

Housing Rights

Policy Briefing Paper

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Housing Rights' evidence submission to the Northern Ireland Assembly Public Accounts Committee Inquiry into Homelessness in Northern Ireland

December 2025

1 Executive Summary

- 1.1 Housing Rights is the leading provider of independent specialist housing advice and advocacy in Northern Ireland. Last year, our services assisted 13,162 households across Northern Ireland on 67,828 housing issues and prevented homelessness for 1,120 households. Given our specialism in prevention and early intervention, this written evidence focuses exclusively on this area.

Absence of an appropriate legislative underpinning for prevention

- 1.2 The statutory duties in relation to homelessness in Northern Ireland do not place preventing homelessness on an equal footing with supporting households once they become homeless. There is therefore an inbuilt tension between the policy objective of the NIHE Homelessness Strategy to prioritise homelessness prevention and the legislative requirements on statutory bodies.

Proposals for reform in 2016

- 1.3 Housing Rights has been lobbying for a change in homelessness legislation since 2016. The organisation worked with then MLA, Nichola Mallon, to develop a draft Members' Bill which would place the prevention duty on a statutory basis by requiring relevant statutory bodies to co-operate in the prevention of homelessness.
- 1.4 Unfortunately, the Bill did not progress due to the collapse of the institutions, but the approach had widespread support across the housing and homelessness sectors and mirrored similar approaches taken elsewhere in the UK.

Developments in other jurisdictions

- 1.5 Statutory duties have been introduced elsewhere in the UK to require the prevention of homelessness and to require public bodies to collaborate in efforts to achieve this goal. A summary of relevant legislation has been included in the body of this submission.

Strengthening calls for reform

- 1.6 There is a strong case for reforming homelessness legislation in Northern Ireland to include a duty to prevent homelessness. Significant stakeholders and experts in the field, including those at the Centre for Homelessness Impact, the Chief Executive of the Northern Ireland Housing Executive and cross-sectoral bodies, have all called for the introduction of such a duty.

The necessary next steps

- 1.7 Enhanced homelessness legislation will drive the required investment in the services and systems to support meaningful change. It is Housing Rights view that a bespoke approach is required in Northern Ireland, but that this should draw upon the developments and learning from other jurisdictions.
- 1.8 Housing Rights recommends that Northern Ireland follow the examples of Scotland and Wales in appointing a cross-sectoral review group, with input from people with lived experience, to assess and make recommendations on a new proposed legislative framework for the prevention duty.
- 1.9 It is our view that not only has there been a failure in Northern Ireland to appropriately advance our legislation to support homelessness prevention, but there has also been a failure by the Department for Communities, to meaningfully consider (along with sectoral experts) the need for such legislation and to bring forward appropriate proposals.

Preventing homelessness is becoming more difficult

- 1.10 Housing Rights collects data on those cases in which we successfully prevent homelessness using a strict UK government definition. Our work is unique among sector stakeholders in that we assist households across the housing market, from social rented, to mortgage / owner-occupiers, to private renters and households who are homeless.
- 1.11 There has been a recent decline in the success of prevention efforts, with notable challenges in the private rented sector, in particular. Loss of rented accommodation continues to be one of the top three causes of homelessness in Northern Ireland. The most significant reason our services fail in efforts to prevent homelessness in the private rented sector, is because of affordability.
- 1.12 Housing Rights are also concerned about vulnerable households in the owner-occupied market, specifically those on low incomes with mortgages. Recent research we commissioned showed households on low incomes with interest-only mortgages and those whose households contained persons with a disability, were particularly at risk and therefore needed additional support to stay in their home.
- 1.13 Whilst social rented housing provides the most secure housing option for many people at risk of homelessness, the safety nets around prevention could be strengthened further. Support for homelessness prevention services to sustain tenancies and prevent rent arrears must continue to be resourced and rent levels must continue to be affordable.

Supporting Homelessness Prevention

1.14 Evidence suggests that there is a range of prevention-related initiatives which work; these should be resourced and strengthened. Reactive measures, of the kind the NI system currently employs, incur high and recurring costs while delivering poor value for money and worse outcomes for individuals who are threatened with homelessness.

1.15 Housing Rights recommends that the following steps be implemented to orient Northern Ireland's homelessness systems toward prioritising prevention.

- Introduce Housing Advice Quality Standards in Northern Ireland to ensure that housing advice is of a high standard and effectively prevents and resolves housing problems at the earliest stage, thereby reducing the harm to citizens and cost to the public purse.
- Strengthen the provision of homelessness prevention services for specific vulnerable groups, including young people, women and ethnic minority communities. In so doing, the risk of homelessness for these groups is minimised and the opportunities for prevention savings are maximised.
- Expedite the reform of the private rented sector in Northern Ireland, which is increasingly being relied upon to meet housing need and which is a key driver of homelessness in Northern Ireland. Reforms should include a specific focus on addressing affordability, standards, and repairs, as well as recourse to justice and security of tenure.

2 Introduction

2.1 Housing Rights welcomes the Public Accounts Committee's inquiry into Homelessness and is grateful to the Committee for extending us the opportunity to provide this written submission as supporting evidence. We note the findings of the Northern Ireland Audit Office report¹ published in March 2025, and its usefulness in setting the context for the Committee's work. The following written evidence is intended to supplement the findings of the report and support the work of the Committee.

3 Background

3.1 Housing Rights is the leading provider of independent specialist housing advice and advocacy in Northern Ireland. For over 60 years, we have worked tirelessly to prevent homelessness by supporting households in resolving their housing issues and helping them stay in their homes. We recognise that prevention is not always possible, therefore our services also work to support households who are experiencing homelessness to ensure they have support to find and keep a home that meets their needs – making homelessness as rare, brief and non-recurring as possible.

3.2 Last year, Housing Rights services assisted 13,162 households across Northern Ireland on 67,828 housing issues. Our services directly prevented homelessness for 1,120 households. Our policy comment is informed by the expertise of our team, our research on best practices in other jurisdictions, and, critically, the experiences of the people using our services. A summary of the types of services we provide across the housing market is included below to provide context to our comments.

An overview of Housing Rights prevention services

3.3 Housing Rights offers a range of homelessness prevention interventions² developed in line with best practice evidence about what works in this area³. Examples of our services include:

- A free, confidential and cross tenure helpline service and a suite of accessible online information so people know their rights and can get independent advice.

¹ <https://www.niauditoffice.gov.uk/publications/homelessness-northern-ireland-report>

² [What we do | Housing Rights](#)

³ https://cdn.prod.website-files.com/59f07e67422cdf0001904c14/61a5fcbfdb6e3b634905254b_CHI.WWC.EvidenceNote.Prevention.pdf

- Support for practitioners through advice, information and training so that everyone across Northern Ireland who seeks advice from other organisations gets the right information and support.
- Further advocacy including, legal representation, to provide crisis prevention to help sustain tenancies and ensure someone does not lose their home.
- Emergency prevention activities through representation at court for those who are unrepresented and facing legal action from their landlord or lender.
- Targeted prevention activities with bespoke services supporting young people, minority communities and people leaving prison custody.
- Lobbying using the evidence and insights from our work to improve the law, policy and practice so that everyone in Northern Ireland has a home.

3.4 Through our work, we are able to collect data, allowing us to assess trends and identify where the problem is most acute, and where preventing homelessness has become most challenging. For every case of successful homelessness prevention we record, we use a UK government definition ('P1E'⁴) in a strict process which is externally audited.

3.5 Whilst the organisation can offer comment across all three areas of the Committee's focus in this inquiry, given our specialism in prevention and early intervention, and to avoid unnecessary overlap with evidence from other stakeholders, the following written evidence focuses exclusively on this area.

4 Prevention and early intervention: the legal architecture

The absence of an appropriate legislative underpinning for prevention

4.1 As noted by the NI Audit Office report, the statutory duties in relation to homelessness in Northern Ireland do not place preventing homelessness on an equal footing with supporting households once they become homeless. There is therefore an inbuilt tension between the policy objective of the NIHE Homelessness Strategy to prioritise homelessness prevention and the legislative requirements on statutory bodies.

4.2 Both the Department for Communities and the NIHE acknowledge the importance of investing in prevention, but are required to prioritise supporting those who have become homeless as per their statutory duty. This is recognised in the NI Audit Office report, which concludes;

"The full impact of NIHE prevention work has therefore not been realised and it is likely that households are becoming homeless in circumstances that could otherwise be preventable with earlier intervention. The NIHE's key objective of

⁴https://assets.publishing.service.gov.uk/media/5a80618f40f0b62305b8ad15/P1E_guidance_Homeless_prevention_and_relief.pdf

prioritising homelessness prevention has not been achieved, despite its potential for long-term harm reduction and cost savings across public services⁵.

Proposals for reform in 2016

- 4.3 Housing Rights has been lobbying for a change in homelessness legislation since 2016. The organisation worked with then MLA, Nichola Mallon to develop a draft Members' Bill which would place the prevention duty on a statutory basis by requiring relevant statutory bodies to co-operate in the prevention of homelessness. The draft Members' Bill proposed to insert the duty by amending Article 6A of the Housing (Northern Ireland) Order 1988⁶. The approach went beyond simply requiring the NIHE to prevent homelessness, which would create an additional short-term resource burden on the regional housing authority, to creating a duty on the other public authorities listed in Article 6A to have a role in cooperating to prevent homelessness, thus prioritising the early intervention points often available in the criminal justice, education and health pathways.
- 4.4 Ultimately, the Bill did not progress due to the collapse of the institutions, but the approach had widespread support across the housing and homelessness sectors and mirrored similar approaches taken elsewhere in the UK.
- 4.5 There is precedent for such an approach, for example, Article 67 of the Health and Personal Social Services (Northern Ireland) Order 1971⁷ states:
"In exercising their respective functions, health and social care bodies, district councils, the Education Authority, the Northern Ireland Library Authority, and the Northern Ireland Housing Executive shall co-operate with one another in order to secure and advance the health and social welfare of the people of Northern Ireland⁸.
- 4.6 More recently, the Children's Services Co-operation Act (Northern Ireland) 2015⁹ placed a duty, on a defined list of public bodies, in the exercise of any functions which may contribute to the well-being of children and young persons to "*co-operate with other children's authorities and with other children's service providers in the exercise of those functions.*" The legislation makes additional provisions to facilitate cooperation, including an ability to share resources and to promote accountability, for example, through requiring the Northern Ireland Executive to report on the operation of the Act at least once every three years.

⁵ [NI Audit Office Report - Homelessness in NI_1.pdf](https://www.auditni.org.uk/sites/default/files/audit-reports/audit-homelessness-ni-1.pdf)

⁶ <https://www.legislation.gov.uk/ni/1988/1990/article/6A>

⁷ <https://www.legislation.gov.uk/ni/1972/1265/contents>

⁸ <https://www.legislation.gov.uk/ni/1972/1265/article/67>

⁹ <https://www.legislation.gov.uk/ni/2015/10/contents>

5 Developments in other jurisdictions since this time

5.1 Elsewhere in the UK, statutory duties have been introduced to require the prevention of homelessness and to require public bodies to collaborate in efforts to achieve this goal. A comprehensive outline of the position across the UK is available in a research paper provided to the NI Assembly Communities Committee earlier this year.¹⁰ For the purpose of this briefing, we have included a summary below.

Wales

5.2 In Wales, legal duties exist around the prevention of homelessness, relief and a final duty to provide accommodation. This includes a requirement that authorities take reasonable steps to stop homelessness, including the provision of financial assistance to cover rent arrears, deposits and rent in advance.

5.3 The Housing (Wales) Act 2014¹¹, commenced in April 2015. Under this Act, addressing homelessness in Wales can now be understood to take place within three stages:

- (1) preventing homelessness (prevention);
- (2) relieving homelessness (relief); and
- (3) securing accommodation.

5.4 The first two stages are available to all, regardless of priority need, intentional homelessness or local connection. Within these stages, local authorities are required to take 'reasonable steps' to prevent or relieve homelessness when people are at risk of becoming homeless in the next 56 days, or are actually homeless¹².

5.5 In October 2023, the Welsh Government published a white paper¹³ on ending homelessness, which included strengthening homelessness prevention provisions. Changes proposed by the Welsh Government include:

- Create new duties on wider bodies, including local health boards, social services and registered social landlords, to identify people at risk of homelessness, refer them for support, take action to mitigate the risk of homelessness, and cooperate with local authorities
- Improve standards for temporary and settled accommodation
- Strengthen the rights of care-experienced people to homelessness assistance, in line with recommendations made by the Welsh Children, Young People and Education Committee

¹⁰ Eleanor Murphy, "Homelessness: a comparison of legislative frameworks in Northern Ireland, England, Scotland and Wales," NI Assembly Research Service,

5.6 Most of these changes to strengthen homelessness prevention provision in Wales flowed from the recommendations of the Expert Review Panel¹⁴, which was convened by Crisis at the request of the Welsh Government. In addition, the Welsh Government keeps their homelessness prevention efforts under constant review, and is advised and assisted in this endeavour by the Ending Homelessness National Advisory Board, which includes stakeholders from the housing, poverty, local authority and third sectors¹⁵.

England

5.7 In England, the Homelessness Reduction Act 2017¹⁶ places a legal duty on local housing authorities to prevent homelessness for anyone likely to become homeless within 56 days. The act also places a duty on a number of named public bodies to refer users of their service, who they have reason to believe are homeless or threatened with becoming homeless within 56 days, to a local authority of the service users' choice.

5.8 The Homelessness Reduction Act introduced substantial changes to local authorities' homelessness duties under Part 7 of the Housing Act 1996 (as amended), which came into force on 3 April 2018. The main changes the Act introduced to local authorities' homelessness duties include:

- a strengthened duty to provide advisory services, particularly in relation to certain groups who are most vulnerable to homelessness
- an extension of the period during which an applicant is considered 'threatened with homelessness' from 28 to 56 days
- a new duty to assess all eligible applicants' cases (not just those unintentionally homeless and in priority need) and agree a personalised housing plan
- a new duty to prevent homelessness for all eligible applicants who are threatened with homelessness
- a new duty to relieve homelessness for all eligible applicants over a period of 56 days, during which time a local authority should take reasonable steps to help them find suitable accommodation (for a minimum period of six months). This duty stops short of requiring a local authority to provide accommodation for applicants not in priority need;

<https://www.niassembly.gov.uk/globalassets/documents/raise/publications/2022-2027/2025/communities/4325.pdf>

¹¹ [Housing \(Wales\) Act 2014 | Law Wales](#)

¹² It should be noted that currently NIHE's statutory duty to provide accommodation to those who are homeless or threatened with homelessness only comes into effect when an individual is within 28 days of losing their home.

¹³ [White Paper on ending homelessness in Wales | GOV.WALES](#)

¹⁴ [ending-homelessness-in-wales-a-legislative-review.pdf](#)

¹⁵ [Ending Homelessness National Advisory Board: update Autumn 2024 \[HTML\] | GOV.WALES](#)

¹⁶ [Homelessness Reduction Act 2017](#)

- and a new duty on certain public bodies to refer service users whom they think may be homeless or threatened with homelessness to a housing authority, subject to obtaining the person's consent. These legislative changes are similar to those introduced in Wales under the Housing (Wales) Act 2014.

Scotland

5.9 In Scotland, The Housing (Scotland) Bill, as introduced in March of this year, contains an, 'Ask and Act,' duty on social landlords and statutory bodies, such as health boards and the police, to ask about a person's housing situation and act to avoid them becoming homeless wherever possible. While the Housing (Scotland) Bill received Royal Assent on 6th November 2025, the 'ask and act' duty will be phased in over 2026-27 and a pilot fund has been established to support public sector bodies and third sector organisations test out how the duties will work in practice.

5.10 Currently, in Scotland, local authorities have legal duties to support people who apply to them as homeless under the Housing (Scotland) Act 1987. These duties have been amended several times to strengthen the rights of homeless people, most notably by legislation in 2003. Local authority homelessness duties are focused on providing support to people who are homeless or threatened with homelessness, i.e. could become homeless within two months. There are fewer statutory provisions relating to homelessness prevention.

5.11 The Housing (Scotland) Act¹⁷ deals with private rented accommodation and homelessness prevention. Key provisions of the Act include a framework for long-term rent controls, strengthened rights for tenants, enhanced duties to prevent and tackle homelessness and the introduction of 'Awaab's Law¹⁸' to address damp and mould in homes.

5.12 Part 5 of the Bill relates specifically to homelessness prevention. Changes include:

- placing duties on relevant bodies, such as health boards or the police, to ask if an individual is homeless or at risk of homelessness, and requiring them to take action if they are - the aim being to make homelessness prevention a shared responsibility across the public sector
- requiring local authorities act sooner to prevent homelessness by providing support to households threatened with homelessness up to 6 months before homelessness appears imminent rather than the current 2 months
- making social landlords put in place support for tenants if they are overdue on rent due to domestic abuse

¹⁷ [Housing \(Scotland\) Bill as passed](#)

¹⁸ <https://www.gov.scot/news/awaabs-law-to-come-to-scotland/>

- requiring social landlords to have a policy which sets out how they will support tenants who are at risk of homelessness due to domestic abuse.

6 Strengthening calls for reform

- 6.1 The Committee will be aware of the building case for reform of homelessness legislation in Northern Ireland to include a prevention duty. Significant stakeholders and experts in the field, including those at the Centre for Homelessness Impact, the Chief Executive of the Northern Ireland Housing Executive and cross-sectoral bodies, have all called for the introduction of such a duty.
- 6.2 Furthermore, research from Herriott Watt University which examined the endemic relationship between domestic abuse and homelessness, specifically called on the Department for Communities “*to consider legislative developments that would allow for a shared public duty in preventing homelessness*¹⁹.”
- 6.3 In recognition of Northern Ireland’s position as an outlier in the UK, and in reference to global human rights standards in relation to homelessness, the United Nations Special Rapporteur on the right to an adequate standard of living, during his visit to Northern Ireland in May 2024, spoke with the Communities Committee and the Minister for Communities and called for the introduction of this legal duty. Professor Balakrishnan said:
*“...I encourage a whole of government approach to the promotion and protection of the right to adequate housing, a strong foundation in law including prevention of homelessness, and a focus on addressing structural causes of the challenges to the right to adequate housing*²⁰...”

¹⁹ <https://www.hw.ac.uk/news/2025/violence-is-forcing-women-in-northern-ireland-into-homelessness>

²⁰ [Keynote address, Special Rapporteur.pdf](#)

7 The necessary next steps

- 7.1 Legislation alone cannot drive change, but it provides the necessary scaffolding for effective delivery. Enhanced homelessness legislation will drive the required investment in our services and systems to support meaningful change. This includes new data systems, improved delivery support, adoption of best practices, and enhanced abilities to leverage learning, all of which are critical in closing what the Centre for Homelessness Impact refers to as the 'implementation gap'.²¹
- 7.2 Due to the unique societal and sectoral landscape that exists in Northern Ireland, Housing Rights does not recommend the adoption of any one legislative framework that exists elsewhere in the UK.
- 7.3 Rather, it is the Housing Rights view that a bespoke approach is required in Northern Ireland, but that this should draw upon the developments and learning from each jurisdiction.
- 7.4 Housing Rights recommends that Northern Ireland follow the examples of Scotland and Wales in appointing a cross-sectoral review group, with input from people with lived experience, to assess and make recommendations on a new proposed legislative framework for the prevention duty. This approach would be similar to the approach taken by the Scottish Government who appointed the charity Crisis, to establish the Scottish Prevention Review Group in 2019²².
- 7.5 It is our view that not only has there been a failure in Northern Ireland to appropriately advance our legislation to support homelessness prevention, but there has also been a failure by the statutory body responsible for homelessness legislation, the Department for Communities, to meaningfully consider (along with sectoral experts) the need for such legislation and to bring forward appropriate proposals. This failure is all the more stark when one considers what has been possible in both Scotland and Wales in this regard.
- 7.6 The approach followed in both these jurisdictions combines the resources and expertise across the sector in making legislative proposals and also lessens the resource burden on any one body to do this individually. Housing Rights would be willing to provide the support role played by Crisis if such an approach were to be adopted in Northern Ireland.

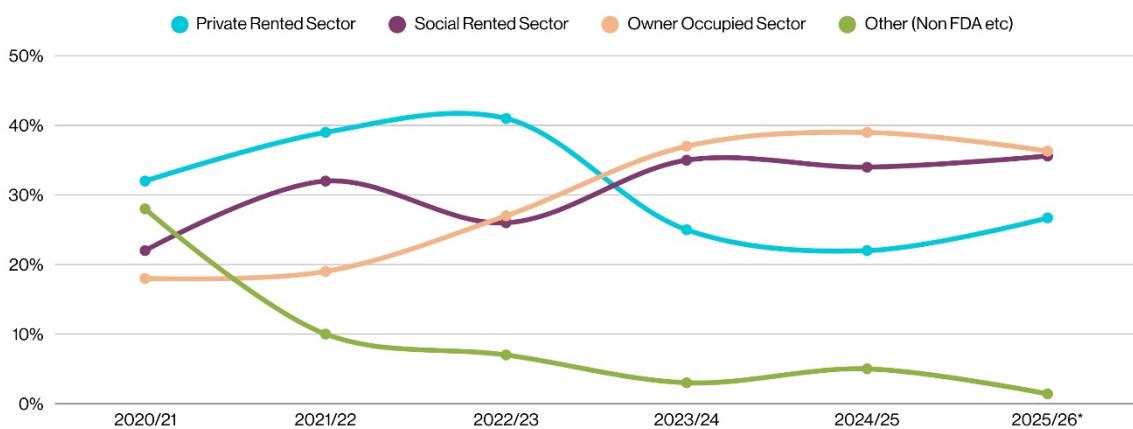
²¹ Often, the underlying policy intent is sound and informed by evidence, but the necessary investment and support to ensure local areas have the systems and capacity to implement it effectively are significantly underestimated. [A-smarter-approach-to-homelessness.pdf](#).

²² <https://www.crisis.org.uk/ending-homelessness/scotland-prevention-review-group/>

8 Preventing homelessness is becoming more difficult, despite the growing recognition of its value

8.1 As noted above Housing Rights collects data on those cases in which we successfully prevent homelessness using a strict UK government definition. Our work is unique among sector stakeholders in that we assist households across the housing market, from social rented, to mortgage / owner-occupiers, to private renters and households who are homeless. As the data below shows, there has been a recent decline in the success of prevention efforts in the private rented sector specifically.

Figure 1: Proportion of total 'P1E's (successful homelessness prevention cases) achieved by housing tenure, in Housing Rights' services for the period 2020 - Sept '25



Prevention in the private rented sector

8.2 There are multiple reasons why homelessness prevention has become more challenging in the private rented sector. These include:

- Rapidly rising rents at 8-10% per annum, with average rents in Belfast reaching £1127 per month²³.
- Housing Benefit paid to private renters is not sufficient to prevent homelessness. The rate it's paid at has recently been frozen again. Research from the Joseph Rowntree Foundation²⁴ has called for Westminster to permanently re-link housing benefits to private rents to address hardship.

²³ <https://www.propertypal.com/news-and-analysis/market-reports/ni-housing-market-update-q1-2025>

²⁴ <https://www.jrf.org.uk/housing/stop-the-freeze-permanently-re-link-housing-benefits-to-private-rents>

- It's difficult for some tenants to find another place to rent when their tenancy ends. This is because of a downward trend in supply in the sector as shown in lettings data from the University of Ulster²⁵.
- There are fewer protections in the sector. Tenants report a lack of security²⁶ because of 'no-fault evictions'. There are poor standards of housing²⁷ with tenants reporting damp, mould and disrepair. Some tenants also face discrimination if they receive benefits, and unlawful letting fees are still charged²⁸.
- There are fewer available mechanisms to provide practical support for those who don't have a guarantor, a deposit or the first month's rent.

8.3 As a result, loss of rented accommodation continues to be one of the top three causes of homelessness in Northern Ireland.²⁹ Loss of rented accommodation is therefore a significant contributor to the rising cost of temporary accommodation in Northern Ireland, which has cost the NIHE £40 million in the past 12 months, an 830% increase over the past decade³⁰. Prioritising tenancy sustainability and homelessness prevention provision focused on the private rented sector can therefore reduce reliance on temporary accommodation, be cost-effective in producing associated savings, and, crucially, prevent families and households from the traumatic experience of homelessness.

8.4 In parallel to this, there is a growing concern that the private rented sector is increasingly being relied upon to relieve pressure in other sectors, with government policies potentially affecting both the availability of private rented accommodation for low income households at risk of homelessness (in the case of the NIHE approach to acquiring private rented accommodation for use in meeting the demand for temporary accommodation), and also placing vulnerable homelessness households in private rented accommodation when they would ordinarily have been placed in more secure social homes (as is the case in the Fundamental Review of Allocations Proposal 4)³¹.

²⁵ https://www.ulster.ac.uk/_data/assets/pdf_file/0010/1655173/PrivateRentalReport_H1-2024.pdf

²⁶ <https://www.housingrights.org.uk/no-fault-eviction-survey-findings>

²⁷ <https://www.nihe.gov.uk/getattachment/975a319a-9516-4f0b-a095-382332405ff0/HCS-Main-Report-2016.pdf>

²⁸ <https://www.cih.org/media/j3borrye/regulation-of-letting-agents-and-letting-agent-fees-in-ni-final-accessible.pdf>

²⁹ <https://datavis.nisra.gov.uk/communities/Northern-Ireland-Homelessness-Bulletin-April---September-2024.html>

³⁰ [Temporary accommodation: Bill rises 830% in 10 years for housing people in hotels, B&Bs and hostels across NI | BelfastTelegraph.co.uk](https://www.belfasttelegraph.co.uk/news/2024/04/15/temporary-accommodation-bill-rises-830-in-10-years-for-housing-people-in-hotels-bbs-and-hostels-across-ni-141111111)

³¹ [The Housing Executive - Fundamental Review of Allocations](https://www.housingexecutive.gov.uk/our-work/the-housing-executive-fundamental-review-of-allocation)

8.5 The most significant reason our services fail in efforts to prevent homelessness in the private rented sector, is because of affordability. Whilst some support is available through Discretionary Housing Payments, not all households can access this support (e.g. because the household has no qualifying benefit or because they are within 12 months of the end of a previous DHP). Housing Rights notes that the Independent Expert Panel recommendations in the Welfare Mitigations Review³² for an extended service to provide support to low-income private rented households, has never been taken forward. We also note the recently published Poverty in Northern Ireland report by the Joseph Rowntree Foundation which expresses particular concern about the high rates of poverty in the private rented sector, with 3 in 10 households living there now in poverty³³.

The owner-occupied – mortgage sector

8.6 Housing Rights continues to be concerned about vulnerable households in the owner-occupied market, specifically those on low incomes with mortgages. Recent research we commissioned showed households on low incomes with interest-only mortgages and those whose households contained persons with a disability, were particularly at risk and therefore needed additional support to stay in their home³⁴.

8.7 Furthermore, prevention efforts in this sector have been weakened. In the Summer Budget 2015, the Conservative Government announced that they would increase the qualifying period for Support for Mortgage Interest (SMI) from 13 weeks to 39 weeks, and change SMI from a benefit to an interest-bearing loan, secured against the mortgage property. This resulted in a severe decline in take-up. Eligible households who were surveyed cited 'loan-related issues' as the biggest barrier to availing of SMI³⁵.

8.8 There have been attempts to make SMI more accessible in recent years. In April 2023, the qualifying period was reverted to 13 weeks again, and the 'zero-earnings' rule was abolished, allowing UC recipients who also work to avail of SMI. Despite these changes, the recent uptake of SMI³⁶ remains lower, indicating that the effectiveness of this once-key homelessness prevention measure remains severely diminished.

³² [Welfare Mitigations Review](#)

³³ [Poverty in Northern Ireland 2025 | Joseph Rowntree Foundation](#)

³⁴ [mortgage-debt-and-homeowner-resilience-research-report.pdf](#)

³⁵ [Research Briefing: Support for Mortgage Interest Loans, House of Commons Library](#)

³⁶ [Support for Mortgage Interest statistics, May 2018 to May 2025 - GOV.UK](#)

The social rented sector

8.9 Whilst social rented housing provides the most secure housing option for many people at risk of homelessness, the safety nets around prevention could be strengthened further. Support for homelessness prevention services to sustain tenancies and prevent rent arrears must continue to be resourced and rent levels must continue to be affordable. Housing Rights notes approaches taken in other jurisdictions with housing authorities in Wales, for example, adopting a ‘zero evictions into homelessness’ policy. In April 2019 ClwydAlyn³⁷ committed not to evict anyone into homelessness with a longer-term goal of zero evictions overall.³⁸

8.10 In Northern Ireland, potential developments in the respect of Anti-Social Behaviour (ASB) risk weakening the safety net of those at risk of homelessness. In November of 2023, the Department of Justice and the Department for Communities launched a consultation on proposals to amend the legislation to help tackle Anti-Social Behaviour.³⁹ This consultation contained a number of proposals which would, in essence, make it easier to make a person homeless. Housing Rights submitted a full consultation response⁴⁰ raising concerns about the implications for homelessness and homelessness prevention. Housing Rights were subsequently appointed to an advisory group, which was successful in mitigating several of the raised issues. However, one issue not covered by the advisory group remains outstanding, which would weaken the safety net for social tenants at risk of homelessness.

8.11 The proposal to create Absolute Grounds for Possession⁴¹ in Northern Ireland is still being considered by the Department for Communities. It is Housing Rights’ position that this would be ineffective in reducing ASB and would serve only to expedite the process to make a person homeless.

8.12 There already exists effective legislation that provides for tenancies to be brought to an end, one which takes account of and sufficiently balances evidence, and which most importantly provides access to justice for defendants.

8.13 A court in Northern Ireland can make a possession order if one or more of the grounds listed in the Housing (Northern Ireland) Order 1983⁴² are satisfied. Where there is ground 2, as would be the case under the Department’s

³⁷ ClwydAlyn is a social housing association in Wales.

³⁸ [clwydalyn-self-evaluation-2022-2023_en-1.pdf](#)

³⁹ [Anti-Social Behaviour | Department of Justice](#)

⁴⁰ [Anti-social behaviour consultation response | Housing Rights](#)

⁴¹ Would enable the court to make an order for possession where there is clear evidence that anti-social behaviour has already been proven to the satisfaction of another court.

⁴² [The Housing \(Northern Ireland\) Order 1983](#)

proposals, then the court can make a possession order if it considers it is reasonable to do so⁴³.

9 Supporting Homelessness Prevention

- 9.1 Evidence suggests that there is a range of prevention-related initiatives which work; these should be resourced and strengthened. In May of 2025, the Centre for Homelessness Impact (CHI) published '*A Smarter Approach to Homelessness: Prioritising Prevention in the 2025 Spending Review*'⁴⁴. The central premise of the paper is to present evidence that reactive measures of the kind the NI system currently employs incur high and recurring costs while delivering poor value for money and worse outcomes for individuals who are threatened with homelessness.
- 9.2 Instead, CHI advocate moving resources toward preventative measures to avoid homelessness in the first instance, and a cross-service approach where schools, health services, early years services and other mainstream agencies play an active role in identifying and addressing the factors that contribute to homelessness.
- 9.3 CHI's recommendations include:
 - The development of a unified vision for prevention, with success measures. It is Housing Rights' view that this can flow from a homelessness prevention review group and from legislation.
 - Protection of the social security net. In a Northern Ireland context, this includes protecting welfare mitigation.
 - New homes targets must include significant numbers of affordable and social housing.
 - Improve data sharing architecture. High-quality, granular data is the foundation on which truly transformational preventative measures are built.
 - Provide 'national prevention endowment' to provide service providers with certainty and security to develop new and innovative preventative interventions.
 - Invest in and scale place-based initiatives to prevent homelessness.

⁴³ [The Housing \(Northern Ireland\) Order 1983](#), section 29

⁴⁴ [A-smarter-approach-to-homelessness.pdf](#)

9.4 With that in mind, Housing Rights recommends the following steps be implemented to orient Northern Ireland's homelessness systems toward the prioritisation of prevention.

Quality Housing Advice

9.5 The role of timely and accurate housing advice in preventing homelessness is widely recognised. Access to legal advice by housing law specialists is also widely evidenced as critical in preventing homelessness, as noted by the Centre for Homelessness Impact.⁴⁵ Acceptance of this premise is underpinned by the legislative duty, which exists in every jurisdiction within the UK, to ensure that free advice on homelessness and prevention of homelessness is available to anyone who needs it. In Northern Ireland, this duty was introduced under the Housing (Amendment) Act (NI) 2010⁴⁶.

9.6 As the leading provider of specialist housing advice, Housing Rights has been calling for housing advice in Northern Ireland to be strengthened through the adoption of Housing Advice Quality Standards. Quality standards for advice provide an easy-to-follow set of competencies, outlining what an individual working on the frontline must be able to do, and what they need to know and understand, in order to give reliable advice to their clients.

9.7 Quality standards are a guarantee to people using the service that the information and support they receive is appropriate, accurate, timely and fit for purpose. Not only do standards improve the quality of advice for the recipient, they also generate benefits for advice providers.

9.8 The introduction of Housing Advice Quality Standards in Northern Ireland would offer several benefits including;

- Help to safeguard the quality of housing advice in Northern Ireland to prevent and alleviate homelessness and, in doing so, support the delivery of the NIHE Homeless Strategy 2022-27;
- Support the implementation of Proposal 1 of the Fundamental Review of Allocations⁴⁷, which requires an independent tenure-neutral advice service for Northern Ireland; and
- Provide a simple framework of competencies at relevant levels of housing advice and a corresponding learning and development plan to support practitioners to achieve these standards.

⁴⁵ CHI, (2022) Tackling Tenancy Insecurity in the Private Rented Sector What works to prevent homelessness? Accessible at: 626bb415605bc8645523cc37_CHI.Tackling-tenancy-insecurity.pdf

⁴⁶ 6D—(1) The Executive shall secure that advice about homelessness, and the prevention of homelessness, is available free of charge to any person in Northern Ireland.

⁴⁷ [The Housing Executive - Fundamental Review of Allocations](#)

9.9 The introduction of these quality standards is a pragmatic and evidence-based assurance mechanism and appropriately recognises that bad advice can have serious consequences. Quality standards exist in other areas, such as debt and in Housing Rights' view should be progressed as a matter of urgency. Housing Rights has been working with the NIHE in relation to this area of work, and further scrutiny by the Committee would be welcome.

Strengthening Provision for Certain Vulnerable Groups/Communities

9.10 It is our experience that young people leaving care, women who have experienced domestic abuse, and ethnic minority communities, are most at risk of homelessness, and that there is a need to strengthen the provisions in place to protect and support these groups.

Young people leaving care

9.11 Through our targeted advice work with young people, we know that young people leaving care experience a greater risk of homelessness. This is supported by recent research⁴⁸ which found 63.9% of care leavers presented as homeless and 56.3% of care leavers presented as homeless more than once.

9.12 The risk of homelessness is highest in the first two years after exit, when care leavers have over 17 times the risk of homelessness compared to young people with no social care history. Although the risk reduced over time, it remained nearly seven times higher than for other young people, even five to ten years after leaving care.

Women who have experienced domestic abuse

9.13 Last year, 1,202 households presented as homeless to the NIHE due to domestic abuse⁴⁹. The numbers affected are likely to be even higher, but due to stigma and fear, many people presenting as homeless do not disclose domestic abuse, while many more are not able to reach out for help at all.

9.14 Unfortunately, systemic failures leave many victims of domestic abuse homeless. Often, victims are forced to leave their homes while the perpetrator stays. There is a lack of accessibility and enforcement of court orders, meaning that they often fail to fulfil their primary purpose of keeping victims safe. There is an insufficient prioritisation given to victims of domestic abuse on social

⁴⁸ [Data Insight: Homelessness among young people leaving care in Northern Ireland - ADR UK](#)

⁴⁹ [Northern Ireland Homelessness Bulletin October 2024 - March 2025 | Department for Communities](#)
[Northern Ireland Homelessness Bulletin April - September 2024 | Department for Communities](#)

housing waiting list. All these factors, combined with the lack of supply of social housing, significantly increase the risk of homelessness for women who have experienced domestic abuse.

Ethnic Minority Communities

9.15 Housing Rights' user profile shows an increase in representation from minoritised communities in our services, and the over-representation of newcomer communities, in 'walk-ins'⁵⁰. The most recent NI homelessness statistics now include data on the numbers of asylum seekers who are destitute or are likely to be destitute and do not have accommodation in Northern Ireland. This cohort is referred to as Section 95, and the statistics show a rise over the period between April-Sept 2024-25 (641 households with 431 accepted as homeless) and October-March 2024-25 (708 with 484 accepted as homeless)⁵¹.

9.16 Additionally, the NIHE reports that the significant acceleration in immigration decisions by the UK Home Office has increased the number of households (many from an ethnic minority background) presenting as homeless. According to information published by the NI Audit Office, as of January 2025, around five per cent of homelessness acceptances and ten per cent of households in temporary accommodation were those with leave to remain status⁵².

9.17 Further provision of targeted homelessness prevention services is required to support these three groups, who are being failed by our existing systems.

The Private Rented Sector

9.18 As discussed above, the private rented sector in Northern Ireland poses unique challenges to homelessness prevention, which requires bespoke interventions and the embedding of rights to reorient its policy framework toward the prevention of homelessness for the most vulnerable. The current affordability crisis and lack of regulation in the sector render positive homelessness prevention outcomes difficult to achieve.

⁵⁰ By way of illustration, our usage of the Language Line service, which we use to provide interpreter support, increased dramatically in the 2024-25 year, with the usage costs increasing from £2,910.96 in 2023/24 to £10,123.23 in 2024/25. The top 5 most used language services were 1) Arabic 2) Somali 3) Polish 4) Farsi and 5) Romanian.

⁵¹ NI Homelessness Bulletin, October 2024-March 2025, published 12 June 2025 accessible at: [Northern Ireland Homelessness Bulletin October 2024 - March 2025 | Department for Communities](https://www.nihomelessnessbulletin.com)

⁵² NI Audit Office (March 2025) *Homelessness in Northern Ireland*, p.21 available at: https://www.niauditoffice.gov.uk/files/niauditoffice/documents/2025-03/NI%20Audit%20Office%20Report%20-%20Homelessness%20in%20NI_0.pdf N.B. a further publication with updated statistics is due for release on 11th December 2025.

9.19 To create an environment where homelessness prevention can be made effective, several legislative steps are required. Housing Rights therefore recommends the following suite of legislative measures be implemented in the sector:

- **Affordability**
 - Review Discretionary Housing Payments to determine how they can best be applied to prioritise tenancy sustainment and homelessness prevention.
 - Consistently lobby the UK Government to unfreeze the Local Housing Allowance rate, and align it on an annual basis with the 30th percentile of rents.
 - Ban unfair Letting Fees
 - Replicate the Renters' Rights Act in England to limit the amount of rent in advance that a landlord can ask for to the equivalent of one month's rent.
 - Review the feasibility of a rent control framework which ensures fair rents for tenants without the fear of unaffordable rent spikes while ensuring a fair return for landlords.
- **Standards and Repairs**
 - Establish improved Minimum Standards through the implementation of a Housing, Health and Safety Rating System.
 - Implement Awaab's Law in the Private Rented Sector.
 - Implement Minimum Energy Efficiency Standards.
- **Recourse to Justice**
 - Establish a free-at-point-of-access dispute resolution service to adjudicate on landlord-tenant disputes at an early stage, avoiding the threat of homelessness and reducing court case load.
 - Establish a fit and proper persons test for landlords and letting agents, and implement a landlord licensing model which requires landlords and agents to meet a set of best practice and professional standards.
 - Increase Local Council powers and resources to act on tenant complaints regarding poor standards in their home or landlords' failures to carry out repairs.
- **Security of Tenure**
 - Lengthen Notice to Quit periods in the private rented sector.
 - Ban 'no fault' evictions and establish indefinite tenancies with a prescribed set of exceptions for fair cases of eviction.

9.20 The implementation of these key policies will go some way to reorienting the policy framework within the private rented sector in Northern Ireland to ensure homelessness prevention provisions can be effective.

10 Recommendations

10.1 Housing Rights has identified the following high-level recommendations, which, if adopted, would play a significant and impactful role in preventing homelessness in Northern Ireland.

1. Establishment of an expert advisory group to bring forward proposals to inform the reform of the homelessness legislation in Northern Ireland to include a prevention duty which requires collaboration and cooperation across agencies.
2. Establish a strategic advisory group, with senior representatives from relevant cross sectoral agencies to influence and monitor the progress in shifting the dial towards prevention.
3. Introduce Housing Advice Quality Standards in Northern Ireland to ensure that housing advice is of a high standard and effectively prevents and resolves housing problems at the earliest stage, thereby reducing the harm to citizens and cost to the public purse.
4. Strengthen the provision of homelessness prevention services for specific vulnerable groups, including young people, women and ethnic minority communities. In so doing, the risk of homelessness for these groups is minimised and the opportunities for prevention savings are maximised.
5. Expedite the reform of the private rented sector in Northern Ireland, which is increasingly being relied upon to meet housing need, and which is a key driver of homelessness in Northern Ireland. Reforms should include a specific focus on meaningfully addressing affordability, standards and repairs, recourse to justice, and security of tenure.