notice-

to-quit periods, which should give renters more time to consider their options, these have not yet been implemented, and it is unclear when they will be. Even with the inclusion of longer notice to quit periods, a 28-day definition of “threatened with homelessness” still leaves applicants uncertain about support if they are unable to source a new tenancy.

The current 28-day period is even more problematic for certain groups who face additional barriers when accessing a suitable private rental. For example, pet owners can struggle to access offers as landlords worry about damage to their properties, even when animals are fully trained. Renters from other countries face barriers to accessing private rentals as well, including the need for a guarantor who lives in NI and a reference from a previous landlord. Older renters and those with disabilities may struggle to find properties that meet their access needs and health problem needs, limiting their options from an already small pool of available properties at suitable locations. A longer term of 60 days will at least provide such renters the comfort of knowing statutory support is available for them.

A highly competitive, limited market also affects long-term renters living in a specific location during their tenancy, who may struggle to consider alternatives if they have never had to do so before. In Renters’ Voice members’ experience, the current period of 28 days may not be sufficient for them to decide on such a major change in location. Again, a longer term of 60 days will at least provide such renters the comfort of knowing statutory support is available for them while they try to decide on a new future elsewhere.

As a result, Renter’s Voice believes that demand on the NIHE to support private renters who are threatened with homelessness is higher than ever, and the current 28-day period is therefore not sufficient for the NIHE to meet its duty to complete homelessness assessments & provide temporary support in this period. Renters’ Voice members have lived experience that even in the current system, a homeless assessment is not always completed within 28 days before the end of a tenancy. In these circumstances, applicants have to rely on less certain interim accommodation, rather than the statutory duty-provided temporary accommodation. The uncertainty about the status of their assessment can cause applicants significant stress as the Tenancy notice period draws to a close. A client may be completely unaware of what kinds of temporary accommodation offers they will receive until a day or so before their notice ends.

Renters’ Voice believes that more than 28 days is required to give NIHE housing officers enough time to consider a homelessness assessment and to provide clients with certainty about whether they will receive homelessness support from NIHE. This would assist the NIHE not only to gauge demand on temporary accommodation but also help them manage their limited supply of temporary accommodation rather than reacting in an individual’s final week of PRS accommodation (as is currently the Renters’ Voice experience).

Proposed 60-day period — Clause 1: “In Article 3(6) of the Housing (Northern Ireland) Order 1988 (definition of threatened with homelessness) for “will become homeless within 28 days” substitute “will become homeless within 60 days”.

3. *Clause 1 would amend the definition of “threatened with homelessness” so that a person is included if they are likely to become homeless within 60 days rather than 28 days. Do you support this change?*

Yes

What impact would this change have on homelessness prevention?

Renters’ Voice supports the proposed change as we believe it would bring the statutory period more in line with the 56-day notice period (8 weeks) required for many private renters in Northern Ireland (i.e. those who have been in their homes for between 1 and 10 years). As noted in the previous question, we believe 60 days would assist the NIHE in gauging upcoming demand for temporary accommodation and in managing its limited supply, rather than reacting in an individual’s final week of PRS accommodation.

Renters’ Voice believes that more time will assist with homelessness prevention, as it may provide people with greater security and peace of mind while they try to resolve their housing situation, either by seeking a new private rental or applying for social housing. If the extended time allows the NIHE to process a client’s homelessness application earlier, it will provide more time to secure suitable temporary accommodation, complete an accurate points assessment or store their items. Renters’ Voice recognises that while eviction is stressful to everyone who experiences it, it can be particularly upsetting for those with medical conditions, pets or families with dependent children, therefore certainty of future support is more appreciated.

The uncertainty of the notice to quit phase of an eviction can raise such stress levels, further affecting their mental health and day-to-day life, not knowing whether they will be supported following the end of the notice or whether they have to remain beyond their notice to quit to avoid being homeless or in unsuitable, last-minute temporary accommodation. Additional time for the NIHE to support clients may help alleviate this uncertainty. Giving more time to secure accommodation near medical facilities, support networks, or educational needs can be invaluable to an applicant’s experience. Extending the statutory duty from 28 days to 60 days will provide applicants with medical issues or dependent families more time to prepare for eviction and mitigate loss of support networks or find alternative means to support family members they may themselves support.

As noted previously in Renters’ Voice experience, those at risk of losing their private accommodation, like many other people needing to leave their homes, may experience a sense of loss if they must relocate away from their long-term, settled community while waiting for new accommodation, either social or private. An earlier homelessness assessment can help reduce the stress of these factors by providing applicants with a clear view of a safety net before their notice period ends.

Renters’ Voice is further aware that many renters without medical or mental health conditions at the time their notice is first issued may develop them during the notice period due to the high levels of stress caused by the uncertainty of their situation and the limited time available to

undertake a homelessness assessment. In our experience, the loss of a private rented home can make a person feel incredibly vulnerable; members have experienced not just a loss of their home but a sense of self. In our experience, the lack of suitable private rented accommodation and the abundance of extremely poor-quality housing is extremely disheartening. In the words of one member, it feels as if you have “been eliminated from the Earth” due to the lack of support and uncertainty of your future.

While supportive of the bill, Renters’ Voice recognises that a change to the definition of “threatened with homelessness” alone may not create new homelessness prevention outcomes. Ongoing issues such as the supply of social housing, which is driving the housing crisis, must also be addressed. In addition, Renters’ Voice believes that, along with the extension, staffing issues within NIHE must also be addressed to ensure housing officers have the capacity to complete the homelessness assessments at an earlier time.

In 2024, one of our older members, then aged 79, presented as homeless when she received a notice to quit from her landlord. However, she received no assistance from NIHE, information or contact with her housing manager. She was contacted only 3 days before eviction by Belfast Central Mission, which had received her details from the NIHE. The result highlighted the need to ensure that an extended support period is accompanied by sufficient NIHE staffing resources and that the NIHE proactively supports people at an earlier stage in their journey.

Practical impact on people at risk of homelessness

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

Yes

Please explain your answer.

Renters’ Voice believes that extending the period during which the NIHE must support people threatened with homelessness should have a positive impact on reducing the number of people who fall into homelessness and avoid them reaching a crisis point. It is our hope that this extension could help curb the risk of homelessness by addressing its causes or preparing tenants in advance for the experience of homelessness services while they remain secure in their current housing. The longer period could give tenants peace of mind, for example, by providing applicants with clarity on what statutory support they are entitled to at an earlier stage, which in turn will give people more time if they find out they are not entitled to support, to access storage, or to enter temporary accommodation.

However, as noted previously, we feel that alongside this extension, the staffing issues within NIHE must also be addressed to ensure housing officers have the capacity to complete the longer-term homelessness assessments at an earlier time. If this is not the case, we are concerned that the extension may only extend the period of non-action. In the Renters’ Voice experience, even the current 28-day period does not guarantee support; as discussed above, one of our members, who had presented as homeless, was not allocated a housing officer by the end of her 28-day period. We are therefore concerned that, if not effectively implemented, the 60-day extension could have the unintended effect of making it more likely that people are lost in the system and not given the support they need in advance of their eviction date.

In order for the extended time period to be effective in preventing people from falling into homelessness or a crisis point, we feel that additional support would be required for private renters who wish to access new private rented accommodation, such as advice or deposit support. This is particularly important in the current context of poor standards, unaffordable rents, and extremely high demand for private rentals, which far outstrips supply. If this is not the case, Renters' Voice is concerned that the role and support provided by NIHE would not necessarily be enhanced by the extended period.

Temporary accommodation and housing supply

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

No

If so, how should this risk be addressed?

Renters' Voice believes that even if the proposal initially causes some financial pressure, it will eventually rebalance. We do not necessarily believe that an increased assessment period will place a greater burden on temporary accommodation, as tenants will likely wish to remain in their private rental until the final couple of weeks of the notice period. At which point, if they have not secured new private rented accommodation, the overall costs would be the same. The additional period provided by the amendment means they will have more time to be assessed, more time to understand the statutory support available and more time to store their larger items.

Instead, Renters' Voice imagines the main cost would be primarily due to increased administration, communication, and the implementation of new processes. As mentioned above, based on our experience of presenting as homeless and the current pressures facing NIHE staff, we feel it is important to provide increased and enhanced resources for NIHE staffing for the changes to be effective.

Renter's Voice feels that the amendment will only work effectively if changes are made to ensure that NIHE actually provide support to people threatened with homelessness at the earlier stage of 60 days. We acknowledge there would be an initial administrative pressure, but over time, we believe this would rebalance with time as processes settle. Indeed. If the system worked and homelessness could be curbed or prevented earlier, then NIHE would face less administrative pressure towards the end of the period, when tenants are imminently threatened with homelessness.

Commencement — Clause 2: “This Act comes into operation at the end of the period of 6 months after the date this Act receives Royal Assent.”

6. *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?*

Yes/No

Please explain your answer.

As outlined in the previous response, the amendment's overall effectiveness will depend on the NIHE's willingness to invest resources to ensure it is effective. Renters Voice strongly believes it will be effective in the long run and will bring better resolution to applicants, but it can only do this if properly invested.

If the NIHE can resource and ensure an effective delivery of longer-term housing assessments, Renters' Voice would like to see implementation as soon as possible. Ultimately, Renters' Voice wants to ensure that the amendment's operation is as effective as possible. Should it take longer than 6 months to implement, such as 12 months, we would support this. However, we would not support a delay longer than 12 months, as it would leave applicants vulnerable to the issues the amendment aims to correct.

We would hope that following the May 2027 Election, a new Assembly Executive will finalise a budget for the NIHE that will consider the implementation of this clause and the required resources are allocated appropriately.

Suggested amendments

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

Renters Voice has no further suggestions on new amendments or clauses