

Children in Northern Ireland



Response to the Consultation on Notice to Quit Periods

March 2026

Natalie Whelehan - natalie@ci-ni.org.uk

Executive Summary

CiNI welcomes the proposed extension of Notice to Quit (NTQ) periods as a positive and necessary step toward improving housing security for tenants. Ensuring families have sufficient time to secure alternative accommodation is critical to preventing homelessness and supporting positive outcomes for children and young people.

However, CiNI has significant concerns regarding the proposed introduction of reduced NTQ periods of 2 weeks under the outlined 'special cases,' including rent arrears, antisocial behaviour, relevant criminal offences, and landlord occupation. We believe these proposals fundamentally undermine the intent of extending NTQ periods and represent a regression in tenant protections. A 2 week notice period is insufficient for families to make alternative arrangements and will increase the risk of homelessness, particularly among already vulnerable households.

The evidence is clear that homelessness has severe and lasting impacts on children's wellbeing, including poorer mental health, disrupted education, and increased exposure to harm. The proposed measures risk placing children at greater risk of homelessness due to circumstances often beyond their control, raising serious concerns in relation to fairness, proportionality, and children's rights. CiNI also believes that the equality impacts of these proposals have not been adequately assessed, and that they may be inconsistent with obligations under Section 75 of the Northern Ireland Act 1998 and the United Nations Convention on the Rights of the Child (UNCRC).

Across each of the proposed 'special cases,' CiNI highlights the disproportionate impact on low-income families, the risks of adopting punitive approaches to complex issues such as antisocial behaviour, and the potential to undermine efforts to reduce homelessness and reoffending. The proposals are also at odds with existing policy commitments, including the Housing Supply Strategy and the Northern Ireland Housing Executive's Homelessness Strategy, both of which prioritise prevention and early intervention.

CiNI strongly recommends that the Department does not proceed with reduced NTQ periods under any circumstances. Instead, existing minimum notice periods should be maintained, alongside strengthened safeguards, access to independent advice, and a focus on tenancy sustainment. We further recommend that a comprehensive Equality Impact Assessment and Child Rights Impact Assessment are undertaken to fully consider and mitigate the potential impacts on children and families.

Housing policy must prioritise prevention, stability, and the best interests of children. CiNI remains committed to working collaboratively with the Department to ensure that legislative changes support these aims and lead to improved outcomes for children, young people and families across Northern Ireland.

Who we are

Children in Northern Ireland (CiNI) is the regional umbrella organisation for the Children's Sector in Northern Ireland. With over 130 members, CiNI is accountable for representing and giving voice to the experiences, views and aspirations of its members across NI to inform and influence those who make policy or plan and deliver services for children and young people. Our vision is to make Northern Ireland a society where all children are valued, treated fairly and are able to flourish. To deliver on this vision, CiNI has three strategic priorities:

- **Influencing:** through campaigning and engagement to ensure that children are at the centre of policymaking;
- **Learning:** capacity building across the sector and innovating best practice;
- **Collaboration:** working with others to increase impact.

We are the secretariat to the All Party Group on Children and Young People at the Northern Ireland Assembly and we are represented on the Children and Young People's Strategic Partnership (CYPSP) - a multiagency partnership that includes the leadership of key statutory agencies and community and voluntary organisations, with responsibility for improving the lives of children and young people in Northern Ireland. CiNI is also a member of Safeguarding Board NI, a statutory body constituted to safeguard and protect children.

CiNI offers a wide range of training to both individuals and organisations working within the community and voluntary sector to develop their skills and knowledge through our high-quality and positively evaluated Children's Services Training Programme. We also offer bespoke training, tailored specially to the needs of organisations, both within the sector and beyond.

CiNI manages the regional parenting support helpline: Parentline NI. Funded by the Department of Health, this service offers free, confidential advice and guidance to Parents and Carers across Northern Ireland. Parentline also provides one-to-one support, practical workshops, online resources (including an award-winning podcast), and referrals to counselling services. CiNI also runs the Parent Participation Service and the Parents' Disability Forum, which are key platforms for parents/carers to have their voices heard and ensure that policymaking is informed by their lived experience.

At a community level, CiNI delivers the 'Gets Active Project', a range of healthy food and physical activity programmes aimed at addressing child food insecurity. Our Youth Advisory Group helps shape these programmes and gives

young people a platform to influence policy making. We also work with a range of partners on specific youth participation projects, such as amplifying youth voice on online safety in collaboration with the NSPCC.

More information is available on our website: <https://www.ci-ni.org.uk/>

Extended Notice To Quit Periods

CiNI welcomes the opportunity to respond to the consultation on Notice to Quit (NTQ) periods. The proposed extension of NTQ periods is very welcome and represents an important step toward strengthening security of housing tenure. Extended notice periods for tenants will provide much needed additional time to find and secure alternative accommodation should they be faced with a NTQ from their landlord. Stable, secure housing is fundamental to children's wellbeing, development and life chances and it is vital that families who are faced with having to source alternative accommodation upon receipt of a NTQ have sufficient time to do so to avoid becoming homeless.

Special Cases

We do however have serious concerns about the proposed introduction of four circumstances which the consultation document states would give rise to a landlord being able to give a shorter NTQ period than those detailed in the draft Regulations. These 'special cases' include situations where there are substantial rent arrears, serious antisocial behaviour, where a relevant criminal offence has been committed or occupation of the property by the landlord or members of their immediate family. The consultation proposes that in these cases, the NTQ period may be reduced to 2 weeks. The proposal to allow for a reduced period of 2 weeks NTQ halves the current minimum NTQ of 4 weeks and significantly undermines tenant rights. We do not believe that this is justified and firmly recommend that NTQ periods are no less than that to which tenants are currently entitled to.

CiNI believes that a 2 week NTQ period is insufficient to allow families to make the necessary preparations to leave their home, source and secure alternative accommodation. This proposal is in conflict with the stated aim of the Private Tenancies Act (Northern Ireland) 2002,¹ 'to make the private rented sector a safer and more secure housing option for a wider range of households' and will undoubtedly increase the risk of homelessness for vulnerable families and children. CiNI believes that any reduction in the current NTQ period for tenants is a clear derogation of rights and urges the Department to not to progress the proposal to allow for reduced NTQ periods under any circumstances.

¹ [Private Tenancies Act \(Northern Ireland\) 2002](#)

Research shows that the impact of homelessness on children is profound. It can lead to mental health issues, social isolation and adverse childhood experiences (ACEs).² Children living in temporary accommodation are more likely to develop mental health disorders,³ and those with mental ill health are at a greater risk of becoming homeless as adults.⁴ The disruption to children's lives and social support structures caused by homelessness can cause lasting damage, impacting on the ability of children to learn, maintain relationships and engage in social activities, all of which are crucial for children's wellbeing.⁵ In addition, homelessness can lead to substance misuse⁶ and an increased risk of violence and exploitation.⁷

Given the gravity of the impact of homelessness on children, we do not believe that the proposal to introduce 'special cases' whereby children will be placed at a greater risk of experiencing homelessness is justified. In the vast majority of cases, children living in households which fall into one or more of the 'special cases' outlined will be at risk of homelessness due to the actions of a member of their household or as a result of circumstances entirely beyond their control. It is CiNI's firm view that it is entirely inappropriate, under any circumstances, for the Department to pursue proposals that will force children into homelessness.

We do not believe that the equality impacts of this proposal have been adequately assessed in the Department's Equality Impact Assessment (EQIA). None of the impacts of homelessness on children have been considered in the EQIA and the proposed mitigating measures fall far short of what is required under section 75 of the Northern Ireland Act 1998 to mitigate against the obvious, severe potential for adverse impact on enjoyment of equality of opportunity. The proposals in the current consultation have the potential to significantly adverse impact on children and young people. In the vast majority of cases, these impacts will be experienced by children due to the actions of another member of their household or circumstances outside of their control. The potential for adverse impact on children's enjoyment of equality of opportunity is entirely unjustified and unacceptable. These proposals risk deepening inequalities and gravely impacting on the future outcomes of children who may become homeless as a result.

In addition, we do not believe that these proposals adequately consider or adhere to the obligations on the Department as a result of the UK and Northern Ireland

² [What are the effects of youth homelessness in the UK? | Action For Children](#)

³ [Housing and Young people, a complicated relationship: Children in Temporary Accommodation - Resolve - Antisocial Behaviour](#)

⁴ [The impact of homelessness on children - Dr Lade Smith CBE - The Royal Foundation - Homewards](#)

⁵ [What Are The Impacts of Homelessness? | Crisis UK](#)

⁶ [Homelessness and its impact on children - ACAMH](#)

⁷ [The life-changing effects of homelessness on children | The Children's Society](#)

being a signatory to the United Nations Convention on the Rights of the Child (UNCRC). The current proposals have the potential to significantly undermine housing security for children and families and impact on a number of key children's rights, not least Article 3: The best interests of the child are a primary consideration, Article 27: Children have the right to an adequate standard of living, including housing, Article 28: The right to education and Article 19: Protection from harm.

CiNI recommends that a more thorough EQIA, which adequately considers the impact of homelessness on children and proposes actual mitigating measures, that will reduce the adverse impact on children's enjoyment of equality of opportunity or alternative policies which will further the policy aim without having the adverse impact on equality is carried out as a matter of priority. We also recommend that the Department carries out a children's rights impact assessment of the current proposals to ensure that the development of this policy takes sufficient cognisance of the need to uphold children's rights.

In addition, the proposal to introduce reduced NTQ periods in the 'special cases' outlined appears to be in direct conflict with the policy aims of the Department's own Housing Supply Strategy⁸ and the Northern Ireland Housing Executive's (NIHE) Homelessness Strategy.⁹ Both of these strategies rightly prioritise early intervention and homelessness prevention. A reduced NTQ period of 2 weeks also falls far short of the NIHE's 28 day, 'threatened by homelessness period,' which is deemed to be the minimum length of time required for tenants to access information and advice and have the necessary assessments carried out by the NIHE.

Rent Arrears

CiNI is opposed to rent arrears as a reason for shorter NTQ periods. Currently 23% (104,000) of children are in living relative poverty (before housing costs) and 20% (90,000), are living in absolute poverty in Northern Ireland. Children are a particularly vulnerable group and are at a higher risk of living in poverty than the overall Northern Ireland population in both relative and absolute measures.¹⁰ Research shows that vulnerable households, particularly those on low incomes and in receipt of Universal Credit to meet their housing costs, are more likely to be in rent arrears.¹¹ These households are also disproportionately affected by the affordability and access challenges prevalent in the current housing market. This proposed exception has the potential to significantly increase the risk of these households' experiencing homelessness and destitution.

⁸ [Housing Supply Strategy - A Home for Everyone](#)

⁹ [The Housing Executive - Homelessness strategy](#)

¹⁰ [Children in low income families: local area statistics, financial year ending 2024 - GOV.UK](#)

¹¹ [Housing challenges faced by lowincome renters evidence review Sept 2022-1.pdf](#)

CiNI is concerned that the proposed changes will disproportionately impact low-income households, particularly those reliant on Universal Credit to meet housing costs. These households are more likely to experience rent arrears and already face significant affordability and access challenges within the current housing market. As such, this proposal risks increasing levels of homelessness and destitution among already vulnerable families.

We are particularly concerned about the expectation that tenants must repay all arrears within a four-week NTQ period in order to sustain their tenancy. Based on recent data from PropertyPal which estimates average rents at approximately £995 per month,¹² this could require tenants to find close to £3,000 within a single month, an expectation that is unrealistic for households already experiencing financial hardship. Without alternative pathways, this approach may lead to avoidable evictions, even where tenants are willing to engage and resolve arrears.

CiNI is also mindful of the wider risks associated with such financial pressures. In a context where financial capability levels are lower and exposure to high-risk and predatory lending, including paramilitary-linked lenders, remains a concern in some communities, this proposal could inadvertently drive households further into debt and financial harm.

Importantly, we know that sustainable alternatives exist. Approaches such as realistic repayment plans have proven effective in supporting tenants to manage arrears while maintaining tenancies. Current protections within the social rented sector, including the Pre-Action Protocol,¹³ place a clear emphasis on early engagement, access to independent advice, and the development of affordable repayment arrangements. These safeguards help prevent homelessness and promote tenancy sustainment, yet similar protections are not consistently available within the private rented sector, where many low-income families are now housed.

CiNI believes that there is a strong case for adopting a more balanced and preventative approach. Where tenants are actively engaging in a reasonable and sustainable repayment plan, eviction should not proceed. This would better reflect the realities facing families, protect children from homelessness and align with wider efforts to reduce harm and support stability.

This issue is particularly urgent given the scale of child and family homelessness in Northern Ireland. One third (18,567) of those who are officially homeless in NI are under the age of 18. Families make up over half (57% / 33,898 people) of everyone with official homelessness status. At November 2024, 5,378 children were living in temporary accommodation. This has doubled in the past 5

¹² | Housing Market Update: Q4 2025

¹³ Pre Action Protocol for Ejectment Proceedings based on Non-Payment of Rent in Social Housing Sector

years, from 2,675 in July 2019,¹⁴ highlighting the growing pressure on families and services alike.

In this context, policy decisions that risk increasing homelessness must be carefully reconsidered. CiNI believes that greater emphasis should be placed on prevention, protection, and supporting families to sustain their tenancies wherever possible.

Antisocial behaviour

CiNI recognises that antisocial behaviour is a significant and complex issue affecting many children, young people and families across Northern Ireland. We are acutely aware that families can be both impacted by antisocial behaviour and, at times, struggling with behaviours that are often rooted in unmet need, trauma, poverty or poor mental health. This highlights the importance of responses that are not solely punitive, but that also recognise and address underlying vulnerabilities. This requires a balanced, trauma-informed response that prioritises support and early intervention rather than defaulting to punitive measures.

CiNI is concerned that the proposed introduction of a 2 week NTQ for, 'serious antisocial behaviour,' reflects a broader shift towards increasingly punitive responses within policy. Recent Departmental proposals, including changes to Antisocial Behaviour Orders (ASBO thresholds), widening definitions of antisocial behaviour, and measures that make it easier to exclude individuals from their homes indicate a trend of addressing ASB through enforcement and exclusion. This is particularly concerning given that recorded levels of antisocial behaviour are at their lowest since records began,¹⁵ raising questions about the proportionality and evidence base for such measures.

Housing stability is a key protective factor for children and families. The loss of a home can have profound and lasting impacts on children's wellbeing, leading to a range of negative consequences, including disruption to education, increased exposure to poverty, and poor mental health outcomes. A 2 week NTQ period significantly reduces the opportunity for families to access support, seek advice, or secure alternative accommodation, increasing the likelihood of homelessness and crisis.

We are especially concerned about the impact on children living in households where antisocial behaviour may be attributed to another family member. In these situations, children, who are often victims of the circumstances within their home, risk being punished further through eviction and displacement. This raises serious questions about fairness, proportionality, and the extent to

¹⁴ <https://simoncommunity.org/about/news/1-in-32-now-homeless-in-northern-ireland#:~:text=As%20of%20November%202024%2C%20there,%C2%A9%202026%20Simon%20Community%20NI>

¹⁵ [Anti-Social Behaviour Incidents Recorded by the Police in Northern Ireland Update to 30th September 2025](#)

which children's rights and best interests are being considered within these proposals.

CiNI believes that responses to antisocial behaviour must be proportionate, evidence-informed, and rooted in prevention. There is clear evidence that homelessness and housing instability can exacerbate risk factors associated with antisocial behaviour and wider harm, rather than resolve them.¹⁶ Without adequate safeguards, including sufficient notice periods, access to independent advice, and pathways to address underlying needs, these proposals risk deepening disadvantage and increasing homelessness.

In light of this, CiNI urges that the Department takes a more balanced approach, prioritising early intervention, family support, and tenancy sustainment, ensuring that policy responses do not inadvertently create further harm for children and families.

We are also concerned that this approach does not reflect the preventative and early intervention principles underpinning wider housing policy frameworks in Northern Ireland, including those focused on reducing homelessness and supporting family wellbeing.¹⁷ CiNI believes that policy responses to antisocial behaviour must be proportionate, fair, and centred on prevention. This includes ensuring sufficient time for intervention, access to independent advice, and pathways that support behaviour change while maintaining tenancies wherever possible. Without these safeguards, there is a real risk that policy intended to address antisocial may instead deepen disadvantage and contribute to poorer long-term outcomes for children and families.

A Relevant Criminal Offence

CiNI recognises the critical importance of stable housing in supporting rehabilitation and reducing reoffending. Evidence clearly shows that individuals leaving custody are significantly less likely to reoffend when they have access to safe and secure accommodation. Through the work of Housing Rights and the Northern Ireland Housing Executive, important progress has been made in supporting people leaving prison to sustain or secure housing, contributing to wider efforts to reduce reoffending and improve long-term outcomes for individuals and communities.

CiNI is concerned that the proposed introduction of a 2 week NTQ would undermine this progress. Such a limited timeframe would significantly restrict the ability of support services to engage with individuals leaving custody, many of whom already face complex needs and barriers to accessing accommodation. The introduction of a 2 week NTQ period increases the risk that individuals could be

¹⁶ [The-Public-Health-Implications-of-Housing-Instability-Eviction-and-Homelessness.pdf](#)

¹⁷ [The Supporting People Policy Framework \(NI\) 2025 guidance | Department for Communities](#)

released directly into homelessness, increasing the likelihood of reoffending and placing additional pressure on public services.

This has wider implications not only for individuals, but also for families and children. Where parents or caregivers are affected, housing instability can disrupt family relationships, increase financial hardship, and contribute to adverse outcomes for children. Ensuring that people leaving custody have a realistic opportunity to secure or maintain housing is therefore not only a matter of justice or housing policy, but a key component of preventing harm and promoting stability for children and families.

CiNI is also concerned about the potential for these proposals to create additional stigma and barriers for those seeking to reintegrate into society. The absence of clear time limits on when a NTQ can be issued following a relevant offence raises the possibility that individuals who have already served their sentence and are actively working towards rehabilitation could face eviction at a later stage. This risks undermining reintegration efforts and may, in effect, amount to a second punishment, contrary to the principles of fairness and rehabilitation.

CiNI believes that policy in this area must align with existing commitments to reduce homelessness and reoffending. This requires a balanced approach that supports rehabilitation, allows sufficient time for engagement and intervention, and protects against unintended consequences that could increase homelessness and harm for individuals, children and families and communities.

Occupation of the Property by the Landlord

The final, 'special case,' relates to occupation of the property by the landlord or members of their immediate family. While recognising a landlord's right to reclaim their property for personal or family use, the lack of robust safeguards within this proposal raises significant concerns for children and families. The low threshold of evidence required, absence of a defined timeframe for occupation, and limited ability for tenants to challenge decisions create a clear risk of misuse. For families with children, this could result in sudden and potentially avoidable displacement, disrupting education, stability, and wellbeing. Where properties are re-let shortly after eviction, it raises serious concerns that families may be made homeless without genuine necessity.

CiNI believes the Department must take steps to mitigate this risk by introducing stronger safeguards, including a clear requirement for landlords to provide verifiable evidence of need, a minimum period of intended occupation, and restrictions on re-letting the property within a defined timeframe. In addition, accessible mechanisms for tenants to challenge decisions should be established. Without these protections, there is a real risk that this provision could be misused, to the detriment of children and families.

Conclusion

While CiNI strongly welcomes the proposed extension of Notice to Quit periods as a positive and necessary step toward improving housing security, we remain deeply concerned that the introduction of reduced notice periods under the proposed, 'special cases,' fundamentally undermines this progress. Across each of the scenarios outlined, rent arrears, antisocial behaviour, relevant criminal offences, and landlord occupation, the proposals risk increasing housing instability and, in turn, homelessness among children and families.

The evidence is clear: homelessness has profound and lasting impacts on children's wellbeing, development and future life chances. Policies that increase the likelihood of families losing their homes, particularly within severely constrained timeframes, are not only inconsistent with the stated aims of housing legislation and homelessness prevention strategies, but also risk breaching the Department's obligations under equality legislation and the UNCRC. In many cases, children will bear the consequences of decisions or circumstances entirely outside of their control, raising serious concerns about fairness, proportionality and the prioritisation of children's best interests.

CiNI strongly urges the Department to reconsider the proposed introduction of reduced NTQ periods in all, 'special cases'. At a minimum, existing notice periods should be maintained, alongside the introduction of robust safeguards, access to independent advice, and a clear focus on prevention and tenancy sustainment. We also recommend that a full and meaningful Equality Impact Assessment and Child Rights Impact Assessment are undertaken to ensure that the potential adverse impacts on children and families are fully understood and mitigated.