

July 2024



**Council
to Homeless
Persons**

Submission

Response to the Minimum
Standards for Rental
Properties and Rooming
Houses

chp.org.au

Contents

Contents	1
Acknowledgement	2
Introduction.....	3
Summary of Recommendations.....	5
Invest in a better Victoria: make homelessness rare, brief and non-recurring	6
End homelessness in Victoria.....	6
Introduce a single regulatory environment for all rental properties	8
Hold rooming houses to the same standard as private rental properties	8
Implement genuine, adequate living standards for rooming house residents	9
Maybe don't let us fry in the summer: Provision of adequate cooling in all rental properties and rooming houses	10
Draughtproofing rooming houses.....	10
Improving heating regulations.....	11
Improve rental reviews through participatory processes.....	13
Consumer Affairs Victoria should improve rent review processes through participatory consultation with lived experience experts	13
Lived Experience Training	14
Putting the Victorian Housing Statement into action.....	14
Make rooming houses better, for everyone.....	15
Provide wrap-around, in-reach support for residents with complex needs.....	15
Fund rooming house outreach advocacy workers.....	16
Support rooming house residents to understand their rights and responsibilities	16

Acknowledgement

In the spirit of reconciliation, Council to Homeless Persons acknowledges the Traditional Custodians of country throughout Australia and their connections to land, sea and community. We pay our respect to their Elders past, present and emerging, and extend that respect to all Aboriginal and Torres Strait Islander peoples today. Council to Homeless Persons is committed to honouring Australian Aboriginal and Torres Strait Islander peoples' unique cultural and spiritual relationships to the land, waters and seas, and their rich contribution to society.

Introduction

Council to Homeless Persons (CHP) welcomes the opportunity to respond to the Residential Tenancies and Residential Tenancies (Rooming House Standards) Amendment (Minimum Energy Efficiency and Safety Standards) Regulations 2024.ⁱ

CHP recommends that a single regulatory framework for all rental properties—including rooming houses—be implemented and in principle supports the proposed changes to the *Residential Tenancies and Residential Tenancies (Rooming House Standards) Amendment (Minimum Energy Efficiency and Safety Standards) Regulations*.

“At its heart, the concept of a home is so much more than just shelter...Every human being has a fundamental right to be able to live in a safe environment.”ⁱⁱ

Ms Kylea Tink MP, Independent

As CHP has previously advocated, the experience of homelessness is often deeply transient. The loss of a stable home typically involves the utilisation of a range of accommodation options that do not represent an end to a person’s homelessness, merely being homeless in a different setting. A person who loses access to a stable home may seek to ‘couch surf’ with friends and family, may live entirely in public as a rough sleeper, or may live in inadequate accommodation, such as rooming houses. We know that 25 per cent of rooming house residents come directly from rough sleeping, while 25 per cent of rough sleepers were last housed in rooming houses.ⁱⁱⁱ

It is possible to conceive of a rooming house standard where residents are not considered homeless; where dwellings are adequate and allow residents access to and control of space for social relations. The options provided in the Regulatory Impact Statement (the RIS) do not yet meet this standard. It is positive that the Regulatory Impact Statement provides an option to provide for greater alignment between the minimum standards in rooming houses and general residential tenancies, and CHP supports this option among those provided. However, no option provided in the RIS has holistically sought to consider whether rooming houses meet community expectations for minimum standards of cooling, draughtproofing, and heating as set forth in the Residential Tenancies Act (the Act).

In this submission, CHP advocates for improvement in minimum standards to make rooming houses and all rental properties safe and comfortable for residents. Providing adequate heating, cooling, and draughtproofing in rooming houses and other rental properties is an important step towards ensuring all Victorians have access to safe and dignified housing. This is particularly the case for rooming houses, where residents experience a high degree of marginalisation: some 62 per cent of rooming residents have health

issues, 65 per cent are experiencing family breakdown and/or family violence, and 62 per cent have substance use issues.^{iv}

When the rooming house regulations were introduced more than a decade ago, rooming houses were held to a higher standard than were general residential tenancies. Yet despite the high level of need of rooming house residents and the high level of occupancy in rooming houses, residents are being left behind. Today, general tenancies have a higher standard than do rooming houses; the regulations proposed in the RIS will further entrench this inequity.

Extending the proposed thermal comfort and energy efficiency regulation to all rented properties including rooming houses is an important step in improving dignity for all tenants. As noted in the RIS, thermal comfort regulations—specifically heating, cooling, and draughtproofing—are central to the health and wellbeing of residents in rental properties and rooming houses. Despite the well-documented need to improve the quality of services available in rooming houses, the RIS does not extend proposed regulations regarding draughtproofing and cooling to rooming houses.

This is an oversight. The inequity in the proposals contained in the RIS will further entrench housing inequity: these proposals will widen the gap between the quality of housing made available to private rental tenants, and rooming house residents. There is no reason for this differentiation. CHP advocates that all thermal comfort regulations, including draughtproofing and cooling, should be extended to rooming houses.

Contact: advocacy@chp.org.au

Summary of Recommendations

Recommendation 1: Build a stronger Victoria by increasing investment crisis, emergency, and social housing so that rooming houses are no longer necessary for people experiencing homelessness.

Recommendation 2: Introduce a single regulatory framework to bring rooming house standards in line with private tenancies.

Recommendation 2a: Extend Option 4 in section 7.3.3 of the RIS to standardise fixed cooling in all rooming house bedrooms.

Recommendation 2b: Ensure minimum standards for cooling in residential properties, including rooming houses, are energy efficient and cost effective.

Recommendation 2c: Extend the proposed draughtproofing regulations under section 5.3.3 Option 2 of the RIS to rooming houses.

Recommendation 2d: Implement RIS section 7.3.3 Option 4 to standardise fixed heating in all rooming house bedrooms to the same standard as other rental properties.

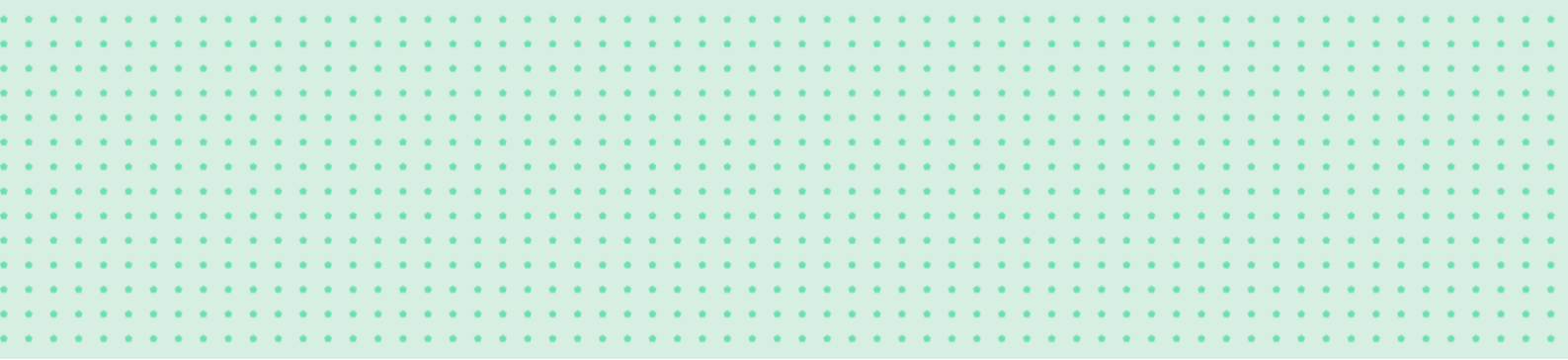
Recommendation 3: Consumer Affairs Victoria should undertake a review into rental increases to ensure rooming house residents are adequately consulted and engaged in rent review processes

Recommendation 4: Develop, implement, and monitor a Lived Experience training process for all property managers and real estate agents to ensure they can fulfil the ambitions put forward in the Victorian Housing Statement.

Recommendation 5: Increase investment in allied support services to ensure rooming house residents with complex needs are getting the in-reach support they need to heal.

Recommendation 6a: Increase investment in advocacy outreach workers to support rooming house residents.

Recommendation 6b: Streamline complaints and remediation processes with increased accessibility of advocacy outreach workers.



Invest in a better Victoria: make homelessness rare, brief and non-recurring

End homelessness in Victoria

Ending homelessness in Victoria is possible, and it must be a priority. While the vision laid out in the Victorian Housing Statement—to increase the stock of social and affordable housing and improve housing accessibility through a variety of support packages and finance mechanisms—is ambitious, more is urgently needed to end homelessness for all Victorians.

The Victorian Government must urgently commit increased funding to crisis and emergency accommodation, including women's refuges, supported accommodation for Victorians with complex issues, and improving the pipeline into permanent, stable housing. The Specialist Homelessness Sector (SHS) is overwhelmed with demand. Too often, people experiencing homelessness are being turned away because there is nowhere to send them. Rooming houses—once a place of last resort—are now the landing place for too many Victorians.

Council to Homeless Persons' vision is that rooming houses will no longer be part of Victoria's homelessness response. Members of CHP's Peer Education Support Program (PESP) provided devastating examples of unconscionable living conditions in rooming houses. Rooming houses do not, by and large, provide stable, dignified accommodation. Efforts to regulate and standardise rooming houses have fallen short, and rooming houses now provide a lesser quality of service. This will be further entrenched if the recommendations proposed in the RIS are implemented. CHP believes that people experiencing homelessness deserve better than what rooming houses can offer. CHP is therefore recommending the Victorian Government increase funding to enable better, for-purpose accommodation to come online for people experiencing homelessness. CHP's ambitious vision is that rooming houses will no longer be a necessity.

Recommendation 1: Build a stronger Victoria by increasing investment crisis, emergency, and social housing so that rooming houses are no longer necessary for people experiencing homelessness.

Case Study: The role of minimum standards in enabling rooming house residents to live dignified lives

“Shortly after I moved in, within weeks, I pulled down the blinds and it came down. Shortly after, the other one started doing this. So I rang the manager and said “This is what’s happening, do you mind if I have some kind of replacement?” They said “No problem at all.” I think I still had to remind them a few times. In the meantime, I had towels and blankets covering my windows. I’ve got these box windows, so it particularly affects the temperature. They’d recently put-up blackout blinds on the side pieces, and I thought I’d get something like that in the middle [the big window pane]. The worst part of it was that those windows are directly opposite the [youth detention facility]. And it’s so brightly lit all night long. I couldn’t sleep. And [the managers] are well aware of that. After a couple of weeks, they said “Great, we’ll get something...” They brought some people out to measure it out, but they put in those curtains that are sheer. Completely see through. Even the guy putting them up for me said “that doesn’t look right.” [The tradesperson] had to go and get it approved, and unfortunately the person managing our property is the most incompetent person I’ve ever met, in any capacity...remember, I’d just been through hell, and I was moving into the place to maybe have some healing. And so months went by, and then a new property manager came along. I started reminding her every so often. “We’ll get straight onto that. That’s ridiculous. Blah blah blah.” So, promises, promises, promises all the way along.

“17 months later, I spoke with the Outreach Worker. She said “right, you know, we can serve a breach of duty notice.” I didn’t know what that would achieve. I thought, I’ll do one. And I did. I know I got the most condescending, ridiculously patronising emails back from both the recipient, the head of the housing officer group, and all the property managers. They were fighting tooth and nail to not put those blinds in. On top of this, they were even trying to cite legislation that I was not entitled to curtains and that they were a luxury. And one day, they said “I happened to be out there at the property recently...and I took some pictures of your window and I can’t see anything through there.” I said “yes, that was at 3pm in the afternoon, when the light was shining the opposite direction.” I eventually said “Look, I’m sick of jumping through hoops. The law plainly says I’m entitled to these curtains. Not only that, when I moved in, I was entitled to, as with any commercial law, any purchase, you are entitled to a replacement with the same standard.” Finally, I get back home with an email saying “We’ve just noticed that new standards are being brought in next year, so we’re going to put them in for you.” Like, aren’t we wonderful?”

Dave, consumer

Introduce a single regulatory environment for all rental properties

Hold rooming houses to the same standard as private rental properties

Council to Homeless Persons echoes the Victorian Government's belief that all Victorians deserve dignified and secure housing.^v Implementing a single regulatory framework for all rental properties—including private properties and rooming houses—would be a significant step towards making this vision a reality.

The introduction of rooming house standards more than a decade ago was a step in the right direction. Unfortunately, rooming house standards have not been reviewed or updated in line with changing regulations for general tenancies. Rooming house residents are once again being left behind, expected to live in conditions that would be illegal in the private rental market. The proposals put forward in the RIS will exacerbate this inequity. There is no reason that rooming houses should provide a lesser quality of accommodation than general tenancies.

High standards for rooming houses are warranted: not only because rooming house residents are often at the intersection of multiple forms of marginalisation, but also because Victoria should aspire to provide safe and secure housing to all Victorians—not just those who can afford the private rental market. Homelessness is a system and market failure. Implementing a single regulatory framework that holds all rental properties to the same standard would be a significant step towards making the experience of homelessness more dignified, and, ultimately, making homelessness rare, brief and non-recurring.

Recommendation 2: Introduce a single regulatory framework to bring rooming house standards in line with private tenancies.

Implement genuine, adequate living standards for rooming house residents

Minimum standards are an important part of regulation. Standards clearly dictate what property owners need to provide and are a clear pathway for tenants to speak up when their rights are violated. The Victorian Government has significantly improved renters' rights over the last few years—it is, therefore, unclear why the rights of rooming house residents have not simultaneously been improved. Rooming house residents shared that minimum standards have tangible impact on their ability to have dignified housing.

In Dave's case, he was forced to wait nearly a year and a half with inadequate window dressings. This is unacceptable. Not only did this negatively impact his sleep, but the process was stressful, dehumanising, and patronising. When the property managers finally agreed to fulfil their obligations and provide him with adequate window dressings, it was only because they would soon be obligated to do so under new minimum standards.

This speaks to the importance of minimum standards. Minimum standards have a tangible impact on the quality of amenities rooming house residents are able to access.

It is unclear why the proposals in the RIS would hold rooming houses to a lower standard than private rental properties. Rooming house residents are equally deserving of properly insulated, draughtproofed, heated, and cooled living conditions as private rental tenants. Rooming house residents often have a higher degree of need, and are more likely to have complex health issues than private tenants; this suggests that rooming houses should be held to an equal if not higher standard in providing safe, comfortable living environments as private properties.

"I lived in a private rooming house. The place was one of those brick early '90s places...that was subdivided further to add more rooms, those additional rooms. I think it was originally only a three or four-bedroom house. It expanded it to a 10-bedroom house with those add-ons. But all those add-ons, filled walls were paper thin.

It wasn't even double plaster. It was just one sheet, I think. Because you could hear far too much going on in adjacent rooms and zero insulation of any kind. But what he did was, I noticed he would satisfy the requirements to the absolute bare minimum. There are ways of getting around these. It gets away with the cheapest possible option, and at the same time, we suffer as if those options are not even there.

So to answer your question, most of the time it's skating the bare edge of... legal requirements, the minimum requirements at the time. Trying to find places where

you could at least, maybe not let us fry during the summer. But they're pretty [inaudible] it anyway that's been the requirements. And he was able to get around them pretty easily with things like plastic windows.”

Dave, consumer

Maybe don't let us fry in the summer: Provision of adequate cooling in all rental properties and rooming houses

Council to Homeless Persons strongly advocates for the introduction of minimum standards for cooling in rooming houses and other rental properties. CHP notes that the RIS does not address cooling in rooming houses. This is an oversight.

In our rooms, we have overhead fans. That's it.

Robert, Consumer

Heat is the most frequent cause of extreme weather-related injury hospitalisations and deaths in Australia, and increasing residential energy efficiency in all social housing is a top priority for mitigating the harmful impacts of extreme heat.^{vi} Victorians living in poverty—and particularly Victorians experiencing homelessness—are ‘by far the most impacted by extreme heat.’^{vii} Victoria’s public housing has low energy efficiency, and residents are often forced to leave their homes during heatwaves.^{viii} It is therefore critical that Option 4 of the RIS, for rental properties to be required to install a 3 star electric room cooler or a 3.8TCSPF ducted electric cooling system (equivalent to a 2 Star room cooler), be extended to rooming houses.^{ix}

Extending this regulation to rooming houses would not only create a safe and more dignified living environment for marginalised residents, but would bring rooming house regulations in line with private rental properties. This would further enable rooming house heating regulations to be aligned with rental properties—the RIS notes that this is not the case in section 8.3.3.

Recommendation 2a: Extend Option 4 in section 7.3.3 of the RIS to standardise fixed cooling in all rooming house bedrooms.

Recommendation 2b: Ensure minimum standards for cooling in residential properties, including rooming houses, are energy efficient and cost effective.

Draughtproofing rooming houses

Council to Homeless Persons supports a higher standard of draughtproofing in rooming houses and all rented premises. The RIS does not currently address draughtproofing in rooming houses; this is an oversight.

The proposed amendments in the RIS, to improve draughtproofing in rented premises via sealing or weather-stripping all external doors; filling unsealed wall vents with non-shrinking sealing material; and to seal unreasonable gaps or holes around door/window frames and other wall penetrations, do not specifically reference draughtproofing rooming houses.

As noted in the RIS, ‘adequate insulation and draught sealing play important roles in enhancing the energy efficiency in homes...sealing gaps and cracks can stop the heated air from escaping in winter, and prevent warm air from entering the house in summer.’^x Rooming houses should be draughtproofed to the same standard of other rented premises.

Recommendation 2c: Extend the proposed draughtproofing regulations under section 5.3.3 Option 2 of the RIS to rooming houses.

Improving heating regulations

As noted in Council to Homeless Persons’ 2022 response to the Residential Tenancies (Rooming House Standards) Regulations—Regulatory Impact Statement, CHP supports the adoption of minimum standards for heating in rooming houses. CHP continues to recommend that minimum standards for rooming houses be consistent with general tenancies.

“We have hydronic heating in the rooms, but it’s rather unreliable. It’s a case of it’s either flat out where you’re falling asleep and it’s so hot, or it’s freezing. There’s no middle ground. In my room, it leaked all over the place so the boxes I had, they were all destroyed. It took about eight to ten visits by service people to get it fixed. And apart from anything else, at the government level, it’s a waste of money because you’ve got a service guy coming around who is charging \$150 bucks at least for a visit. And he just whacks that off...and nothing is fixed.”

Robert, consumer

CHP supports the introduction of regulations to standardise and improve heating in rooming houses. Heating is not currently standardised in rooming houses in Victoria. CHP notes that the preferred option for rooming houses as per the RIS is for a less efficient heater—2-star fixed RCAC/1.5-Star equivalent central system in rooming houses versus a 2-star electric room heater, a 3.2HSPF ducted electric heating system (equivalent to a 1.5-Star room heater) in rental properties--than the preferred option for rental properties.^{xi} This difference is due in part to the lack of cooling regulations proposed for rooming houses. This should not be the case. Rooming houses should be subjected to the same standards of heating and cooling as all other rental properties.

To that end, CHP supports Option 4, section 7.3.3, if it is extended to rooming houses. This would 'require rental properties, including rooming houses, to install a 2 star electric room heater or a 3.2 HSPF ducted electric heating system (equivalent to a 1.5 Star room heater) and a 3 Star electric room cooler or a 3.8 TCSPF ducted electric cooling system (equivalent to a 2 Star room cooler).'^{xii}

If, however, rooming house regulations are not commensurate with those for other rental tenancies, CHP supports the RIS proposal under Option 1 (section 8.3.3), to require rooming house operators to install a fixed 2-star RCAC or 1.5-Star equivalent central system outline in each bedroom in a rooming house.^{xiii} Where rooming house operators already provide fixed heating, operators will be required to upgrade heating systems to ensure they comply with the standard once existing heating systems reach the end of their life.

CHP recommends that Option 4 from section 7.3.3 be applied to rooming houses.

Recommendation 2d: Implement RIS section 7.3.3 Option 4 to standardise fixed heating in all rooming house bedrooms to the same standard as other rental properties.

Improve rental reviews through participatory processes

Consumer Affairs Victoria should improve rent review processes through participatory consultation with lived experience experts

The previous rent review process “was just total clownsville.”

Robert, consumer

Council to Homeless Persons strongly advocates that Consumer Affairs Victoria (CVA) undertake a participatory review into rental increases for rooming houses. Rooming house residents must be consulted in this review process. During our consultation, rooming house residents gave multiple examples where their knowledge, expertise, and concerns were brushed off by rooming house property managers. This was particularly the case for Robert, during a recent rental review process. Robert engaged repeatedly and through multiple mechanisms with the non-profit agency charged with management of his rooming house and with DFFH to provide input on their consultation process. Robert was repeatedly assured that his concerns would be addressed through a consultation process, but when the time for the consultation came and went, Robert realised he'd been ignored. Ultimately, Robert was ignored.

They conducted the rent review...and there were so many issues...But people were never told what their rent was! The most they would get would be a phone call where they're ringing them, and saying 'what is my rent?'

Robert, consumer

Recommendation 3: Conduct a participatory review into rental increase processes, ensuring that people with lived experience of homelessness are provided multiple avenues to participate

Lived Experience Training

Putting the Victorian Housing Statement into action

The 2022 Victorian Housing Statement puts forward a clear vision to address the state's housing crisis. Council to Homeless Persons welcomes DFFH's commitment to 'introduce mandatory training and licensing for real estate agents, property managers, owners, corporation managers and conveyancers.'^{xiv} Mandatory training is essential to ensure consistent and adequate services are delivered to tenants, regardless of the type of residence in which they live.

CHP heard from members of the Peer Education Support Program (PESP) that too often, their valid concerns are dismissed.

Property managers clearly have an adversarial approach to customer service. No matter what we do for them, we're trying to help. For instance, we were dealing with an issue of someone who was constantly breaking in and the managers were doing absolutely nothing. They were lying to us, telling us they were checking video footage and so forth. It turns out, they didn't even know how to turn on the CCTV. And this woman [manager] came at one stage, she graced us with her presence unannounced. I happened to be in a really bad state of anxiety in the house, I was having an anxiety attack. She turned, and as I was leaving the room, because I didn't want to be further humiliated by her. And she starts mocking me, in front of [another resident].

Dave, consumer

This is unacceptable. Treating residents with dignity and respect is fundamental to the delivery of safe and supportive housing. Rooming house residents deserve to have their concerns taken seriously by property managers, and they deserve to have their concerns remedied in a professional and efficient manner.

CHP recognises that property managers and real estate agents rarely have the benefit of engaging directly with people with lived experience of homelessness in a learning environment. CHP is therefore recommending that the Victorian Government mandate all real estate agents and property managers working in social housing—including rooming houses—to undertake a training program with lived experience experts. Real estate agents and property managers must be able to effectively serve their clients. This type of program would not only enable real estate agents and property managers to understand and serve their clients better, but would give them valuable insight into the experience of being homeless.

Recommendation 4: Develop and implement a lived experience training program for all property managers and real estate agents to enable them to deliver high-quality services as per the Victorian Housing Statement

Make rooming houses better, for everyone

Provide wrap-around, in-reach support for residents with complex needs

As Minister Shing recently said, combining housing with comprehensive support is critical to “make homelessness rare, brief, and non-recurring.” CHP applauds and echoes this statement. If that vision is to become reality, it is essential that people experiencing homelessness are met with wrap-around support. This can and should include support for complex mental health challenges, alcohol and other drug use, employment support, education and training opportunities, and clear pathways to integrate and engage with community.

One-quarter of rooming house residents come directly from rough sleeping, and one-quarter of rough sleepers were most recently housed in rooming houses.^{xv} This demonstrates the high level of need of rooming house residents—and that, currently, rooming house residents are not getting the support they need to permanently end their experience of homelessness. CHP has consistently advocated that Victoria requires more services to divert people from homelessness, and people experiencing homelessness need more support to ensure their experience is rare, brief, and non-recurring.^{xvi} Providing services to rooming house residents is an integral part of ending homelessness. Rooming house residents have a high level of need, and therefore require a high degree of proactive, consistent care—from a trusted, specialised worker.

According to members of the Peer Education Support Program (PESP), support workers are non-existent in rooming houses. When asked about social workers, mental health workers, or other allied services coming to visit residents with identified need, PESP consultants were unequivocal that this does not happen in their rooming house. Rooming house tenants with complex needs are not getting the proactive support they need; this is detrimental to the peace, security, and dignity of all rooming house residents.

Recommendation 5: Increase investment in allied support services to ensure rooming house residents with complex needs are getting the in-reach support they need to make homelessness rare, brief, and non-recurring.

Fund rooming house outreach advocacy workers

Support rooming house residents to understand their rights and responsibilities

Rooming house residents are an almost completely unserved population. Rooming house outreach work for people experiencing homelessness is an important part of the wrap-around service structure. CHP heard from members of the Peer Education Support Program (PESP) that their outreach worker—a part-time staff member who is chronically overworked—is the only person they feel is on their side. Rooming house outreach workers can support residents who have a concern, complaint, or problem with their rooming house.

“I have a [5 metre] crack in my ceiling. There are gaps where...for many years, when it rained...it would come pouring down. I'd be sitting right there and it would be splashing on the mantelpiece where I sit. I'd have towels permanently on the mantelpiece. I swear to God, I must have spoken to 25 different people about it over the space of five years before they got it to the point where it seems as if they've almost stopped the problem—but I noticed [during a recent downpour] ... rain coming in, and bits of the ceiling or the cornice have fallen down. It's still not fixed. This has been going on for eight years.”

Robert, consumer

Funding rooming house outreach workers means enabling residents to understand their rights and responsibilities, and that they feel confident and supported if they raise a concern. During the consultation with members of PESP, CHP heard that outreach workers play an important role in their lives. CHP heard multiple stories where the outreach worker provided specific options for filing complaints, supporting residents to understand their rights and the responsibilities of the property managers to fulfil those rights. This type of advocacy outreach contributes to empowerment and self-determination for rooming house residents.

Recommendation 6a: Increase investment in advocacy outreach workers to support rooming house residents.

Recommendation 6b: Streamline complaints and remediation processes with increased accessibility of advocacy outreach workers.

References

ⁱ State of Victoria, “Residential Tenancies and Residential Tenancies (Rooming House Standards) Amendment (Minimum Energy Efficiency and Safety Standards) Regulations Exposure Draft” (State of Victoria, 2024).

ⁱⁱ Ms Kylea MP Tink, “Hansard Second Reading: National Housing and Homelessness Plan Bill 2024” (Second Reading Speech, Parliament House, Canberra, June 24, 2024), https://app.advoc8.co/feeds_v2/hansard_fragments/j3TEgrx?contribution_id=432599&feed_keywords%5B%5D=homelessness&feed_keywords%5B%5D=housing&feed_keywords%5B%5D=Housing+Supply&feed_keywords%5B%5D=housing+crisis&mxp_s=email_notification&mxp_u=1420.

ⁱⁱⁱ CHP, “Council to Homeless Persons Response to the Residential Tenancies (Rooming House Standards) Regulations 2022 – Regulatory Impact Statement” (Council to Homeless Persons, 2022), <https://chp.org.au/wp-content/uploads/2023/01/230113-Response-to-the-Rooming-Houses-RTA-Regulatory-Impact-Statement-FINAL-brand-correction.pdf>.

^{iv} CHP, 3.

^v Department of Premier and Cabinet, “Victoria’s Housing Statement: The Decade Ahead 2024-2034” (State of Victoria, 2023), 32.

^{vi} Ben Latham and Emma King, “Feeling the Heat” (Victorian Council of Social Services (VCOSS), 2021), <https://vcoss.org.au/wp-content/uploads/2021/06/Feeling-the-Heat.pdf>.

^{vii} Latham and King, 11.

^{viii} Latham and King, 11.

^{ix} Deloitte Access Economics, “Minimum Energy Efficiency and Safety Standards for Rental Homes – Regulatory Impact Statement” (Deloitte Access Economics, 2024), 57, <https://engage.vic.gov.au/download/document/35484>.

^x Deloitte Access Economics, 72.

^{xi} Deloitte Access Economics, 57 and 62.

^{xii} Deloitte Access Economics, 57.

^{xiii} Deloitte Access Economics, 62.

^{xiv} Department of Premier and Cabinet, “Victoria’s Housing Statement: The Decade Ahead 2024-2034,” 28.

^{xv} CHP, “Council to Homeless Persons Response to the Residential Tenancies (Rooming House Standards) Regulations 2022 – Regulatory Impact Statement,” 3.

^{xvi} CHP, “Residential Tenancies Act Review- Response to Heading for Home Final Options Paper” (Council to Homeless Persons, 2022), 4, <https://chp.org.au/wp-content/uploads/2022/03/170213-Response-to-final-RTA-issues-paper-FINAL.pdf>.