



5th August 2025

Dear Applicant

Our Ref: FOI 827

Your request for information received on 30 June 2025 has been handled under the Freedom of Information Act 2000 (FOIA).

Request

This is a request for information under the Freedom of Information Act.

We are trying to better understand the ramifications for NIHE practice of the recent policy changes around intimidation points.

Before the changes, NIHE guidance on Applying for Social Housing indicated that the award of 200 housing points for intimidation were contingent on “evidence of a serious and imminent threat” (p. 6).

The guidance said that the Housing Executive gathered this evidence, in the first instance, via information from the applicant; followed up by 1) “confirmation of any risks or threats that may exist against the applicant” by the PSNI under its information-sharing protocol with the Housing Executive (p. 6); and 2) Base 2 confirmation. The relevant text explains:

Base2 contacts a source in the relevant community to see if they can help. They may contact several people before a clear picture emerges, particularly where the threat is coming from 'the community' and the source of the threat is not easily identified.

The Housing Executive should get written consent from the applicant before contacting Base2 for information. Both the applicant and the housing officer should sign this.

Base2 tells the Housing Executive:

if a threat has been issued against the person

the details and context of the threat

the nature and source of the threat

the date the threat was made

if the applicant or a member of their household is at serious and imminent risk of being killed or seriously injured if they were to live/resume living in their home areas
the applicant may be at risk if they live there

Alternatively, Base2 may confirm that no threat exists or might not be able to provide information about all of the above matters. (p. 7)

In light of the removal of the provision for 200 intimidation points, with cases where these might have been available in the past now being assessed under Primary Social Need criteria, for a maximum of 40 points, please

- 1. explain if / how the Housing Executive's relationship and procedures with Base2 and PSNI have changed*
- 2. provide any new memoranda of understanding / information sharing protocol between the Housing Executive and (1) Base2 (2) PSNI*
- 3. provide copies of any new policy / guidance / protocols / circulars / guidelines for Housing Executive staff in this area.*

Please include copies of information which you hold on paper or in electronic form. I would be grateful if you would supply this information in the form of photocopies or, if possible, by email.

If I can help to clarify this request please contact me by email at paige@pprproject.org or by phone at (028)90313315. I look forward to hearing from you promptly, as required by the legislation, and in any case within 20 working days.

Our response

- 1. Explain if / how the Housing Executive's relationship and procedures with Base2 and PSNI have changed*

All cases prior to the removal of Intimidation Points would have been assessed under all aspects for the Housing Selection Scheme under the four headings: Intimidation; Insecurity of tenure; Housing Conditions; Health and Social Well Being. Where violence or a fear of violence became apparent housing need factor during an assessment, PSN 1, 2 or 3 would be considered, a homeless investigation would be triggered and, where alleged intimidation is evident in the case, an investigation as to whether to award intimidation points should be awarded would be carried out. Where the criteria were met to under Rule 23, the 200 Intimidation Points would be awarded to the applicant, in addition to an award

of a PSN factor related to violence – namely PSN 1. With the removal of Intimidation Points the assessment for the award of PSN factors for violence or fear of violence remains unchanged. Applicants will continue to be assessed, as before, with PSN 1 to 3 considered in cases where violence or a fear of violence is an apparent housing need factor.

Following the removal of Rule 23 from the Scheme, with effect from 1 April 2025, Rule 23 will continue to apply under the Rule 23B Saving Provision in the following circumstances:

-

- An Applicant awarded Intimidation points under Rule 23, prior to its removal from the Scheme, will retain these points until they are rehoused, or they refuse two reasonable offers of accommodation, whichever is the earliest. For the avoidance of doubt for Applicants who have already refused one reasonable offer before 1 April 2025 this will leave them with one remaining reasonable offer.
- Where consideration of an Applicant's circumstances has commenced under Rule 23 prior to its removal from the Scheme, it will be undertaken and completed in accordance with Rule 23 and the related policies and procedures. An applicant will be entitled to Intimidation points where they are found to have met the relevant criteria in Rule 23 as if that rule had not been removed.

Verification of any such cases falling under the Saving Provision of Rule 23B will be required. The staff guidance in Chapter 3.3.5 of the Housing Selection Scheme Guidance Manual is attached for information. In summary, it states that the following procedure should be followed during an assessment for the award of Intimidation Points:

- Verbal or written confirmation by the PSNI is the most likely source of confirmation. The NIHE should seek a written Report from the PSNI in all cases,
- Information to assist in the decision-making process may be sourced from BASE2.

It is important to note that the assessment procedures for an award of points under the Primary Social Needs criteria is separate and does not require the same level of verification. A review of Primary Social Needs is currently being undertaken by the Housing Executive following directive from the Communities Minister, Gordon Lyons MLA. Work to agree a Data Sharing Agreement between the Housing Executive and Police Service of Northern Ireland to support decision-making by Deciding Officers within the Housing Executive is ongoing and will take into account any changes made to the Housing Selection Scheme.

2. Provide any new memoranda of understanding / information sharing protocol between the Housing Executive and (1) Base2 (2) PSNI

At present there are no new memoranda of understanding or information sharing protocols between the Housing Executive and Base 2/ PSNI as outlined above.

3. Provide copies of any new policy / guidance / protocols / circulars / guidelines for Housing Executive staff in this area.

Please see attached documents:

1. Landlord Services Advice Note – LSAN (FRA) No. 05/25a
2. Landlord Services Advice Note – LSAN (FRA) No. 08/25
3. Chapter 3 Homelessness Guidance Manual- Homelessness/ Threatened with Homelessness

This concludes our response.

Landlord Services Advice Note – LSAN (FRA) No. 08/25

Title: The removal of Rule 23 / Intimidation points from the Housing Selection Scheme and associated changes to Homelessness Policies & Procedures

Department: Fundamental Review of Allocations Implementation Project/ Homelessness Policy

Responsible Officer: [REDACTED]

Should you have any queries with the information contained within this document please contact:

FRAProject@nihe.gov.uk
(for matters relation to FRA Changes)

Or

homelessnesspolicy@nihe.gov.uk
(for matters relating to homelessness)

Quoting reference: LSAN FRA 08/25

Background: The purpose of this Advice Note is to provide information and guidance for staff in relation to the removal of Housing Selection Scheme (the Scheme) Rule 23 (Intimidation points) arising from the Fundamental Review of Allocations (FRA).

What is required: Staff should note the changes to policies and procedures and apply them when carrying out duties in relation to the assessment of housing needs (under the Scheme) and Homelessness.

Who is responsible: All Housing Services staff involved in the administration of the Scheme and all Housing Services Staff involved in the assessment of Homelessness.

Please read the information contained within this advice note carefully and in full. Should you have any queries please discuss in the first instance with your line manager. Any additional queries should be directed to the inbox as detailed above.

LSAN Issued Date:	Issued 31.03.2025
Effective from Date:	01.04.2025
Approved By:	Caroline Connor & Brian O’Kane

Linked Policy Documents:

[Chapter 3 of the HSSGM](#)

[Chapter 5 of the HSSGM](#)

[Chapter 12 of the HSSGM](#)

[Chapter 1 of GHPGM](#)

[Chapter 3 Homelessness Manual](#)

[Housing Solutions Handbook](#)

Landlord Services Advice Note – LSAN (FRA) No. 08/25

To: All NIHE Staff involved in the Administration of the Housing Selection Scheme and Homelessness Regional Managers, Area Managers, Assistant Area Managers, Team Leaders, Lettings Managers, Housing Advisors, Patch Managers, Landlord Services Trainers.

Plus Normal Distribution

Subject: Removal of Rule 23 (Intimidation points) from the Housing Selection Scheme and associated Homelessness Policies & Procedures

1.0 Introduction

- 1.1 The purpose of this advice note is to provide information and guidance for staff in relation to the removal of Rule 23 / Intimidation points from the Housing Selection Scheme (the Scheme) which takes effect from 1st April 2025. This includes changes to Homelessness Guidance Manuals regarding homelessness presenting and established reasons codes impacted by the removal of Rule 23.
- 1.2 **An online session will be provided week commencing 7th April 2025 to walk staff through the information and guidance provided in this LSAN. Further information and invites to follow.**
- 1.3 Changes to the Scheme result from the implementation of the Fundamental Review of Allocations (FRA) Proposal 7. Rule 15, Rule 24A and Schedule 4 have been also amended to reflect the removal of Rule 23 ([see Chapter 12 HSSGM](#)).
- 1.4 This note should be read in conjunction with the previous [LSAN \(FRA\) No. 05/25a](#), which details the transitional arrangements which have been put in place with the addition of Rule 23B Saving Provision (see box below).

Rule 23B (Saving Provision)

Following removal of Rule 23 from the Scheme, with effect from 1 April 2025 it will continue to apply in the following circumstances: -

- An Applicant awarded Intimidation points under Rule 23, prior to its removal from the Scheme*, will retain these points until they are rehoused, or they refuse two reasonable offers of accommodation, whichever is the earliest. For the avoidance of doubt for Applicants who have already refused one reasonable offer before 1 April 2025 this will leave them with one remaining reasonable offer.

Where consideration of an Applicant's circumstances has commenced under Rule 23 prior to its removal from the Scheme*, it will be undertaken and completed in accordance with Rule 23 and the related policies and procedures. An applicant will be entitled to Intimidation points where they are found to have met the relevant criteria in Rule 23 as if that rule had not been removed.

**The effective date of removal is 1st April 2025.*

2.0 Changes to Staff Guidance Manuals

- 2.1 Staff guidance has been updated to reflect changes to the Housing Selection Scheme Rules and Homelessness policies and procedures and are available on the [Housing Hub](#).

Amendments have been made to the following:

- Housing Selection Scheme Guidance Manual - Chapters 3, 5 and 12
- General Housing Policy Guidance Manual – Chapter 1
- Housing Solutions Handbook
- Homelessness Guidance Manual – Chapter 3

The Housing Solutions Form (online) has been amended and is also available on the Housing Hub under Useful Forms.

Amendments have also been made to the wording of the HMS 'Final Offer Letter' to highlight that Intimidation points are included in those removed following refusal or non-response to a final offer. Additional text has been included (in bold) as follows:

*If you are a person owed the Full Housing Duty under the homelessness legislation, refusal or non-response to this offer will result in that duty having come to an end and the removal of all related points awarded to you by virtue of that duty coming to an end **(this includes the removal of Intimidation points where applicable)**.*

- 2.2 The transitional arrangements / saving provision (Rule 23B) mean that associated policies and procedures in relation to Rule 23 – the Investigation and award of Intimidation Points may still apply in certain cases. Please refer to [Section 3.3.1 of HSS Guidance Manual](#) and [LSAN FRA 05/25a](#) for further guidance.
- 2.3 It is important to note that referrals to the PSNI and Base 2 in relation to Rule 23 investigations may still be necessary where investigations continue beyond 1st April 2025 only for cases that fall within the saving provision (Rule 23B).
- 2.4 The Emergency Grant will remain payable to eligible Applicants who meet the criteria following re-housing. Further work on this will continue and staff will be updated in due course.
- 2.5 Staff should note that [Rule 61](#) restriction of choice related to Rule 23, will continue to apply to those on the Waiting List with Intimidation points. Careful consideration should always be given to whether it would be appropriate to apply Rule 61 i.e. where the Designated Officer, on reasonable grounds, decides that the Applicant or a member of their household may be at significant risk of attack in any wider areas chosen by the

Applicant (staff should refer to Chapter 5.5 of the HSSGM). This Rule has a built-in obsolescence as it will be of no effect when there are no longer Applicants with Intimidation points on the Waiting List.

3.0 HMS Keying, Reports and ongoing monitoring of cases

- 3.1 There are no changes being made to the Circumstance Table which means that the system will still allow Intimidation points to be keyed. From 1st April 2025 these points should only be keyed for applications that fall within the Saving Provision (Rule 23B). **Note: any new housing applications and or homeless presentations from the 1st April 2025 should not be investigated under Rule 23 and Intimidation points should not be awarded / keyed.**
- 3.2 Please note, with the removal of Rule 23 and the addition of Rule 23B Saving Provision, the decision to award Intimidation points continues to rest with the Team Leader or above within the Housing Executive.
- 3.3 As points may still be keyed after 1st April 2025, the H006b report that establishes where there has been a mismatch in keying between homeless reason codes 03 and the keying of associated points (PSN1, Intimidation, FDA) will remain in place and should be actioned appropriately (see the [Housing / Homeless Reports and Dashboards Manual](#)).
- 3.4 Following the removal of Rule 23, it is essential that staff continue to monitor cases where Applicants (including Transfer Applicants) have already been awarded Intimidation points under Rule 23. These cases should be reviewed on a continuous basis until they are either rehoused or they refuse two reasonable offers of accommodation. [Please Note: some Applicants / Transfer Applicants may only have one reasonable offer remaining].
- 3.5 **Staff should continue to follow the guidance in [LSAN FRA 05/25a](#) and should continue to update ‘Spreadsheet 2’ and submit weekly returns until further advised. Each Area should nominate someone to collate the returns from across their different offices and submit a completed Spreadsheet 2 via email to the FRA Project Team inbox (FRAProject@nihe.gov.uk) by 2pm every Friday. We greatly appreciate your time in providing these returns and thank you for your continued efforts to monitor cases.**
- 3.6 If there are any cases that cannot be contacted, or where the circumstances are complex, please contact the FRAProject@nihe.gov.uk or Housing.Policy@nihe.gov.uk for assistance.

4.0 Changes to Homelessness Guidance Manual and Homelessness Reason Codes

- 4.1 As a result of changes to the Housing Selection Scheme following the implementation of FRA Proposal 7 and the removal of Rule 23 and Intimidation points from the Scheme, Chapter 3 of the Homelessness Guidance Manual has been updated to reflect the changes and include additional guidance. Staff should adhere to and implement the changes as set out in this guidance.

This amended chapter is now available on the Housing Hub page on Huddle. To access the page.

Huddle

- > "I want to" and select "Use a System"
- > "Team Sites"
- > "Housing"
- > "Housing Guidance & Manuals"
- > "Homelessness Manual"

- 4.2 Homelessness Guidance Manual Chapter 3.5.3 has been updated to reflect the changes. Homelessness Reason codes Intimidation – Paramilitary / Sectarian / Racial / Sexual Orientation / Disability / ASB, **should not be used** as a presenting or established Homelessness Reason effective from 1st April 2025, except for the cases which have been outlined under the Savings Provisions in Rule 23b of the Housing Selection Scheme.

Please refer to Section 3.3.1 of HSS Guidance Manual and LSAN FRA 05/25a for further guidance.

- 4.3 Chapter 3.5.11 of the Homelessness Guidance Manual has been updated as Homeless Reason 08F – Accommodation Not Reasonable (Violence) will be removed from HMS effective from 1st April 2025 and will no longer be available for use. Designated officers should be aware that any cases which have been opened as believed Accommodation Not Reasonable (Violence) may be established (if applicable), under any other relevant homelessness reason, for example, Violence/Risk of Violence, Neighbourhood Harassment or any other applicable homelessness reason dependent on the circumstances of the case.
- 4.4 Chapter 3.5 of the Homelessness Guidance Manual has been updated to reflect the addition of a new Homelessness Reason, 'Violence/Risk of Violence' and associated guidance provided. Please note that the guidance clearly outlines that this code should not be used for any cases of domestic abuse or sexual abuse.
- 4.5 Chapter 3.5 has also been updated to reflect the addition of a new Homelessness Reason – 'Hate Incident' with subcategories Sectarian/ Racial/ Sexual Orientation/ Disability/ Gender Identity. Designated officers should familiarise themselves with new guidance which is outlined at 3.5.22 of the Homelessness Guidance Manuals and

contact Homelessness Policy if they have any queries.

- 4.6 It is important that staff contact Homelessness Policy if they require any additional guidance in respect of the changes to Chapter 3 of the Homelessness Guidance Manual and Homelessness Reasons. Please contact homelessnesspolicy@nihe.gov.uk for assistance.

5.0 Comms with customers and changes to NIHE website and booklets

- 5.1 Staff should note that changes have been made to the NIHE website and to customer-facing content to reflect the removal of Rule 23. This includes:
- [How We Allocate Accommodation](#) (booklet)
 - [Applying for Social Housing in Northern Ireland](#) (booklet)
 - [How we assess your application](#) (webpage)
 - [The points system](#) (webpage)
 - [Housing Selection Scheme Rules \(PDF\)](#)
 - [The NI Direct webpage](#) (webpage)

6.0 Further Information

- 6.1 If you require any further information in relation to this LSAN please contact the FRA Project Team at FRAProject@nihe.gov.uk for matters relating the FRA changes or the Homelessness Policy Team at homelessnesspolicy@nihe.gov.uk for matters relating to homelessness.

Approved by Caroline Connor
Assistant Director, Housing Services

Approved by Brian O’Kane,
Assistant Director, Central Policy & Business Excellence

PLEASE BRING THE CONTENTS OF THIS CIRCULAR TO THE ATTENTION OF ALL RELEVANT STAFF AFTER WHICH IT SHOULD BE PROPERLY INDEXED AND FILED.

Homelessness Guidance Manual
CHAPTER 3 – HOMELESSNESS/THREATENED WITH HOMELESSNESS
July 2025

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Chapter 3 – Homelessness / Threatened with Homelessness

3.0 Definition of Homelessness / Threatened with Homelessness

Article 3 (1) A person is homeless if he or she has no accommodation available for his or her occupation in the United Kingdom or elsewhere.

Article 3 (2) A person shall be treated as having no accommodation if there is no accommodation which he or she, together with any other person who normally resides with him or her as a member of his or her family or in circumstances in which it is reasonable for that person to reside with him or her –

- a) Is entitled to occupy by virtue of an interest in it or by virtue of an order of a court, or
- b) Has an expressed or implied licence to occupy, or
- c) Occupies as a residence by virtue of any enactment or rule of law giving him or her, the right to remain in occupation or restricting the right of another person to recover possession.

Article 3 (3) A person shall not be treated as having accommodation unless it is accommodation which it would be reasonable for him or her to continue to occupy.

Article 3 (4) Regard may be had in determining whether it would be reasonable for a person to continue to occupy accommodation, to the general circumstances prevailing in relation to housing in Northern Ireland.

Article 3 (5) A person is also homeless if he or she has accommodation but –

- a) he or she cannot secure entry to it, or
- b) it is probable that occupation of it will lead to violence from some other person residing in it or to threats of violence from some other person residing in it and likely to carry out the threats, or
- c) it consists of a movable structure, vehicle or vessel designed or adapted for human habitation and there is no place where he or she is entitled or permitted to place it and to reside in it.

Article 3 (6) A person is threatened with homelessness if it is likely that he or she will become homeless within 28 days from the day on which he or she gives written notice to the Housing Executive that he or she is threatened with homelessness.

Meaning of accommodation available for occupation

Article 4 For the purposes of homelessness, accommodation shall be regarded as available for a person's occupation only if it is available for occupation both by him or her and by any other person who might reasonably be expected to reside with him or her; and references to securing accommodation for a person's occupation shall be construed accordingly.

3.1 Homelessness

When a Designated Officer is gathering information about the housing circumstances of a person who is requesting accommodation or assistance in obtaining accommodation and it appears to them that the person may be homeless or threatened with homelessness during an interview / visit, the Designated Officer must consider whether the duty to conduct inquiries under Article 7 of the Housing (NI) Order 1988 has been triggered even in the absence of an explicit homelessness application.

If the Housing Executive has reason to believe that an applicant may be homeless, it shall make such enquiries as are necessary to satisfy themselves as to whether he or she is homeless.

Each case must be assessed individually and decisions made on the particular circumstances of the case. The Designated Officer should take into account, the information provided by the applicant together with any additional information considered appropriate, by way of interview, visit or further enquiries.

3.1.1 No Accommodation in the UK or Elsewhere

Checks should be made to determine if the applicant has accommodation of any tenure in any country. Such checks should be initiated when considering the information on the Housing Solutions Form.

If the Housing Executive considers that there is accommodation available for the applicant outside of Northern Ireland, then that accommodation is subject to the same tests as accommodation in the UK, for example, it must be reasonable for the applicant to continue to occupy that accommodation - [see 3.2. Reasonable to Continue to Occupy](#)

Checks may include making enquires with Housing Associations, landlords, building societies, local authorities, family members, Immigration Office, etc.

3.1.2 Availability for occupation

Accommodation shall be treated as available for a person's occupation only if it is available for occupation by him or her together with:

- a) any other person who normally resides with him or her as a member of his or her family, or
- b) any other person who might reasonably be expected to reside with him or her

The first group covers those members of the family who normally reside with the applicant. The phrase “as a member of his or her family” although not defined in the legislation, will include those with close blood or marital relationships and cohabiting partners including same sex relationships, and, where such a person is living in accommodation as an estranged member of the household, the accommodation must provide for him or her as well.

The second group relates to any other person, and includes those who may not have been living as part of the household at the time of the assessment, but whom it would be reasonable to expect to live with the applicant as part of his or her household. Persons in the second group might include a housekeeper or companion for the elderly or disabled person or children who are being fostered by the applicant or a member of his or her family. The second group will also include those members of the family who were not living as part of the household at the time of the assessment but who nonetheless might reasonably be expected to form part of it.

It is for the Housing Executive to assess whether any other person might reasonably be expected to live with the applicant and there will be a range of situations that may need to be considered.

Persons who normally live with the applicant but who are unable to do so because there is no accommodation in which they can all live together should be included in the assessment. When dealing with a family where there has been a relationship breakdown, the Housing Executive will need to reach a decision as to which members of the family normally reside, or might reasonably be expected to reside with the applicant. In case involving the care of children the courts may have made a residence order indicating with whom children are to live, or it may

be a matter of agreement between the parents and a court will not have been involved. In such cases the Designated Officer will need to reach a decision based on the individual circumstances of each case and the information available to them.

3.1.3 Entitled to occupy

A person is homeless if he or she has no accommodation, which he or she has a legal right to occupy.

This will include a person who has been occupying accommodation as a licensee and whose licence has been revoked, such as

Temporary accommodation / sharing

It is important to distinguish between accommodation which is clearly being occupied on a temporary basis because it is crisis accommodation for example, a women's refuge / other hostel, and accommodation which may be considered more permanent such as sharing with a relative or friend.

Licencee

A person who has been occupying accommodation as a licensee and whose licence has been revoked is homeless because he or she no longer has a legal right to continue to occupy that accommodation (despite the fact that that person may continue to occupy). For example, an applicant who has been asked to leave their parent's or other family member's home.

3.2 Reasonable to Continue to Occupy

An applicant may be homeless if they are occupying accommodation which it would not be reasonable for them to continue to occupy, together with any other person who normally resides with them as a member of his or her family or who might reasonably be expected to reside with him or her.

There is no simple test of reasonableness. It is for the Housing Executive to make a judgement on the facts of each case taking into account the circumstances of the applicant, which may include (but is not limited to) the following:

- a) The applicant's accommodation is unfit for human habitation (see 3.5.2.1)
- b) The physical characteristics of the accommodation make it unsuitable for the applicant or a member of the applicant's household for example, due to a physical disability
- c) Applicants accommodation is adversely affecting the mental health of the applicant or a member of the applicant's household
- d) Living in overcrowded conditions which is having a detrimental effect on the applicant or a member of the applicant's household
- e) The **housing costs** associated with the accommodation are causing financial hardship
- f) Violence or threats of violence including domestic abuse, harassment or intimidation
- g) The applicant's accommodation is negatively impacting on the applicant or a member of the applicant's household for some other reason that is not included in the above list

3.3 Inability to Secure Entry to Accommodation

A person is homeless if he or she has a legal right to occupy accommodation, but is unable to secure entry to it, for example:

- 1. those who have been evicted illegally, or
- 2. those whose accommodation is being occupied illegally by squatters.

Although legal remedies may be available to the applicant to regain possession of the accommodation, the Housing Executive cannot refuse to assist while he or she is actually homeless.

3.4 Threatened with Homelessness

A person is threatened with homelessness if he or she is likely to become homeless within 28 days. This includes:

- A tenant who has received notice to quit
- A licensee who has been told to leave their accommodation (e.g. a son or daughter whose parents have asked them to leave)
- An owner occupier whose home is about to be repossessed due to mortgage arrears
- An employee in tied accommodation who is about to lose his / her job and therefore also lose his / her home

In such circumstances the Designated Officer should take reasonable steps to prevent the loss of the applicant's current home where possible by providing appropriate advice and assistance.

Evidence that an applicant is threatened with homelessness will be required from the applicant's landlord / parents / court / employer. Where the Housing Executive is given verbal notice that a person will become homeless within 28 days the Designated Officer should undertake further enquiries in order to satisfy themselves that the applicant is threatened with homelessness.

3.5 Possible Reasons for Homelessness / Threatened with Homelessness

Although it would be impossible to detail all of the circumstances the Housing Executive may have to make enquiries into and consider, some of the most frequently presented situations are outlined below, together with the type of enquiries Designated Officers might undertake in such situations, and the type of information that may assist in decision making. The circumstances outlined are

not exhaustive, and it should be stressed that each case should be considered on its individual circumstances.

Note: the following circumstances reflect the homelessness reasons provided on the Homelessness Assessment Form. The corresponding homelessness reason has therefore been included for ease of reference.

3.5.1 Asked to Leave Accommodation by Family or Friends

(Homeless Reason 01)

Some applicants may have been asked to leave their present accommodation by family or friends, with whom they have been living with. In such cases, the Housing Executive will need to consider carefully whether the applicant's licence to occupy the accommodation has in fact been revoked. The Housing Executive may need to interview the parents or friends to establish whether they are genuinely revoking the licence to occupy, and thus rendering the applicant homeless.

Requests to leave by parents, relatives or friends account for a significant proportion of homeless presentations. In some cases there will be genuine reasons why the applicant is unable to stay in their accommodation and in others there may be scope for preventing or postponing homelessness and providing the applicant with an opportunity to plan their future accommodation and pursue other housing options with advice and assistance from the Housing Executive.

3.5.2 Relationship Breakdown (Including Breakdown in Co-habitation and Breakdown in Same Sex Relationships)

(Homelessness Reason 02)

An applicant may be homeless or be threatened with homelessness as a result of a relationship breakdown. If the applicant has sought legal assistance there are a

number of documents he or she may have that may assist the Housing Executive in arriving at a decision in relation to homelessness / threatened homelessness:-

- a) An Order for Maintenance, Residence or Contact
- b) An Occupation or Non-Molestation Order
- c) A Decree of Judicial Separation or Divorce
- d) Dissolution Order – in the case of breakdown of civil partnership
- e) Documents from a solicitor
- f) If co-habiting evidence of residency should be sought

Other sources of information which may be relevant in assessing homelessness / threatened homelessness can include:

- a) Information from a bona fide voluntary group for example, Women's Aid, that the applicant has taken up residence in a hostel as a result of relationship breakdown and/or domestic abuse
- b) Information from the police, social worker, Social Security Agency, or other reputable source that the applicant has been forced to leave the marital home as there has been marital or relationship breakdown
- c) If information provided by GP it should be accepted and relevance considered

In some cases, information may not be available from any other source. In such cases, it is for the Housing Executive to reach a decision as to whether the applicant is homeless or threatened with homelessness based on the information available (even if the only source of information is the statement from the applicant).

3.5.3 Intimidation – Paramilitary / Sectarian / Racial / Sexual

Orientation / Disability / ASB

(Homeless Reasons 03, 03A, 03B, 03C, 03D, 03E)

Rule 23 and Intimidation Points have been removed from the Housing Selection Scheme with effect from 1st April 2025. However, associated policies and procedures in relation to Intimidation will still apply to certain cases – Please see Chapter 3.3.1 of the Housing Selection Scheme Guidance Manual.

Please note that any of these Homeless Reasons should only be used for cases which fall under the guidance outlined within Rule 23B of the Housing Selection Scheme and fall under the ‘Savings Provisions.’

Written or verbal responses from the police will be the most likely source of information and the Housing Executive should seek a written report where appropriate see Appendix 1 – PSNI: Pro Forma.

Information to assist in the decision making process may also be sourced from voluntary sector organisations for example, Base 2 see Appendix 2 - Base 2: Pro Forma, voluntary sector hostels etc.

The decision as to whether or not the applicant is homeless / threatened with homelessness rests with the Housing Executive, and not with any individual or agency which provides the Housing Executive with information.

Note: decisions relating to intimidation must be made in accordance with Standing Orders

3.5.4 Bomb / Fire Damage

(Homelessness Reason 04)

Where damage has been caused to an applicant’s home that renders the property uninhabitable, the applicant should be considered to be homeless if they have no

other accommodation anywhere else available for their occupation and which he or she has a legal right to occupy.

It may also be appropriate to request a report from, for example, the Fire Authority to confirm that the accommodation has been rendered uninhabitable.

3.5.5 Neighbourhood Harassment

(Homelessness Reason 05)

Harassment is when someone behaves in a way, which makes a person feel distressed, humiliated or threatened. It could include behaviour such as unwanted phone calls, letters, emails or visits, abuse and bullying online, stalking, verbal abuse and threats, smashing windows or using dogs to frighten a person. Harassment can include situations where there have been a substantial number of incidents including those of a minor nature, although consideration should be given where one incident has occurred which has had a seriously detrimental effect on the victim or members of his/ her family.

Hate harassment is any incident committed against a person or property which is perceived by the victim or any other person as being motivated by an offender's prejudice or hatred because of their Ethnicity, Sexual Orientation, Gender identity, Religion or Disability.

Where an applicant alleges that they are being harassed it will be necessary to make enquiries whether or not the applicant can return to their accommodation or whether or not it would be reasonable to expect them to do so.

Each case should be taken on its own merits to determine the severity of the circumstances. The Designated Officer should take into account the ongoing

nature of harassment, the length of time and/or frequency. Where one of the parties involved is a Housing Executive / Housing Association tenant it will be necessary to make enquiries to establish if there is any current, past or ongoing ASB investigations. Information to assist in the decision making process may also be sourced from the Housing Executive's HMS System, contact with the PSNI, council and other statutory bodies.

Where one of the parties is a Housing Executive tenant and there is not an active ASB case, the Designated Officer should open one when and consult the ASB manual for further guidance.

3.5.6 Domestic Abuse

(Homelessness Reason 06)

Domestic Abuse is defined as *“threatening, controlling, coercive behaviour, violence or abuse (psychological, virtual, physical, verbal, sexual, financial or emotional) inflicted on anyone (irrespective of age, ethnicity, religion, gender, gender identity, sexual orientation or any form of disability) by a current or former intimate partner or family member”*.

The following will assist in the application of this definition:

- (a) **Incident** – means an incident anywhere not confined to the home of one of the partners/family members. The legislation will criminalise abusive behaviour that occurs on 2 or more occasions against a current or former intimate partner or family member.
- (b) **Family members** – include mother, father, son, daughter, brother, sister, grandparents, in-laws or step family (known as familial abuse). This list is not exhaustive and on occasions can include other close family members such as aunt, uncle, grandchildren, cousins, niece or nephew.

- (c) **Intimate partners** – means there must be a relationship with a degree of continuity and stability. The relationship must also have had (or reasonably supposed to have had) a sexual aspect, such as in the relationship between husband and wife or between others generally recognised as a couple including same sex couples.

Please note that sexual abuse committed within an intimate partner relationship should be classed as Domestic Abuse.

Recent legislative changes have brought Domestic Abuse and its consequences to greater prominence. Legislation that you should be aware of is detailed below:

- **The Domestic and Civil Proceedings Act (NI) 2021**

This new legislation, introduced in February 2022, criminalised abusive behaviour that occurs on two or more occasions against an intimate partner, former partner or close family member. In addition, the offence now captures not only physical violence but sexual violence and threatening behaviour. Abusive behaviour can include, but is not limited to coercive control, psychological, emotional, physical, sexual and technological abuse.

- **Protection from Stalking Act (NI) 2022**

The Act introduces two new offences of stalking and threatening or abusive behaviour as well as Stalking Protection Orders (applied for by PSNI). Stalking is a crime of psychological terror that impacts in ways that are long lasting and traumatic and affects one in five women and one in ten men.

- **Justice (Sexual offences and trafficking victims) Act (NI) 2022**

This Act makes non-fatal strangulation a specific standalone criminal offence. Strangulation is a common and extremely dangerous form of abuse and is a risk factor for homicide. Non-fatal strangulation typically involves the

perpetrator strangling or intentionally affecting their victim's ability to breathe in an attempt to control or intimidate them. Studies show that someone who has experienced non-fatal strangulation are 8 times more likely to be murdered by their partner. This Act also introduces new offences of "upskirting", "downblousing" and sending unwanted images (also known as cyber-flashing.)

Designated officers should be aware that previous terminology such as Domestic Violence is not broad enough to cover the many non-physical forms of abuse detailed above therefore consideration should be given to all forms of Domestic Abuse not just physical domestic abuse. **Appendix 8A** of the Homelessness Guidance Manual provides a more detailed description of the different forms of domestic abuse and signs to look out for.

When considering cases of Domestic Abuse, the legislation states that:

"A person is...homeless if he or she has accommodation, but it is probable that occupation of it will lead to violence from some other person residing there or to threats of violence from some other person residing in it and likely to carry out the threats".

All violence/abuse (including sexual abuse) and threats of violence/abuse likely to be carried out against the applicant or a member of the applicant's household should be considered when determining if an applicant is homeless / threatened with homelessness. The fact that violence/abuse may not yet have occurred does not, on its own, mean that it is not likely to occur.

Designated Officers should investigate the particular circumstances of the case and liaise with the relevant agencies / individuals in order to arrive at a decision. Investigations into such cases will need to be conducted sensitively. It is essential

that enquiries do not provoke further abuse. At no time should the alleged perpetrator be approached as this could incite further abuse.

It is acknowledged that in cases of domestic abuse the victim may not have involved the police. However, this should not prejudice the applicant's case and the Designated Officer will be required to exercise discretion based on their investigations and the information available. In cases involving domestic abuse the Housing Executive may wish to inform applicants of the option of seeking a Non-Molestation Order. It should be made clear to the applicant however that there is no obligation for him or her to do so. Where an applicant wishes to pursue this option, it is advisable that they obtain independent legal advice.

Designated Officers should be aware that court orders compelling persons not to molest, or not to enter the home of the applicant, may not be effective in deterring perpetrators from carrying out abuse, further abuse or threatening abuse. Applicants should not automatically be expected to return home on the strength of a court order and applicants may not have confidence in their effectiveness. Where there would be a probability of domestic abuse if the applicant continued to occupy his or her present accommodation, the Housing Executive must treat the applicant as homeless and should not expect him or her to remain or return to the accommodation. In all cases involving domestic abuse the safety of the applicant and his or her household should be the primary consideration at all stages of the decision making process.

In assessing whether threats of domestic abuse are likely to be carried out, the Housing Executive should only consider the probability of domestic abuse and not actions which the applicant could take (such as Non-Molestation Orders against the perpetrator) but which he or she may not intend to take.

NOTE: Designated Officers should also have regard for the "NIHE-Women's Aid Joint Protocol". This protocol sets out the roles and responsibilities of the key

statutory and voluntary agencies in providing services to those experiencing domestic abuse, sexual abuse. See Appendix 8 -NIHE-Women's Aid Joint Protocol.

When conducting a homelessness assessment there are various steps you can take to make the customer feel more at ease:

- Listen
- Believe
- Offer to conduct the interview in a neutral location so that the customer doesn't have to come into an office or have a home visit.
- Be aware that the customer may have a time constraint so ask if there is a time they have to finished by.
- Offer support, not judgement or opinions
- Do not blame them
- Go at their pace, don't push them in to detail.
- Encourage them to seek support from an appropriate organisation
- **Don't** tell them to leave or criticise for staying
- Be patient – leaving an abusive partner is a process

NB On average a woman will leave a violent relationship 35 times before leaving for good.

3.5.7 Sexual Abuse

(Homelessness Reason 07)

Sexual Abuse is defined as ***“any behaviour (physical, psychological, verbal, virtual/online) perceived to be of a sexual nature which is controlling, coercive, exploitative, harmful, or unwanted that is inflicted on anyone (irrespective of***

age, ethnicity, religion, gender, gender identity, sexual orientation or any form of disability).”

The difference between sexual abuse and domestic abuse is that the sexual abuse is inflicted on the victim by **anyone other than** a current or former intimate partner or family member eg a neighbour, stranger etc.

When considering cases where sexual abuse is alleged, the legislation states that:

“A person is...homeless if he or she has accommodation, but it is probable that occupation of it will lead to violence from some other person residing there or to threats of violence from some other person residing in it and likely to carry out the threats”.

All violence (including sexual abuse) and threats of violence likely to be carried out against the applicant or a member of the applicant’s household should be taken into account when considering whether an applicant is homeless / threatened with homelessness. The fact that violence may not yet have occurred does not, on its own, mean that it is not likely to occur.

Designated Officers should investigate the particular circumstances of the case and liaise with the relevant agencies / individuals in order to arrive at a decision. Investigations into such cases will need to be conducted sensitively. It is essential that enquiries do not provoke further abuse. At no time should the alleged perpetrator be approached as this could incite further abuse.

It is acknowledged that in cases of sexual abuse the victim may not have involved the police. However, this should not prejudice the applicant’s case and the Designated Officer will be required to exercise discretion based on their investigations and the information available. In cases involving sexual abuse the Housing Executive may wish to inform applicants of the option of seeking a Non-Molestation Order. It should be made clear to the applicant however that there is

no obligation for him or her to do so. Where an applicant wishes to pursue this option it is advisable that they obtain independent legal advice.

Designated Officers should be aware that court orders compelling persons not to molest, or not to enter the home of the applicant, may not be effective in deterring perpetrators from carrying out abuse, further abuse or threatening abuse. Applicants should not automatically be expected to return home on the strength of a court order and applicants may not have confidence in their effectiveness. Where there would be a probability of domestic abuse if the applicant continued to occupy his or her present accommodation, the Housing Executive must treat the applicant as homeless and should not expect him or her to remain or return to the accommodation. In all cases involving sexual abuse the safety of the applicant and his or her household should be the primary consideration at all stages of the decision making process.

In assessing whether threats of sexual abuse are likely to be carried out, the Housing Executive should only consider the probability of sexual abuse and not actions which the applicant could take (such as Non-Molestation Orders against the perpetrator) but which he or she may not intend to take.

NOTE: Designated Officers should also have regard for the “NIHE-Women’s Aid Joint Protocol”. This protocol sets out the roles and responsibilities of the key statutory and voluntary agencies in providing services to those experiencing domestic abuse, sexual abuse. See Appendix 8 -NIHE-Women’s Aid Joint Protocol.

3.5.8 Applicants Leaving the Armed Forces

Armed forces personnel are generally provided with accommodation by the Ministry of Defence (MOD) but are required to leave this when they are

discharged from the service. Many will not have alternative accommodation of their own and hence some will present as homeless to the Housing Executive. Homelessness application from those discharged or approaching discharge from the armed forces should be dealt with in the same way as all other homelessness applications.

The MOD recognises that the Housing Executive will need to be satisfied that entitlement to occupy service quarters will end on a certain date in order to determine whether applicants who are service personnel discharged or approaching discharge are homeless or threatened with homelessness. For this purpose MOD issues a **“Certificate of Cessation of Entitlement to Occupy Service Quarters and of Impending Homelessness”**. These certificates indicate the date that homelessness will occur, and the Housing Executive should not insist upon a court order for possession in such cases. Certificates are produced by the appropriate area office in the “Defence Infrastructure Organisation” (of the MOD) and are usually issued six months before discharge.

3.5.9 Illegal Occupants

The Housing Executive will initiate a homelessness assessment in relation to cases of illegal occupation of Housing Executive dwellings. An illegal occupant does not have a legal right to occupy a Housing Executive dwelling and hence the Housing Executive must determine if indeed that applicant is homeless / threatened with homelessness.

An illegal occupant may be homeless if he or she has no accommodation in the UK or elsewhere which is available for his occupation and which that person has a legal right to occupy. An illegal occupant may also be homeless where he or she has accommodation but cannot secure entry to it, or where he or she has accommodation that is a moveable structure (such as a caravan or house boat) and there is no place where it can be placed in order to provide accommodation.

An illegal occupant who has accommodation elsewhere is to be treated as homeless where it would not be reasonable for him or her to continue to occupy that occupation.

In summary, the fact that an applicant is illegally occupying a Housing Executive dwelling and, therefore, not “roofless”, does not automatically mean that he or she is not homeless / not threatened with homelessness.

The Housing Executive should treat in the same way, homeless applications from those illegally occupying dwellings belonging to social landlords and private sector landlords.

3.5.10 Occupation Order

An applicant may be homeless if an Occupation Order, excluding him or her from his or her accommodation, is made against him or her. In such cases, the applicant can be asked for a copy of the relevant Order. If this is not provided, information can be sought from a solicitor.

3.5.11 Accommodation Not Reasonable

(Homelessness Reason 08)

IN ALL CASES BEFORE RECORDING REASONS FOR HOMELESSNESS / THREATENED WITH HOMELESSNESS STAFF SHOULD LOOK AT THE PRIMARY REASON BEFORE LOOKING AT ‘ACCOMMODATION NOT REASONABLE’.

An applicant is homeless if his or her accommodation is such that it is unreasonable for him /her to continue to occupy it. Whether or not it is reasonable to continue to occupy accommodation relates not only to the applicant but also to any other person who might reasonably be expected to reside with the applicant as a member of their household.

The Context of Reasonableness

What is "reasonable" is a matter for judgement and will depend in some cases on the personal circumstances of the applicant - for example what might be reasonable for adults may not be for households containing children.

Whether accommodation is reasonable to continue to occupy can be looked at in two contexts:

- The characteristics of the property
- The personal circumstances of the applicant

Continue to Occupy

The phrase "to continue to occupy" means that occupation is to be looked at over time. Staff will therefore need to consider the applicant's circumstances as they are at the time of application, whilst also considering whether it would be reasonable for them to continue to occupy their accommodation for the foreseeable future. In looking to the future the Designated Officer must be certain that a particular set of circumstances are likely to arise before they can be factored into the decision making process.

For example, when considering a homeless application involving a household member who is pregnant, which is made on the grounds that it is not reasonable for the household to continue to occupy their accommodation (e.g. when the baby is born the property will be overcrowded or it may be that the property is an unsuitable environment for children generally), the Designated Officer will need to consider whether the impending birth would make the accommodation unsuitable for the purposes of Article 3(3) of the 1988 Order.

Whether it is reasonable for the household to continue to occupy the property will depend on the severity of the problem that will arise, or the degree to which an individual or family concerned suffers serious inconvenience / risk, giving their living conditions.

When assessing whether an applicant's accommodation is reasonable for them to continue to occupy, the Designated Officer should consider the applicant's ability to function in their current accommodation and whether rehousing would alleviate their reported difficulties.

A visit to the property should be carried out in all instances.

Note: the only exception would be in the event of a very robust OT report being received in support of the applicant.

3.5.11.1 Property Unfitness **(Homeless Reason 08A)**

Private Rented Sector

Where consideration is being given as to whether or not a privately rented or an owner-occupied property is reasonable for an applicant to continue to reside in due serious disrepair, the case must be referred to the Environmental Health Department in the relevant council area to undertake a fitness inspection.

Where a privately rented property is deemed to be unfit, the Environmental Health Department may serve a Notice of Unfitness on the landlord or the landlord's agent. This will not guarantee that landlord will comply to a Notice of Unfitness and the Designated Officer will therefore have to liaise closely with the Environmental Health Department when considering if the applicant's accommodation is reasonable for them to continue to occupy for the purposes of determining if he or she is homeless. **See Appendix 14 Pro Forma for Unfitness (Environmental Health)**

Owner Occupied

Where an owner-occupied property is deemed to be unfit, the owner of the property will be responsible for undertaking the necessary repairs. In such cases,

staff may need to consider the financial implications on the applicant for remedying the repairs, the applicant's available income and whether it would be reasonable for the applicant to meet the costs associated with the work required to the dwelling.

Social Housing

Housing Executive and Housing Association properties should be referred to the relevant Maintenance Section.

3.5.11.2 Physical Health (Homeless Reason 08B)

It may not be reasonable for household to continue to occupy accommodation if the dwelling does not meet the physical needs of the applicant or a member of the applicant's household. When considering the physical characteristics of the property, the Designated Officer must also explore the possibility of the property being adapted to better meet the needs of the disabled person.

Home Improvement Grant Applications / Disabled Facilities Grant

There are a range of grants available to help with the cost of adaptations to the home of a disabled person. These grants are available to owner-occupiers or Private Tenants (not NIHE Tenants or Housing Association Tenants). Applicants who have been successful in securing an Improvement Grant for their home will not normally be considered as homeless / threatened with homelessness.

For further details in relation to Home Improvement Grants, which are currently available, please see website:

https://www.nihe.gov.uk/index/benefits/home_improvement_grants/grants_available.htm

3.5.11.3 Mental Ill Health
(Homeless Reason 08C)

Where there is reason to believe that accommodation is adversely affecting the mental health of an applicant or a member of the applicant's household, the Designated Officer should consider whether it is reasonable for the household to occupy their home. The Designated Officer should also consider whether rehousing would alleviate the adverse effect felt by the applicant, or if the applicant could be supported to sustain their tenancy with the appropriate support services in place.

It is important to note that an assessment of whether an applicant's accommodation is unreasonable for them to continue to occupy is not based solely on the presence of mental ill health, but on the impact the applicant's accommodation is having on their mental health.

Staff will need to satisfy themselves that the applicant's housing is having a detrimental effect on his or her mental health. The Designated Officer should seek this information directly from professional sources such as Social Workers, District Nursing Staff, Occupational Therapists, and Mental Health services, etc.

Whilst consideration should be given to any medical evidence provided, it is important for staff to remember that it is for the Housing Executive to decide whether it is reasonable for an applicant to continue to occupy their home due to mental ill health. Where medical evidence suggests that a property is exacerbating an applicant's mental health, the Designated Officer may nevertheless conclude that the property is reasonable to continue to occupy, having had regard to the individual circumstances of that applicant. Where a negative homeless decision is reached staff must provide applicant with sound reasons for the decision.

It is important for staff to note that the existence of mental ill health alone is not sufficient to conclude that it is unreasonable for applicant to continue to occupy his or her home. The Designated Officer will be expected to understand and address the customer's needs, including their support needs. It is important that the Designated Officer considers if an applicant could be supported to help sustain the tenancy and prevent the applicant from becoming homeless. Where support needs have been identified, the Designated Officer should either signpost or support the customer to engage with relevant support services.

3.5.11.4 Overcrowding **(Homeless Reason 08D)**

It is important to note that overcrowding alone should not lead to a decision that an applicant is homeless as their accommodation is unreasonable to continue to occupy. Staff should instead consider the effect the overcrowding may be having on the household and whether the impact of living in overcrowded conditions is having a detrimental impact on the household or a household member. Where overcrowding exists the Designated Officer may still decide that the applicant's accommodation is reasonable for them to continue to occupy, having had regard to the applicant's particular circumstances.

3.5.11.5 Financial Hardship **(Homeless Reason 08E)**

When considering whether accommodation is reasonable for an applicant to continue to occupy, Designated Officers will have to determine if the accommodation is affordable. Staff will need to consider whether the applicant can meet his or her reasonable living expenses which will include their housing

costs excluding any shortfall. It is essential that each case is assessed on its own merits.

Living expenses are deemed reasonable where they are within the applicant's personal / standard allowance (Standard Allowance = amount of income an applicant would be entitled to receive for their household if their sole income is / was means tested social security benefits). All applicants in receipt of **full means tested benefits** with **no other source of income** will automatically be considered as in financial hardship.

Means Tested Benefits are;

- Income – based Jobseeker's Allowance
- Income – related Employment and Support Allowance
- Income Support
- Pension Credit
- Housing Benefits
- Tax Credits (Child Tax Credit and Working Tax Credit)
- Universal Credit

Where an applicant is in receipt of full means tested benefits and are also in receipt of additional benefits for example disability benefits (being granted for themselves, a partner or dependent children) then this can be taken into consideration as income. In circumstances where disability benefits are being considered as income careful consideration needs to be given by the designated officer when assessing the reasonableness of the household's expenditure, particularly if there is additional expenditure/costs attributed to the disability that those specific benefits may be granted to cover.

Where an applicant has a non-dependant adult residing as part of their household any financial contribution that they make (regardless of how small the amount) is taken into consideration as additional income. In circumstances where a non dependant adult is residing as part of the applicant's household but they are not contributing financially, a notional financial amount is taken into consideration based on the gross income that they earn. In circumstances where there is a nondependent couple residing and they are not contributing financially, their income should be added together and the total notional amount should be used to calculate the contribution. Note: Non-dependents who are working and non dependents who are in receipt of benefits including disability benefits should be treated the same when applying the notional financial amount. See below as a guide;

Gross income of the non-dependant

- Gross income – less than £162.00 per week: £18.10
- Gross income - £162 to £235.99 per week: £41.60
- Gross income - £236 to £307.99 per week: £57.10
- Gross income - £308 to £409.99 per week: £93.40
- Gross income - £410 to £510.99 per week: £106.35
- Gross income - £511 or more per week: £116.75

Where an applicant is not in receipt of means tested benefits, or they receive partial benefits because, for example, they are working, staff will need to apply a notional test to determine the baseline amount that the government deem is reasonable for an individual or household to survive. The Baseline is what the applicant would be entitled to claim for their household if they were to make a claim for benefits and they had no other source of income. Any income above the baseline will be assessed and the reasonableness of the expenditure will determine if the individual or household is in financial hardship or not.

Designated officers when looking at an applicant's expenditure should consider whether the applicant can afford the housing costs without being deprived of basic essentials such as food, clothing, heating, transport and other essentials specific to their circumstances. Housing costs should not be regarded as affordable if the applicant would be left with a residual income that is insufficient to meet these essential needs. The baseline amount as determined by the award of means tested benefits may be used to guide staff when assessing the income that an applicant will require to meet essential needs aside from housing costs, but should ensure that the wishes, needs and circumstances of the applicant and their household are also taken into account. The wider context of the applicant's particular circumstances should be considered when considering their household expenditure especially when these are higher than might be expected.

Designated officers may consider using the 'minded to' letter See Appendix 13. A Minded to Letter offers applicants the chance to comment and correct information relating to their income and expenditure prior to a final decision being made. The use of this process provides the applicant with an opportunity to be involved at the various stages of the process and also gives the Housing Executive an evidence base should a challenge to the decision be made.

In order to assist with the application of the notional test staff should access the Benefit and Budget Calculator on Gateway. It is vitally important that **consent is given by the applicant** before this assessment is carried out. See LSAN HS WBU BB Calculator 01 21.

Should the applicant refuse consent staff should advise them that they can access the main website on;

<https://www.nihe.gov.uk/my-housing-executive/advice-for-housing-executive-tenants/making-your-money-work>

for self-assessment.

The calculator enables staff to calculate benefit entitlements, explain complex benefit changes, and provide customers and tenants with the advice they need to make decisions. The calculator has an integrated budgeting solution which will allow staff to quickly compare a customer or tenant's (potential or real) income with their expenditure and highlight areas in which savings can be made. Use of the calculator will be complementary to existing support mechanisms such as the full **Making Your Money Work Service** and referrals to **Financial Inclusion Officers**.

Regardless of the outcome of the homelessness decision, it is good practice to consider whether the applicant could benefit from debt counselling or other advice. Details of Northern Ireland advice agencies can be found at [HousingAdviceNI](https://www.housingadviceNI.org/) and relevant information can be passed on to the applicant.

3.5.11.6 Other **(Homeless Reason 08G)**

It is not possible to provide for every set of circumstances that may render an applicant's accommodation as being unreasonable for them to continue to occupy. Some circumstances may arise that are not set out in 3.5.10 – 3.5.10.6 and may need to be categorised as "other".

3.5.12 Fire, Flood, Other Emergency

(Homelessness Reason 09)

This category includes all emergencies consisting of physical damage or threat of physical damage to the dwelling, for example, gas explosion, earthquake, landslide etc.

In order to determine if the applicant is homeless, a visit to the dwelling may be appropriate. It may also be appropriate to request a report from, for example, the Fire Authority / Environmental Health Department, to confirm that accommodation has been rendered uninhabitable.

3.5.13 Mortgage Arrears

(Homelessness Reason 10)

An owner-occupier may be threatened with homelessness if he or she is about to lose their home due to mortgage arrears. The Designated Officer should take into consideration any mitigating circumstances that prevent the applicant making their repayments. Confirmation of the mortgage arrears and / or any court action should be sought from the applicant or other appropriate sources e.g. solicitor, mortgage lender, court service etc.

3.5.14 Release from Prison

(Homelessness Reason 11)

To establish if an applicant who is about to leave prison or who has just been released from prison is homeless, it will be necessary to make enquiries as to the availability of his or her last settled address and whether or not he or she can return to it. The Northern Ireland Prison Service and/or Housing Rights Service,

Housing Advice Development Worker, located in the relevant prison may be able to assist with enquiries about applicants leaving prison.

Designated Officers should have regard for the “Protocol for the management of the accommodation and related support needs of people in custody in Northern Ireland”. This protocol sets out the roles and responsibilities of the key statutory and voluntary agencies in the management of those leaving prison. **See Appendix 2a – A Protocol for the Management of the Accommodation and Related Support Needs of People in Custody in Northern Ireland.**

When an applicant leaves prison and is subject to Public Protection Arrangements Northern Ireland (PPANI), please refer in all cases to the guidance set out in Appendix 17 – Guidance for those subject to Public Protection Arrangements Northern Ireland (PPANI).

3.5.15 Persons in the Care of an Institution

(Homelessness Reason 12)

In the case of discharge from hospital, care home, or similar institution, it will be necessary to make enquiries as to the availability of an applicant’s last settled address and whether or not he or she can return to it. Information should also be sought from the appropriate hospital authorities; social services etc. and should include the date of discharge.

It is preferable that such information is sought and provided in writing.

3.5.16 Young Person Previously Cared for by the Trust

(Homelessness Reason 13)

16 and 17 year olds

The Housing Executive should accept and register all homelessness applications submitted by 16 and 17 year olds. When considering a homeless application submitted by a 16 / 17 year old, regard should be had to the Regional Good Practice Guide agreed by the Housing Executive and the Health and Social Services Trusts “Meeting the Accommodation and Support Needs of 16 – 21 year olds” **see Appendix 6 – Meeting the Accommodation and Support Needs of 16 – 21 Year Olds: Regional Good Practice Guidance Agreed by the Northern Ireland Housing Executive and the Health & Social Care Trusts.** This protocol document sets out the respective roles and responsibilities of the two lead agencies (i.e. the Housing Executive and the Trust) with statutory responsibility for vulnerable young people who are homeless or at risk of becoming homeless.

18 to 21 year olds

When a homeless application is received from a young person (18-21 year old) regard should be given to the possibility of this applicant being a former Looked After Child, appropriate enquiries must be undertaken with the relevant Trust to determine if the applicant is a Relevant or a Former Relevant child to whom the Trust continues to owe a duty.

Staff should refer to the Regional Good Practice Guide agreed by the Housing Executive and the Health and Social Services Trusts “Meeting the Accommodation and Support Needs of 16 – 21 year olds” at **Appendix 6 - Meeting the Accommodation and Support Needs of 16 – 21 Year Olds: Regional Good Practice**

Guidance Agreed by the Northern Ireland Housing Executive and the Health & Social Care Trusts

3.5.17 Loss of Private Rented Accommodation

(Homelessness Reason 14)

Homelessness Reason - 14A	Affordability,
Homelessness Reason - 14B	Property sale,
Homelessness Reason - 14C	Landlord dispute,
Homelessness Reason – 14D	Fitness/repairs or
Homelessness Reason – 14E	Other reason

The homelessness reasons set out above reflect those available on HMS when an applicant presents as homeless due to loss of private rented accommodation. Staff should choose the appropriate category when recording an applicant's reason for homelessness.

It is possible that the applicant has not yet lost their Private Rented accommodation; however, their landlord may have issued a notice to quit or may be pursuing court action in respect of homelessness reasons 14A-E above.

Where it is claimed that a notice to quit has been served or a possession order is being sought / obtained, it is appropriate to ask for a copy of the relevant court order or for written confirmation from the landlord / solicitor. In addition to written information received, verbal contact with the landlord is essential to discuss prevention possibilities and establish that an arrangement hasn't been entered into.

The Designated Officer must ensure that their enquiries are balanced and take into consideration the views of all parties.

Information sourced here may also assist with the assessment of other elements of the legislation such as intentionally.

3.5.18 Loss of Housing Executive Tenancy/Housing Association Tenancy (Homelessness Reason 15 or 18b)

Notice Seeking Possession (NSP) / Notice of Possession (NOP)

Notice Seeking Possession / Notice of Possession (Introductory Tenancy)

Where an eviction date is set the homelessness assessment should be undertaken as a matter of urgency.

The Designated Officer must ensure that their enquiries are balanced and take into consideration any mitigating circumstances of the applicant as is relevant.

Information sourced here may also assist with the assessment of other elements of the legislation such as eligibility and intentionally.

3.5.19 Other

(Homelessness Reason 16)

The Designated Officer must ensure that every effort is made to establish the last settled address for the purposes of determining why or how an applicant became homeless or threatened with homelessness. The use of this homelessness reason should only arise in exceptional circumstances, where no last settled address can be established.

Note: It is not possible to cover every set of circumstances that may render a person homeless or threatened with homelessness. It is the responsibility of the Designated Officer to apply the full rigour of the legislative criteria set out in this chapter and to reach a decision that is supported by facts, and which adheres to the principles of P.L.A.N (Proportionate, Legal, Auditable and Necessary)

3.5.20 No Accommodation in Northern Ireland or Elsewhere

(Homelessness Reason 17)

The Housing (NI) Order, 2003 expanded the assessment criteria to include accommodation that is available to an applicant in Northern Ireland but also in other geographical areas. When an applicant arrives in Northern Ireland from elsewhere with no established links to Northern Ireland and presents as homeless to the Housing Executive, the Designated Officer should consider what accommodation is available to the applicant to occupy not only in Northern Ireland but also elsewhere.

Checks should be made to determine if the applicant has accommodation anywhere which they have a legal right to occupy. Such checks should be initiated when considering the information on the Housing Solutions Form.

If the Housing Executive considers that there is accommodation available for the applicant outside of Northern Ireland, then that accommodation is subject to the same tests as accommodation in Northern Ireland. Checks may include making enquires with Housing Associations, landlords, building societies, local authorities, family members, Immigration Office, etc.

3.5.20.1 Processing “No Accommodation in NI” applications

Five additional sub categories have been added to the “No Accommodation in NI” category on HMS. Sub category 17A is specific to applicants who are exiting Mears accommodation once they have been granted their Asylum status. Sub categories 17B, C and D are specific to Ukrainian Nationals arriving in NI under one of the three Ukrainian schemes. These 3 sub categories are required to assist finance and homelessness in managing budgets and monitoring increased demand associated with the overall “No Accommodation in NI” reason. 17E should be used for all

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other presentations that do not fit in the Other “No Accommodation in NI” sub categories as explained below.

New Sub Categories

- **17A Section 95** – To be used for all those presentations from households previously supported by Mears via the Home Office asylum process.
- **17B Ukraine Visa Extension Scheme** - To be used for those Ukrainian citizens that have arrived under the Visa Extension Scheme and those that have arrived who are not currently under any scheme (As per existing LSAN on UDCs)
- **17C Homes for Ukraine** - To be used only for those Ukrainian citizens that have arrived under the Homes for Ukraine Scheme (As per existing LSAN on UDCs)
- **17D Ukraine Family Scheme** – To be used only for those Ukrainian citizens that have arrived under the Ukraine Family Scheme (As per existing LSAN on UDCs)
- **17E Other** – To be used for all other presentations within the No Accommodation in NI category but for which none of the above schemes apply.

Staff should ensure that the correct sub category is selected when processing homeless applications. With the implementation of the Sub Categories it is no longer necessary for staff to key any UDC attributed to Ukrainian Nationals who have presented as homeless as per LSAN 22/22 (A)

3.5.21 Hate Crime/Incident

Sectarian/ Racial/ Sexual Orientation/ Disability/ Gender Identity

(Homeless Reasons 19, 19A, 19B, 19C, 19D)

A hate crime is an incident against any person or property on the grounds of the victim’s ethnicity, sexual orientation, gender identity, religion, sectarianism or disability.

Consideration should **ONLY** be given to this homelessness reason if the incident has been logged as a hate crime by PSNI. Staff should be particularly aware that this reason should only be used where homelessness is a direct result of the incident. The Designated Officer should investigate the particular circumstances of the case and liaise with the relevant agencies / individuals in order to arrive at a decision. Written responses from the police will be a **required** source of information and the Housing Executive should seek a written report where appropriate see Appendix 1 – PSNI: Pro Forma.

Staff may also give consideration to this homeless reason if the incident has been logged under the Hate Incident Practical Action (HIPA) Scheme and it would not be reasonable to expect the applicant to remain in his or her home or return to the accommodation. Further information on the HIPA Scheme can be found [here](#).

Staff should ensure that the correct sub category is selected when processing homeless applications. If the Designated Officer is satisfied that an applicant is homeless / threatened with homelessness, they must proceed to assess whether the applicant is in priority need and/or intentionally tests.

3.5.22 Violence/Risk of Violence

(Homelessness Reason 20)

Where an applicant or a member of the applicant's household has been subjected to, or is at risk of violence in their accommodation, the Designated Officer should consider if it would be reasonable for them to continue to occupy their home.

Threats of violence, intimidating behaviour and other forms of abuse that may give rise to harm are also considered forms of violence. When undertaking enquiries Designated Officers must carefully consider if the continued occupation of the dwelling would, or could, lead to violence or a threat of violence. The fact that violence may not yet have occurred does not, on its own, mean that it is not likely to occur.

The Designated Officer should investigate the particular circumstances of the case and liaise with the relevant agencies / individuals in order to arrive at a decision. Written or verbal responses from the police will be the most likely source of information and the Housing Executive should seek a written report where appropriate see Appendix 1 – PSNI: Pro Forma.

In such cases it is for the Designated Officer to satisfy themselves as to whether the applicant is homeless or threatened with homelessness based on the information available to them.

Where the Designated Officer is satisfied there would be a risk of violence if the applicant continued to occupy his or her present accommodation, the Housing Executive must treat the applicant as homeless and should not expect him or her to remain or return to the accommodation. In all cases involving violence the safety of the applicant and his or her household should be the primary consideration at all stages of the decision-making process.

PLEASE NOTE THAT THIS REASON MUST NOT BE USED FOR DOMESTIC ABUSE OR SEXUAL ABUSE. (Please see 3.5.6 & 3.5.7 for more guidance).

Staff should ensure that the correct sub category is selected when processing homeless applications. If the Designated Officer is satisfied that an applicant is homeless / threatened with homelessness, they must proceed to assess whether the applicant is in priority need and/or intentionally tests.

3.6 In General

It is important for the Designated Officer to remember at this stage of the assessment, that consideration is being given to determining if the applicant is homeless / threatened with homelessness (even though information may be made available at the same time to assist with decisions in relation to eligibility, priority need, intentionality).

If the Designated Officer is satisfied that an applicant is homeless / threatened with homelessness, they must proceed to assess whether the applicant is in priority need and/or intentionally tests.

Landlord Services Advice Note – LSAN (FRA) No. 05/25a

Title:	Outline of Transitional Arrangements and actions required in preparation for the removal of Rule 23 from the Housing Selection Scheme	Should you have any queries with the information contained within this document please contact:
Department:	Fundamental Review of Allocations Implementation Project	FRAProject@nihe.gov.uk
Responsible Officer:	██████████ FRA Implementation Project Senior Project Manager	Quoting reference: LSAN FRA 05/25a

Background: The purpose of this Advice Note is to provide information and guidance for key frontline staff in relation to immediate actions required in preparation for the removal of HSS Rule 23 (Intimidation Points).

What is required: Staff should note the information and guidance and take immediate action as requested.

Who is responsible: NIHE Housing Solutions Team Leaders and Patch Team Leaders involved in the administration of HSS Rule 23, and Lettings Managers responsible for allocations to Intimidation cases and relevant Housing Association offices.

Please read the information contained within this advice note carefully and in full. Should you have any queries please discuss in the first instance with your line manager. Any additional queries should be directed to the inbox as detailed above.

LSAN Issued Date:	Issued 18.02.2025 / reissued 20.03.2025
Effective from Date:	18.02.2025
Approved By:	Caroline Connor

Linked Policy Documents:

[Chapter 3 HSSGM](#)

[Chapter 5 HSSGM](#)

Landlord Services Advice Note – LSAN (FRA) No. 05/25a

To: All NIHE Staff involved in the Administration of the Housing Selection Scheme and Homelessness Regional Managers, Area Managers, Assistant Area Managers, Team Leaders, Lettings Managers, Housing Advisors, Patch Managers, Landlord Services Trainers and all relevant Housing Association staff.

Plus Normal Distribution

Subject: Outline of Transitional Arrangements and Actions required in Preparation for the Removal of Rule 23 from the Housing Selection Scheme

1.0 Introduction

- 1.1 In advance of the removal of Rule 23 from the Housing Selection Scheme, a number of immediate actions are required. These actions should:
- ensure that where Applicants (including Transfer Applicants) have already been awarded points under Rule 23, that their cases are reviewed on a continuous basis to help facilitate them being rehoused or they refuse two reasonable offers of accommodation. [Please Note: some Applicants / Transfer Applicants may only have one reasonable offer remaining]
 - support the transitional arrangements which will be in place following the removal of Rule 23. These are explained in more detail below.
- 1.2 While Rule 23 and Intimidation Points will be removed from the Scheme with effect at midnight 31 March 2025 (subject to formal approvals of the changes to the Rules of the Housing Selection Scheme), there are planned arrangements which mean that Rule 23 and the associated policies and procedures will be saved in the sense they will still apply to certain cases. These arrangements are referred to as transitional arrangements. The arrangements apply to applicants where any of the following circumstances apply:
- a) Applicants awarded 200 points on or before 31st March 2025 under Rule 23 will retain these points until they are rehoused, or they refuse two reasonable offers of accommodation. [Please Note: some Applicants / Transfer Applicants may only have one reasonable offer remaining].
 - b) Where an Applicant or Transfer Applicant's circumstances are under consideration under Rule 23 **on or before 31st March 2025**, they shall be eligible for an award of 200 intimidation Points if, following investigation and verification, their circumstances meet the specific criteria under Rule 23. This includes:
 - Cases where the investigation remains ongoing after 31st March 2025; and
 - Cases with alleged intimidation on or before 31st March 2025 and are being dealt with under the Two Stage Complaints process.

- c) An Applicant / Transfer Applicant whose circumstances are being considered on or before 31st March 2025, where the case remains under investigation after 31st March 2025, and who are subsequently not awarded Intimidation points, will still be entitled to make a complaint regarding the decision to refuse Intimidation points under HSS Rule 23 and the associated policies and procedures. Where the outcome of such a complaint results in a decision that the criteria under Rule 23 are met, the Applicant / Transfer Applicant will be entitled to be awarded 200 Intimidation Points. **Note: Staff should contact the FRA Project Team where such a case arises.**
- d) The Emergency Grant will remain payable to eligible Tenants who meet the criteria following re-housing. The FRA Project Team are working with DfC on future changes to the relevant legislation and Emergency Grant Scheme. Staff will be notified of the outcome of this work and any changes in due course.

- 1.3 To support and facilitate these transitional arrangements, all relevant NIHE and Housing Association staff should immediately prioritise the key actions detailed below.

2.0 Immediate Action required for existing cases with Intimidation Points Awarded

- 2.1 All Area Managers / Housing Association equivalent Designated Offers will receive a spreadsheet ['Spreadsheet 1'] with a list of existing Intimidation cases in their area. These are cases already assessed and awarded Intimidation Points and are currently on the Waiting List awaiting an offer of accommodation. These cases are extracted from a download of the Waiting List taken on 1st February 2025. They should be reviewed in line with section 2.3 below and any actions required should be given immediate priority by the NIHE Team Leader / Housing Association responsible officer.

PLEASE NOTE: There may be no intimidation cases in your area. As such you will not receive Spreadsheet 1. Any cases which have been awarded Intimidation Points which were keyed after the download was taken on 1 February 2025 should be added to Spreadsheet 1 / notified to FRA Project Team.

- 2.2 The FRA Project Team are carrying out a desktop review of the cases currently awarded Intimidation Points on HMS. It is important that the Applicant's / Transfer Applicant's Areas of Choice are reviewed to help ensure that a reasonable offer can be made at the earliest opportunity.
- 2.3 NIHE Housing Solutions Team Leaders and Patch Team Leaders and relevant Housing Association staff should ensure that the following actions are undertaken as a matter of priority for each of these cases:
- Contact the Applicant / Transfer Applicant. Where an Applicant / Transfer Applicant cannot be easily contacted, reasonable steps should be taken to establish their whereabouts and to obtain a means of contact. Notes regarding attempts to contact

them should be recorded on HMS. If you cannot make contact, you should consider making a home visit.

- Once contact is made, officers should review and discuss the Applicant's / Transfer Applicant's Areas of Choice and housing prospects, ensuring any Estate level exceptions are reviewed and keyed in line with guidance. As always, these discussions should be noted on HMS; in particular the advice offered in regard to stock, turnover, and expansion of Areas of Choice to improve housing prospects. Staff should ensure the policy in relation to the application of exceptions is applied appropriately (please refer to 5.3.3 of Chapter 5 of HSSGM).

Please Note: Staff should ensure that these conversations are undertaken at least once a month with Applicants / Transfer Applicants who have been awarded Intimidation Points to help ensure that they are able to receive a reasonable offer as soon as possible.

- Any preferences should be treated as such (for example, preference for a bungalow / ground floor, or for a certain street). In making an offer, Lettings Managers should not regard preferences as being an essential need. Housing *need* should determine the reasonableness of the refusal of an offer.

Please Note: Lettings Managers / Housing Association Allocations Officers should, in all cases, ensure that they are following the guidance on allocations in HSSGM Chapter 5.7 **and** the guidance on the refusal of reasonable offers in HSSGM Chapter 5.8. Care should be taken to follow the guidance to help ensure that the Waiting List is effectively and properly managed.

- Multiple Offers should only be used for difficult to let stock, in line with Housing Selection Chapter 5.9 of the HSSGM. It is important to note that Multiple Offers should not normally be employed in areas of medium or high demand.
- Rule 61 restriction of choice related to Rule 23 will continue to apply to those on the Waiting List with Intimidation points. Careful consideration should always be given to whether it would be appropriate to apply Rule 61 i.e. where the Designated Officer, on reasonable grounds, decides that the Applicant or a member of their household may be at significant risk of attack in any wider areas chosen by the Applicant. (staff should refer to Chapter 5.5 of the HSSGM).
- Where it has been applied, the use of Rule 61 in the case should be reviewed in line with the guidance in Chapter 5 of the HSSGM, during normal case management.

2.4 ACTION: Each case on this Spreadsheet 1 must be reviewed, comments inserted, progress status completed and returned via email to the FRA Project Team inbox (FRAProject@nihe.gov.uk) by 2pm on Friday 28th February 2025. [Where relevant, this return should also include any cases which have been awarded Intimidation Points which were keyed after the download was taken on 1 February 2025].

3.0 Monitoring of cases being considered under Rule 23 or review under the complaints process

- 3.1 HSS Rule 23 remains in the Scheme up to and including 31st March 2025. NIHE staff should continue to investigate any existing or new cases of alleged Intimidation that may present on or before 31st March 2025, in line with current housing and homelessness guidance. Staff should also continue to use the existing homelessness codes on the housing solutions form and HMS when keying presenters and acceptances. Staff will be advised of any changes to homelessness codes and associated policies and procedures in a further email before 31st March 2025.

Please Note: Referrals to the PSNI and Base 2 in relation to the investigation of cases which fall under the saving provisions / transitional arrangements will continue as per current arrangements.

- 3.2 To facilitate the removal of Rule 23, and to ensure monitoring of the transitional arrangements as detailed in section 1.2 above, it is important that the FRA Project Team are notified of the following:
- The number and progress of cases currently received / open and being investigated under Rule 23 due to alleged Intimidation [code '03'] **and** all cases currently being investigated under homelessness due to a presentation because of violence / threat of violence (excluding Domestic Abuse).
 - Any cases that are currently being dealt with under the First Stage of the complaints process, following a decision not to award Intimidation Points.
- 3.3 Team Leaders should prioritise any cases under investigation for both alleged intimidation and those cases under a First Stage complaint following a decision not to award Intimidation Points.
- 3.4 All NIHE Housing Solutions Team Leaders and Patch Team Leaders will receive a spreadsheet template (Spreadsheet 2) to record the details and status of all relevant cases in their area which are currently being considered under Rule 23, or where a First Stage complaint has been received and / or is under consideration by their office (as outlined in section 3.2 above).
- 3.5 ACTION: Spreadsheet 2 must be completed and returned on a weekly basis. The first completed spreadsheet must be returned via email to the FRA Project Team inbox (FRAProject@nihe.gov.uk) by 2pm on Friday 28th February 2025. Thereafter, the updated template must be returned by 2pm every Friday. A NIL return should be submitted if you have no cases under investigation.**
- 3.6 NIHE Team Leaders should notify the FRA Project Team immediately of any spike or unusual trend in Homeless Presenters / alleged Intimidation cases in their area.

- 3.7 A separate Spreadsheet is being issued to the Housing Policy team to facilitate monitoring of ongoing Second Stage complaints, Pre- Action Protocol cases and Judicial Review cases which are challenging the decision not to award Intimidation Points.

4.0 Notifying applicants of negative decision

- 4.1 In all cases the Applicant / Transfer Applicant should be made aware of the decision not to award Intimidation points and the reasons why the award has been refused, in line with guidance. It will be important to include the date that the decision not to award the points was made, the reasons for that decision and the date when the applicant was informed and means of communicating that decision recorded on Spreadsheet 2 provided.

5.0 Next steps

- 5.1 Further advice notes will be circulated to staff prior to the removal of Rule 23 at the end of March 2025, with further information on:

- Changes to the Rules of the Housing Selection Scheme
- Changes to Housing and Homelessness guidance manuals, homelessness coding and forms.
- Changes to monitoring and reporting regarding cases with Intimidation Points or under investigation.
- Comms with customers and changes to NIHE website and leaflets
- Details of Staff Awareness sessions

6.0 Further Information

- 6.1 If you require any further information in relation to this LSAN please contact the FRA Project Team at FRAProject@nihe.gov.uk.

Approved by Caroline Connor
Assistant Director, Housing Services

PLEASE BRING THE CONTENTS OF THIS CIRCULAR TO THE ATTENTION OF ALL RELEVANT STAFF AFTER WHICH IT SHOULD BE PROPERLY INDEXED AND FILED