



Submission

Housing (Amendment) Bill

September 2026

homelessconnect.org

Housing (Amendment) Bill Consultation

Introduction

1. Homeless Connect welcomes the opportunity to provide evidence to the Committee for Communities on the Housing (Amendment) Bill. Homeless Connect has worked to prevent and alleviate homelessness since 1983. As an umbrella body, we represent over forty organisations in the independent homelessness sector and support people with lived experience of homelessness to have their voices heard.
2. We responded in July 2025 to the Bill Sponsor's consultation on the proposal then described as the Homelessness Prevention Bill.¹ Our position since the consultation was conducted has not changed. We remain supportive of the principle of extending the period within which a person at risk of homelessness can access support for the purposes of preventing homelessness.
3. The Bill introduced in the Assembly on 30 June 2026 gives effect to that proposal by amending Article 3(6) of the Housing (NI) Order 1988. It contains one substantive clause, replacing the current 28-day period with 60 days. If enacted, the change would come into operation six months after Royal Assent.²

Key Messages

- Homeless Connect is supportive of the principle of extending the period within which a person at risk of homelessness can access support for the purposes of preventing homelessness.
- The current 28-day threshold does not provide sufficient time for meaningful prevention activity and is difficult to align with current private tenancy notice periods. Earlier intervention is likely to improve opportunities to sustain accommodation and avoid crisis responses.
- The Housing Executive and the Department of Communities should provide a quantified assessment of implementation costs, staffing implications and anticipated outcomes.
- While welcome, this amendment should be viewed as a first step towards wider reform of homelessness legislation.

Support for the Bill

4. Homeless Connect strongly believes that it is preferable to prevent homelessness before it occurs rather than respond after a household has already lost its home. Prevention produces better outcomes for individuals and families and can reduce the wider personal, social and financial costs associated with homelessness.
5. We agree with the Bill Sponsor that the current 28-day period is too short in practice. Four weeks provides very limited time for meaningful preventative work, particularly where a household is dealing with relationship breakdown, the loss of rented accommodation, domestic abuse or another housing emergency.³ Earlier engagement creates more opportunity to understand the circumstances, sustain existing accommodation where this is safe and appropriate, or identify a suitable alternative before crisis point.
6. Earlier intervention would be beneficial for people whose departure from an institution or supported setting can be anticipated in advance, including people leaving prison, care or other institutional settings. In many cases, the date of discharge or release is known beforehand, creating opportunities for housing needs to be identified and addressed before a person loses accommodation. The Scottish Prevention Review highlighted transitions from public institutions as points at which homelessness can potentially be prevented through earlier planning and coordination between relevant agencies.⁴ While the evidence from Scotland cannot be assumed to apply directly here, it illustrates how extending the timeframe for intervention may create additional opportunities to prevent homelessness before a crisis occurs.
7. The case for change is reinforced by the interaction between homelessness and private tenancy law. A private tenant whose tenancy has lasted for more than one year may currently receive at least 56 days' notice to quit, while the statutory homelessness framework may prevent that person from being treated as threatened with homelessness until the final 28 days.⁵ Moving to 60 days would create greater alignment and allow assistance to begin sooner.
8. The Bill would also move Northern Ireland (NI) closer to the approach taken elsewhere. England and Wales use a 56-day period and Scotland uses two months.⁶ While these jurisdictions provide useful examples of longer intervention periods, it is important to recognise that each has also introduced wider homelessness prevention reforms. As a result, it is difficult to isolate the effect of the threatened homelessness

period itself from the broader legislative changes implemented elsewhere. The impact of this amendment should therefore not be overstated. Its principal benefit is to provide earlier opportunities for preventative action and remove an unnecessary constraint within the current framework. NI's statutory framework has remained largely unchanged since 1988 and has not kept pace with the stronger prevention focus developed in other jurisdictions.⁷

Developments since the 2025 Consultation

9. The summary of the Bill Sponsor's consultation records substantial support for the proposal. Ninety-four per cent of respondents considered that 28 days did not provide adequate protection, 83% supported extending the period to at least 60 days, and 81% believed the change would have a positive impact in reducing the number of people becoming homeless.⁸
10. The consultation also demonstrated support for wider reform. Ninety-one per cent of respondents supported consideration of a period of up to six months, while 93% supported extending responsibilities for preventing homelessness to organisations beyond the Housing Executive.⁹ In our view, these findings underline that effective prevention requires earlier identification and coordinated action across housing, health and social care, justice, local government and the voluntary and community sector.
11. The context in which the Committee is considering the Bill is extremely challenging. According to the NI Housing Bulletin, at 30 June 2026, more than 92,000 people from almost 51,000 households are on the social housing waiting list. Over 64,000 of these individuals from over 34,000 households have homelessness status.¹⁰ It also records continuing pressure on temporary accommodation and a steep increase in expenditure on it.¹¹
12. The Public Accounts Committee's February 2026 report called on the Department and Housing Executive to explore options for strengthening homelessness prevention through a statutory duty, including a review of approaches in jurisdictions where the relevant period extends to at least 56 days.¹² The present Bill is consistent with the direction of that recommendation, although it does not amount to the wider statutory prevention framework envisaged by the Committee.

Areas requiring scrutiny

13. While supporting the Bill, we caution against overstating what can be achieved through a single amendment to the 1988 Order. Homelessness is complex and has structural, economic and social causes. While the amendment may strengthen opportunities for prevention, it cannot by itself address the structural causes of homelessness, including shortages of suitable and affordable housing
14. The Housing Executive has expressed concern that widening the statutory period could increase the number of households requiring temporary accommodation and create additional financial and administrative costs. These concerns are recorded in the Explanatory and Financial Memorandum and merit careful consideration. However, the Bill does not amend the existing statutory tests governing entitlement to interim or temporary accommodation. The Committee should therefore ask the Housing Executive to explain the legal and operational basis on which it anticipates an increase in temporary accommodation use and to quantify the likely effect.
15. We acknowledge that neither the potential costs nor the potential savings associated with this amendment have yet been fully quantified. This underlines the need for the Department and Housing Executive, as the bodies holding the relevant administrative data, to publish detailed modelling during the Committee Stage.¹³ To date, to our knowledge, neither the Housing Executive nor the Department for Communities has published a quantified assessment of the likely additional caseload, staffing requirements, temporary accommodation use, net financial effect or anticipated prevention outcomes arising from this proposal.
16. The policy rationale for this amendment should also be tested against specific and measurable outcomes. These may include the number of households whose existing accommodation is sustained, the number who secure alternative accommodation before homelessness occurs, the use of temporary accommodation, repeat homelessness presentations and overall costs. Baseline measures should be established before commencement so that the effects of the amendment can be properly assessed following implementation. The Committee should seek evidence on:
 - a. The expected number and profile of additional presentations arising specifically from this change, including people leaving prison, hospital, care or other institutional settings, including an explanation of how any anticipated increase

- would arise when the Bill does not amend the existing statutory tests governing interim or temporary accommodation;
- b. The likely effect on prevention activity and interim accommodation;
 - c. Any staffing and systems changes required;
 - d. How they propose to implement the change if the Assembly determines to take this step.
17. Assessment of cost should also consider potential savings. Any assessment should consider both implementation costs and any anticipated savings arising from successful prevention activity.¹⁴ The Committee should therefore seek a balanced appraisal of gross costs, offsetting savings and the outcomes expected for households, rather than considering the possible increase in activity in isolation.
18. Assembly members may also want to take this opportunity to probe the Department and the Housing Executive on whether specific guidance should be introduced when it comes to the implementation of these changes. In other jurisdictions, statutory guidance has been produced to inform housing authorities on how legislative provisions should be interpreted and applied.¹⁵ England, Scotland and Wales have each produced guidance to support the interpretation and implementation of their homelessness legislation, although the form and status of that guidance differ between jurisdictions. While the argument has been made that this is not necessary in NI because we only have one statutory housing authority covering the whole jurisdiction, members may wish to probe the Department and the Housing Executive on whether (a) such guidance would assist in consistent interpretation and application of the law (b) it would be better for guidance to be statutory or non-statutory.
19. The six-month commencement period provides an opportunity for preparation. It should be used to update guidance and procedures, train staff, agree referral arrangements with partner organisations, communicate the new threshold clearly and establish monitoring arrangements before the provision takes effect. While Homeless Connect agrees with the need for a specific commencement period to be inserted into the Bill, we believe Assembly members should be willing to be flexible on the precise length of time before this change is implemented.

Need for wider reform

20. We believe this Bill should be understood as a helpful first step, not a substitute for broader reform. NI needs a full, independent review of its homelessness legislation,

informed by lived experience and by the evidence from reforms in England, Scotland and Wales. Our understanding is that the Department plans to conduct a review in the near future.

21. The Department for Communities should commission and fund this review early enough to inform proposals for wider legislative reform in the next Assembly mandate. However, the prospect of a future review or future legislation should not on the basis of current evidence be used as a reason to delay the present Bill. There is currently no guarantee that wider legislation will be introduced in the next mandate.

Conclusion

22. Homeless Connect supports the principle of the Housing (Amendment) Bill. Extending the statutory period from 28 days to 60 days would address an illogical aspect of the current framework and provide a more realistic opportunity for preventative engagement. The concerns raised about staffing, administration and temporary accommodation require careful scrutiny. The Committee should carefully assess the evidence presented by the Department and Housing Executive regarding the anticipated operational and financial implications of the amendment.
23. The Committee's scrutiny should consider the likely gross costs, potential offsetting savings and expected outcomes for households. It should also examine the guidance, resources, systems and commencement period required for effective implementation. On the evidence presently available, Homeless Connect does not consider the concerns raised to provide sufficient grounds to oppose the Bill. A broader review of NI's homelessness legislation remains necessary, but such a review is not mutually exclusive with consideration of this Bill.

References

- ¹ Homeless Connect, *Homelessness Prevention Bill* (Belfast: Homeless Connect, July 30, 2025), <https://homelessconnect.org/wp-content/uploads/2025/07/Homelessness-Prevention-Bill-30-July-2025.pdf>
- ² Northern Ireland Assembly, *Housing (Amendment) Bill*, NIA Bill 43/22–27, as introduced June 30, 2026, clauses 1–2, accessed August 11, 2026, <https://www.niassembly.gov.uk/assembly-business/legislation/2022-2027-mandate/primary-legislation-bills-22-27-mandate/housing-amendment-bill/bill---as-introduced/>
- ³ Department for Communities, *Northern Ireland Housing Bulletin: April–June 2026* (Belfast: Department for Communities, August, 2026) accessed September 1, 2026, <https://www.communities-ni.gov.uk/publications/northern-ireland-housing-bulletin-april-june-2026>
- ⁴ Scottish Prevention Review Group, *Prevention Review Group Final Recommendations Report* (Edinburgh: Scottish Government, 2021), <https://www.crisis.org.uk/media/244558/preventing-homelessness-in-scotland.pdf>
- ⁵ *Private Tenancies Act (Northern Ireland) 2022*, 2022 c. 20, sec. 11, accessed August 11, 2026, <https://www.legislation.gov.uk/nia/2022/20/section/11/enacted>.

⁶ *Housing Act 1996*, 1996 c. 52, sec. 175(4), accessed August 11, 2026, <https://www.legislation.gov.uk/ukpga/1996/52/section/175>; *Housing (Wales) Act 2014*, 2014 anaw 7, sec. 55(4), accessed August 11, 2026, <https://www.legislation.gov.uk/anaw/2014/7/section/55>; and *Housing (Scotland) Act 1987*, 1987 c. 26, sec. 24(4), accessed August 11, 2026, <https://www.legislation.gov.uk/ukpga/1987/26/section/24>.

⁷ Eleanor Murphy, “Homelessness: a comparison of legislative frameworks in Northern Ireland, England, Scotland and Wales,” NI Assembly Research Service, <https://www.niassembly.gov.uk/globalassets/documents/raise/publications/2022-2027/2025/communities/4325.pdf> “There undoubtedly has been a clear shift in England, Scotland and Wales towards enshrining a homelessness prevention approach within the legislation framework for homelessness in these jurisdictions. The approach in these jurisdictions has been informed by comprehensive and independent reviews of those legislative frameworks in each of these jurisdictions. The legislative framework for homelessness in Northern Ireland is now over 30 years old, and whilst it has been amended several times over the years, it has arguably not been subject to the same level of independent scrutiny” 104.

⁸ Colm Gildernew, *Consultation Summary: Homelessness Prevention Bill* (Belfast: Office of Colm Gildernew MLA, 2025), 3–4.

⁹ Gildernew, *Consultation Summary: Homelessness Prevention Bill*, 3–4.

¹⁰ Department for Communities, *Northern Ireland Housing Bulletin: January–March 2026* (Belfast: Department for Communities, May 28, 2026), “Social Housing Need” and “Homelessness,” accessed August 11, 2026, <https://www.communities-ni.gov.uk/publications/northern-ireland-housing-bulletin-january-march-2026>.

¹¹ Also see Northern Ireland Audit Office, *Homelessness in Northern Ireland: Report by the Comptroller and Auditor General* (Belfast: Northern Ireland Audit Office, March 25, 2025), 32–38, accessed August 11, 2026, <https://www.niauditoffice.gov.uk/publications/homelessness-northern-ireland-report>

¹² Northern Ireland Assembly, Public Accounts Committee, *Report on Homelessness in Northern Ireland*, NIA 144/22–27 (Belfast: Northern Ireland Assembly, February 26, 2026), recommendation 2, accessed August 11, 2026, <https://www.niassembly.gov.uk/assembly-business/committees/2022-2027/public-accounts/reports/>.

¹³ Gildernew, *Explanatory and Financial Memorandum to the Housing (Amendment) Bill*, paras. 35–36, 39–40.

¹⁴ Northern Ireland Audit Office, *Homelessness in Northern Ireland*, 27–31.

¹⁵ Ministry of Housing, Communities and Local Government, *Homelessness Code of Guidance for Local Authorities* (London: Ministry of Housing, Communities and Local Government, 2018; updated May 1, 2026), accessed August 11, 2026, <https://www.gov.uk/guidance/homelessness-code-of-guidance-for-local-authorities>; Welsh Government, *Allocation of Accommodation and Homelessness: Guidance for Local Authorities* (Cardiff: Welsh Government, 2016; updated July 29, 2026), accessed August 11, 2026, <https://www.gov.wales/allocation-accommodation-and-homelessness-guidance-local-authorities>; and Scottish Government, “Homelessness Guidance,” accessed August 11, 2026, <https://www.gov.scot/policies/homelessness/homelessness-guidance/>.



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