

Response ID ANON-UCWH-NXGW-U

Submitted to The Landlord Registration Scheme Regulations (NI) 2014 Consultation
Submitted on 2026-04-13 14:01:58

Information required at registration

1 Do you agree with the proposal to expand the information requested for landlord registration as outlined in the consultation document?

Please choose one option below:

Yes

Please explain your answer below:

National Energy Action Northern Ireland (NEA NI) supports the proposal to expand the information requested at registration. It is necessary and important that landlords are asked to confirm whether they are compliant with existing legislation relating to the safety and standards of their properties. This will help to ensure landlords are fully aware of their responsibilities and assist with raising the safety and standards of homes in the private rented sector (PRS).

2 Do you agree with the proposal that information on the following requirements should be provided as part of the registration process?

Question 2 - Fitness for human habitation:

Yes

Question 2 - Smoke, heat and carbon monoxide alarms:

Yes

Question 2 - Electrical safety checks:

Yes

Question 2 - Gas safety certificates:

Yes

Question 2 - Energy performance certificates:

Yes

Please explain your answer below:

NEA NI supports requiring all of the listed information as part of the registration process. Landlords should not be permitted to let properties that fail to meet basic safety and standards requirements. These are existing legal duties, and confirming compliance at registration, and at each renewed registration every three years, is a necessary and proportionate way to strengthen tenant protections and ensure landlords are fully aware of their ongoing responsibilities.

For this to be effective, the Landlord Registrar (Lisburn and Castlereagh City Council) must take enforcement and verification seriously. While the consultation notes that providing false information at registration is an offence, this must be backed by meaningful oversight. We are concerned by the suggestion that the council may decide a sample check of registrations is sufficient, rather than requiring every landlord to provide physical documents relating to gas and electrical safety. While we understand capacity constraints, the risks of non-compliance to tenant safety are too significant for this approach, which may miss dangerous or unlawful practices. Requiring landlords to provide all necessary documentation to evidence compliance is proportionate and necessary.

Requiring EPC information is also essential. Much of the PRS consists of older, energy-inefficient homes, and EPC data can be used to inform the development of policies to raise standards. Including EPC information at registration, and allowing this to be shared with the Department for Communities, can support the development, monitoring and progress of future policy. This includes the introduction of Minimum Energy Efficiency Standards (MEES), which is a strategic commitment in the Executive's Warm Heathy Homes Strategy 2026 - 2036.

Integrating MEES into the Landlord Registration Scheme will be important to aid compliance and enforcement when this policy is introduced. To support this, we encourage the Department to consider the example set by Rent Smart Wales* and assess how the Landlord Registrar could provide similar supports, in particular providing or signposting to relevant training for those involved in the rental market.

*"Rent Smart Wales assists those who let or manage rental properties in Wales to comply with their Housing (Wales) Act 2014 obligations and provides advice on renting out safe and healthy homes. We also process landlord registrations, grant licences and deliver informative and relevant training for those involved in the rental market both online and in classroom venues across Wales." For more information see: <https://rentsmart.gov.wales/en/home/>.

Regulation 9 – changes to data sharing

3 Do you agree with the proposal to share information held on the Landlord Register with the Health and Safety Executive Northern Ireland to assist with gas safety enforcement in private rented properties?

Please choose one option below:

Yes

Please explain your answer below:

NEA NI supports the proposal to allow the registrar to share information with the Health and Safety Executive Northern Ireland (HSENI) to assist with enforcement of gas safety legislation in private tenancies. Landlords are legally required to ensure that a gas safety check is carried out every 12 months by a Gas Safe registered engineer, yet current restrictions prevent HSENI from accessing landlord information from the register to assist with its enforcement of gas safety legislation.

Amending Regulation 9 is therefore an important and proportionate change that will help protect tenants by strengthening monitoring and compliance with gas safety law, and by ensuring landlords fully understand and meet their legal obligations. It is also important that landlords are aware that gas safety duties apply not only to properties with gas boilers but also to any gas appliance in the home, including those used for cooking.

4 Do you agree with the proposal to share information (this will not include personal information that would allow an individual to be identified) held on the Landlord Register with the Department for Communities for research and statistical purposes, to assist with the formulation and development of policy and legislation relating to the private rented sector?

Please choose one option below:

Yes

Please explain your answer below:

NEA NI supports this proposed amendment to Regulation 9. The consultation document makes clear that current restrictions prevent information from the Landlord Register being shared with the Department's Analytical Services Unit for research and statistical purposes. Allowing access to anonymised, non-identifying data is a proportionate change that will deliver clear public benefit if used to inform policy and legislation related to the private rented sector (PRS).

Better data is particularly important given the well-evidenced challenges within the PRS. The Executive's Warm Healthy Homes Strategy 2026 – 2036 highlights that much of the PRS stock is older and less energy efficient and commits to introducing Minimum Energy Efficiency Standards (MEES) for the sector. Recent polling commissioned by NEA NI indicates that around 42% of PRS households are in fuel poverty, spending over 10% of their income on energy.* Allowing the Department for Communities to use Landlord Register data, especially EPC information, will be essential for developing vital MEES policy and monitoring compliance and enforcement to raise housing standards and domestic energy efficiency.

*LucidTalk, (2025). 'Northern Ireland (NI) Attitudinal Poll – National Energy Action Northern Ireland'.

Schedule 2

5 Do you agree with the proposal to amend Schedule 2 to bring this in line with the current practice of allowing a public online search by address function on the Landlord Registration Scheme website?

Please choose one option below:

Yes

Please explain your answer below:

The ability for prospective and current tenants to check whether a landlord is registered supports transparency and informed decision-making. Allowing a public online search by address would also help to deter unregistered landlords from operating unlawfully and allow tenants to verify that their landlord is meeting the legal requirements.

General

6 Do you have any other comments on the proposed changes to the Landlord Registration Scheme Regulations?

Comments:

Yes.

1) While the consultation document does not suggest any change to the current three-year registration period, we would welcome confirmation that this renewal timescale will remain and not be extended. Regular re-registration helps keep key information, such as EPC data, accurate and up to date. EPC information will become increasingly important as the Department progresses the introduction of MEES in the PRS, where up to date data will help to monitor progress and compliance.

2) The amendments capture landlords' responsibilities in relation to gas and electricity safety, but there is no mention of the responsibilities landlords have or ought to have, in relation to other types of heating, such as oil central heating and an open/closed fire or stove. This is relevant as the majority of private rental properties in NI (61% in 2024/25) use oil central heating as the primary household heating method. In addition, 80% of all households used an open/closed fire or stove in 2024/25 as a secondary heating method.*

Important checks are required for these heating types to operate safely and efficiently. For example, an annual oil boiler service, chimney sweeping and flue maintenance, and the installation and maintenance of carbon monoxide (CO) alarms. The amended Landlord Scheme Regulations should reflect landlords' responsibilities in relation to these.

3) This consultation response is from National Energy Action (NEA), the national fuel poverty charity. We've worked across England, Wales, and Northern

Ireland for over 40 years, to ensure that everyone can afford to live in a warm, healthy home. Together with frontline practitioners, companies, regulators and governments, National Energy Action works to support vulnerable clients, raise awareness and achieve enduring change.

Our consultation comments are informed by our experience and expertise providing advice and practical support to households struggling to keep their homes warm.

*Northern Ireland Statistics and Research Agency, (2025). 'Continuous Household Survey: Heat and Insulation Results, 2024/25'.

Thank you