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From: [REDACTED]
Sent: 03 September 2026 20:16
To: +Comm Communities Public Email
Cc: Mulholland, Sian; McHugh, Maoliosa; Durkan, Mark H.; Cameron, Pam; Bradley, Maurice; Armstrong, Kellie; Allen, Andy; Mason, Cathy; Gildernew, Colm; [REDACTED]
Subject: Housing (Amendment) Bill - Call for Evidence
Importance: High
Follow Up Flag: Follow up
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Categories: Correspondence, Bills Info

3 September 2026

Dear Committee for Communities,

I am writing regarding the **Housing (Amendment) Bill - Call for Evidence**, which closes today, 3 September 2026.

I completed the Assembly's online consultation this evening and proceeded through to the final submission stage. The form warned that, once submitted, I would not be able to return to amend my answers. I confirmed this and selected submit.

The following page indicated that a copy of the completed response could be downloaded. However, when I attempted to proceed, the page failed to open and displayed an error. I therefore received no clear confirmation that my consultation response had successfully been submitted and was unable to download the copy offered by the system.

As I do not want a technical issue at the point of submission to prevent my evidence being considered, I am sending my completed answers directly to the Committee tonight.

Please treat the responses reproduced below as my formal response to the Housing (Amendment) Bill Call for Evidence, whether or not my online submission was successfully recorded.

If the online submission did arrive successfully, this email can simply be treated as confirmation and a duplicate copy of that response.

Publication and confidentiality

I consent to the Committee considering, quoting, referring to and publishing the substance of my evidence for the purposes of its scrutiny of the Housing (Amendment) Bill.

However, I ask that **my personal information and any information [REDACTED] be redacted from anything published or otherwise made publicly identifiable.**

This includes my name and contact details and, where relevant, any combination of contextual information which could reasonably identify [REDACTED]

My response is made from lived experience as [REDACTED] I am content for that general description and the substantive policy evidence contained in my response to be used.

I would be grateful if the Committee office could confirm:

1. whether my original online response was successfully received; and
2. in any event, that this emailed copy has been accepted as a response submitted within the consultation period.

For completeness, my answers are reproduced below.

Housing (Amendment) Bill - Consultation Response

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

Yes.

I strongly support the principle of intervening earlier to prevent homelessness rather than waiting until a household has reached an acute housing crisis.

I respond from lived experience [REDACTED] who has had prolonged experience of housing problems involving property condition, health and disability impacts, anti-social behaviour/intimidation, safeguarding concerns and engagement with a number of housing and public bodies.

My experience has taught me that homelessness does not always begin with an eviction notice or on the day somebody physically loses their home. A household can progressively become unsafe or unsustainable because of disrepair, health risks, intimidation, disability-related needs or failures to resolve serious housing problems.

Earlier intervention is therefore important.

However, extending a statutory period will only achieve its purpose if the additional time is used for meaningful preventative action rather than simply allowing a case to be opened earlier.

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

No.

Twenty-eight days is an extremely short period in which to understand and resolve a complex housing crisis.

Some cases require coordination between the Housing Executive, a housing association or landlord, Environmental Health, health services, police, support organisations and other public bodies.

For disabled people, families with children, households affected by intimidation or violence and households whose existing accommodation may no longer be reasonable to occupy, the evidence and circumstances may also be considerably more complicated than the expiry date on a tenancy.

Meaningful prevention can require:

- assessment of the household's individual circumstances;
- assessment of safety and safeguarding risks;
- consideration of disability and health needs;
- investigation of housing conditions;
- communication between different agencies;
- obtaining supporting evidence;
- determining whether an existing tenancy can genuinely and safely be sustained;
- and, where it cannot, identifying suitable alternative accommodation.

Waiting until only 28 days remain risks converting what should have been prevention into crisis management.

3. Do you support changing the definition of “threatened with homelessness” from 28 days to 60 days?

Yes. I support Clause 1.

The additional 32 days could create valuable space for proper assessment and preventative action.

However, the 60-day period should be understood as the point at which the statutory homelessness-prevention obligation applies, not as a reason for public bodies to ignore identifiable housing risks before that point.

Where a public authority already knows that a household’s accommodation is becoming unsafe, unsuitable or unsustainable, good preventative practice should begin as early as reasonably possible.

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, provided the additional time produces meaningful action.

The additional time is potentially very important, but time by itself does not prevent homelessness.

My own experience has shown me how a housing problem can continue for a prolonged period while different organisations each deal with only one element of it. Reports can be made, visits can occur, correspondence can be exchanged and cases can remain technically active without the underlying housing risk actually being resolved.

For the 60-day provision to work effectively, early intervention should involve a clear preventative process. I would encourage the Committee to consider the importance of:

- an individual assessment of why the household is at risk;
- a written homelessness-prevention plan;
- clearly identified actions and timescales;
- a named point of responsibility;
- reasonable adjustments and accessible communication for disabled applicants;
- appropriate safeguarding assessment where children are involved;
- coordination between relevant agencies;
- and regular review of whether the proposed intervention is actually reducing the risk of homelessness.

A longer statutory period should mean earlier problem-solving, not simply a longer period during which a household waits for the same crisis to develop.

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

Yes, particularly in the short term, but that should not in itself be regarded as a reason not to enact the Bill.

Earlier intervention may identify households whose housing situation is already unsafe or unsustainable but whose need would previously have remained hidden until much closer to crisis point.

Any initial increase may therefore represent previously unmet housing need being identified earlier rather than the legislation itself creating homelessness.

The important question is what happens during the additional prevention period.

Where an existing tenancy can genuinely and safely be sustained, earlier intervention may prevent the need for temporary accommodation altogether.

Where it cannot be sustained, identifying that reality earlier provides more time to seek a suitable alternative and may reduce reliance on emergency accommodation.

The legislation therefore needs to be accompanied by sufficient resources for genuine prevention and by continued investment in social and suitable temporary housing.

6. Clause 2 provides that the legislation would come into operation six months after Royal Assent. Is this appropriate?

Yes, provided those six months are actively used to prepare for implementation.

I would be concerned about unnecessarily delaying an improvement in homelessness protection while waiting for wider structural problems in the housing system to be solved.

However, commencement should not simply mean changing a number from 28 to 60 in existing procedures.

Before commencement, there should be clear operational guidance, staff preparation and appropriate resources so that the additional period is capable of producing genuine preventative intervention.

Particular attention should be given to:

- complex and multi-agency cases;
- disability and reasonable adjustments;
- families with children;
- health-related housing risks;
- cases involving intimidation, harassment or violence;
- housing-condition cases;
- and clear responsibility for coordinating prevention.

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

I support Clause 1 and the extension from 28 to 60 days. Rather than widening this focused Bill substantially, I ask the Committee to consider the following safeguards and wider recommendations.

1. Make prevention substantive, not procedural

The additional 32 days should be used for active prevention. Legislation, guidance or policy should require a documented assessment or plan stating why homelessness is threatened, what action will be taken, by whom, by when, and what happens if it fails.

2. Recognise that homelessness risk is not limited to eviction

Implementation should recognise where accommodation may no longer be reasonable to occupy because of serious disrepair, health impacts, intimidation, violence, disability-related unsuitability or safeguarding concerns. Households should not have to reach acute crisis before meaningful intervention begins.

3. Distinguish safeguarding and violence from ordinary tenancy disputes

Mediation may be appropriate in some cases, but must not substitute for safeguarding or homelessness intervention where there is violence, credible intimidation or serious risk. Where mediation has failed, repeating it should not delay consideration of whether it remains reasonable or safe to stay.

4. Improve multi-agency working

Consider a statutory or policy “duty to refer”, allowing relevant public bodies, with consent, to refer serious homelessness risk early to the Housing Executive. People in crisis should not have to coordinate multiple agencies themselves while trying to prevent homelessness.

5. Embed disability and accessibility

Disabled applicants may face added barriers in gathering evidence, managing communications, attending appointments and finding suitable accommodation. Reasonable adjustments and accessibility should be built into prevention procedures from the outset.

6. Review the wider homelessness framework

The Bill makes an important but limited amendment to legislation dating from 1988. I encourage a wider review of the Housing (Northern Ireland) Order 1988 and homelessness-prevention framework, including households whose accommodation becomes unreasonable to occupy because of condition, disability, intimidation or safety concerns.

7. Measure outcomes

Implementation should be assessed by whether homelessness was actually prevented, whether an existing tenancy was safely sustained, whether temporary accommodation was needed, what intervention worked, and whether some groups experience poorer outcomes.

The central question should be: **did earlier intervention actually make the household safer and prevent homelessness?**

Extending the period to 60 days is welcome. The additional time should become a period of meaningful intervention, not merely a longer administrative countdown to homelessness.

Thank you for ensuring that my views are placed before the Committee.

Kind regards,

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