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## **RE: Consultation on Amendments to the Landlord Registration Scheme Regulations (Northern Ireland) 2014**

To whom it may concern

I am writing on behalf of the Commissioner for Older People for Northern Ireland regarding the amendments proposed to the Landlord Registration Scheme Regulations (Northern Ireland) 2014.

The issue of private renting has been central to COPNI's work in recent months. In May 2026, this office published a report titled *The Experience of Older Private Renters in Northern Ireland*,<sup>1</sup> which explored the challenges older people experience in the private rented sector (PRS) and offered recommendations to improve the situation of the most vulnerable renters.

This office considers the proposals set out in the present consultation to be a positive and necessary step toward strengthening legal protections and improving living conditions for vulnerable private renters, while respecting landlords' property rights. COPNI welcomes the Department's progress in enhancing both security of tenure and enforcement mechanisms to better protect older tenants.

### **Improving the living conditions of older private renters**

In the aforementioned report, COPNI has shown that older people in the PRS are particularly vulnerable and face multiple and cumulative disadvantages. Older households have lower average incomes than working age households,<sup>2</sup> which has made them more vulnerable to the significant rent inflation experienced in recent

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<sup>1</sup> Leira Pernas, Á. (2026) [The Experience of Older Private Renters in Northern Ireland](#), Commissioner for Older People for Northern Ireland.

<sup>2</sup> The average net weekly income of working age households (£1203) is 67% higher than pensioner households (£718). Source: Family Resources Survey (Individual Dataset, Department for Work and Pensions). Retrieved through Stat-Xplore. Weighted mean total income by household in Northern Ireland, in latest prices (weekly, CPI adjusted in real terms) by type (working-age, pensioner) and financial year (2023-24).

years. Over the past decade, rent increases have, on average, outpaced pensioners' incomes, placing additional financial pressure on older renters.<sup>3</sup>

Older people are also more vulnerable to the low security of tenure that is typical of the PRS. Later life is often characterised by a desire to settle down, and the constant fear and threat of eviction can therefore be particularly difficult. In these circumstances, COPNI's report has shown that many older people are reluctant to complain about issues in their homes or even to exercise their rights as tenants (i.e. to establish what their rights are under the tenancy agreement). As a result of all of these factors, both private rented households and older households experience higher levels of disrepair and poorer energy efficiency.<sup>4</sup>

This tough environment combines with the fact that private renters are statistically among the most vulnerable individuals in society, with the lowest incomes,<sup>5</sup> increased physical vulnerability,<sup>6</sup> and the highest poverty rates.<sup>7</sup> This creates a perfect storm for private renters, in particular older tenants, and makes it essential that the Department takes further steps to increase their protection.

COPNI commends the Department's recent action in this regard, in particular the work on increasing Notices to Quit and the current proposals to improve the Landlord Registration Scheme. The present proposals clearly advance tenant protection. The information that landlords will be required to provide is wholly reasonable. Furthermore, the measures will be a stepping stone for further improvements in protections, including the Department's commitment to introducing Minimum Energy Efficiency Standards. The PRS requires strong action to address the reality that private rentals are broadly speaking, poorer quality, resulting in renters spending more on bills and facing risks to their health due to the poorer environments.

This office acknowledges the efforts in the present consultation but also believes that more needs to be done to protect older people. In the Warm Healthy Homes Strategy, the Department acknowledges that—without actionable and enforceable

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<sup>3</sup> Between 2015 and 2024, the average monthly rent of Northern Ireland has increased by 60%, from £560 to £896 per month; Source: Ulster University (2024) [At a Glance. Private rental market performance 2024](#). In the same period, the income of renters aged 65 and over increased by 50.1% (not CPI adjusted). Source: Family Resources Survey (Individual Dataset, Department for Work and Pensions). Retrieved through Stat-Xplore. Weighted mean gross income in Northern Ireland of households (weekly, in year prices in nominal terms) by type of individual, tenure type and financial year (2014-15 and 2023-24).

<sup>4</sup> Source: Northern Ireland Housing Executive, [Northern Ireland House Condition Survey 2016](#); Table 6.1: Dwelling Tenure – Fuel Poverty (10% definition), and Table 6.6: Household Characteristics – Fuel Poverty (10% definition).

<sup>5</sup> Source: Family Resources Survey (Individual Dataset, Department for Work and Pensions). Retrieved through Stat-Xplore. Weighted mean total income by household in Northern Ireland, in latest prices (weekly, CPI adjusted in real terms) by type (working-age, pensioner) and financial year (2023-24).

<sup>6</sup> Older private renters experience levels of health problems and disability slightly below those of social renters but significantly higher than homeowners. They are also more likely to report difficulties and limitations in their home than homeowners. Source: NISRA Census 2021, [health problem or disability \(long-term\) \(2 categories\) by age \(4 categories\) and tenure \(5 categories\)](#); [health condition \(mobility – limits physical activity\) by age \(4 Categories\) and tenure \(5 Categories\)](#).

<sup>7</sup> 21.2% of older private renters live in relative poverty, compared to 15.6% of social renters and 10.4% of homeowners. Source: Households Below Average Income (Department for Work and Pensions). Retrieved through Stat-Xplore. Pensioners in low income calculated as lower than 60% of median net household income) in Northern Ireland by tenure type, AHC, in latest prices by financial year (three-year averages).

legal standards in place—market forces are unlikely to improve housing standards in the PRS on their own.<sup>8</sup>

In the recommendations included in the report cited above, COPNI urged the Department to implement a series of small but practical measures to reduce the vulnerability of private renters. While these steps would not be a comprehensive solution, they would make a meaningful contribution to strengthening tenant protections. COPNI expects the Department to continue working to increase protections and improve regulation. Otherwise, the Registration Scheme will not reach its full potential.

## Conclusion

A rented property is the landlord's rightful property, but it is also central to the tenant's wellbeing. A home is distinctive to all other forms of property, in that it is essential to the tenant and their happiness. The present housing market environment is buyer-friendly, and presents difficulties for people who do not own a property and have to rent privately. This is particularly true for older people, who are more likely to be refused credit and have limited options to generate additional income.

Many older people in the PRS currently experience issues such as the absence of an EPC for the property before the start of the tenancy and throughout its duration, as well as basic issues of unfitness. The lack of control over these issues must be addressed, and the present proposals offer a necessary first step.

However, while positive, the Registration Scheme alone is not sufficient. Advancing other enforceable measures to improve fitness and energy efficiency in the private sector will build on the increased regulatory oversight of the private rented market brought about by these proposals. In particular, the Registration Scheme will require landlords to provide information on the state of fitness and energy efficiency. It is therefore important that these two areas are properly enforced, and that higher standards are introduced, including Minimum Energy Efficiency Standards for the PRS.

Yours faithfully,



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**Commissioner for Older People for Northern Ireland**

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<sup>8</sup> Department for Communities (2026) [Warm Healthy Homes Strategy 2026–2036: A new fuel poverty strategy for Northern Ireland](#); page 20.