

Submitted to Housing (Amendment) Bill - Call for Evidence
Submitted on 2026-09-02 20:47:28

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:

Voice & Justice Alliancen Ltd.

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.:

oice & Justice Alliance supports the Bill. Extending the definition of "threatened with homelessness" from 28 to 60 days is proportionate, evidence-based, and corrects a genuine inconsistency in existing law: under the Private Tenancies Act 2022 a tenant of more than a year must receive at least 56 days' notice to quit, yet the Housing Executive's prevention duty currently begins only in the final 28 days. A person can therefore hold a valid notice and remain outside the statutory framework for at least half of their notice period. The Bill closes that gap, and aligns Northern Ireland with the Public Accounts Committee's February 2026 recommendation of "at least 56 days," and with Wales, England and Scotland.

We support the Bill as drafted, but ask the Committee to treat it as necessary rather than sufficient. Extra time only prevents homelessness if people reach the Housing Executive early enough to use it — and homelessness rarely begins inside the housing system. It begins in hospitals, courts, prisons, refuges and domestic abuse services, which routinely see the risk first. The Bill improves what happens once Housing becomes responsible; it does not change how, or how early, people reach that responsibility. That is a question of ownership as much as of time.

This is not an untested idea. Through New Foundations (November 2025), the Executive has already accepted, for care leavers, that preventing homelessness requires housing, health and other services to work together rather than in sequence. We ask the Committee to extend that logic: through a duty to refer; by treating "60 days" as a minimum, not a ceiling; by publishing prevention outcomes; and through clear public communication so people know they can seek help earlier. We also ask whether children placed in temporary accommodation keep continuity of school, GP and health-visiting support.

A fuller explanation, with evidence, is set out in our written submission, which will be emailed to the Committee.

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.:

No. The clearest evidence is internal to the statute book. Under the Private Tenancies Act 2022 a private tenant with a tenancy of over a year must receive at least 56 days' notice to quit, yet Article 3(6) of the Housing (NI) Order 1988 delays the Housing Executive's prevention duty until only 28 days remain. A tenant can therefore hold a lawful notice to quit and still wait a month — at least half of the notice period already spent — before the statutory duty engages. The 28-day figure predates the 56-day notice regime, and the two have never been reconciled: it is a seam between two pieces of housing

legislation, and the person in the middle falls through it.

The 28-day model also assumes a tidy, notice-driven route into homelessness. For many people that assumption fails. The Sponsor's own memorandum records domestic abuse as the cause of 12.3% of homelessness presentations; people fleeing abuse rarely arrive with weeks of notice in hand — they arrive in crisis, and some, under coercive control, may not identify themselves as homeless at all. Relationship and family breakdown, unsafe hospital discharge and leaving prison follow the same pattern: the housing risk is real and visible well before any 28-day clock could start.

Twenty-eight days is also simply too short to do prevention work — mediation with a landlord or family member, resolving arrears, arranging a managed move. When there is no time for that work, cases tip instead into emergency accommodation, which is worse for the household and far more expensive for the public purse. The period is inadequate both because it is out of step with notice-to-quit law and because it turns on the applicant's own paperwork rather than on the risk they actually face.

A fuller explanation, with evidence, is set out in our written submission, which will be emailed to the Committee.

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?

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Sixty days is the right figure. It clears the 56-day notice-to-quit period under the Private Tenancies Act 2022 with a margin, so a tenant served notice is covered for the whole of that period rather than only its final month. It exceeds the “at least 56 days” floor recommended by the Assembly's Public Accounts Committee in February 2026, and aligns Northern Ireland with Wales (56 days), England (56 days) and Scotland (two months).

The impact on prevention is straightforward: the gain is time. Prevention work — landlord or family mediation, resolving rent arrears, arranging a planned move — takes time that a 28-day window rarely allows, which is why so many cases fall into emergency accommodation instead. Doubling the window makes it realistic to keep people in their existing homes. That is both the better outcome for them and the cheaper one for the public purse: the Sponsor cites the Crisis estimate of £9,266 saved per person for each case of homelessness prevented, and the wider evidence is consistent that prevention costs far less than crisis response.

We support Clause 1, and ask only that “60 days” be understood and applied as a minimum — consistent with the “at least 60 days” language used in the consultation — so that it operates as a floor for early intervention rather than a ceiling in future guidance. The extra time should be treated as the earliest point at which help may begin, not the latest: earlier intervention should be the default, not the maximum the law permits. Read that way, the change should measurably increase the number of households helped to remain in their homes.

A fuller explanation, with evidence, is set out in our written submission, which will be emailed to the Committee.

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.:

Yes — but with an important condition. Extra time prevents crises only for people who are in front of the Housing Executive early enough to use it, and that is not automatic.

Two things decide whether the additional 32 days reach people. First, the duty in Article 3(6) is triggered by the applicant giving written notice that they are threatened with homelessness. The people in the most precarious situations — those in a domestic abuse crisis, care leavers, people with mental ill-health, people in contact with the justice system — are the least likely to know they can start that clock, or to be able to complete the process. If no one tells them, the extra time never begins.

Second, prevention is cross-cutting. The services that first see someone heading towards homelessness are often not in housing at all — a hospital, a GP surgery, a prison, a court, a refuge or a domestic abuse service. Unless those services are expected to refer, the earlier threshold is a door that opens sooner but that many people still never reach. The Executive has already accepted this logic elsewhere: New Foundations (November 2025) is built on the recognition that preventing homelessness for care leavers requires services to work together rather than in sequence.

So the change makes prevention more likely, and we support it — but its full benefit depends on people entering the system early. That means pairing the longer period with cross-service referral and clear public information, so the additional time is not simply available in law but reaches people in practice. Time cannot prevent homelessness if the statutory clock has not yet started.

A fuller explanation, with evidence, is set out in our written submission, which will be emailed to the Committee.

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?:

Yes, realistically, at the margin — and it is better to acknowledge that than to let it become a reason to reject the Bill. The Housing Executive's concern is legitimate given current pressure on temporary and non-standard accommodation.

Three points on managing it. First, the risk should not be overstated. As the Sponsor notes, most people who engage early want to stay in their existing tenancy, and the purpose of the extra time is to sustain that, not to place people. Handled as prevention, earlier engagement should reduce the flow into temporary accommodation over time — which is the whole basis of the cost case. The Sponsor's own plan to purchase 600 units for use as temporary accommodation, projected to save £75 million over seven years, should also absorb much of any additional short-term demand.

Second, the risk falls unevenly. Any squeeze on temporary and non-standard accommodation bears most heavily on people who need safe, appropriate placements — notably those fleeing domestic abuse, for whom an unsafe or unsuitable placement is not a neutral outcome. It also bears on children: in April 2026 there were 4,837 children under 18 in temporary accommodation in Northern Ireland, and repeated or out-of-area moves risk breaking their continuity of school, GP and health-visiting support.

Third, the Department should monitor and report placement outcomes disaggregated by cause, including domestic abuse, so any displacement effect can be seen and managed rather than assumed. The risk is real but manageable, and on the evidence it is outweighed by the benefit of preventing homelessness earlier and reducing crisis demand over time.

A fuller explanation, with evidence, is set out in our written submission, which will be emailed to the Committee.

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?

Yes

Please explain your answer.:

Yes, in principle — provided the six months are used rather than merely waited out. Six months is a proportionate period: long enough to prepare properly, short enough not to delay protection unnecessarily. But it is the right length only if it is treated as an implementation programme, not a delayed start date.

The change to the threshold is simple to draft but not simple to operate. The period before commencement should be used to revise operational guidance; train frontline Housing Executive staff so the 60-day trigger is applied consistently; establish referral pathways with health, justice and domestic abuse services so people can be brought in early; update public information; and put outcome-monitoring arrangements in place.

Public communication matters in particular. Because the duty is engaged by the person coming forward, an extended statutory period helps only those who know it exists. Unless tenants and the public understand that they may now seek assistance earlier than before, the benefit will reach professionals before it reaches the people the Bill is meant to protect.

Our concern is a familiar one: a duty that changes on paper on day one but whose supporting practice lags behind, so that the people it is meant to reach do not feel the difference for months. We therefore ask the Committee to seek assurance from the Housing Executive that guidance, staff training, cross-agency referral arrangements and public communication will all be in place at commencement — and to treat the six months as a window with those deliverables, not simply a delay before an unchanged process begins.

A fuller explanation is set out in our written submission, which will be emailed to the Committee.

Suggested amendments

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

A textbox for adding comments:

Voice & Justice Alliance suggests the following, in priority order.

1. A duty to refer (new clause). The Bill's trigger rests on the applicant's own written notice under Article 3(6), which the most vulnerable people are least able to use. We suggest a duty on specified public authorities — health bodies, prisons, probation and domestic abuse services — to refer people they believe are homeless or threatened with homelessness to the Housing Executive, with the person's consent. England's Homelessness Reduction Act 2017 shows such a duty is workable; we cite it as evidence, not as a template to be copied, since any Northern Ireland scheme should be designed for local conditions. This is the single change that would do most to ensure the extra 32 days reach the people who most need them.
2. Clause 1 — put the threshold beyond doubt as a floor. The consultation refers to "at least 60 days" while the Bill says "within 60 days." If the intent is a

minimum, that should be explicit, so guidance cannot later treat 60 days as a maximum.

3. Reporting (new clause or via guidance). A requirement on the Housing Executive to publish prevention activity and outcomes — disaggregated by cause of threatened homelessness, including domestic abuse, and covering tenancy sustainment, repeat homelessness and use of temporary accommodation — so the effect of the change is visible and open to scrutiny rather than assumed.

4. Public communication (Clause 2 / implementation). Because the duty is applicant-led, commencement should be accompanied by public information so people know they can seek help earlier than under the previous framework.

5. Children in temporary accommodation. We ask the Committee to establish whether Northern Ireland has any safeguard equivalent to England's new duty (Children's Wellbeing and Schools Act 2026) connecting a child's school, GP and health-visiting service to their placement — and, if not, to consider one designed to follow a child through repeated moves rather than lapsing after the first placement. With health and education organised across separate Health and Social Care Trusts and a single Education Authority, and no shared record between housing, health and education, the risk of a child losing continuity is arguably higher here than the risk England has just legislated against.

Full detail on each is set out in our written submission, which will be emailed to the Committee.