



Fundamental Review of Allocations: implementation and impact

24 November 2025

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DFC's FRA proposals (all already implemented unless marked 'pending')

1. An independent, tenure-neutral housing advice service
2. An applicant who has been involved in unacceptable behaviour should not be eligible for social housing or Full Duty homelessness status unless there is reason to believe – at the time the application is considered – that the unacceptable behaviour is likely to cease **(pending)**
3. NIHE may treat a person as ineligible for Full Duty homelessness status on the basis of their unacceptable behaviour at any time before allocating that person a social home if the NIHE sees 'no reason to believe that conduct will improve' **(pending)**
4. NIHE can meet their duty to homeless applicants on a tenure-neutral basis, provided that the accommodation meets certain conditions **(pending)**

Application stage:

5. Unlimited areas of choice for all waiting list applicants
6. Greater use of mutual exchange service

Assessment stage:

7. Removal of (previously 200) intimidation points from the Housing Selection Scheme
8. Removal of 'no detriment' principle protecting past points for FDA applicants; points 'should reflect current circumstances for all applicants' **(pending)**
9. Removal of interim accommodation points (eg 20 points for applicants in temporary accommodation for six months) from the Housing Selection Scheme **(pending)**

Allocation stage:

10. Applicants should be placed into bands 'based on similar levels of need to meet long standing housing need more effectively' **(pending)**
11. The Selection Scheme should always align the number of bedrooms a household is assessed to need with the size criteria for tenants receiving Housing Benefit
12. For 'difficult-to-let' properties social landlords should be able to make multiple offers to as many applicants as they think necessary
13. For difficult-to-let properties social landlords should be able to use choice-based letting
14. For difficult-to-let properties social landlords should be able to go directly to multiple offers (if they have evidence that a property will be difficult to let)
15. Reduce the number of offers an applicant is due from three to two (if two are refused people are removed from the waiting list for a year)
16. Social landlords may withdraw an offer of accommodation in specified circumstances (eg breach of offer terms; material error by landlord etc)
17. Social landlords may withhold consent for a policy succession or assignment to a general needs social home in limited circumstances where there is evidence an applicant needs it
18. Social landlords may withhold consent for a policy succession or assignment of adapted accommodation or purpose built wheelchair standard accommodation where there is evidence an applicant needs it
19. Updating the Housing Selection Scheme to bring it in line with developments in Public Protection Arrangements Northern Ireland **(pending)**
20. Specialised properties may be allocated by a separate process outside the Housing Selection Scheme **(pending)**

1/ Overview

The DFC's Housing Selection Scheme changes: where do they come from & what is their impact?

The **Housing Selection Scheme (HSS)** is a policy that governs how the social housing system assesses need and allocates homes. It was introduced in 2000 and remained basically the same for more than 20 years.

The lead-up to the review of the Housing Selection Scheme

A look back at the process leading up to and including today's implementation of the recommendations from the DFC's 2017 'Fundamental Review of Allocations' [consultation document](#) – which touch on far more than just allocations-- reveals multiple layers. The first HSS Preliminary Consultation Paper was issued in March 2011 (PPR obtained a copy by Freedom of Information as it is no longer available online). The housing [strategy](#) ("Facing the Future") for 2012-17 proposed a range of changes to the housing system as a whole and referred to the review of the social housing allocations system.

The then-Department for Social Development commissioned foundational academic research in 2012-2013; its 18 proposals – to which many of the 20 recommendations of the DFC's eventual FRA consultation of 2017 can be traced-- are described in more detail below.

However some of the most controversial changes being implemented today did not figure in that academic research, instead dating back to earlier, largely forgotten consultations, the original proposals and outcome reports of which are no longer part of the public record online. To give one example, the abovementioned 2011 Housing Selection Scheme Preliminary Consultation (to which NIACRO's [response](#) is still publicly available online) explicitly asked consultees their views on the **possible removal of intimidation points** from the HSS and the **changes to Primary Social Needs points** that would entail. The consultation document noted

any decision to remove Intimidation Points would require further analysis of those PSN factors 1-4 (appendix 2) to determine if they continue to recognise the range of circumstances in which a person is forced to leave their home because of violence or serious risk of violence or lose their home because of an unforeseen disaster e.g. fire / flood (p. 10)

The proposal to remove intimidation points received a mixed reaction, according to the DSD's report of consultation responses (received by Freedom of Information), and it was not taken forward at that time. The mixed response continued when the DFC again proposed removing intimidation points during the 2017 Fundamental Review of Allocations consultation. In 2020 the then-Communities Minister Deirdre Hargey (SF) announced that the proposal would not be advanced, and that intimidation points would remain but be reformed. Yet in January 2025 her successor, Gordon Lyons (DUP), pivoted, and four months later implemented the recommendation to remove them altogether – despite no review of Primary Social Need factors having been undertaken, or at least issued publicly. As of this writing the PSN points

element of the Housing Selection Scheme remains unchanged, despite the removal of intimidation points.

In other areas, we see the reverse: positive proposals in the initial 2011 consultation that were – unfortunately – dropped rather than carried forward. These include increased recognition in the points system of the toll taken on residents of **unsuitable accommodation**. The HSS currently awards 10 points in certain cases where a tenant's mobility needs make accessing or moving around their allocated home problematic but does not address the fitness or condition of the property itself. The question asked in the 2011 Housing Selection Scheme Preliminary Consultation Paper was

do you agree that a range of circumstances relating to unsuitable accommodation should be given greater recognition through the Housing Selection Scheme, thereby reducing the need to seek redress through homelessness legislation? (p. 16)

The August 2011 report on consultation responses said that

there was overwhelming support for this proposal with a number of respondents suggesting that if the objective is to ensure that alternative remedies other than seeking redress through homelessness legislation are available, then a comparable amount of points, e.g. 70 points should be awarded under the Housing Selection Scheme. (p. 5)

The issue of unsuitable accommodation-- and the failure of the Housing Selection Scheme to fully address it -- remains very live today, as [analysis](#) of the housing complaints from PPR-sponsored housing clinics in 2024 and 2025 attests.

The 2013 academic research underpinning some of the Fundamental Review of Allocations

The Department for Social Development commissioned academic research from Ulster University and the University of Cambridge in 2012-13 to inform its review of the HSS; researchers' [final report](#) was issued in 2013. According to the report, at that time the waiting list was just shy of 42,000 households. Today the list has grown by a fifth, while the number of social homes allocated per year has halved (from 12,000 in January 2013 to just over 6,000 in March 2025 (2025 Housing Executive figures obtained by Freedom of Information request).

(Incidentally, this belated drying up of allocations was predicted by housing experts looking ahead to the outworkings of the '[right to buy](#)' scheme, which has seen [over 124,000](#) social homes across Northern Ireland sold to tenants while building of new ones has stalled.)

The Ulster / Cambridge research produced recommendations which [concerned](#) PPR at the time:

PPR's assessment of the current proposals has shown that there will be clear and significant impact on groups protected by section 75; many of whom are already suffering significant inequality.

In particular, the UU recommendations include a range of measures intended to ensure tenants for 'hard to let' social homes – even, expressly, when the applicants willing and able to live in those areas demonstrably had less need (and fewer points) than many others. PPR expressed concern at the potential diluting of the housing system's obligation to assess and allocate social housing strictly on the basis of objective need; these were not taken on board.

In 2017, the (newly renamed) Department for Communities opened consultation on its FRA proposals. They did not necessarily follow on from the UU / Cambridge [recommendations](#); some content had not been recommended by the academics, but came from earlier consultations as described above.

At the same time, a welcome UU / Cambridge recommendation, which could have alleviated some of the concerns around the rest, was among those that went disregarded by the DFC in the Fundamental Review of Allocations document it produced for consultation. The 2013 academic [research](#) findings had included a detailed proposal for the establishment of a **Strategic Independent Allocations Scrutiny Panel** (pp. 69-74). Its key drivers were to ensure that the scheme was “sustainable, fair, equitable, robust, consistent, customer driven, transparent, complaint, efficient and value for money”. While such an independent oversight panel would be highly welcome by many applicants and the civil society groups working with them — and might serve to mitigate some of their concerns about the outworkings of the HSS and changes to it-- this recommendation for independent oversight disappeared from the DFC proposals taken forward in 2017.

(Additional elements of the 2013 Ulster/Cambridge research had aimed at fostering greater agency amongst tenants and prospective tenants. While this was not an aim of the 2017 consultation, in an earlier reform in 2015 the DSD had [consulted](#) on a social housing tenant participation strategy, asking questions such as “Do you agree that the Department should introduce legislation to support the introduction of tenant empowerment rights?” The resulting Tenant Participation Strategy for the social housing sector ran from 2015 to 2020 but was later “[formally paused](#)” for lack of resources. In April 2025 the Housing Policy Panel of social housing tenants addressing the NI Assembly's Committee for Communities [called](#) for the tenant participation strategy to be reinstated.)

DFC's 2017 Fundamental Review of Allocations consultation

As will be shown in more depth below, what the DFC proposed in 2017 was a range of measures aimed not at making the system more protective of and responsive towards tenants, but at making it easier to manage. While the 2013 academic research produced concrete proposals retaining both **universal access** to social housing and **the needs-based approach** to its allocation, the DFC's 2017 [consultation document](#) had dropped both recommendations. Universal access became a principle, qualified by eligibility criteria that the DFC recommended tightening; the needs-based approach was qualified (“those in greatest housing need receive priority, with recognition of their time in need”; more on this below) and became one of five “key outcomes” alongside four others, more administrative in character:

- greater range of solutions to meet housing need;
- improved system for the most vulnerable applicants;
- a more accurate waiting list that reflects current housing circumstances; and
- better use of public resources by ensuring the list moves smoothly (p. 7)

Similarly, many of the DFC's concrete recommendations in 2017 were aimed, not at making the system more responsive towards tenants with the greatest need, but at making it easier to administer: for instance, enlarging the powers of social landlords to withdraw offers and of the Housing Executive to suspend applicants from the waiting list, and reducing the number of 'reasonable offers' due to applicants from three to two.

PPR's criticised the DFC's 2017 package for its

focus on reducing the appearance of housing need, rather than resolving the housing crisis through building social homes and allocating these in line with objective need ([Chasing Homes, Not Points](#): a critique of the Fundamental Review of Social Housing Allocations, Nov 2017, p. 3).

A look at the Department's 2017 equality screening exercise and full EQIA (2020) is indicative of this prioritisation of ease of administration of the scheme over meeting objective need. The 2017 screening [found](#) that "all Section 75 groups are expected to benefit from the proposals" but identified some limited potential adverse impacts. The full EQIA, published in October 2020, examined these further but did not propose substantive changes. In several instances, proposed changes that clearly constricted individual applicants' choices (for instance proposal 15, for a reduction to two 'reasonable offers') or expanded landlords' powers over them (such as proposal 16 allowing offers to be withdrawn in certain circumstances) were found to have no adverse impacts and require no mitigations in part on the grounds that they would "ensure the list moves more smoothly" ([DFC 2020 EQIA](#), p. 24) – a consideration of interest to DFC policy makers perhaps, but of no weight with impacted Section 75 groups.

Implementation of FRA proposals to date

Most of the specific concerns raised by PPR in 2017 – detailed more fully below-- were not taken on board; in fact the DFC's December 2020 [Outcomes Report](#) left 18 of the initial 20 recommendations unchanged. Only the proposals to remove intimidation points and interim accommodation points were dropped.

The sitting Communities Minister, Carol ni Chuilin (SF), [addressed](#) the NI Assembly with an update on the FRA and other housing issues in November 2020, alongside commitments to reintroduce ringfencing of funds to prioritise areas of high social housing need; identify surplus public land to build more social housing; and consult on the future of the Housing Executive's right-to-buy scheme. In the private sector, she proposed investigating regulation of letting agents, the introduction of grounds for eviction and improved fitness standards.

After the SF Communities Minister Hargey was replaced by a DUP one, Gordon Lyons, in 2024, these substantive housing commitments were dropped; and the Fundamental Review recommendations around removal of both intimidation points and interim accommodation points were reinstated. The roll-out of some FRA proposals had already begun in January 2023, and further ones were implemented in September 2024 and April 2025. The remaining changes will be implemented, according to housing authorities, by autumn 2026.

PPR's 2024 and 2025 [housing clinics](#) with affected families have already seen the fall-out from some of the most impactful changes to date, including a tightening of succession rules and removal of intimidation points – with nothing developed to properly replace them-- for families put out of their homes. And the process is far from over, with steps to 'fulfil' the housing duty towards homeless households by placements into private rentals, and others equally concerning, still pending.

As in 2013, PPR's bedrock concern is that the FRA 'reform' diminishes rather than strengthens the housing system's commitment to meeting objective need. Restrictions on applicants' or tenants' agency, and increases to that of landlords, are justified on administrative grounds. The people who feel the impact of the changes most are those already suffering the impact of inequality. PPR remains deeply concerned that the FRA changes ultimately serve the interests of the administrators of the Housing Selection Scheme rather than the people trying – and in too many cases failing – to access a home through it.

2/ The substance of the reforms

2.1 'Throughout the process' proposals

The DFC identifies four proposals as having impacts 'throughout the process'. One of these changes – a tenure neutral advice service – has been practiced for years. Three others are awaiting implementation.

Recommendation 1: Tenure neutral advice service

The 2013 UU research recommended a full 'Housing Options' service integrated with other services. By 2017, as noted in the DFC [consultation on proposals](#), this was already underway: "the NIHE has recently adopted a Housing Solutions and Support approach" (p 15) including provision of private sector rental advice, though they did not take on board the full model proposed in 2013.

PPR's 2017 response to the consultation expressed concerns. First and foremost, it said, "while advice can help people navigate a complex allocation system, it does not result in the building of houses" ([Chasing Homes](#) p. 6). Also, taken in conjunction with proposal 4, to discharge the FDA duty into private rental sector, the proposed changes "promote unregulated private rented housing", which PPR judged

problematic given the lack of security of tenure and rent control together with poor property conditions and management standards often encountered in this largely unregulated sector (10).

DFC's 2020 [consultation outcomes report](#) acknowledged that the shortage of available social housing stock had forced the adoption of a tenure neutral approach:

an advice service will be most effective where the stock is available to follow through on the advice provided. However, there is currently a lack of social homes to meet demand. The Department is committed to increasing the stock of social homes; which often represents the best option for many people who approach the Housing Solutions Service. Given the current supply situation whereby need outstrips the available supply of social homes, it is vital that an advice service explores alternative solutions to prevent someone reaching the point of homelessness: this may include providing advice and support to help those who can stay in their homes to retain their home, whether that be in the private or social sector. p. 20

It goes without saying that the shortage of available social housing stock is itself in large part the product of another DSD/DFC policy, the House Sales Scheme – otherwise known as the 'right to buy' scheme, which has seen [over 124,000](#) social homes sold across the north. The scheme for sale of housing association properties ended in 2022, however the Housing Executive scheme is still running and the current Communities Minister Gordon Lyons (DUP) has repeatedly said that he has no plans to change that (see for instance his response to AQW [16024/22-27](#)).

Recommendations 2 and 3: potential for exclusion from social housing and FDA status in the event of anti-social behaviour

A 2009 Department for Social Development consultation on the Housing Bill (Northern Ireland), a copy of which was obtained by Freedom of Information as it was unavailable online, included questions around this topic. Its 2010 outcomes report noted that

while there was widespread support for those community safety proposals which underpin existing housing management practice, there was a mixed response to the proposals which had the potential to weaken security of tenure or strengthen existing sanctions (p. 2).

For its part, the 2013 academic research paper's second proposal was "retain **universal access** to social housing", and the third was "retain a **needs-based approach** to allocation of social housing". As described above, by the time of the 2017 DFC [consultation paper](#) the needs-based approach was no longer a concrete proposal but qualified ("those in greatest housing need receive priority, with recognition of their time in need") and relegated to one of five "key outcomes", the other four of which were largely administrative in character.

For its part, the 2013 recommendation to retain universal access to social housing was gone by 2017; in the DFC [consultation paper](#) universal access was described as a "principle" qualified by "eligibility criteria" around age, "connection to Northern Ireland" and, lastly, "not have engaged in unacceptable behaviour serious enough to make him/ her unsuitable to be a tenant of social housing" (p. 27). The text further stated that the DFC wanted "changes in law" to clarify the caveat around unacceptable behaviour, adding "proposals 2 and 3 deal with these changes".

PPR's concern in 2017 was that this approach was punitive, particularly when taken alongside a number of other proposed measures. PPR's consultation [response](#) stated bluntly, "PPR is concerned that these proposals will leave vulnerable people with less access to social housing" (para. 11).

The DFC's 2020 consultation [outcomes report](#) gives a nod to such concerns, but prioritises efficiency:

the Department acknowledges the serious impact that exclusion from an allocation of a social home or from Full Duty homelessness status has on both applicants and their wider household. However the objective is to strike a better balance between excluding people from the waiting list and prioritising vulnerable groups... The proposed changes will enable a more efficient allocations system with greater tenancy sustainment, providing tools to aid decision-making around eligibility in the light of serious anti-social behaviour (p. 26)

The substance of these two proposals was the subject of joint DFC and DOJ consultation on responses to anti-social behaviour from 2024. [PPR's March 2024 response](#) to that consultation highlighted the too-often unmet needs of victims:

while the fundamental review outcomes described above increase the powers of NIHE staff with regard to anti-social behaviour, as stated above too many tenants' testimony indicates that they feel insufficiently protected from such behaviour, and that too often they are left to deal with it on their own. They question NIHE's actual commitment and responsiveness to countering what feels to them like racially-motivated threat, intimidation and violence.

PPR's later (February 2025) [response](#) to the [draft EQIA](#) on the proposals called for an urgent review of its findings due to flaws in the data choice and analysis underpinning the finding that no mitigations based on religious beliefs or background were necessary.

In November 2025 media [reports](#) indicated that the DFC would propose a legislative bill to give the Housing Executive "strengthened powers to deem an applicant ineligible for social housing or Full Duty Applicant (homelessness) status due to unacceptable behaviour", including "legislative changes regarding injunctions against unacceptable behaviour and possession powers for social landlords".

Recommendation 4: tenure-neutral discharge of duty to homeless people, "provided that the accommodation meets certain conditions"

One of the most concerning of the as-yet unimplemented plans is for the Housing Executive to discharge its duty to homeless families, not with a stable tenancy in a social home but in the impermanent and (still – despite DFC claims) largely unregulated private sector. PPR's [housing clinics](#) in 2024 and 2025 saw multiple requests for help from people seeking support and redress for private rental evictions, disputes or conditions ranging from the unsuitable to the frankly uninhabitable. Yet the DFC and Housing Executive assert that the duty to some of our society's most at-risk people can safely be met by a tenancy in this sector if as-yet-unspecified conditions are met.

Homelessness and vulnerability

An important October 2025 [report](#) by Simon Community NI into homelessness and childhood adversity found that homelessness here is at a record high and that it is currently suffered by an astonishing one in every 31 people (p. 5). It commented:

this report paints a clear picture: people living in homeless hostels in Northern Ireland have faced **significantly higher levels of trauma and disadvantage** [emphasis added] throughout their lives compared to the wider population. For many, homelessness is not rare or short-lived. It begins with childhood adversity and returns again and again in adulthood, marked by rough sleeping, repeated exclusions and long periods without stability. (p. 4)

Simon Community analysis of data on Adverse Childhood Experiences in Northern Ireland found that while in the general Northern Ireland population fewer than 18% of people report four or more ACEs, this is true of 66% of hostel residents -- an indication of "the strong link between childhood trauma and later homelessness" (p. 22). A closer look at conflict-related

ACEs revealed, for instance, that 36.8% of participants reported that someone close to them was killed or beaten up; 32.6% reported being beaten up by police, soldiers or paramilitaries as a child. Over a quarter had experienced deliberate destruction of their home while 30.5% reported being forced to live in another place (p. 26).

The Simon Community report called for meaningful action and resourcing to prevent homelessness, alongside a statutory duty for prevention across all public agencies supporting people at risk of homelessness (p. 31). Putting formerly homeless people into the under-regulated private rented sector and calling this 'duty discharged' flies in the face of the urgent call for prevention of further homelessness.

This FRA proposal 4 was not a product of the initial UU / Cambridge research in 2013, but rather as based on a much earlier consultation, according to the DFC's 2017 [consultation document](#):

this proposal was welcomed in a 2010 consultation provided the Department regulated the private rented sector better. There have been many improvements in regulation since 2010. (p. 16)

PPR submitted a Freedom of Information request to the DFC for this earlier consultation and received in return a 2009 consultation document ("The Housing Bill (Northern Ireland)") that sought reactions to a proposal to meet the statutory duty to homeless people via the private sector. The document argued that

while the Housing Executive normally seeks to meet this duty by offering a secure tenancy in the social rented sector, this may not always be the most effective way to meet an individual's housing needs or the most efficient use of resources (p. 18)

It proposed amending Housing (NI) Order 1988 to

place certain safeguards on the use of the Housing Executive's existing powers and make it clear that homeless applicants should only be placed in the private rented sector where the accommodation is suitable for their needs and the tenancy will last for at least 12 months (p. 19)

The 'intended benefits' section of the consultation paper stated, "the proposal would facilitate a more flexible response to dealing with homelessness and meeting housing need".

The motivation for and benefits of this proposal appeared to be centred on the functionality of the housing system rather than on considerations of the impact on homeless applicants. This proposal and language reappeared in the DFC's 2017 Fundamental Review of Allocations consultation.

The 2010 report on the consultation (obtained via Freedom of Information) noted

some [stakeholders] suggested the proposal to make greater use of the private rented sector to house homeless households should be put on hold until more work was done to improve regulation of the private rented sector (p. 2).

The 2010 report (p. 8) said that the Department acknowledged that regulation of the private rented sector needed to be strengthened in advance of any changes to the status quo regarding discharge of the homelessness duty. It states further,

the Department acknowledges the need to consider both safeguards and suitability [of accommodation]. These factors will play an important role in any future work on this issue (p. 7)

The section's conclusion adds,

the Department will consider including the provision of statutory safeguards for homeless people, in circumstances where the Housing Executive decides to discharge its homelessness duty by securing accommodation in the private rented sector, in future legislation (p. 9)

It is not clear whether the current Department for Communities envisages such legislation as well; if so its 2017 [consultation paper](#) does not mention it.

Recommendation 4 and the weakness of the fitness standard

The DFC's 2017 claim of improvements in private sector regulation, quoted above, bears closer scrutiny, particularly as regards fitness. Numerous participants in PPR supported [housing clinics](#) in 2024 and 2025 reported unhealthy and damaging **living conditions** ranging from unsafe fixtures to insufficient heating to recurring damp and mould, vermin infestation or maintenance and repair needs in their privately rented homes, alongside in many cases, unresponsive landlords.

Northern Ireland still lacks any effective mechanism for monitoring, not to mention enforcement, of the [Decent Homes Standard](#) brought in in 2004, and tenants suffering from breaches of any the standard's four criteria-- statutory fitness (as per Housing (NI) Order 1981), repair, modern facilities / services and thermal comfort-- feel acutely the absence of an effective and accessible mechanism for seeking redress.

From 27 October 2025, [Awaab's Law](#) (named for a two-year-old who died after prolonged exposure to mould and damp in his home) will mandate strict legal timeframes for social and ([eventually](#)) private landlords in England and Wales to respond to this and other hazards as defined by the Housing Health and Safety Rating System. At the same time in NI, the Housing Executive confirmed to PPR that the last publicly accessible [House Condition Survey](#) (which measures a set of randomly-selected dwellings of all tenures against the Decent Homes Standard) was in 2016, as the results of a 2023 survey have yet to be published. Meanwhile [media](#) and [political party scrutiny](#) of the impact of damp and mould in people's homes, and landlords' responses, continues to grow.

A closer look at the private rental sector

The [Private Tenancies \(NI\) Order 2006 \(Article 33\)](#) provided for a fitness inspection and certificate for private rentals in most properties built before 1945. The system is imperfect, to

say the least: a 2010 report (obtained by Freedom of Information) on the Department of Social Development's Building Solid Foundations strategy for the private rented sector said,

while the percentage of unfit properties in the private rented sector continues to drop it could be argued that it is so because the current statutory standard is too low. Responses to the consultation paper agreed that the current standard is no longer a comprehensive measure of the suitability of a dwelling for occupation... To ensure that people have access to a decent home the majority of those who responded to the consultation paper agreed that the current fitness standard should be raised (p. 14)

It continued,

the Department will take appropriate action to raise the fitness standard for the private rented sector using the current Decent Homes standard as the starting point. If Decent Homes had been the statutory fitness standard in 2006 approximately 26% of all private rented sector stock would not have met this compared to 2.6% which did not meet the fitness standard (p. 14)

A November 2015 [consultation](#) by the Department of Social Development, 'Review of the Role and Regulation of the Private Rented Sector', also said that it was planning to tighten the minimum fitness standard (p. 23). The text gave the contrasting example of Scotland, where the minimum fitness standard had been augmented by a further Repairing Standard for the private rented sector:

the Scottish Repairing Standard extends the provisions of the statutory minimum tolerable standard and requires a landlord to undertake a pre-tenancy check of the property and make good on any necessary works. There is also a role for the Private Rented Housing Panel to require a private landlord to adhere to the standard. This can protect the landlord in safeguarding their property and to the tenant in ensuring that the home they rent is fit for habitation and purpose. (p. 24)

if, after a landlord has been notified of any problem, it is not attended to satisfactorily or if there is disagreement about whether or not there is a problem, then tenants have the right to refer the matter to the Private Rented Housing Panel (PRHP). The PRHP has power to require a landlord to carry out work necessary to meet the standard. (pp. 65-66))

(The functions of the Private Rented Housing Panel have since been [transferred](#) to the First-tier Tribunal for Scotland (Housing and Property Chamber). NI does not have a body with these powers and accessibility.)

The fitness standard, its enforcement, and the mechanisms for dispute resolution were all looked at more closely in the DFC's 2017 Private Rented Sector in Northern Ireland- Proposals for Change [consultation document](#) - a separate exercise to the Fundamental Review of Allocations. There the DFC said (p. 44) it was conducting a separate review of the housing fitness standard (a discussion paper presenting options for changes to the housing fitness

standard had been open for consultation for several months in 2016; PPR have requested this by FOI as it appeared to be unavailable online.

In the NI system the Department holds the landlord registration scheme, under which landlords are required to register every three years. However, “council environmental health officers have direct responsibility for the fitness enforcement process in respect of the private rented dwellings” (p. 44). The DFC proposed was to shift landlord registration responsibilities to councils as well:

It is important to note that the Department will be undertaking a review of the fitness standard and that the proposal to transfer landlord registration to councils will, in the slightly longer term, drive improvements in the PRS fitness levels. (p. 16)

However neither proposal has been implemented thus far.

Similarly, with regard to accountability and resolution of disputes, the DFC proposed to “examine the financial case for establishing an **independent housing panel** for Northern Ireland” (9) The status of this proposal is unclear.

Meanwhile, other of the 2017 Private Rented Sector Proposals for Change have been given higher priority and progressed via the [Private Tenancies Act \(NI\) 2022](#) and the [Private Tenancies Regulations \(NI\) 2022](#). These include changes to notice to quit (PPR’s input to that consultation is [here](#)), limitations on frequency of rent increases and measures like obligatory smoke and carbon monoxide detectors. Other issues remain unaddressed.

PPR’s response to recommendation 4

PPR’s 2017 FRA [consultation response](#) highlighted the precarious situation of private tenants in terms of security of tenure, rent control and lack of regulation of either property conditions or management standards (10). The DFC’s 2020 consultation [Outcomes Report](#) acknowledges the issues raised, but commits to ploughing ahead anyway:

The importance of security of tenure, affordability and housing standards was emphasised as crucial for social housing applicants. Some respondents also noted concerns around existing regulation of the private rented sector and raised questions around the suitability of the sector for applicants looking to avail of social housing (p. 28) ... [however] This proposal will proceed as per the consultation. The Department recognises that social housing is the preferred option for most applicants, especially the most vulnerable, however the private rented sector may be an appropriate choice for some. This is in the context of improvements in the regulation of the private rented sector (p. 32)

The Department’s EQIA, published in October 2020, was equally unconcerned, [finding](#) no adverse impacts to recommendation 4 at all:

This should ensure that the Housing Executive has a greater range of ways to meet its duty to homeless applicants and that it can provide more options for those applicants

to meet their housing needs. This should be an addition to current provision, and therefore beneficial for all. (p. 16)

Today, as stated above, PPR remains deeply concerned that the DFC overstates the 'improvements in regulation of the private rented sector' alluded to in its Outcomes Report. PPR [housing clinics](#) in 2024 and 2025 saw repeated reports of people

- living with serious **mould and damp** and a range of other **fitness issues** affecting their physical and mental health
- being evicted because their landlord no longer wanted to rent the property out. Private tenants are extremely vulnerable to such moves, particularly as current Communities Minister Lyons has repeatedly refused to move towards introducing a ban on **no fault evictions** here (see inter alia response to [AQW 27095/22-27](#)). (No fault evictions will however be [banned](#) in England from May 2026).
- being forced out of their homes following unaffordable **rent increases**, notwithstanding the enactment of Private Tenancies Act (NI) 2022 [limiting](#) rent rises to once every twelve months. (According to the Office for National Statistics, average NI rents [increased](#) by 7.1%, to £865, in the 12 months to July 2025.)

Coping with these issues takes a serious toll on tenants-- even for those with strong support networks and resources around them. Discharging people who have undergone at times lengthy periods of homelessness into the private sector, with only a vague proviso that 'the accommodation meets certain conditions', leaves a door wide open for further harm. In this regard the DFC [consultation outcomes report](#) promised,

protecting the most vulnerable people will be a priority and further work on this proposal will ensure that the appropriate safeguards are in place.... It is important that the complexities of such a proposal are fully understood and that the feedback from the consultation regarding conditions for discharge are carefully considered. Prior to proceeding with this proposal, the Housing Executive will undertake an **initial scoping exercise** to consider the practicalities associated ... and the safeguards which may be required. (p. 32)

Five years on, the result of the 'scoping exercise' have not been made public to PPR's knowledge. PPR has requested it under Freedom of Information legislation.

In the meantime, concerns about the lack of protection for private renters were the subject of a February 2025 NI Assembly [debate](#) in which MLAs passed the following motion:

that this Assembly expresses concern at the unaffordable rents, lack of long-term security and inadequate protections for tenants in Northern Ireland's private rented sector; recognises that many private renters face a constant struggle to keep a roof over their heads, afford daily essentials or access the basic repairs necessary to make their homes habitable and safe; and calls on the Minister for Communities to deliver a new deal for private renters, including a considered system of third-generation rent controls, a ban on no-fault evictions, legislation to make open-ended tenancies the norm for private tenants, creation of a statutory housing ombudsman, measures to

boost the supply of affordable rental properties, a review of minimum fitness standards and enforcement in the private rented sector, legislation to extend the threatened with homelessness window and the introduction of a grant to provide meaningful support to help renters facing a shortfall between local housing allowance and market rent.

The DFC do not appear to have taken any of the recommended actions. The Department reportedly plans to have implemented the shift towards placing vulnerable homeless households into the private sector by autumn 2026.

2.2 Application and assessment stage recommendations

Recommendations 5 (areas of choice) and 6 (mutual exchange service)

With regard to applications, the DFC recommendation 5 presented in the 2017 consultation was to allow applicants an unlimited number of areas of choice; it was implemented in early 2023. The UU / Cambridge proposal around provisions facilitating greater exchange between tenants was taken forward by the DFC as recommendation 6 and has also already been implemented.

A range of proposals addressed the assessment stage. The most impactful one – around removal of intimidation points – merits a closer look.

Recommendation 7: removal of intimidation points

Intimidation points were not part of the 2013 UU / Cambridge recommendations underpinning most of the Fundamental Review of Allocations; the FRA proposal to remove them followed on from a 2011 Preliminary Consultation no longer available online, which PPR obtained by Freedom of Information.

Those documents show that even in 2011, housing authorities sought consultees' views on whether, if intimidation points were to be removed from the Housing Selection Scheme, Primary Social Needs points would need reviewed, "to determine if they continue to recognise the range of circumstances in which a person is forced to leave... or lose their home" (p. 10). The Summary of Responses to Preliminary Consultation issued in August 2011 stated that

the overwhelming majority of respondents believed that if the award of 200 points were to be removed, current Primary Social Needs (PSN) factors may not give adequate recognition to the range of circumstances associated with cases of intimidation, including circumstances of domestic violence, and situations where applicants are unable to return to their homes. It was suggested that a range of points or award of multiple primary social needs factors, may be needed (pp. 4-5)

Communities Minister Gordon Lyons (DUP) announced the two measures – removal of intimidation points and review of PSN points-- simultaneously in January 2025; to date, over seven months since the removal of intimidation points went into effect, no result of a PSN review has been made public and the Housing Selection Scheme text around PSN points apparently remains unamended.

When it emerged in the Fundamental Review of Allocations [consultation paper](#) back in 2017, PPR was critical of the DFC proposal. PPR's [response](#) expressed concern that the package "will leave vulnerable people with less access to social housing" (para. 11). PPR referred to "NIHE's

well-documented reticence in awarding points in [intimidation] cases where the threshold is met” (para. 5) and addressed the proposal to remove them:

the DFC’s justification for the proposed abolition of intimidation points (Proposal 7) rests on their assessment that the “number of households awarded intimidation points is *relatively small*” despite the fact that data shows that they numbers are “small” due to NIHE’s inaction, problematic implementation of the allocation scheme, and poor enforcement mechanisms. Moreover, PPR finds the rationale that the points should be scrapped because it is unfair to domestic violence victims bizarre as these proposals do nothing to assist that group, rather they act to disadvantage even more groups. The rationale also misses the point that gender-based violence could easily be included in the criteria for the awarding of intimidation points thus addressing the very real need among domestic violence survivors for a secure home (para. 13)

Nonetheless, the proposal remained part of the Fundamental Review of Allocations package of measures going forward from 2017. In 2020, the DFC’s EQIA [recognised](#) its potential to have adverse impacts:

the proposed change would result in victims of intimidation receiving fewer points for re-housing. This would impact on victims of paramilitary intimidation and antisocial behaviour in particular; and to a lesser extent, people intimidated because of sectarianism or on the basis of racial identity, sexual orientation or disability... [with] possible adverse impact on intimidated households (pp. 17-18)

It added that “while intimidated households will no longer receive ‘over-riding’ priority for re-housing, they will still be entitled to removal from the threat of violence and full duty homeless applicant status and accompanying points for re-housing” (p. 18).

By the time of the DFC’s [consultation outcomes report](#) in 2020, however, housing authorities had reversed course and decided to retain intimidation points:

this proposal will not proceed. The Department is instead considering an alternative proposal and will commence work to investigate how to:

- strengthen the verification process to ensure that those who are genuinely being intimidated receive the priority they deserve and to prevent any abuse of the system; and
- address the current inconsistencies where other victims of trauma or violence, for example, victims of domestic abuse, do not currently receive intimidation points (p. 47)

The text continued,

protecting the most vulnerable in our society is central. Therefore, the immediate personal safety of those who have suffered intimidation will remain front and centre. Robust, clear and consistent processes are required and tightening of these will be considered. (p. 47)

However instead of following through on strengthening oversight and verification of the intimidation points scheme, the DFC flip-flopped. In 2023 the NI Human Rights Commission had [filed](#) a legal challenge centred on what it described as the Housing Selection Scheme's failure to address "domestic violence, gender-based violence, the intimidation of individuals from within their own community or the real impact of anti-social behaviour". In October 2024, the challenge was heard at the Judicial Review Court in Belfast and the judge set a hearing date for both parties to attend in March 2025.

Before that could happen, in January 2025 Communities Minister Lyons [addressed](#) the NI Assembly to say the DFC would scrap intimidation points after all:

following careful consideration and in line with the Housing Executive's recommendation, I am announcing today that intimidation points, in the form of rule 23 of the selection scheme, will be removed. The allocation of 200 points will cease.... I have asked the Housing Executive to take forward work to review the primary social needs criteria and points for all victims of violence, abuse and trauma as soon as possible and to engage with stakeholders to inform what the prospective changes will look like.

On that basis, the NI Human Rights Commission withdrew its legal case.

The announcement was condemned in many quarters on the grounds that it left people under threat without sufficient recourse and without any new steps or measures to ensure an adequate response to their needs. While the Housing Executive gave assurances (Committee for Communities [video](#) meeting 6 Jan 2025, at 1:50) that its emergency response mechanisms for housing people forced for their safety to flee their homes immediately (required under homelessness legislation, separate from the selection scheme) remained in place, questions remain about the suitability of the emergency hotel accommodation that it is currently offering for threatened and often traumatised people.

Other responses, like this one from an MLA participating in the Stormont [debate](#) in January 2025, were more qualified, but still wary:

we welcome the ongoing efforts to amend a housing allocation scheme that abuses many people and is abused by some. It is shameful and sad that it is victims of domestic abuse who have to uproot their lives and leave their properties, and it is appropriate that they should be served equally by the system to other victims of threat, fear and abuse. However, they should be served equally well not equally badly,

and we will have to reserve judgement on that until we see the review of primary social needs points.

Despite the removal of intimidation points, Communities Minister Lyons stipulated that structures set up in the past for verifying threats in advance of the award of the 200 points would remain:

there are existing systems in place using the PSNI and voluntary and community sector organisations and others. That will continue, but I also expect it to be reviewed, because we need to make sure that the system is as robust as possible. I understand that concerns have been expressed about that, but I hope that we will be able to get a system in place that everybody has confidence in.

The removal of intimidation points was implemented in April 2025, with some caveats for ongoing cases. In the months that followed families were forced from their homes in Ballymena, North Belfast and elsewhere; as of this writing some [remained](#) in transient temporary accommodation rather than the permanent home that the extra 200 points might have enabled them to access.

Meanwhile, the impact of the removal of intimidation points is being monitored at the highest levels of government here. In a 7 October 2025 NI Assembly [debate](#) around DFC and NIHE support of families forced from their homes by recent sectarian and racist intimidation and violence, one MLA asked,

in situations such as the recent case, in which it is obvious that there was intimidation — indeed, the police have said that the UDA was involved in such intimidation — and a specific threat, is there a method of accessing housing? Obviously, we need the points process for everything else, but I am worried that, having removed intimidation points, we have nothing with which to replace them.

For his part, Communities Minister Lyons said

intimidation contributes directly to housing need, increasing the number of families who have to resort to temporary accommodation to feel safe in their homes. It is not acceptable. I will continue to condemn such activity and push for greater investment in our housing stock to tackle the housing crisis and improve the standard of available housing.

The October 2025 [research](#) by the Simon Community NI into childhood adversity and homelessness cited above revealed that over a third of the underlying study's 175 NI participants reported having been threatened with community or paramilitary violence. Nearly one in three had been directly victimised by this violence:

these findings show that violence, especially threats and assaults tied to community and paramilitary groups, is a defining feature of homelessness in Northern Ireland. For many, it added another layer of trauma on top of childhood adversity, mental health struggles and exclusion.... these harms, most concentrated in the 27–46 age range, reflect the continuing impact of territorial control and coercion (p. 18)

This new evidence from the Simon Community underlines the extent to which the experiences of intimidation and of homelessness require thoughtful, deliberate, evidence-based planning following by transparent and constantly-monitored implementation.

There is no information available about the nature or outcome of either the promised review of primary social needs points to ensure that are adequate to the task of responding to what formerly would have been treated as intimidation cases; or the review of the need for and functioning of a threat verification mechanism, given the removal of intimidation points.

Recommendation 8: removal of the ‘no detriment’ provision

Historically, the Housing Selection Scheme had included a ‘no detriment’ provision which meant that waiting list applicants recognised as homeless would retain points they had been allocated at an earlier stage. As the DFC’s 2017 DFC [consultation on proposals](#) explained,

when an applicant reports a change in their circumstances, such as a change in address or a change in household composition, the NIHE carries out a reassessment. Following a reassessment an ordinary housing applicant can have points either added or taken away. However, a Full Duty homeless applicant can only have points added and never taken away. This is known as the ‘No Detriment’ policy ... This ‘No Detriment’ policy is not set out in the rules of the Selection Scheme. It is a custom and practice which began with the introduction of the current Selection Scheme in November 2000. The rationale for this was to recognise the applicant’s housing/homelessness journey, and to assist in discharging the statutory duty in a reasonable period of time. (p. 63)

The DFC’s 2017 proposal was that an applicant’s points should only reflect their current circumstances, to prevent anyone whose situation had improved from being offered housing before someone in worse circumstances. PPR’s [response](#) to this and related elements of the 2017 consultation was that they

focus on reducing the appearance of housing need, rather than resolving the housing crisis through building social homes and allocating these in line with objective need.

The DFC’s 2020 EQIA [noted](#) that some applicants would be adversely affected by this change, and that that they were more likely than other waiting list applicants to be young, non-white and families (pp. 19-20). However it did not consider this to require mitigation (p. 20).

According to the 2020 [consultation outcomes report](#), “the proposal is currently undergoing further investigation and analysis which is being undertaken by an independent researcher to assess the operational impacts”. The impacts foreseen in the report – far from the very clear person-centred ones that the change will entail-- are of an administrative nature:

this change represents a significant body of work given the major reassessment exercise that will be required and the significant system and IT changes. Subject to approvals, budget and resourcing, the Housing Executive has indicated that this may be taken forward in the medium term (in the region of 18+ months from project commencement) (p. 51)

The results of the independent research have yet to be made public, nor have the mechanisms for its implementation. MLAs taking part in an all party group meeting in June 2025 were reportedly told that the change would apply to new assessments of FDA homelessness only; for those already holding FDA status, the no detriment principle would apply until they refused a ‘reasonable offer’, at which time their points would be reassessed.

Given that this change will have a significant human impact on the applicants affected, it is incumbent on housing authorities to show that they are not only interested in improving the management of the waiting list but are also concerned about the people on it – by communicating clearly and well in advance of any changes to current practice and taking steps to mitigate any harm caused. PPR will continue to monitor the impact of the FRA changes through its ongoing [housing clinics](#) and related work.

Recommendation 9: removal of interim accommodation points

The DFC’s 2017 [consultation on proposals](#) explained the system of interim accommodation points:

under the current Selection Scheme Full Duty Applicants (homeless) are awarded 20 additional points if they have spent six months in temporary accommodation which is arranged by the NIHE under the Homelessness legislation... The points are not awarded to those applicants who arrange temporary accommodation themselves (whether with family or friends or in a short term private sector lease) or those applicants who remain ‘homeless at home’ because their accommodation is unreasonable for them to occupy (p. 66)

The rationale behind these points was “to recognise the additional stress associated with living in temporary accommodation” (p. 66).

Interestingly, a review of NI housing policy over time reveals that the 2011 Housing Selection Scheme Preliminary Consultation Paper (obtained by Freedom of Information) looked at – and got “overwhelming support” for, according to its August 2011 outcomes report (p. 7)--

expanding the points provided after further periods of time in temporary accommodation and amongst a wider group of people (namely, all statutory homeless applicants in temporary accommodation).

By the time of the DfC's 2017 Fundamental Review of Allocations 2017 [consultation paper](#), however, it was clear that what was being proposed was removal of the points altogether. While levels of homelessness at the time were markedly below what they are now, PPR (2017, [Chasing Homes](#)), expressed deep reserve:

there is no substantive purpose to remove interim accommodation points awarded to homeless applicants who have been in NIHE-arranged temporary housing for at least six months because data shows that people are waiting for up to two years before finding permanent accommodation ... Rather than remove interim points, the DfC and the NIHE should revise and reform the way in which points are awarded to ensure housing need is captured accurately, and address the shortage of homes which is at the root of the DfC and NIHE's attempts to mitigate the appearance of need (p. 4)

Similarly, PPR's 2017 [consultation response](#) criticised the punitive approach behind this and other recommendations:

PPR's experience is that people often receive fewer points than they are entitled to, and efforts should be taken to facilitate applicants receiving their full entitlement, rather than seeking to reduce the points on offer. PPR is concerned that these proposals will leave vulnerable people with less access to social housing (para. 11)

It added:

the proposal to remove interim accommodation points (Proposal 9) from the selection scheme merely reduces the appearance of housing need and contravenes state commitments to significantly increase the social housing stock and prioritise meeting housing need. Proposal 9 does not actually alleviate the root of NI's housing crisis which is the shortage of decent accommodation needed to support Northern Ireland's growing population. (para. 12)

In November 2020 the sitting Communities Minister (Caral ni Chuilin (SF)), speaking to the NI Assembly, [expressed](#) support for a return to the 2011 position favouring expansion rather than removal of interim accommodation points:

I believe that people who find themselves in any form of temporary accommodation should be awarded points to recognise the additional stress associated with being insecurely housed in whatever form that takes, whether in hostel accommodation or sofa surfing with friends or family. That would involve extending interim points to a wider range of people who are homeless.

The 2020 [Outcomes Report](#) reiterated this:

the Department believes that all those who find themselves in temporary accommodation should be treated in a similar way. Having reviewed the consultation proposals and concerns raised, an alternative proposal is being considered whereby points may be awarded to those applicants who find themselves in any form of temporary accommodation. This amended proposal will require further analysis and will therefore involve a long term timescale (24+ months from project commencement). The current process will remain in the interim (p. 55)

At a time when homelessness has reached [unprecedented levels](#) and increasing numbers of households are precariously housed in a series of hotel rooms, the current Department has again changed approach. It is in effect planning to withdraw its previous recognition of the stress caused by insecure temporary accommodation by removing interim accommodation points from the Housing Selection Scheme altogether. It will reportedly implement this recommendation in 2026, with potential for transitional protections for FDA households already awarded these 20 points, having spent six months or more in temporary accommodation.

2.3 Allocation stage proposals

With regard to allocations, work on many proposals is underway or already completed, but one of the most potentially concerning – proposed ‘banding’ of applicants-- remains pending.

Recommendation 10: ‘banding’

A serious area of concern is the DFC recommendation around ‘banding’ of applicants rather than the current (with the exception of recent rule changes around ‘difficult-to-let’ properties, described more fully below) points-based system.

The UU / Cambridge research made fairly detailed proposals around such banding, addressed in a fairly perfunctory manner in the 2017 [consultation on proposals](#):

Ulster University recommended a banded system. The NIHE has modelled the effects of a hybrid system of points and bands, which indicates that this approach can meet longstanding housing need more effectively than the current Selection Scheme (p 19)

In theory, the banding would prioritise households on similar points but with longer waiting times, which would be welcome to many. However, the examples offered in the UU paper also prioritised households with low housing need seeking to downsize, among other categories; this would indicate that implementation would bear close watching going forward, to ensure the focus on meeting objective need is not diminished even further.

According to the DFC’s 2020 [EQIA](#),

this measure should give greater priority to those applicants who have spent the longest time in a high degree of housing need ... The proposal to give greater

recognition to time waiting, based on level of need, reflects the finding that some Section 75 groups are waiting for a very long time – in a high level of need – to access social housing. The proposal should therefore be beneficial for all those in high need, who are experiencing long waiting times. (pp. 21, 23).

It did however note a “possible adverse impact for those with high housing need, who have not been waiting a long time” but did not recommend mitigations. The balance between these and other factors taken into consideration in the banding will need monitored to ensure that objective need is sufficiently prioritised.

The 2020 [Outcomes Report](#) noted that

substantial further modelling work will be required to develop this proposal. This work is currently underway and picks up on some of the consultation feedback around the need to carefully consider the number and size of the bands which may be used. The outcome of this independent research will assist in determining any implementation issues and potential timescales. A switch to a banding approach is likely to entail significant system and IT changes (p. 59)

No such independent research has been made public.

Additional allocations recommendations

Recommendations around changes to the existing rules to “enable social landlords to make restrictions based on the suitability of an allocation in relation to applicants (or a member of their household) that have been convicted or charged” with certain offences (DFC [consultation on proposals](#) p. 109) appear to be underway, with an April 2025 review of the relevant chapter of the HSS. Work on the recommendation for a separate list for specialised properties in order to ‘ringfence’ them for tenants with those specific needs also is in the pipeline.

Already-implemented proposals include aligning bedroom numbers with the **size criteria for the housing element** of Universal Credit (recommendation 11), so that the amount of housing benefit which people are awarded is aligned with the size of the property they live in. This is reflected in current Housing Executive [advice to tenants](#).

A different approach for ‘difficult to let’ properties

An interesting group of already-implemented recommendations focused on administration of ‘difficult-to-let’ properties. As such they are designed to facilitate the letting process for Housing Executive or housing association staff and to reduce social housing under-occupancy / voids overall.

By definition the ‘difficult-to-let’ homes addressed by these three recommendations are ones located outside of areas of high housing need, and allocations are not strictly based on points

but on finding tenants willing to take up the property in a short timescale. Two of the three (recommendations 12 and 14) allow landlords to make multiple offers to “as many applicants as they think necessary” to try to fill a ‘difficult’ vacancy, and to proceed directly to this step “if they have evidence that a property will be difficult to let”.

Recommendation 13 was for a system of choice-based lettings for certain properties only. The UU / Cambridge proposal had been for an across-the-board choice based letting scheme; however the DFC took this forward only in a very limited number of areas, for properties considered ‘difficult to let’ (and generally not located in areas of high housing need). The areas included in this measure are listed in a Housing Executive [webpage](#) on the scheme.

PPR’s 2017 [consultation response](#) pointed out that by setting up workarounds to the points system for certain properties, the recommendations “subvert the principle of objective need” (para. 14); these fears were if anything proven justified as the process continued. The DFC’s 2020 [EQIA](#), for instance, admitted that recommendations 12-14 “may increase the likelihood and speed of allocation for applicants in lower housing need” (pp. 23-24)-- but found no adverse impacts and recommended no mitigations.

For its part, the text of the DFC’s 2020 consultation [Outcomes Report](#) makes clear that motivation of the moves toward multi-offers for difficult-to-let properties was administrative rather than objective need-based:

these proposals aim to provide applicants with more choice, and to provide a greater range of solutions to meet housing need. Given the acute shortage of social homes, the Department welcomes amendments to the Selection Scheme that offer alternative options for those on the waiting list and at the same time enable good housing management and better use of stock and resources (p. 69)

The text around choice-based lettings – barring a reference to allocation by points amongst those who chose to opt in to the choice-based service-- was similar:

given the acute shortage of social homes, the Department welcomes amendments to the Selection Scheme that offer alternative options for those on the waiting list and at the same time enable good housing management and better use of stock and resources (p. 75).

All three recommendations have already been implemented.

Reduction in ‘reasonable offers’

This proposal (15), also already implemented, was to reduce the number of ‘reasonable offers’ an applicant is due from three to two. In its 2017 [consultation response](#) PPR was highly critical of this now-implemented recommendation 15 which has reduced the number

of 'reasonable' offers someone on the waiting list was due from three to two, on pain of suspension from the waiting list for one year. PPR wrote:

not only does this proposal fail to consider refusals based on substandard housing, issues regarding what the NIHE deems as "reasonable" have historically been a point of contention. The negative impact of this change on applicants WILL NOT be balanced by the increase of choice they will have over the areas where they would wish to live if the current scarcity of social housing remains. (Proposal 5). PPR has assisted residents who are allocated housing deemed "reasonable" by NIHE which are in very poor conditions, e.g., pigeon waste from communal landings, sewage systems which frequently overflowed through baths and sinks; as well as campaigned for changes in multimillion pound plans which ignored residents' needs and the re-housing of the majority of families into more suitable accommodation. Unless the current practice around what is a reasonable or unreasonable offer is clarified then the current due process problems will continue to arise. (para. 15)

The 2020 consultation [Outcomes Report](#) tacitly recognises the potential for mismatch in what is perceived as 'reasonable' and proposes counter-measures:

it will be crucial that informed discussions take place between the applicant and Housing Adviser to set realistic expectations and to ensure that all relevant information is considered and recorded where necessary. This could include the applicant's specific needs and the likely waiting time for a suitable offer. Both the Housing Adviser and applicant should be clear as to what will be acceptable for the applicant's circumstances, and where relevant this should be recorded so this information is available to social landlords when they make an offer of accommodation. The aim is to ensure that offers meet applicants' needs where possible, reducing the need for a refusal (p. 80)

It does not appear that the care outlined above is being taken in all cases. A review of housing clinic data for 2024-25 revealed numerous cases where the Housing Executive's definition of a 'reasonable offer' differed significantly from the applicant's, with heightened consequences given the reduction in offers due. What constitutes a 'reasonable offer' remains a live issue.

Withdrawal of offers

Recommendation 16, another that has already been implemented, allows social landlords to withdraw offers of accommodation in specific circumstances. PPR was highly critical of this proposal in its 2017 [consultation response](#), particularly with regard to the "proposed set of vaguely worded circumstances which a social landlord may rely on to withdraw an offer" (para. 11), adding

PPR's experience is that people often receive fewer points than they are entitled to, and efforts should be taken to facilitate applicants receiving their full entitlement, rather than seeking to reduce the points on offer. PPR is concerned that these proposals will leave vulnerable people with less access to social housing (para. 11)

This criticism was not taken on board. The DFC's [consultation outcomes report](#) of 2020 says that

a new rule will be developed for approval by the Department which clarifies the circumstances for when an offer may be withdrawn. The rule and any associated guidance will provide clarity on the circumstances in which an offer may be withdrawn, and will aim to address the concerns raised in some consultation responses.

Under the newly revised Housing Selection Scheme guidance, the new rule 58a stipulates that a landlord may withdraw an offer before the grant of tenancy when the Designated Officer decides that the conditions of the offer have not been met or have been breached; the offer was made on the basis of a material error or fact or law; the offer is no longer considered reasonable due to new information; the applicant cannot take up the tenancy within a reasonable timeframe; or due to concerns about the personal safety of the applicant, a member of their household or another resident.

Similarly, rule 58a allows an allocation of accommodation to be withdrawn before the grant of tenancy where the applicant is found to be no longer eligible, for instance because of unacceptable behaviour or change to immigration status.

Changes to succession policy

These changes are among the most contested in the Fundamental Review of Allocations to date. Historically, the Housing Selection Scheme recognised specific circumstances where a person who did not have a statutory entitlement to a tenancy succession or assignment could be awarded the tenancy. Review of practice in this area began in the context of welfare reform over a decade ago, out of fears that people's benefit award may not match their rent if they 'inherited' a bigger house for instance:

the Housing Executive is concerned that decisions to award a tenancy to an applicant who meets the policy Assignment and Succession criteria as outlined may not make best use of stock and may result in under occupation and potential financial hardship for the new tenant. Working age tenants in receipt of housing benefit in these circumstances will be advised before they accept the offer that they will need to consider how they would meet any potential shortfall in rent as a result of the potential Housing Benefit restriction. Our Proposal: The relevant rules should be amended to clarify that the landlord may decide to withhold consent in such circumstances where the new tenancy is likely to or would result in under occupation and potential financial hardship (Housing Executive, [Consultation on Changes to the Housing Selection Scheme](#), November 2012, p. 12)

The 2017 DFC [consultation on proposals](#) recommendations 17 and 18 aimed at allowing social landlords to withhold consent for a policy succession or assignment to a general needs or a wheelchair-accessible or other specialised home "in limited circumstances where there is evidence an applicant needs it" .

PPR's 2017 [consultation response](#) included these recommendations to be part of the "punitive approach" of which it was highly critical, noting "PPR is concerned that these proposals will leave vulnerable people with less access to social housing" (para. 11).

These concerns were ultimately dismissed. The DFC's 2020 [EQIA](#) did admit that "households requesting a policy succession may be impacted" by the proposed change, but recommended no mitigations, seeming content to remark only that "greater discretion, particularly in areas of high demand, can ensure the best use is made of public resources" (p. 25).

The DFC's 2020 [Outcomes Report](#) said that the Housing Executive "will develop appropriate guidance setting out the very particular situations when this discretion may be exercised" (p. 89). The relevant Housing Selection Scheme provisions (chapter 8: changes in tenancy) were reviewed in April 2024

Since its implementation in September 2024, this tightening of the rules around potential policy successions (for instance that a family member have given up their own tenancy in order to live with the deceased tenant as their carer) has been one of the most controversial of the FRA's changes to the Housing Selection Scheme, with a [number of high-profile eviction orders](#) against newly [bereaved people](#) from their family homes.

In an NI Assembly [debate](#) on intimidation points in January 2025, one MLA flagged that in the wake of these changes,

the succession of tenancy policy has seen an increase in evictions and homelessness, particularly in the Belfast area, in recent times. A recent High Court case actually ruled in favour of a tenant whom the Housing Executive was trying to evict. In light of those incidents, will the Minister urgently review that policy and its application?

Minister Lyons responded, "we always keep those issues under review". The remainder of his answer served to highlight the discretionary nature of the policy change:

It is clear that there is a balance to be struck to ensure that we always have the right homes for the right people who need them, with the right adaptations or whatever else it might be. At the same time, we understand the importance of succession, especially when families have been established and people have been living in those homes. If the Member has a particular case that she wants to raise with me, I will be happy to look at that.

In January 2025, the Community Action Tenants Union [called for](#) an immediate halt to all succession-related eviction proceedings pending a full Equality Impact Assessment of the succession policy specifically. PPR was among the [organisations](#) supporting its call.

3. Conclusions to date

PPR's original concerns about proposed changes to the Housing Selection Scheme, in 2013 and again in 2017, were that they privileged reducing the appearance of housing need rather than its substance; that they risked further diminishing the commitment to allocating social housing by objective need; and that this would cause harm, including to people to whom housing authorities owe duties under section 75. The message was and is that we need a greater supply of social homes so that we can begin to meet existing housing need; focusing on tinkering around the edges of the waiting list and allocations systems do not get us any closer to achieving this.

Since implementation of recommendations began in January 2023, PPR's initial misgivings have been borne out, as evidenced by testimonies from [housing clinics](#) and complaints in 2024 and 2025. With the notable exception of the move to unlimited areas of choice for waiting list applicants, the changes generally increase the range of powers of social landlords and housing authorities, while further limiting the access of some people in housing need to a safe, secure and permanent home.

Meanwhile too many of the equality impacts on section 75 groups flagged in the DFC's screening exercise were waved away on the grounds that the changes would make the system easier to manage or better value for money. The changes have been made, and as predicted some have caused real harm. Waiting list applicants and social housing tenants still – rightly – look to housing authorities to set things right.

And there is more on the horizon. Upcoming changes like discharging the duty to homeless people via an unregulated and insecure private rental; expanded powers to exclude people from FDA and from the waiting list; revocation of 'no detriment' and interim accommodation points; and 'banding' of the waiting list all risk having deeply detrimental impacts on people's lives. Much depends on the implementation of the ideas. The lack of engagement with the people who are most likely to be affected and the lack of transparency and openness about the changes to come (including the failure to make public the results of promised additional research on implementation and impact mitigation) are deeply concerning.

Revisiting the DFC's decision to drop the UU / Cambridge [research](#) proposal for an **independent scrutiny panel** would help to build much-needed confidence in the housing system going forward. Applicants and tenants would be reassured to know that any concerns they may have, now or in future, about the multiple changes to the Housing Selection Scheme and their impact, will be formally addressed by an independent oversight body. Of all the proposals made over the years, this was absolutely the wrong one to leave in the drawer: there is still time to act on it.