

Housing Rights

Policy Consultation Response

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**Response to Consultation on Amendments to
the Landlord Registration Scheme Regulations
(Northern Ireland) 2014**

April 2026

1.0. Introduction

1.1. About Housing Rights

Housing Rights is Northern Ireland's leading independent provider of specialist housing advice. For over 60 years, we have been helping people to find and keep a home. We believe that prevention is better than the cure. Our work seeks to ensure that individuals and families living in Northern Ireland do not reach this crisis point. We recognise, however, that this is not always possible, and we also provide advice and assistance to help ensure that the experience of homelessness is rare, brief and non-recurrent.

Housing Rights passionately believes that no one should be without a home. We work towards the goal that everyone in Northern Ireland has a good quality, affordable and sustainable home that meets their needs. In particular, the organisation's services are targeted at people who need help to:

- Prevent them from becoming homeless;
- Find suitable rented accommodation;
- Sustain their tenancies;
- Explore their housing options;
- Avoid repossession and eviction;
- Tackle disrepair or poor conditions in their homes; and
- Meet their housing costs;
- Repay mortgage and/or rent arrears;
- Resolve disputes with their landlord and/or lenders.

Last year, our **services assisted 13,162 households** across Northern Ireland on **67,828 housing issues** and **prevented homelessness for 1,120 households**. 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. Our services also work closely with statutory services including the NI Housing Executive, the NI Prisons Service and the Courts and judiciary. We therefore have a profound understanding of the impact of homelessness in Northern Ireland. We recognise the value of independent advice to prevent homelessness and to affect positive outcomes across a number of government priorities including reducing recidivism, promoting access to justice and addressing health inequalities.

In addition to frontline specialist advice, representation and support services, Housing Rights has a policy and participation service that influences government policy decisions to improve housing and homelessness in Northern Ireland. **Our policy work is informed by the views and experiences of the people who contact us for advice, aiming to support the identification of evidence-based, informed solutions.**

1.2 The Nature of our Response

This response aims to inform the Department for Communities' (the Department) consultation on Amendments to the Landlord Registration Scheme Regulations (Northern Ireland) 2014. As an independent housing advice charity, Housing Rights assists upwards of 13,000 households a year, with approximately a third of those households being private rented tenants. In addition, Housing Rights administers the Landlord Advice Helpline, which advises thousands of landlords each year on their responsibilities and legal rights. For landlords, a precondition of receiving advice from the Landlord Helpline is registration with the Landlord Registration Scheme (the Scheme). In addition, Housing Rights has engaged extensively with both the Department and Lisburn and Castlereagh City Council (LCCC) to influence and shape the Landlord Registration Scheme to best support tenants and landlords across Northern Ireland.

We are therefore well placed to provide comment and feedback on the proposals outlined in the consultation document¹ and will provide additional recommendations for both the Department and LCCC, which we believe will further strengthen the Scheme's effectiveness, improve its self-sufficiency, protect tenants, and encourage professional and lawful landlord behaviour.

2.0 Overarching Comments

Housing Rights welcomes the broad intent of the policy proposals outlined. Linking the regulations to the Housing Supply Strategy² is a positive step forward, and Housing Rights recommends that this approach be taken more broadly when implementing policy and legislation regulating the private rented sector (PRS). As the tenure most associated with affordability challenges, poor housing standards, and tenure insecurity, enhanced regulation of the PRS and increased protections for private renters will support all five objectives of the Housing Supply Strategy, as well as other linked strategies such as the Fuel Poverty and Anti-Poverty Strategies.

Housing Rights supports expanding the information LCCC can collect and agrees that this will help the council identify risks, target support, and take enforcement action where necessary. We also welcome efforts to improve data-sharing between LCCC, the Department and the Health and Safety Executive Northern Ireland (HSENI). Housing Rights can see how this measure will enable better enforcement of safety standards, assist with targeted support, and inform positive policy development.

We agree that tenants must be able to rely on their landlord to provide a home that is safe, well-maintained and properly managed, and believe that landlords who fail to do so should be held to account. These proposals provide for better data sharing to enable the identification of landlords who are not meeting their responsibilities, and for enforcement against those landlords, which is a welcome step forward.

¹ [Amendments to the Landlord Registration Scheme Regulations \(Northern Ireland\) 2014](#)

² [Housing Supply Strategy - A Home for Everyone](#)

3.0. Proposals

Housing Rights will provide comment on each proposal individually.

3.1. Proposal 2: Formally appoint LCCC as the Landlord Registrar

Housing Rights supports this proposal and encourages the Department to ensure that LCCC is adequately supported and resourced to carry out its duties, including investigation and enforcement.

3.2. Regulation 7(2): Exempt HMO landlords from paying landlord registration fees

The justification of this proposal is sound, as the Scheme is designed to register landlords, not properties, and these landlords will have already paid a fee to the HMO Scheme. Provided that these landlords, as landlords of both HMO and standard accommodation, remain required to register with both schemes but can have the fees waived, we have no major objections to this proposal.

Housing Rights believes the Department should assess the fee for registering with the Scheme, which is currently £70³ as per Schedule 3 of the regulations⁴. We are unaware of any increase in the fee since the introduction of the regulations in 2014, despite inflation and, presumably, increased costs in administering the Scheme in the intervening 12 years. In the same time period, tenants have experienced an approximate 80% inflation in rental costs⁵⁶.

Housing Rights would assert that it makes sound financial sense to adjust the fee for landlord registration in line with inflation from its 2014 base of £70. Doing so would enable LCCC to reinvest additional resources into the Scheme's capacity to effectively meet its legal duties and to publicise its existence, aiding the Council's efforts (and Department's goal) to ensure as many landlords across Northern Ireland as possible are registered.

This could be achieved by including a proposal to amend Schedule 3 of the Landlord Scheme Regulations (Northern Ireland) 2014.

Recommendation: Adjust the fee for landlord registration in line with inflation from its 2014 base to enable revenue raising and reinvestment back into the Landlord Registration Scheme.

3.3. Regulation 9: Allow LCCC to share information with HSENI and the Department

Housing Rights agrees with this proposal. We see how improved data sharing between LCCC, the Department and the Health and Safety Executive Northern Ireland (HSENI) will enable better enforcement of safety standards, support targeted interventions, and inform positive policy development. We also agree that this will support the council in identifying risks, targeting support, and taking enforcement action where necessary.

³ £80 for paper registration

⁴ [The Landlord Registration Scheme Regulations \(Northern Ireland\) 2014](#)

⁵ <https://www.nihe.gov.uk/getattachment/5821e08a-5394-430d-b095-aab01dad778e/private-rental-market-july-dec-2014.pdf>

⁶ [Performance of the Private Rental Market in Northern Ireland, H1 2025](#)

3.4. Schedule 1: Request extra information from landlords about their properties at the point of registration

Housing Rights supports this proposal. The additional information outlined in the proposal aligns with recent improvements in standards implemented under the Private Tenancies Act and assists the Department in assessing the standard of private rented accommodation, enabling better data to inform future policy reforms in the sector.

It will also enable LCCC to ensure Landlords are meeting standards, and inform their targeting of investigation and enforcement efforts.

Most importantly, tenants have the right to know as much information as possible about the standard of the home they are renting or are interested in renting. This will allow them to make an informed decision on the quality of the home and the amount of rent they are being asked to pay.

This information could reassure tenants that the accommodation they are renting or considering renting meets safety standards, and gives them an idea of the level of energy efficiency they can expect from the house. It would also allow them to weigh that against how much rent they are being asked to pay. **Housing Rights would therefore recommend that the information submitted by landlords is available to tenants through the public search function on the Scheme's website⁷.** If GDPR restricts tenants from viewing documents directly, LCCC may wish to consider adding a checkbox under the property search that confirms that all necessary documentation, including the EPC Standard, has been provided. LCCC may further consider collaborating with Letting Agents to ensure they are sharing this information with their customers.

Housing Rights would assert that any amendment to Schedule 1 of the regulations should go further than *requesting* extra information from landlords, and that provision of that information should be mandatory.

Recommendation: The submission of additional information required of landlords regarding the safety and standard of the home should be publicly confirmable by tenants or prospective tenants.

Recommendation: It should be a mandatory requirement for landlords to provide the additional information outlined in the consultation document.

4.0. Recommendations beyond the Proposals

Housing Rights agrees that tenants must be able to rely on their landlord to provide a home that is safe, well-maintained and properly managed. It is also our view that landlords who fail to do so should be held to account. These proposals provide for better data sharing to enable the identification of landlords who are not meeting their responsibilities, and for enforcement against them, which is a welcome step forward.

However, we believe that the proposals miss an opportunity to further strengthen the PRS by introducing enhanced measures to prevent the letting of accommodation below an acceptable standard and to provide sufficient consequences for those who fail to meet their legal responsibilities.

⁷ [Landlord Registration Scheme](#)

While we acknowledge that the proposals seek to amend the regulations in a ‘proportionate and balanced way’, we believe there is a need to strengthen the options to hold those who do fall short to account.

4.1. Fine for non-registration

The requirement for a landlord to register with the Scheme is set out in Schedule 3⁸ of the regulations. The goal of both the Department and LCCC is to maximise the number of landlords registering with the scheme. Despite this, Housing Rights understands that a sizeable proportion of landlords in Northern Ireland remain unregistered. As outlined above, in reference to Regulation 7(2), an increase in the fee might allow LCCC to publicise the Scheme to landlords who are not registered, as they may not be aware of it.

Registration is, however, a legal requirement, and it is an offence to let accommodation without registering with the scheme. While Housing Rights would not wish to issue immediate fines or prosecute landlords who are unaware of their obligation to register, there are landlords in Northern Ireland who do not wish to register for unethical reasons. This could include anything from the home being in extremely poor condition and failing to meet safety standards, to fraudulent activity, to informal renting to vulnerable individuals or groups⁹.

These landlords are unscrupulous, but if caught, are liable only to a fixed penalty of up to £500, or to a fine of up to £2,500 if successfully prosecuted in court. In Housing Rights’ opinion, this is not an adequate deterrence for these landlords, who often operate in a ‘shadow’ PRS¹⁰.

If we are to encourage good practice among landlords, professionalism, and the provision of warm, comfortable homes for tenants, there must be appropriate consequences for intentionally failing to register with the Scheme.

Housing Rights recommends increasing the maximum penalty for renting out a property while failing to register with the Landlord Registration Scheme to £50,000, in line with what is in place in Scotland through the Private Housing (Tenancies) (Scotland) Act 2016¹¹. This will act as a preventative deterrent for rogue landlords, as well as holding the worst offenders to account.

This could be achieved by amending the regulations to insert a section similar to Part 5 of the Houses in Multiple Occupation Act (Northern Ireland) 2016¹².

We reiterate that Landlords who were not registered because they were unaware of their obligations should continue to be signposted toward registration without further action, and significant fines should be reserved for repeat offenders or those rogue landlords who avoid registering for unethical reasons.

Recommendation: Increase the maximum penalty for renting out a property while failing to register with the Landlord Registration Scheme to £50,000, in line with what is in place in Scotland.

⁸ [The Landlord Registration Scheme Regulations \(Northern Ireland\) 2014](#)

⁹ [Supporting-Systemic-Change-in-the-Private-Rented-Sector.pdf](#)

¹⁰ [Criminal landlords in the shadow private rented sector in England](#)

¹¹ [Private Housing \(Tenancies\) \(Scotland\) Act 2016](#)

¹² [Houses in Multiple Occupation Act \(Northern Ireland\) 2016](#)

4.2. Fit and Proper Persons Test

The aforementioned Houses in Multiple Occupation Act contains, in Section 10, a requirement on HMO landlords to complete a ‘fit and proper persons’ test¹³. This is positive and makes sense. We believe that society benefits from ensuring that those who are renting accommodation as someone’s home are free from a history of fraud, violence, drugs or human trafficking.

Housing Rights does not see sufficient justification for why this requirement should apply to one group of landlords but not another, especially when, by the logic of Proposal 7(2), there is overlap between those two groups.

The introduction of a fit and proper person test to the Landlord Registration Scheme Regulations would encourage good practice, increase professionalism within the sector, and, by attracting responsible landlords, improve outcomes and the quality of homes for tenants.

Housing Rights therefore recommends that the regulations be amended to include a fit-and-proper-person test. Similarly to proposal 7(2), if a landlord has completed the HMO fit and proper persons test, they should not need to complete it again for the purposes of this recommendation.

Recommendation: Include an additional proposal to amend the regulations to insert a fit and proper persons test for landlords.

5.0. Conclusion

Housing Rights broadly welcomes the proposals outlined in this consultation and considers them a positive step forward. We especially welcome increased data sharing and believe this can support the functions of the Department, LCCC and HSENI. We further believe that it will benefit tenants directly and indirectly through improved targeting and enforcement, and by fostering positive policy development moving forward.

We welcome the additional information that can be requested from landlords and, for the reasons outlined above, believe this can be beneficial to the Department and LCCC. Our primary concern is the well-being of tenants, and we believe this Proposal can be strengthened by taking on board our recommendation that tenants should be able to confirm that their landlord or prospective landlord is meeting their obligations.

Housing Rights accepts that the proposal to waive the landlord registration fee for registered HMO landlords is sound. We argue that there is a need to consider a reasonable adjustment to the landlord registration fee in line with inflation, and that this will benefit LCCC in terms of revenue-raising and sustained service improvements.

While respecting the Department’s desire to amend the regulations in a proportionate and balanced manner, we believe the Proposals fall slightly short of achieving this balance, not through what is included in the Proposals, but by what is omitted. While the proposals to amend the regulations are positive, we believe they lack the necessary ‘teeth’ to achieve the goal of enabling more effective action against those who fall short of legal standards.

We have made two reasonable recommendations to address this. A higher potential fine could serve as a key preventative deterrent to the purposeful avoidance of registering with the Scheme, while also providing a sufficient and meaningful penalty for the worst-offending landlords who show no

¹³ [Houses in Multiple Occupation Act \(Northern Ireland\) 2016](#)

interest or willingness to meet their legal obligations. Simultaneously, we believe that if the inclusion of a fit and proper persons test is justifiable for one set of landlords (HMO landlords), there is no reason it should not apply to those renting standard accommodation, especially given the overlap between the two groups.

Housing Rights believes these recommendations to be reasonable and that they will serve to strengthen and improve the regulations, achieving the goal of proportionate and balanced amendments to support good landlords, while enabling effective action against those who fall short of their legal obligations. Most importantly, we believe they will deliver better outcomes for the PRS as a whole and the tenants who call it home.

Recommendations:

- Adjust the fee for landlord registration in line with inflation from its 2014 base to enable revenue raising and reinvestment back into the Landlord Registration Scheme.
- The submission of additional information required of landlords regarding the safety and standard of the home should be publicly confirmable by tenants or prospective tenants.
- It should be a mandatory requirement for landlords to provide the additional information outlined in the consultation document.
- Increase the maximum penalty for renting out a property while failing to register with the Landlord Registration Scheme to £50,000, in line with what is in place in Scotland.
- Include an additional proposal to amend the regulations to insert a fit and proper persons test for landlords.

If you wish to discuss or request more information on this consultation response, please contact our Policy Lead, Stephen Morrison at stephen.morrison@housingrights.org.uk.

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