

Response ID ANON-6H9C-3P8D-S

Submitted to Housing (Amendment) Bill - Call for Evidence
Submitted on 2026-09-02 09:47:08

Consent and introduction

What is your name?

Name:

[REDACTED]

What is your email address?

Email address box:

[REDACTED]

If you are providing a submission on behalf of an organisation, please state its name.

Organisation name box:

Chartered Institute of Housing

Please confirm you have read the Northern Ireland Assembly's Committee privacy notice by clicking the button below.

I have read the privacy notice

Do you consent to your submission being published on the Committee's website and included in the Committee's report?

Yes, publish in full.

General views on the Bill

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.:

CIH Northern Ireland strongly supports the overall purpose of the Housing (Amendment) Bill introduced to the Northern Ireland Assembly. Shifting Northern Ireland's statutory framework from reactive crisis management to proactive prevention is vital. Extending the statutory timeframe in Article 3(6) of the Housing (Northern Ireland) Order 1988 gives the Northern Ireland Housing Executive (NIHE) and sector partners a critical window to intervene before households hit crisis point. Key reasons for supporting the bill include:

- Emphasis on prevention – early engagement enables NIHE to explore tenancy sustainment, welfare/debt counselling and landlord negotiation before homelessness occurs
- Regional alignment – it brings Northern Ireland closer to practice across the UK, such as England's 56-day duty under the Homelessness Reduction Act 2017
- Resolving statutory misalignment – it addresses the disconnect where Notice to Quit (NTQ) periods in the private rented sector exceed the current 28-day presentation window.

As noted in previous policy analysis by CIH Northern Ireland, this change must be accompanied by adequate funding, expanded NIHE staffing, a statutory 'duty to refer' for wider public bodies and broader independent reform of Northern Ireland's homelessness legislation.

Current 28-day period

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.:

A 28-day statutory period is inadequate for meaningful prevention. Four weeks is too brief to resolve complex drivers of homelessness – such as severe debt, benefit delays, domestic abuse or private rented sector evictions. Furthermore, the 28-day threshold creates a practical contradiction with private tenancies legislation. A tenant receiving a long NTQ cannot formally present as "threatened with homelessness" to NIHE until only 28 days remain. This forces households to wait until crisis before receiving statutory assistance. Over-reliance on crisis interventions helped to drive temporary accommodation expenditure up to £39 million in 2023/24 due to an 81% demand increase since 2017.

Proposed 60-day period — Clause 1

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?

Text box for entering data:

Extending the duty under Clause 1 to 60 days will enhance prevention outcomes by:

- Enabling early intervention – giving officers time to conduct comprehensive assessments, address underlying vulnerabilities and connect individuals with mental health, addiction or social care support
- Facilitating mediation - granting NIHE additional scope to mediate family disputes or negotiate with private landlords to maintain tenancies
- Delivering person-centred care – replacing rushed, procedural processes with more tailored, sustainable prevention plans.

Practical impact on people at risk of homelessness

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.:

A 60-day window provides the necessary operational time to secure alternative accommodation or sustain existing tenancies before an eviction date arrives. It is particularly vital for people with complex needs – such as care leavers, domestic abuse survivors or prison leavers – where multi-agency coordination across housing, health trusts and justice services is more difficult to mobilise within 28 days.

Temporary accommodation and housing supply

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

Yes

If so, how should this risk be addressed?:

In the short to medium term, opening the presentation window earlier will increase active caseloads and likely the demand for temporary accommodation where early prevention fails or because social housing supply remains constrained. To address this risk, examples of ameliorating measures include:

- Resource NIHE teams – provide ring-fenced funding for NIHE staffing and training
- Protect prevention programmes – ensure long-term funding for voluntary sector partners and the Supporting People programme, which enables independent living
- Private rented sector stability – address financial disincentives that cause property sale (a leading cause of landlord-led NTQ)
- Strategic supply deficits – resolve water infrastructure capacity constraints that currently hold back new housing developments.

Commencement — Clause 2

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?

No

Please explain your answer.:

A fixed six-month commencement period is not appropriate given the absence of a fully agreed, multi-year Executive budget.

Extending the statutory window from 28 to 60 days will increase active caseloads for NIHE, requiring increased front-facing staffing and expanded resource allocations including for partner services. Implementing this expanded duty without long-term financial certainty risks creating an unfunded mandate that could undermine the bill's preventative intent and place strain on already overstretched housing services.

Commencement should instead be aligned with the allocation of a multi-year Executive budget settlement that provides ring-fenced, long-term funding for the implementation and operational delivery of the extended duty.

Suggested amendments

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

A textbox for adding comments:

While direct technical adjustments can be made to the bill itself, broader systemic enhancements – such as establishing the statutory duty to refer – require extensive cross-departmental and public consultation with key stakeholders. Rather than delaying this bill, these broader measures should be highlighted as critical concurrent issues for exploration alongside the legislative process.

1. Direct bill amendment – amend Clause 2 so that commencement considers the allocation of a multi-year Executive budget settlement based on known information at the time of amendment
2. Concurrent issue for exploration: statutory "duty to refer" – explore establishing a legal duty requiring public bodies (Health & Social Care Trusts, NI Prison Service, Probation Board NI, Jobs & Benefits Offices and Local Councils) to refer individuals threatened with homelessness to NIHE at the earliest opportunity; while not proposed as an immediate amendment to this specific bill – as it requires formal stakeholder consultation across multiple government departments – the committee should recommend this as a priority policy workstream to run concurrently with implementation
3. Concurrent issue for exploration: comprehensive legislative review – the committee should recommend a broader, independent review of Northern Ireland's statutory homelessness framework (under the 1988 Order) within 12–18 months to identify further legislative modernisations needed to support long-term prevention.