

**Simon Community submission
to the consultation on a
Homelessness Prevention Bill**

July 2025

Simon Community welcome the opportunity to respond to this consultation and thank the member for bringing forward this important Bill.

About Simon Community

As Northern Ireland's largest homelessness charity, Simon Community is determined in our commitment to ending homelessness. Operating right across the region and working in partnership with all sectors, we provide preventative services, temporary accommodation and specialised support to address the unique challenges faced by those experiencing homelessness. Our aim is not only to provide immediate assistance but also long-term solutions that end the cycle of homelessness for good and help to create a society where everyone has a place to call home.

Homelessness prevention is central to the ethos of Simon Community's work. We know that the best thing we can do for people is prevent them from ever needing our temporary accommodation services in the first place. Our prevention services include:

- A free **Homeless Support Line and digital support** which is often the first point of contact for many people who need our assistance. Last year, we received around 26,000 requests for help, including almost 16,000 calls. In many cases, we can provide advice, support and signposting to help prevent homelessness.
- Our **Tenancy Deposit Service** which helps to prevent homelessness by removing some of the barriers to accessing a home in the private rented sector through provision of a grant to cover some or all the deposit. Last year, we helped to pay 179 deposits, ending homelessness for 106 households (helping them exit our temporary accommodation service, ending sofa-surfing etc.) while preventing 73 households from becoming homeless due to relationship breakdown, domestic abuse or loss of rented property.
- **Emergency financial interventions** to support households at risk of homelessness with payments for food, fuel, electricity etc. Last year, we provided home heating oil to 151 households and over 30 supermarket vouchers to people in need.
- Our **Floating Support services** in the community which focus on homelessness prevention through the provision of support and advice to people and families who are at risk of homelessness. Our teams work 1:1 with households experiencing housing insecurity to help them retain their home and successfully live independently.

Executive Summary

For many, the roots of a housing crisis can start several months, even years before someone loses their home and becomes homeless. Unfortunately, current

homelessness legislation in Northern Ireland restricts early intervention, only identifying someone as ‘threatened with homelessness’ if they are likely to lose their home within the next 28 days. This often means people who know they are at imminent risk of homelessness are unable to access early support to prevent this. In most cases, 28 days is far too late for effective and meaningful intervention and means the Northern Ireland Housing Executive (NIHE) must respond to an emergency rather than having the opportunity to prevent it. This not only results in an economic cost to society due to an enhanced need for costly temporary accommodation, but results in a personal, devastating cost to the people and families who find themselves with no safe space to call home.

Simon Community therefore strongly support the proposals within this Bill to extend the time window whereby the NIHE must support people threatened with homelessness from 28 days to at least 60 days. By intervening earlier and allowing more time for support, we can prevent homelessness before it starts. This will spare many people from the significant trauma and mental and physical health impacts that homelessness can bring, while also being more cost-effective for public services due to a reduced demand over time for temporary accommodation and crisis services.

However, to ensure that the NIHE have adequate staffing and resources to allow for a more prevention-focused approach, we would also like to see the Department for Communities introduce a statutory prevention duty for the NIHE. Any duty to support those threatened with homelessness should also extend to all relevant public bodies – homelessness is more than just a housing issue and opportunities for prevention extend right across government departments and agencies.

An enhanced focus on prevention however will only truly be successful if there is an adequate supply of social and affordable housing. Simon Community therefore also want to see increased investment in new social home development as well as efforts to protect and retain the social homes we already have.

Introduction

Homelessness is a devastating experience that shatters stability, harms mental and physical health and isolates individuals from the support networks they need to rebuild their lives. In Northern Ireland it has reached crisis levels. Nearly 60,000 people – that's 1 in every 32 people - are officially homeless, many of whom are children and young people under the age of 18.ⁱ Yet the true figure could be even greater as our research estimates there may be as many as an additional 25,000 people in Northern Ireland

experiencing ‘hidden homelessness’ as they are not engaging with statutory services and are therefore invisible to the official system.ⁱⁱ Every day at Simon Community, we see the destructive impact of people not having a safe and secure place to call home – it is families torn apart, children growing up in uncertainty and young people living without hope for their futures.

Years of underinvestment in social home development has resulted in Northern Ireland’s social housing waiting list reaching a record high with around 90,000 people now in need of a safe and secure social home.ⁱⁱⁱ This has resulted in a rising demand for properties in the private rented sector with figures from Property Pal showing that each available property receives around 50 enquiries.^{iv} Affordability is also increasingly becoming a barrier to accessing and sustaining suitable, high-quality homes in this sector, particularly for low-income households, with the average cost of rent now around £960 per month.

Inadequate supply of social housing coupled with an increasingly inaccessible private rental market has resulted in a rapidly escalating need for emergency temporary accommodation. Shockingly, nearly 5,000 children and young people are living in temporary accommodation across Northern Ireland today, including unsuitable and expensive hotels and B&Bs.^v

It’s clear that we need to do things differently to turn the tide on homelessness and shift from a crisis response only to a strategic focus on homelessness prevention. As a society, we need to collectively focus our efforts on how we can save people and families from ever experiencing the trauma of overcrowding, temporary accommodation and homelessness in the first place.

Extending the threatened with homelessness window

Simon Community strongly support the Bill’s proposal to extend the time period whereby the NIHE must support people threatened with homelessness from 28 days to at least 60 days.

We believe that earlier intervention has the potential to help break the vicious cycle of homelessness that we see every day in our services. It’s a sad reality that experiencing homelessness during your childhood means you are more likely to experience it as an adult. Breaking the cycle of disadvantage and adversity requires a shift towards early intervention strategies that focus on the root causes of homelessness and provide people with more time, options and support to source alternative accommodation.

Despite the NIHE advising those at risk of homelessness to seek help within 28 days of losing their home, we often hear anecdotally from the people we support that they are told to phone back only when they are about to become homeless. This is far too late for effective support. By this stage, options are often limited and the NIHE, already under significant pressure, must respond to an emergency rather than having the chance to prevent it.

For many, the roots of a housing crisis can start many months, even years before someone loses their home and becomes homeless. This means there are often many potential opportunities to intervene early and prevent homelessness. Crisis Scotland recently interviewed 15 people with experience of homelessness and found that between them, the 15 interviewees had been in touch with at least 80 services prior to presenting as homeless.^{vi} That's 80 missed opportunities to intervene and prevent that person from ever becoming homeless in the first place – saving them from the personal cost of homelessness as well as saving local authorities the financial cost of homelessness. Services that people had engaged with included housing, health, social work, justice and jobcentres, showing the wide range of organisations who can play a role in identifying those at risk of homelessness.

The importance of homelessness prevention has been recognised by other nations where the 'threatened with homelessness' window has been extended in recent years to allow local authorities more time to try and source alternative accommodation and solutions for those at risk. Scotland moved from 28 days to two months in 2001; in Wales, the window was extended from 28 days to 56 days in 2014; and in England, the window was expanded to 56 days in 2017. All 3 nations are now currently exploring how to extend the window for intervention further to six months. We are also aware of efforts in the Republic of Ireland in recent years to extend the 'threatened with homelessness' window to 60 days.

In contrast, the window for intervention in Northern Ireland has remained at 28 days since this was introduced nearly 40 years ago in 1988. Hansard transcripts suggest that at this time, between 6'000 and 8'000 households were estimated to be homeless in Northern Ireland and that, as of 31st December 1987, only 26 homeless families and 75 homeless individuals were living in temporary accommodation.^{vii} It is quite clear that the situation has monumentally changed since this legislation was introduced. Given the skyrocketing number of people experiencing homelessness in recent years, Simon Community believe that Northern Ireland's homelessness legislation is well overdue an

independent review and update and agree that extending the threatened with homelessness window to at least 60 days is a necessary first step.

We would also welcome consideration of further extending this window to six months as we believe the further upstream we can intervene to prevent homelessness the better. Additional time would allow for better consideration of an individual's need and preferences in a way that is impossible with crisis response. However, we do note some concerns flagged by stakeholders in Scotland around possible difficulties with predicting who may find themselves homeless in six months – for example, it could be hard to predict a relationship breakdown or loss of rented accommodation in the next six months^{viii} - and suggest that we learn from the Scottish approach before making further changes in Northern Ireland. However, regardless of official windows for intervention, Simon Community believe that people should be supported as soon as they think they may be at risk of homelessness.

We believe **extending the time NIHE and other organisations can support a household at risk of homelessness will have a significant positive impact in terms of homelessness prevention.** This has been the case in other jurisdictions that have extended their windows for intervention. An evaluation of the implementation of the 2017 Homelessness Reduction Act in England, which introduced an extended prevention duty on local authorities to intervene and provide support at least 56 days before homelessness appeared imminent, found that this extended duty stood out as the clearest area of positive impact in terms of tackling homelessness.^{ix} The evaluation showed that during the first year of the Act, 58% of prevention duty cases ended with the household having secured accommodation (i.e. homelessness was prevented). A survey of stakeholders undertaken as part of the evaluation also showed that 67% felt that the extended 56-day prevention duty was helping them prevent homelessness more effectively.

A post-implementation evaluation of the 2014 Housing Act in Wales also showed positive support from local authorities and service providers for the extension of the prevention duty from 28 days to 56 days.^x Feedback from local authorities highlighted how the extension helped them do more preventative work, particularly with at risk groups such as those about to leave prison and with landlords, and allowed for a more flexible, informed and person-centred approach to each case.

Simon Community believe that **extending the 'threatened with homelessness' window in Northern Ireland could have a particularly positive impact on preventing homelessness among those that we know are at increased risk** such as care leavers,

those fleeing abusive relationships, people and families with leave to remain status and people leaving prison. Allowing more time for the NIHE and other public authorities to source appropriate accommodation could prevent many of these often vulnerable people from falling through the cracks of support systems and becoming homeless. The latest homelessness bulletin shows that between October 2024 and March 2025, 225 people presented as homeless after leaving care, hospital or prison.^{xi} Given that we often know when people are going to leave these institutions, there is no excuse for them becoming homeless. The bulletin also shows that during that six-month period 609 households presented as homeless due to domestic abuse while 708 households presented after coming through the asylum system. Extending the window for intervention would ensure better alignment with the recently enhanced move-on period for those granted leave to remain, which was extended from 28 days to 56 days in December 2024 to allow people more time to find a home.

Similarly, extending the window to align with the 56-day notice-to-quit period for tenancies of 12 months or more will also help to address one of the main drivers of homelessness in Northern Ireland - loss of rented accommodation. In 2024/25, over 2,500 households presented to the NIHE as homeless due to losing their home in the private rented sector, often due to the landlord selling the property. This highlights the volatility of the private rented sector evidenced by rising rents and insecure tenancies. Allowing the NIHE to intervene earlier to engage with landlords or provide support with rent arrears so as to sustain tenancies will help prevent many people and families from ever losing their home.

Considerations for implementation

We appreciate that the NIHE, like all providers in the sector, are operating under increased strain trying to respond to spiralling demand in a tight fiscal environment. There is therefore a risk that extending the time window for intervention could further stretch capacity and add to already heavy workloads, meaning that the 60-day window becomes another target that cannot be met. **Any extension must therefore be accompanied by adequate additional funding and staffing for the NIHE to enable their teams to respond effectively to requests for support.** It's important to note however that while extending the time window will inevitably have initial cost implications for the NIHE, taking a more preventative approach will ultimately deliver savings in the long run by reducing demand for more costly crisis interventions and emergency accommodation.

Ultimately to ensure that the NIHE have ring-fenced resources for homelessness prevention, **we would also like to see the Department for Communities introduce a statutory prevention duty for the NIHE** to sit alongside their current statutory duty to provide accommodation for those who are homeless. We believe introducing a statutory prevention duty alongside extending the threatened with homelessness window will help make the needed strategic shift to prevention.

Communication with the public about any changes to windows for intervention will also be crucial to ensure that people know how to identify their homelessness risk and how to access support as soon as possible.

Collaboration across departments and bodies

Homelessness is more than just a housing issue and its' impacts extend right across government departments. Given the wide range of issues that can lead to homelessness, **we agree that any duty to support those threatened with homelessness should extend to all relevant bodies** across housing, health, education and justice. This could take a similar format to the proposed new 'Ask & Act' duties in the Housing (Scotland) Bill which will place greater requirements on specified public bodies such as the police and health boards to ask a person they come into contact with about their housing status and then act on that information with the persons' consent.

In Wales and England there are also duties on relevant public bodies to cooperate in relation to early intervention and to refer service users who may be homeless or at risk of homelessness to the relevant housing authorities. Currently in Northern Ireland, while partnership working is one of the key principles of the NIHE *Ending Homelessness* Strategy, there is no widespread statutory duty on public institutions such as Health & Social Care Trusts or the Probation Board to refer those at risk of homelessness to the NIHE. The recent Northern Ireland Audit Office report on homelessness in Northern Ireland also highlights missed opportunities for effective cross-departmental collaboration in terms of both the Interdepartmental Homelessness Action Plan and the Homelessness Strategy Steering Group. The report states that there are "*few genuine examples of collaborative working between departments*" and recommends that the Department for Communities and the NIHE should work with other departments to identify opportunities for meaningful and significant joint working.^{xii}

It is often the case for many people that they will be unable to achieve housing stability until they receive other, wraparound support. This is the premise of the Housing First approach which focuses on giving someone immediate access to a settled and secure

home and then addressing people's support needs through coordinated and intensive support. There is overwhelming international evidence about the effectiveness of Housing First, with studies showing that it can help people with complex needs sustain permanent accommodation while also helping to resolve or improve other non-housing issues they might face.^{xiii} Therefore, we believe that collaboration across departments, public bodies and sectors is absolutely vital to preventing homelessness and helping people live independently. As well as extending the duty to support to other agencies (alongside clear guidance from government on the role each body should play), we would like to see the Northern Ireland Executive go even further in showing their commitment to tackling homelessness by considering the potential for pooling resources into a ring-fenced prevention funding pot. This could help ensure that Department for Communities funding challenges do not hinder the cross-government goal of making homelessness *"brief, rare and non-recurrent"*.

What else needs to happen?

Homelessness prevention work requires adequate and sustained funding to truly make the positive impact that we want to see. While we welcome the Communities Minister's commitment to deliver a ringfenced pot of funding for homelessness prevention work this year, it's vital that this funding is recurrent to allow us to truly make the strategic shift to prevention. Funding for community and voluntary sector providers, who not only provide temporary accommodation but also essential housing support to enable people to live independently, must also be sufficient to keep up with rising demand and costs of delivery.

However, it is impossible to prevent and end homelessness without an adequate supply of affordable and social housing. Some local authorities in England have highlighted how insufficient access to this type of housing was one of the main barriers to fully exercising their extended prevention duty.^{xiv} With upcoming multi-year budgets, Simon Community want to see **ambitious investment in the Social Housing Development Programme so that we can build at least 2,000 new social homes every year.**

However, to truly tackle the housing crisis, we must not only build new social homes, but we also need to protect the social homes we already have. That's why we would also like to see **a moratorium placed on the NIHE House Sales Scheme.** We believe that placing a temporary pause on the sale of NIHE social homes could help retain up to 6,000 homes in the social housing sector over the next fifteen years.^{xv} If this action is taken alongside ambitious investment in building new social and affordable housing, we believe the social housing sector could be placed on a more sustainable footing,

helping thousands of individuals and families to find a permanent and affordable home of their own.

Conclusion

Simon Community strongly support the proposals within this Bill and believe that by requiring the NIHE to intervene at least 60 days before homelessness is likely to occur, we can help prevent many people from ever entering a cycle of homelessness that is becoming increasingly difficult to escape from.

As well as being the morally right thing to do, there is a strong economic argument for investing in homelessness prevention. Some research has suggested that preventing homelessness for one year could reduce public expenditure by around £10,000 per person.^{xvi} If we were able to prevent even 20 people from becoming homeless this year, the savings could cover the cost of a new build social home.^{xvii} In the face of a severe housing supply crisis, this is surely an investment worth making.

Preventing homelessness benefits us all – it reduces costs for society, improves the lives of individuals and strengthens communities. The proposals within this Bill represent a positive and necessary step forward in taking a more strategic and prevention focused approach to tackling homelessness. We hope that the Northern Ireland Executive will now stand by their commitment in the Programme for Government to focus on homelessness prevention and support this Bill.

*For further information, please contact Cathy Brolly, Public Affairs and Policy Manager:
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- ⁱ NIHE FOI 661 (February 2025).
- ⁱⁱ Simon Community. (2024). *Under the Radar: Unveiling Hidden Homelessness across the island of Ireland*.
- ⁱⁱⁱ NIHE FOI 661 (February 2025).
- ^{iv} Property Pal Northern Ireland Housing Market Update – Q1 2025.
- ^v Department for Communities Homelessness Bulletin Oct 2024 – Mar 2025.
- ^{vi} Mullaney, J. (2024). *A window of opportunity*. Crisis: Scotland.
- ^{vii} Hansard record from House of Commons debate on the Housing (Northern Ireland) Order on 27th October 1988: [https://hansard.parliament.uk/commons/1988-10-27/debates/56b3e706-dc16-4f70-b67b-f06d3d8ebefb/Housing\(NorthernIreland\)](https://hansard.parliament.uk/commons/1988-10-27/debates/56b3e706-dc16-4f70-b67b-f06d3d8ebefb/Housing(NorthernIreland))
- ^{viii} Scottish Government / COSLA. (2022). *Prevention of Homelessness Duties: A joint Scottish Government and COSLA consultation: Analysis of consultation responses*.
- ^{ix} ICF Consulting Services Ltd. (2020). *Evaluation of the implementation of the Homelessness Reduction Act: Final report*.
- ^x Ahmed, A. et al. (2018). *Post implementation evaluation of Part 2 of the Housing Act (Wales): Final report*.
- ^{xi} Department for Communities. (June 2025). *Homelessness Bulletin: Oct 2024 – Mar 2025*.
- ^{xii} Northern Ireland Audit Office. (2025). *Homelessness in Northern Ireland*.
- ^{xiii} Crisis. (2018). *Everybody In: How to end homelessness in Great Britain*. Available at: https://www.crisis.org.uk/media/239951/everybody_in_how_to_end_homelessness_in_great_britain_2018.pdf
- ^{xiv} ICF Consulting Services Ltd. (2020). *Evaluation of the implementation of the Homelessness Reduction Act: Final report*.
- ^{xv} Based on preventing the sale of around 400 homes per year which is the average number of homes sold per year over the past decade according to NIHE FOI 797 (June 2025).
- ^{xvi} Crisis. (2016). *Better than Cure: testing the case for enhancing prevention of single homelessness in England*.
- ^{xvii} Based on the average Total Cost Indicator (TCI) Allowance for a New Build General Needs 3-person/2-bedroom 2-storey house in Northern Ireland for 2023/24 being £183,617. (Source = NIHE FOI 797)