



Submission

Expanding access to
naloxone:
Supply and Emergency
Use Consultation

March 2026

homelessconnect.org

Expanding access to naloxone: Supply and Emergency Use Consultation

Introduction

Homeless Connect has been working to prevent and alleviate homelessness in Northern Ireland since 1983. As an umbrella body, we represent over forty organisations working in the independent homelessness sector. We also support people with lived experience of homelessness to have their voices heard. We provide services that directly benefit people and communities, helping to sustain tenancies and diverting surplus nutritious food to charities and other not for profit groups.

Homeless Connect warmly welcomes the proposals included in this consultation. We know that in Northern Ireland provision of naloxone saves lives. In 2024/5, naloxone was administered 197 times.¹ There are people who are alive today solely because of the provision of this medication. We know from our member organisations the difference having access to naloxone can have.

It is our view, in line with the proposals set out in the consultation, that the proposals set out will safely and responsibly expand access to naloxone in this society.

Consultation

About you

In what capacity are you responding to this survey?

- On behalf of an organisation

Questions for individuals sharing their personal or professional views

Where do you live in the UK?

- Northern Ireland

Questions for people responding on behalf of an organisation

What is the name of your organisation?

Homeless Connect.

Which is the best description of the type of organisation that you represent?

- Charity

Where does your organisation operate or provide services? Select all that apply.

- Northern Ireland

Expanding the route 1 list of services and professionals

We are proposing to add 3 types of services into the route 1 list of professionals and services who can supply naloxone for future use without needing a prescription. They are:

- hostels for people experiencing homelessness
- day centres for people experiencing homelessness
- outreach services for people experiencing homelessness

This is with the intention of expanding access to naloxone for people at risk of opioid overdose.

To what extent do you agree or disagree with the proposal to enable hostels for people experiencing homelessness to supply naloxone without a prescription through route 1?

- Strongly agree

To what extent do you agree or disagree with the proposal to enable day centres for people experiencing homelessness to supply naloxone without a prescription through route 1?

- Strongly agree

To what extent do you agree or disagree with the proposal to enable outreach services for people experiencing homelessness to supply naloxone without a prescription through route 1?

- Strongly agree

We are proposing to bring requirements for pharmacists supplying take-home naloxone in line with other route 1 suppliers by amending regulation 253 of the HMRs so that pharmacists are not required to make a record of such a supply.

To what extent do you agree or disagree with the proposal?

- Strongly agree

Clearly enabling organisations whose employees are at risk of opioid contamination to procure and stock naloxone for emergency use

We are proposing to amend the legislation to clarify the definition of drug treatment services.

This is to end the uncertainty about whether certain organisations are able to procure naloxone for emergency use if they have concerns about opioid contamination or accidental exposure in a workplace. These organisations may include government enforcement authorities, such as Border Force and the National Crime Agency and private bodies performing public functions, such as lab testing facilities.

This is essentially a technical change that is not expected to have a direct impact on members of the public who are not performing specialist activities.

To what extent do you agree or disagree with this proposal?

- Strongly agree

Aside from government enforcement authorities and lab testing facilities, do you know of any other organisations whose employees are at risk of opioid contamination who may benefit from procuring naloxone for emergency use?

- No

Creating a new route of supply

We are proposing to amend the legislation to enable organisations and services to supply naloxone for public emergency use using the delivery model of a locked box.

To what extent do you agree or disagree with the proposal to enable the supply of naloxone through a publicly accessible emergency locked box, which can be accessed in the event of an opioid overdose?

- Strongly agree

To what extent do you agree or disagree that enabling the supply of naloxone through a publicly accessible emergency locked box model would be a helpful tool in increasing public awareness of naloxone?

- Agree

If a publicly accessible emergency locked box model was introduced, we propose the box would be supplied and operated as part of:

- the NHS
- another service that is funded wholly or partly by the appropriate national authorities or a local authority
- arrangements with the appropriate national authorities or local authority (that already have well established governance and training requirements)

To what extent do you agree or disagree that (if introduced) the publicly accessible emergency locked boxes should be supplied and operated by organisations that provide an NHS or other publicly funded service?

- Agree

To what extent do you agree or disagree that (if introduced) the supply of naloxone in a publicly accessible emergency locked box should include both nasal and injectable naloxone products?

- Agree

If you have any further comments on these proposals, please include them here. (Optional, maximum 250 words)

Homeless Connect support these proposals and believe there is a reputable evidence base behind their adoption.² To our knowledge, such an intervention has not been trialled in Northern Ireland. We would recommend consideration is given to the “six key lessons” learned from the experience in Michigan in considering how this should be done.³

Comments on the full legislation

The consultation document provides a summary of the proposals in the draft legislation. We have also included the draft statutory instrument to enable respondents to see the full detail. We welcome further thoughts on the finer detail of this legislation.

If you have any further comments on the detail of the draft legislation, please include them here. (Optional, maximum 500 words)

In terms of the full legislation, we would outline our view that the language of “homeless people” should be avoided where possible. As an organisation, we believe that homelessness is something that people experience. It is not something which is definitive of their

identity. The regulations adopt a mixed approach in this regard. On the one hand, the language of “daycentre for homeless people”, “hostel for homeless people” and “outreach service for homeless people” is utilised. However, in the content of the definitions being introduced, the term “people experiencing homelessness or rough sleeping” is utilised regarding these services.

It may be that there will be a technical or procedural reason why the language of “homeless people” is being maintained. If that is the case, we hope that the four administrations would seek to find an appropriate legislative vehicle to amend the language being used in legislation.

In terms of the definitions outlined of daycentres, hostels and outreach services for people experiencing homelessness, we recognise the complexities around defining these institutions in law. We would like to understand what, if any, impact the adoption these definitions in these regulations would have on other areas of homelessness provision. It is pertinent to consider each in turn.

To our knowledge, the terms “daycentre for homeless people” and “outreach service for homeless people” are not defined in the Northern Ireland statute book. The term “hostel” is defined in the Housing Benefit Regulations (Northern Ireland) 2006 and the terminology used in the proposed regulation reflects the definition used there.⁴ However, to our knowledge the term “hostel for homeless people” is not one which can be found in the law in Northern Ireland.

Can we ask what consultation, if any, has been conducted with (a) the Department for Communities (b) the Northern Ireland Housing Executive on these legal definitions? It may be that this has occurred and if so that would be reassuring to the homelessness sector. The important point is to ensure that there are no unintended consequences arising from the adoption of these regulations.

Do you think the proposals risk impacting people differently, or could impact adversely on any of the protected characteristics covered by the public sector equality duty set out in section 149 of the Equality Act 2010 or by section 75 of the Northern Ireland Act 1998?

- Don't know

Please explain your answer. (Optional, maximum 250 words)

In Northern Ireland, any new or revised policies must be ‘rural proofed’ in line with the Rural Needs Act (NI) 2016. The Department of Health (Northern Ireland) has assessed this and does not consider that these policy proposals will affect people differently if they live in rural areas in Northern Ireland.

Do you agree or disagree with this assessment?

- Don't know

For further information contact Mark Baillie, Head of Policy and Programmes
mark.baillie@homelessconnect.org 028 90246440

References

¹ Public Health Agency, “Annual Report on the Take Home Naloxone Programme: 1 April 2024 – 31 March 2025,” 17 November 2025, <https://www.publichealth.hscni.net/sites/default/files/2025-11/Take%20Home%20Naloxone%20Annual%20Report%201%20April%2024%20to%2031%20Mar%2025.pdf> 9

² Pamela S. Lynch, Lou Gamalski, Virginia Roys, Autumn Albers, Katie Burk, Sara Durán & Shelley N. Facente, “Use of low-threshold naloxone boxes for opioid overdose prevention in a Midwestern US State: a public health program evaluation,” *Harm Reduction Journal*, 22, no. 185 2025

³ Lynch et al, “Low-Threshold Naloxone Boxes” 7.

⁴ Housing Benefit (General) Regulations (Northern Ireland) 2006 SR 2006 No. 405
<https://www.legislation.gov.uk/nisr/2006/405/regulation/2/made>



Homeless Connect

Units 2-4 | Building 14 | Central Park
Mallusk Road | BT36 4FS

homelessconnect.org