



30 October 2024

Council to Homeless Persons is the peak body representing organisations and individuals in Victoria with a commitment to ending homelessness. Our members provide services to people at risk of and experiencing homelessness, including for people in the private rental market. Council to Homeless Persons (CHP) supports the findings outlined in the *Renter Services Review Discussion Paper*.

Rental market conditions

As identified in the *Discussion Paper*, renters are struggling. Skyrocketing costs of living, climbing rental costs with diminishing housing affordability are increasing eviction risks—and more renters than ever are at risk of housing instability and homelessness. As more and more renters fall into financial disadvantage, demand for renter services like Tenancy Assistance and Advocacy Program (TAAP) is surging. With a new cohort of renters accessing TAAP, at-risk and marginalised Victorians are facing increased competition for scarce support resources, and are sometimes missing out. Every person that TAAP prevents from being homeless, is one less person or family that needs a crisis intervention.

Preventing homelessness means intervening early to provide renters with the support they need to maintain their tenancies, but because TAAP is stretched and priority is understandably given to people in immediate crisis, vulnerable people who need early intervention are without support until they themselves reach crisis. Expanding TAAP would mean expanding early intervention offerings to keep more people out of crisis and safely in their homes.

CHP notes that the *Renter Services Review Discussion Paper* focuses primarily on TAAP, a program providing informed advice to renters in dispute with their residential rental provider. This is important and necessary work. In the midst of the current cost of living crisis, it is equally important to support renters with financial support for rent arrears, and social support with matters impacting their lives. The Private Rental Assistance Program (PRAP) is an important part of responding to the needs identified in the *Discussion Paper*, and should also be expanded.

Representation at VCAT

CHP agrees with the *Discussion Paper's* findings that renter self-representation can ultimately lead to an exacerbation of issues and can lead to an accrual of debts as renters try and catch-up on payments. The power imbalance between renters and residential rental providers means that while residential rental providers are almost always represented at VCAT, most often by an agent, there is no similar level of support or expertise systematically available to renters. This means



renters are heading into VCAT without the same level of knowledge as their residential rental providers, putting them at greater risk of losing their tenancies. Fortunately, Victoria's TAAP program can effectively inform and represent renters at VCAT, putting renters on more equal footing with their residential rental providers. A massive increase in TAAP resourcing would go along way to addressing this structural inequality in the private rental market.

We know that in regional areas, some TAAP providers have found it beneficial to be physically present when VCAT visits their region. This enables providers to directly engage with people going into their cases, both raising awareness about the availability of TAAP and providing vital services to renters. As renters may have limited awareness of the services available to them, the physical presence of TAAP at VCAT, especially in regional areas, is an important part of service provision. Expanding TAAP to enable more regional providers to be physically at VCAT would lead to better outcomes for renters.

We can build on what works to address the challenges identified in the *Discussion Paper*. A significant expansion of TAAP, and related services like PRAP, would ensure more Victorians can access the services they need to avoid homelessness, right across the state.

We look forward to working with you to support housing security for all Victorians.

Sincerely,

A handwritten signature in blue ink that reads "Thomas Johnson".

Tom Johnson – Acting CEO, Council to Homeless Persons