



Submission

Private Tenancies Bill Call for Evidence

October 2021

homelessconnect.org

Homeless Connect Submission on the Private Tenancies Bill

Introduction

1. Homeless Connect welcome the opportunity to make a submission to the Communities Committee on the Private Tenancies Bill. Homeless Connect (previously known as Council for the Homeless NI) has been working to prevent and alleviate homelessness in Northern Ireland since 1983. As a membership body, we represent organisations working with people experiencing homelessness or at risk of becoming homeless and provide direct support to service users through our projects.¹ In considering this piece of legislation, we have engaged with our members who have experience of working with households seeking properties in the Private Rental Sector (PRS).

2. We believe the Private Tenancies Bill is a positive step forward and will have a beneficial impact for those at risk of or experiencing homelessness. This is because some of its measures would, if implemented, reduce barriers to those at risk of or experiencing homelessness from accessing the PRS. As Committee members scrutinise this Bill, Homeless Connect would urge the Committee to consider how the clauses impact on access to the PRS for those at risk of or experiencing homelessness. As the Committee is well aware, this society is currently facing a homelessness crisis. Measures which improve the ability of this vulnerable group of people to access good-quality, affordable and sustainable housing in the PRS will be warmly welcomed.

3. It would have been preferable if the Bill had gone further in several regards. However, it is appreciated that the Department only had limited time to bring forward proposals in this mandate and that this Bill is viewed as only the first step in a two-step programme of legislative reform in this area.² Half a loaf is indeed better than no loaf at all and there may be opportunities during passage of this Bill for further measures to be considered. **It should be a major priority of the Department for Communities to bring forward the second piece of legislation as soon as possible in the next Assembly mandate.** This response will briefly consider some of the measures we believe need to be introduced in this second piece of legislation.

4. In this submission, we will only comment on four clauses in the Bill: clauses 4, 7, 11 and 13. This is not to imply that Homeless Connect opposes any of the other clauses or views them as unimportant. However, it is our view that other organisations are better placed to comment on other clauses in the Bill and that clauses 4, 7, 11 and 13 are of particular significance regarding households at risk of or experiencing homelessness.

Clause 4

5. Clause 4 places a maximum limit on a tenancy deposit. The maximum amount allowed will be one month's rent. It includes a penalty for requiring a deposit above this level. At the current time, no limit exists on the size of tenancy deposits for most tenancies in Northern Ireland. **Clause 4 is a welcome move for households at risk of or experiencing homelessness as it will remove a potential barrier for some households to accessing a tenancy in the Private Rented Sector.** The Republic of Ireland

recently introduced a similar measure through section 7 of the Residential Tenancies (No. 2) Act 2021. This measure states the following: “A person shall not be required, for the purpose of securing a tenancy, to make any payment other than—... (b) a deposit of an amount no greater than that payable under the tenancy agreement as rent in respect of a period of one month.”³ This provision came in to force for tenancies created after August 9. According to the guidance published with the legislation, a person who seeks a deposit greater than one month’s rent can face the “sanction of a caution, and/or a fine of up to €15,000 and up to €15,000 costs against the landlord.”⁴

6. We are not aware of how widespread a practice it is to require deposits beyond one month’s rent, but it is evident some landlords do charge deposits of this size and that that this can and does serve as a barrier to accessing a tenancy for households with little income. It is important for Committee members to be aware of the amount of money which can be involved here. The average monthly rent on a rental property in Northern Ireland in Q3 of 2021 stood at £691 per month according to PropertyPal.⁵ Rental costs vary across Northern Ireland from a low of £499 in Fermanagh and Omagh to a high of £769 per month in Belfast.⁶ If a landlord sought a tenancy deposit of even two times the monthly rent this would lead to tenants needing £1382 for an average rental property before they could access the tenancy. In Belfast, for the average property, this would rise to £1538. This is without considering the possibility of a requirement to provide rent in advance in addition to a deposit or the possibility of illegal letting fees being levied by letting agents (this issue is considered in paragraph 26 below). **For households on low incomes these figures would prove to be a major hurdle to accessing a tenancy. Virtually all households experiencing homelessness could not afford these upfront costs.** Even affording one month’s rent in deposit can be a real challenge for many in this situation. Consequently, in Homeless Connect’s view this measure will assist with affordability for some in this situation and therefore this is a welcome and much-needed legislative change.

7. We would also point out that the legislative provision currently in place in the Republic of Ireland also restricts advance payments of rent to one month’s rent. The legislative provision in question states the following: “19B.(1) A person shall not be required, for the purpose of securing a tenancy, to make any payment other than— (a) an advance payment of rent, which shall be no greater than the amount of rent payable under the tenancy agreement in respect of a period of one month.”⁷ In our estimation, this is a wise provision as it ensures that landlords are not able to circumvent the restriction on the size of a deposit through seeking additional rent in advance.

Recommendation: We submit that the Committee should consider seeking a similar provision to the restriction introduced in the Republic of Ireland to restrict advance payments to a maximum of one month’s rent.

Clause 7

8. Clause 7 introduces a restriction on the frequency of rent increases in private tenancies. This clause prevents a landlord in most circumstances from increasing the rent within the first year of a tenancy. If an increase occurs after the first year, no further increase is possible in the following year. On the face of it, this is a well-intentioned proposal to help households sustain tenancies. With rents in Northern Ireland rising fast, greater certainty around when rent increases can be levied would be welcome. According to PropertyPal the average rent in Northern Ireland has grown by 5.6% since the same quarter in 2020.⁸ **Significant rises in rent can make PRS properties unaffordable for those on low incomes**

especially if they are unexpected. Such rent rises unfortunately can lead to homelessness in some cases. The policy intention behind this proposal is one we support. However, it is important careful consideration is given to this proposal to ensure the proposal as it stands would have the intended outcome.

9. It is important the Committee is cognisant that there is evidence from Scotland that introducing this clause may prove counter-productive in terms of protecting tenants from rent rises. This seems counter-intuitive, but evidence from Scotland on a similar provision has illustrated that the introduction of a similar clause led some landlords to increase the level of rent more frequently than they had before the new legislation was introduced. Research conducted by Indigo House with IBP Strategy and Research found the following:

“The PRT [the equivalent Scottish legislation] limits the increase of rent for tenants to once a year, with the policy intention of this measure being to prevent landlords from increasing the rent more frequently than that. It is notable that none of the landlords interviewed saw this as a negative impact of the new tenancy, and only one mentioned it at all, explaining that it legitimised a once a year increase, and subsequently put one tenant’s rent up by 2% where they said they would not have done so previously. The interviewee commented that it: ‘Felt like permission was given...thanks a lot for the pay increase!’ and ‘...This seems like an unintended mistake on the Government’s part... they didn’t do their research.’ This qualitative evidence, corroborated by interviews with wider stakeholders suggests that the annual limits on rent setting might have had the perverse effect of actually increasing rents more regularly than the previous common practice of increases only on change of tenancy, or when there had been some investment in the property.”⁹

10. The outcome reported here is not one we would like to see replicated in this jurisdiction. However, it is also the case that a real issue does exist here which needs to be addressed. One alternative option would be to introduce amendments to replace this clause with a new clause introducing an enabling power for the Department to introduce a restriction on the number of rent increases allowed. This would give the Department the power to introduce a restriction on rent rises but would not mandate them to do so as the Bill currently requires. This would allow the Department to explore how best to avoid the outcome reported in Scotland. Such a clause could incorporate a requirement to consult with representatives of tenants and landlords before any new restrictions were introduced. Another option would be for the Committee to consider whether additional safeguards could be introduced to the clause as it stands to avoid the negative potential outcome reported here. It should be borne in mind that the Republic of Ireland has a similar legislative restriction to Scotland in law. We are not aware of evidence from that jurisdiction of the same effect being reported. **We would invite the Committee to carefully scrutinise this clause considering the evidence from Scotland.**

11. If this clause is introduced as it stands or if an enabling clause was introduced, it is important to flag one potential issue in the clause as it stands. Clause 7(2)5C(3) gives the Department a regulatory power to “specify circumstances” in secondary legislation where a landlord can increase the rent in the same year. Clause 7(2)(5C)(4) states that “circumstances specified under paragraph (3) may include, in particular, circumstances in which the dwelling-house let under the tenancy is renovated, refurbished, altered or extended.” **We would highlight to the committee that there is a possibility of abuse here if the terms utilised are not carefully defined.** For example, clarity is needed from the Department over

what constitutes a “renovation, refurbishment, alteration or extension.” Would the installation of a fire alarm or a carbon monoxide detector constitute an “alteration” allowing for an additional rent increase? It is unlikely that this is what the Department intends, but this illustrates the importance of getting the secondary legislation right. It is worth noting that in the Republic of Ireland, the comparable statute outlines that a rent rise can only occur if “a substantial change in the nature of the accommodation provided under the tenancy occurs.”¹⁰

12. If this clause is to prove effective, the Department needs to ensure there are not major loopholes which unscrupulous landlords can exploit or which could lead to costly litigation. We accept that it is highly likely the Department will be aware of this potential issue, but during the Committee stage we would submit members should seek clarification on this point. Committee Members may wish to press officials on the inclusion of language similar to that utilised in the Republic of Ireland to minimise the risk of this provision being abused.

Recommendations: Committee members should consider the evidence from Scotland on the potential counter-productive impact of introducing this clause as it stands. Members may wish to consider whether to convert this clause in to an enabling clause to allow for further consideration, or to introduce additional potential safeguards to avoid the outcome reported.

Committee members should press Departmental Officials on the definition of what constitutes a “renovation, refurbishment, alteration or extension” for the purposes of Clause 7(2).

Committee members should consider whether an amendment to Clause 7(2) is necessary to ensure the changes made to the property are of a “substantial” nature in line with the legislation in place in the Republic of Ireland.

Clause 11

13. Clause 11 focuses on Notices to Quit (NTQ) for firstly landlords and then tenants. Clause 11(3) will introduce a standard form that an NTQ must take for landlords. This is a positive development and will be beneficial to tenants.

14. Clause 11 introduces a new minimum period for an NTQ issued by a landlord for a tenancy longer than 12 months but shorter than ten years of eight weeks. The legislation gives the Department a power to increase this length of time to up to six months. We welcome these proposals. However, **we believe the Assembly should give strong consideration to going further than what is currently proposed in the Bill.** We note that tenancies which last for less than one year will still have an NTQ period of four weeks. There is a risk of a cliff edge negatively impacting on certain tenants as landlords may seek to end a tenancy before the twelve-month period to avoid having to allow for an eight-week NTQ period. Committee members should also bear in mind that under this legislation as introduced rent increases can only happen once a year. In practice, four weeks is a truly short time period for a household to identify accommodation once they receive an NTQ from a landlord. This can create real stress and anxiety for tenants. Even an eight-week NTQ period is in practice a short time to leave a property and identify a new place to live.

15. It is worth noting that PropertyPal in early October reported that they are seeing an average of 78 enquiries for PRS properties advertised on their site. This is almost four times higher than the previous three-year average.¹¹ Especially in this context, tenants need more time to consider their options if they receive an NTQ. Additionally, throughout the coronavirus pandemic, the Department rightly increased the duration of the NTQ period up to twelve weeks for all tenancies. While this was a measure taken due to the unique set of circumstances arising from the pandemic, it provided crucial protection for renters without to our knowledge causing major difficulties in the PRS. We commended the Minister for taking this step and extending this provision to next May.¹²

16. Consequently, **we submit that the NTQ period should be twelve weeks for all tenancies.** While we acknowledge that it is a principle of tenancy law to differentiate between tenancies up to a year in length and those which last longer. If the Committee believes it is important for this principle to be maintained, we would submit Committee members should still seek to increase the NTQ period for tenancies less than one year in duration beyond four weeks.

17. We note that this Bill creates a differentiation between the NTQ required on the part of tenants as compared to the NTQ required on the part of landlords. Tenants are only required to give an NTQ of four weeks duration as opposed to the longer periods proscribed for landlords. In our estimation, this is a justifiable move on the part of the Department. For tenants given an NTQ, there is a risk of homelessness if they are unable to find suitable alternative accommodation. The potential consequences for a tenant are far greater than for a landlord who is unable to find a new tenant.

18. The power granted to the Department under this Bill to increase the NTQ period up to six months is welcome. At a recent Housing Rights event, representatives of Renter's Voice powerfully outlined why a six-month NTQ period would be desirable for renters.¹³ We do note, however, that unlike the change outlined in clause 7, there is no requirement on the face of the Bill to consult with tenant or landlord representatives before the Department can introduce this change. While it is likely the Department would seek to consult before introducing a change in the NTQ period, the Committee may find it appropriate to insert a requirement for the Department to consult relevant parties before making further changes. This would be to ensure the Department had heard from relevant stakeholders before making a decision in this regard.

19. We note that even with an extended NTQ period of up to eight weeks for a tenancy between 12 months to 10 years, the Housing Executive can only legally provide assistance to a person at risk of homelessness twenty-eight days before they are due to become homeless. We believe this creates an illogical situation. **We submit that consideration should be given as to whether it would be in scope within this Bill to move an amendment to Article 3(6) of the Housing Order (NI) to extend the time limit from 28 days to 56 days.** This would line up with the NTQ limit and the length of time councils are given in Great Britain to support households at risk of homelessness (albeit it is acknowledged that they have different legislative frameworks.) It may prove to be the case that such an amendment would not be in scope in this Bill, but in our view it is important that the Committee fully explore this question.

20. We welcome the following comments of the Minister for Communities during the second stage debate regarding homelessness: *"[Members] raised the homelessness point. I recently asked officials to review the existing legislation to ensure that it is fit for purpose, and they will come back to me before the end of this mandate with proposals or recommendations on what we need to do. We are looking at that*

*urgently.*¹⁴ In our estimation, **the time has come for a fundamental review of homelessness legislation in this jurisdiction.** This Bill is not the place to seek fulsome reform of homelessness legislation, but the crisis this society is facing on housing and homelessness has starkly shown the flaws in the current legislative framework in this area.

Recommendations: We submit that the NTQ period provided by landlords to tenants should be twelve weeks in length for all private tenancies. If the Committee determines the NTQ period for tenancies shorter than one year should be shorter than for tenancies of a longer duration, we would recommend the period is longer than the four weeks currently proposed in the Bill.

The Committee should consider amendments to clause 11 to ensure the Department for Communities consults with representatives of tenants and landlords before extending the NTQ period.

The Committee should explore whether an amendment to Article 3(6) of the Housing Order (NI) would be in scope to extend the period of time in which the Housing Executive is empowered to help households at risk of homelessness.

Clause 13

21. The current commencement provision set out in clause 13 gives a wide discretion to the Department as to when they commence the clauses. The order making powers come in to force the day after royal assent, but the Department have complete discretion as to when they have to implement the clauses. The other provisions in the Act only come in to force on “such day or days” as the Department may by order appoint. In general, for understandable reasons, Departments prefer to have a wide discretion on commencing clauses. However, **it is submitted that there are convincing arguments for the Department to commence clauses within a particular timeframe.**

22. Two particular arguments should be borne in mind. Firstly, there is a risk (albeit a remote one) that a future Minister may not commence certain clauses at all. There is a precedent for this in this jurisdiction with section 1 of the Housing (Amendment) Act (NI) 2011 which the Department never commenced.¹⁵ It is doubtful that when the Assembly passed this provision into law that this was the intention. Secondly, without a set time limit the Department could take many years before it implements much needed changes which would benefit households at risk of or experiencing homelessness. At this point in time, it is impossible to know who will hold the role of Minister for Communities beyond the end of this Assembly mandate and what their priorities will be. As this legislation is only likely to pass towards the very end of this mandate, there is no guarantee that the current Minister will be able to commence clauses before a new Communities Minister comes into post. This could of course be the current incumbent, but within our system of government there is no guarantee that this will be the case. Any issues in relation to this could be resolved by amendments requiring the Department to implement the clauses by a particular date(s). Determining the precise dates would require input from relevant departmental officials and the Minister concerned. We note that at a recent Housing Rights event entitled 'Where to next for security of tenure in Northern Ireland's private rented sector?', officials indicated that the Department are considering amendments to the commencement dates for this Bill.¹⁶ **Homeless Connect would ask Committee members to press officials for the specific details on proposed commencement dates.**

23. A final comment which is pertinent to the entirety of this Bill relates to how the Department will seek to ensure that both landlords and tenants are aware of the new legislation. Anecdotally, Homeless Connect would be aware that many renters are not aware of what their rights are as tenants which can leave them vulnerable to exploitation by unscrupulous landlords. If this Bill becomes law, it will only prove effective if tenants know about the additional protections which the legislation provides so they can uphold their rights. Simply passing legislation is not enough in and of itself. **The Department needs to commit resources to ensure potential and current tenants are aware of their rights. We understand that this is not straightforward, but the Committee should press officials on how they will raise awareness of the new provisions if they become law.**

Recommendations: The Committee should seek amendments to ensure the Department commences clauses by a specific date(s). The views of the Department on realistic timescales for commencement should be sought.

The Committee should press the Department on what specific measures they will take to ensure potential and current tenants are aware of their legal rights following the passage of this legislation.

Measures not included in the Bill

24. It is pertinent to briefly note some of the measures which are not incorporated in this Bill which we believe need to be either considered during legislative scrutiny on this Bill or introduced in the second stage of legislative reform in this area to ensure access for those at risk of or experiencing homelessness to the PRS.

Fitness Standard

25. It is widely acknowledged in the housing and homelessness sector and beyond that the current fitness standard in operation in Northern Ireland is no longer fit for purpose. Dating back to 1992, the current standard no longer ensures properties in the PRS are up to the requisite standard. Unfortunately, the quality of some properties in the PRS can be a factor impacting on tenancy sustainment. This is especially the case regarding issues such as poor-quality insulation and heating which can contribute to fuel poverty. The Department for Communities is well aware that this is the case and it is disappointing that action has not been taken to update the standard to this point (although admittedly the three lost years without a Minister did not help matters in this regard). **Committee members should press the Department to give a timeline in which it will complete its review of the fitness standard during scrutiny on this Bill.** Other jurisdictions such as Scotland,¹⁷ England and Wales¹⁸ have implemented reforms and Northern Ireland needs action on this as well.

Regulation of letting agents

26. The regulatory framework for letting agents and letting agent fees in this society is no longer fit for purpose. The current framework has unfortunately negatively impacted on access to the PRS. Unfortunately, despite ministerial statements and court rulings, tenants in this jurisdiction are still on occasion charged illegal letting fees.¹⁹ **It is past time for the Assembly to provide full legal clarity alongside enforcement measures against letting agents engaging in these practices.** Wales²⁰ and

Scotland²¹ have both implemented reforms in this area and this jurisdiction needs to learn from what has happened in those jurisdictions and implement reforms.

Assisting Access to the PRS

27. The Private Tenancies Bill does introduce important measures which may in some regards help in making the PRS more accessible for those on low incomes. This is especially the case with the restriction on the size of deposits and the frequency of rent increases. However, **it is still the case that for many, significant barriers to accessing the PRS remain**. This is especially the case for those at risk of or experiencing homelessness. While it remains the case that social housing will be the primary means of alleviating homelessness, for some households experiencing or at risk of homelessness the PRS may be a possible solution. However, for this to be possible, measures need to be taken to help households in this position with upfront costs. Even with the restrictions on deposits proposed, this can prove a major hurdle for households with little income. We acknowledge that this is an issue the Department is actively considering and that statutory agencies and civil society could introduce measures which could make a difference in this regard without legislation. However, **Homeless Connect would contend that Committee members should consider in this Bill and in the second step of the proposed legislative reform process whether legislative provisions could be introduced to create schemes and initiatives which would assist households to access the PRS**. A range of approaches including tenancy deposit schemes; access to affordable credit such as interest free loans to cover upfront costs; and bond schemes have been adopted in other parts of these islands which the Department should consider further.

Landlord Registration

28. It is of concern that the Landlord Registration scheme in this jurisdiction currently does not require the property in question to be of a certain fitness standard. The scheme also does not require landlords to have received certain forms of training or accreditation. Wales and Scotland have both implemented reforms in these areas and Northern Ireland needs to consider lessons from those jurisdictions and introduce reforms. This would help to improve the quality of properties in the PRS and ensure landlords know their responsibilities. If the Department does decide to transfer the landlord registration function to local councils, it needs to ensure the councils have the capacity and ability to uphold the requirements outlined in legislation. We acknowledge that the Department is considering this issue alongside the fitness standard. **Homeless Connect would urge the Department to review both issues in a speedy fashion so that the second stage of legislation can be introduced early in the next mandate.**

Recommendations: The Committee should ask the Department for a timeline in which they will complete the review of the fitness standard.

The Committee should explore whether this Bill can serve as a legislative vehicle to provide full legal clarity around illegal letting fees. If this Bill cannot be used to provide this clarity, we would invite members to press the Department to ensure they take action in the second step of the legislative process.

The Committee should explore legislative options which would fall within the scope of this Bill to introduce schemes and initiatives to help households to access the PRS.

The Committee should press the Department to review the Landlord Registration scheme to see how it can be utilised to improve standards in the PRS.

Conclusion

29. The Private Tenancies Bill is a welcome piece of legislation and supplies an opportunity to improve conditions for tenants in the PRS. While Homeless Connect would have preferred more extensive legislation rather than the piecemeal two-step approach adopted, it is conceded that the Department faced considerable challenges in this regard due to the brief period of time since the restoration of the devolved institutions in January 2020. However, it is crucial the Department begin preparations for the introduction of the second piece of legislation as soon as possible in the next mandate. It is evident to the housing and homelessness sector that wider reform of the legislation in this area is urgently needed.

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References

¹ 'Homeless Connect' is the working name of 'Council for the Homeless (Northern Ireland)', registered charity in Northern Ireland (charity number 103325)

² [Official Report](#), Deirdre Hargey MLA- "Once the Bill has completed its passage through the Assembly, a further Bill will be considered covering areas such as the regulation of letting agents and grounds for eviction" 13 September 2021, 55.

³ Section 7, Residential Tenancies (No. 2) Act 2021 <https://data.oireachtas.ie/ie/oireachtas/act/2021/17/eng/enacted/a1721.pdf>

⁴ Government of Ireland, "Residential Tenancies (No.2) Act 2021: What this Means for Landlords and Tenants" 16 July 2021, [https://www.rtb.ie/images/uploads/Comms%20and%20Research/Residential_Tenancies_\(No.2\)_Act_2021_\(16th_July_version\).pdf](https://www.rtb.ie/images/uploads/Comms%20and%20Research/Residential_Tenancies_(No.2)_Act_2021_(16th_July_version).pdf) 6

⁵ PropertyPal.com, "Housing Market Trends: Q3 2021", https://insights.propertypal.com/?_wpdmlo=164#, October 7, 2021, 2.

⁶ PropertyPal.com, "Housing Market", 13.

⁷ Section 7, Residential Tenancies (No. 2) Act 2021 <https://data.oireachtas.ie/ie/oireachtas/act/2021/17/eng/enacted/a1721.pdf>

⁸ PropertyPal.com, "Housing Market", 10.

⁹ Anna Evans, Mandy Littlewood, Eddy Graham, Regina Serpa, Briega Nugent, Emma Dore and Douglas Robertson, "RentBetter Wave 1 Baseline Report", August 2020, <https://rentbetter.indigohousegroup.com/wp-content/uploads/sites/3/2020/11/Wave-1-Baseline-Report-published.pdf> 34.

¹⁰ Section 20(3) Residential Tenancies Act 2004, <https://www.irishstatutebook.ie/eli/2004/act/27/section/20/enacted/en/html#sec20>

¹¹ "Number of properties on NI housing market down by almost a half from pre-pandemic levels" *Irish News*, 8 October, 2021, <https://www.irishnews.com/business/2021/10/08/news/number-of-properties-on-ni-housing-market-down-by-almost-a-half-from-pre-pandemic-levels-2471987/>

¹² Nathaniel Barker, "NI government extends longer eviction notice periods until May 2022", Inside Housing, 31 August 2021, <https://www.insidehousing.co.uk/news/ni-government-extends-longer-eviction-notice-periods-until-may-2022-72358>

¹³ Housing Rights Seminar, "Where to next for security of tenure in Northern Ireland's private rented sector?" 29 September 2021.

¹⁴ [Official Report](#), Deirdre Hargey MLA 13 September 2021, 67.

¹⁵ Section 1 Housing (Amendment) Act (Northern Ireland) 2011 <https://www.legislation.gov.uk/nia/2011/22/section/1>

¹⁶ Housing Rights Seminar, “Where to next for security of tenure in Northern Ireland's private rented sector?” 29 September 2021.

¹⁷ See mygov.scot, “Tolerable Standard” accessed 1 October 2021, <https://www.mygov.scot/landlord-repairs/tolerable-standard> and Scottish Government, “The Repairing Standard”, accessed 1 October 2021, <https://www.gov.scot/publications/repairing-standard/>

¹⁸ See gov.uk, “Housing health and safety rating system (HHSRS): guidance for landlords and property-related professionals,” accessed 1 October 2021, <https://www.gov.uk/government/publications/housing-health-and-safety-rating-system-guidance-for-landlords-and-property-related-professionals>

¹⁹ See Housing Rights, “Letting Fees in Northern Ireland”, December 2020, accessed 1 October 2021, <https://www.housingrights.org.uk/sites/default/files/policydocs/HousingRights-briefing-letting-fees.pdf>. Note in particular this comment on p3 paragraph 4: “Housing Rights is regularly contacted by tenants who have been charged unlawful letting fees. Since December 2017, Housing Rights has been contacted 250 times about letting fees.”

²⁰ See Welsh Government, “Landlord and Agent Licensing”, accessed 1 October 2021, <https://www.rentsmart.gov.wales/en/licensing/>

²¹ See Scottish Government, “Letting agent code of practice”, accessed 1 October 2021, <https://www.gov.scot/publications/letting-agent-code-practice/>



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