

Simon Community response to:

Housing (Amendment) Bill – Call for Evidence

September 2026

General views on 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.

Homelessness in Northern Ireland has reached a critical point. More than 64,000 people - including almost 20,000 children and young people - are now officially homeless. The number of people experiencing homelessness has increased by almost 13,000 in the past three years alone and over doubled in the past decade, with reliance on temporary accommodation rising to unprecedented levels. A severe shortage of affordable housing, rapidly rising rents and gaps in early intervention support have pushed more people into crisis. The result is a system under immense strain, with growing numbers of people living in unsafe, insecure or inappropriate conditions.

As Northern Ireland's largest homelessness charity, Simon Community see first hand the profound human and economic consequences of this failure. Homelessness damages people's health, disrupts family life and exposes individuals to ongoing stress, trauma and uncertainty. It also places significant pressure on already stretched public services, driving higher spending across health, justice and temporary accommodation, while reducing people's ability to work, learn and contribute to the local economy.

For many, the roots of homelessness begin many months, even years, before they lose their home. Yet current homelessness legislation restricts early intervention, forcing services to focus on managing crisis rather than preventing it.

Simon Community therefore strongly supports the purpose of the Housing (Amendment) Bill and have no proposed amendments. Extending the definition of 'threatened with homelessness' to at least 60 days would give the Housing Executive and partner organisations more time to meaningfully step in and provide support to prevent homelessness.

Preventing homelessness is one of the most powerful and cost-effective interventions a government can make. Shifting support upstream to help people before they ever enter the homeless system protects them from trauma, instability and harm, while reducing demand on public services and avoiding the high costs associated with temporary

accommodation, repeated health and social care interventions, lost productivity and pressures on the justice system. Strengthening early intervention through this Bill is therefore both a compassionate and fiscally responsible step towards a more effective homelessness system.

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.

Simon Community does not consider the current 28-day period to provide adequate protection for people who are threatened with homelessness. In most cases, 28 days is far too late for effective and meaningful intervention and forces the Housing Executive to respond to an emergency rather than having the opportunity to prevent it. By the time someone is within 28 days of losing their home, the opportunities to sustain an existing tenancy, resolve rent arrears, mediate with a landlord or identify alternative accommodation have often narrowed significantly. This results in significant economic costs to the public purse due to increased reliance on costly temporary accommodation, as well as profound personal costs for the people and families who find themselves with no safe place to call home.

The current 28-day period is also out of step with other parts of Northern Ireland's housing system. The Private Tenancies Act (2022) increased notice-to-quit periods in the private rented sector to eight weeks / 56 days for tenancies of more than one year, and people granted refugee status have a 42-day move-on period to leave asylum accommodation. In practice, this lack of alignment means that people can know they are going to lose their home and still be unable to present as threatened with homelessness to the Housing Executive. As a result, they are unable to access prevention support such as financial assistance, support with rent arrears or landlord mediation at the point it is most likely to make a difference. By the time they become eligible under the current definition, opportunities to prevent homelessness have already been missed. Extending the window to 60 days would create greater coherence across the system, align homelessness

legislation with other existing timeframes and give the Housing Executive a more realistic opportunity to prevent homelessness before a crisis occurs.

The current 28-day period also places Northern Ireland out of line with other jurisdictions, such as England, Scotland and Wales, where the ‘threatened with homelessness’ definition has been extended to 56 days / two months in recent years. These nations are also currently exploring how to extend this even further to six months. Maintaining a 28-day definition leaves Northern Ireland with a more reactive, crisis-driven system and limits the Housing Executive’s ability to intervene early and effectively.

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?

As highlighted in our responses above, amending the definition of ‘threatened with homelessness’ to 60 days would have a positive and practical impact on homelessness prevention in Northern Ireland. Simon Community believe a longer window would:

- Allow earlier intervention from the Housing Executive so support begins when homelessness is still preventable, not just days or weeks before crisis.
- Align prevention with private rented sector notice periods so people can access help as soon as they receive notice from their landlord.
- Create more opportunities for mediation between tenants and landlords, helping to resolve issues early and sustain tenancies.
- Increase time to tackle rent arrears and identify financial support and repayment plans.
- Provide earlier support for people experiencing relationship breakdown, poor mental health, domestic abuse or other issues that put them at risk of homelessness.

- Allow earlier engagement from the Housing Executive in pathway and accommodation planning for people leaving institutions like care, hospital or prison.
- Help prevent homelessness among people granted refugee status by allowing them to seek support as soon as they are given their 42 days' notice.

Evidence from other jurisdictions also demonstrates the value of extended prevention periods. An evaluation of the implementation of the 2017 Homelessness Reduction Act in England, which introduced an extended prevention duty of 56 days, found this duty to be the clearest area of positive impact in tackling homelessness. During the first year of implementation, 58% of prevention duty cases ended with the household securing accommodation, meaning homelessness was successfully prevented. Stakeholder feedback reinforced this: 67% reported that the extended duty was helping to prevent homelessness more effectively.

A post-implementation evaluation of the 2014 Housing Act in Wales also showed strong support from local authorities and service providers for extending the prevention duty from 28 to 56 days. Local authorities reported that the longer window enabled more meaningful preventative work, particularly with at risk groups such as people leaving prison and with private landlords, and supported a more flexible, informed and person-centred approach to each case.

While England and Wales operate different housing and homelessness systems to Northern Ireland, the underlying principle is consistent: earlier intervention creates more opportunities to prevent homelessness. Extending the window for preventative support here would provide similar benefits, strengthening the Housing Executive's ability to act early, reduce crisis presentations and improve outcomes for households at risk. Crucially, it would help break the cycle of homelessness for the nearly 20,000 children and young people currently experiencing it, who we know face a far higher risk of homelessness in adulthood.

Overall, a stronger focus on early action would mean fewer people slipping into homelessness, less reliance on expensive temporary accommodation, reduced pressure on public services and better long-term for people and families.

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.

Extending the period to 60 days would make it more likely that homelessness can be prevented before a person or household reaches crisis point. A longer window for support enables better assessment of an individual's needs and preferences and more effective, person-centred support in a way that is impossible with crisis response.

In a recent survey of people we support in our temporary accommodation services, around a third of respondents strongly believed their homelessness could have been prevented. Most identified affordable housing, help with managing finances and better support for mental health and addiction issues as the key interventions that would have prevented them from losing their home. Many also said that being able to approach the Housing Executive earlier for support would have made a difference.

Simon Community's own services demonstrate the impact of early intervention. Our Tenancy Deposit Service provides financial assistance to help people access private rented accommodation. Throughout 2025/26, we provided 170 deposits, preventing homelessness for 102 households and ending it for another 68. Our Community Support Service helps people at risk to stay in their homes by supporting them with benefits, landlord disputes, rent arrears and repairs. Both services show that when support is available early, homelessness can be prevented.

Early intervention is especially effective for groups at increased risk such as care leavers and people leaving prison. These groups often face structural disadvantage, limited support networks and practical barriers that make the transition to stable housing more challenging. With more time to act, services can put in place the tailored, multi-agency support needed to prevent issues escalating into homelessness. For care leavers this includes earlier engagement in pathway planning and support with budgeting and tenancy readiness. For people leaving prison, a longer window would enable housing teams to engage earlier with prisons, probation and landlords to plan accommodation in advance and ensure support is in place upon release.

Across all groups, the principle is clear: when services like the Housing Executive have more time, they have more options for effective intervention, increasing the likelihood that homelessness can be prevented.

Temporary accommodation and housing supply

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

Yes

If so, how should this risk be addressed.

While Simon Community strongly support the purpose and intent of the Bill, we do recognise that the Housing Executive, like all housing and homelessness providers, is already operating under significant strain, responding to spiraling demand in a tight fiscal environment. In the short-term, earlier identification of people at risk may lead to more households being assessed and supported by the Housing Executive. And if prevention activity is not sufficiently resourced, this could further stretch capacity and increase demand for temporary accommodation.

We are aware that the Housing Executive plan to purchase 600 homes to reduce reliance on temporary accommodation. This is a welcome step that could help mitigate any short-term increase in demand. Better signposting to prevention-focused support, such as Simon Community's Tenancy Deposit Service, would also help reduce pressure by enabling people to secure or sustain accommodation before crisis occurs, preventing a significant rise in need for temporary accommodation.

It's widely accepted that Northern Ireland must do things differently if we are to reduce homelessness. A shift towards prevention is central to achieving this. Over time, earlier intervention should reduce demand for temporary accommodation and deliver significant savings by avoiding costly crisis responses and emergency placements. A study by Crisis estimates that preventing homelessness for just one year could reduce public spending by around £9,200 per person. Preventing homelessness for 100 people could therefore deliver close to £1 million in savings - money that could be redirected from emergency response to effective, early support.

However, extending the definition of 'threatened with homelessness' is only one part of the wider solution to ending homelessness here. To ensure the Housing Executive has the

capacity and resources to focus on prevention, a statutory prevention duty is also required. This duty should sit alongside their existing duty to provide accommodation for those who are already homeless, ensuring that prevention is prioritised, properly funded and embedded across the system.

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?

Unsure

Please explain your answer.

We are unable to say for certain how long is sufficient for the Housing Executive to prepare for and implement this change. Extending the definition of 'threatened with homelessness' will require adjustments to staffing, resourcing, training, processes and partnership working – all of which take time to put in place.

While we want to see the extended window introduced as quickly as possible, it is essential that it is implemented consistently and effectively across Northern Ireland. The Housing Executive must have the capacity to respond to any increase in caseloads and to provide meaningful early intervention. Otherwise, the full benefits of the change in terms of prevented homelessness will not be realised.

Clear public communication will also be vital. People and frontline support organisations need to be aware of and understand the new rights to seek help earlier if someone is at risk of homelessness. Without this, the extended window may not translate into earlier prevention in practice.

Suggested amendments

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

Simon Community has no suggested amendments to the Bill.