



Safe, secure and affordable housing for rooming house residents – Rooming Houses Lived- Experience Project submission

With updates on 16 September 2022

Tenants Victoria acknowledges the Wurundjeri people of the Kulin Nation as the traditional owners of the land on which we practise. We recognise that sovereignty was never ceded and pay our respects to their Elders past, present and emerging.

About Tenants Victoria

Tenants Victoria is the peak body for the state's renters, who number more than 2 million people. Our vision is for a safe, secure and affordable home for every Victorian renter in a fair housing system. For many renting is a permanent situation rather than a transition from the family home to home ownership. We believe all renters, including rooming house residents, should be able to afford a home that allows them to live full lives and contribute to their communities.

Founded in the 1970s by renters, we aim to empower all renters and make sure their voices are heard in our advocacy. We work in partnership with other community legal centres and housing sector organisations, and strategically with government to inform policy development and enhance service delivery. We aim to make the housing system fairer in several ways. We advocate for practices and attitudes that respect renting and for policies and laws that support the rights of renters. We increase the skills of the community workers who assist renters. We provide information that encourages rental providers, real estate agents and rooming house operators to act responsibly.

Our services include information, legal representation and advice, financial counselling, and outreach. We aim to make the housing system fairer in several ways. We advocate for practices and attitudes that respect renting and for policies and laws that support the rights of renters. We increase the skills of the community workers who assist renters. We provide information that encourages rental providers and real estate agents to act responsibly.

Acknowledgments

Tenants Victoria acknowledges the support of the Victorian Government.



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About our rooming house support services

Since its inception Tenants Victoria has provided outreach, advice and support to rooming house residents. This support currently includes a Rooming House Outreach Program (RHOP), funded by the Department of Families, Families and Housing (DFFH), in recognition of the fact that many rooming house residents live with complex vulnerabilities and disadvantages and therefore find it more difficult to engage with housing and legal support. Through the RHOP we assist rooming house residents with information, facilitated referrals and other support. In 2020-21 we supported 63 residents with 84 referrals in relation to their support needs. We also work to escalate issues of non-compliance by rooming house operators to relevant regulators. In the 2020-21 financial year we also ran an International Student Rooming House Outreach Program that target support to international students. Through that program we engaged with 279 students, including through training and other outreach, and directly supported 66 students.

This submission draws on the client and worker experience of those programs.

Structure of response

There are two broad clusters of residents who live in rooming houses. Firstly, there are people with complex needs and entrenched vulnerabilities, including those with complex mental health issues, family violence survivors, people recently released from prison, and alcohol and other drug users. The second broad cluster comprises of international students, who experience a different set of vulnerabilities and disadvantages. Other clusters include working professionals and young international travellers. Given the depth of experience working with the first cluster through our RHOP, the focus of our submission is on that group of residents, although, where relevant, discussion also includes international students.

A range of rooming house types are available in our community – registered and unregistered rooming houses, run by private operators and by community housing providers. We recognise that many problems relate to private rooming houses; however, other issues run across all categories of ownership and operation. We seek to distinguish between these categories where appropriate.

This submission responds to the ‘Questions for resident support services and others’ posed in the Call for Submissions, with each part responding to more than one question as relevant, as set out below:

Question	Relevant part of our submission
10. What do residents tell you about their experiences of living in rooming houses?	See parts 1-8 below.
11. Are there common problems that are reported to you?	See parts 1-8 below.
12. Has your service ever reported a problem? What happened?	See ‘6. Insufficient regulation and enforcement’ below.

13. Are there any impediments to effective oversight or regulation of rooming houses in Victoria?	See '6. Insufficient regulation and enforcement' below.
14. Have you noticed any changes in living conditions in rooming houses?	We have not observed substantive changes in rooming houses over the course of the operation of the RHOP between 2013 and 2022.
15. What would improve living conditions in rooming houses?	See the summary of our recommendations below.

Finally, we note that all of the case studies in this submission have been provided with the consent of our clients and are de-identified.

Executive summary and our recommendations

Executive summary

Thank you for the opportunity to respond to this important Review.

A rapidly growing social housing wait list, stagnating social housing growth, and declining affordability of private rental have meant more people have little choice but to move into a rooming house. Yet despite significant regulatory reform of the rooming house sector¹ since the 2009 Rooming House Standards Task Force, which found 'squalid conditions' and 'unusable' shared facilities in rooming houses, support services such as ours have observed little substantive change in the state of many of them, including since the onset of the COVID pandemic. This is consistent with the findings of other agencies in relation to the quality of rooming houses, and other 'emergency' or short-term accommodation, over time.²

The residents that the Tenants Victoria RHOP supports, in general, live with highly complex needs and histories and entrenched vulnerabilities. Rooming house residents regularly report living with other people who have a mix of complex mental health and physical health issues, which often co-exist, histories of family violence, trauma, alcohol and other drug use and dependence and histories of incarceration, including people who have recently been released from prison. We hear of residents who feel they live 'without hope', are 'forgotten' and who are 'just existing' in rooming houses.

¹ This includes the introduction of the *Residential Tenancies (Rooming House Standards) Regulations 2012* (which introduced rooming house minimum standards), the *Rooming House Operators Act 2016* (which introduced a fit and proper persons test for operating a rooming house), *Public Health and Wellbeing Regulations 2009*, and the *Building Regulations 2018* (which require hard-wired smoke alarms for rooming houses).

² See for example the Peninsula Community Legal Centre, 'Open the Door! A resident's view of life in a rooming house' (2020); Northern and Western Homelessness Networks, 'A crisis in crisis - The appalling state of emergency accommodation in Melbourne's north and west' report (2019); Northern and Western Homelessness Networks, 'Crisis in Crisis II: A Way Forward - report of the Crisis Accommodation Option Project' (2021).

Residents regularly report, and our RHOP worker regularly observes, the disrepair of many, particularly private, rooming houses, which despite their non-compliance with minimum standards – which our worker regularly reports to regulators – exist in this state for many years. The often unsafe, even hazardous, conditions of these rooming houses directly and indirectly affect the physical safety and mental health of residents, compounding their experience of disadvantage. In addition, as the housing of ‘last resort’, rooming houses at times house people with histories of violence, who without appropriate support impact on the safety and wellbeing of other residents.

Further substantial reform in a number of areas is required, as we propose below, in order for the rooming house sector to be brought into line with what ordinary Victorians would expect are the conditions in which we house the most vulnerable in our society.

Recommendations

Our recommendations are:

Recommendation 1: That the Minimum Standards for Rooming Houses be reviewed by a consultative and human-designed process so that:

- They are brought in line with the current minimum standards for rental housing under the *Residential Tenancies Act 1997*.
- Rooming-house specific standards are strengthened: for example a minimum of one toilet for every five residents; a minimum of one shower for every five residents; continuous access to heating, cooling and cooking facilities; room numbers and separate mailboxes for each room; the provision of a washing machine as part of the laundry facilities.
- These standards be required in all rooming houses no later than January 2024.

Recommendation 2: That the Victorian Government consider whether, given the reliance on rooming house accommodation to house vulnerable Victorians who are eligible for social housing, all rooming houses should be required to be managed and operated by a registered social housing provider.

Recommendation 3: That the Victorian Government amend regulations so that any new purpose-built Class 1b (rooming houses with up to 12 residents) and Class 3 (rooming houses with more than 12 residents) are required to have fully self-contained rooms with some communal space.

Recommendation 4: That DFFH:³

- Update the Housing Establishment Fund (HEF) Guidelines to include a definitive statement regarding the use of HEF for accommodation that is appropriate to varying client needs, including clear definitions, using a rating scale, of what standard of accommodation is appropriate.
- Confirm in the HEF Guidelines that HEF should not be used to place a person where the cost of housing represents more than 30% of their income.

³ This largely mirrors recommendations in the Northern and Western Homeless Network’s 2019 *Crisis in Crisis* report.

- Draft and promulgate a policy that it and its funded services cease the use of rooming houses as a purchased accommodation option unless they meet a sufficient rating standard of accommodation.
- Increase HEF allocation to services at a level commensurate with the aim that emergency accommodation interventions are not only safe and secure, but long enough to provide a stabilising pathway to better housing outcomes. Further, that the HEF increase is viewed as a temporary measure until sufficient funding is provided to enable an appropriate housing-first model for those experiencing homelessness.

Recommendation 5: That DFFH, and its funded housing and homelessness services, prioritise the procurement of emergency accommodation options with self-contained facilities.

Recommendation 6: That DFFH undertake investigation into what policy or legislative reform may be required to ensure individuals are not placed in unsafe or hazardous housing. One option may be that any government-funded housing or support service (including housing services, mental health services, prisons and other health services) is unable to place people in rooming houses without undertaking an initial safety assessment that confirms: (a) the person's capacity to live independently in such a setting; (b) that the rooming house meets a particular rating standard of quality; (c) that the setting is sufficiently safe for the person, taking into account the other people placed in that premises where possible.

Recommendation 7: That high-quality access to the internet be considered an essential service in all rooming house properties and provided at no or low cost to residents.

Recommendation 8: That the Victorian Government fund at least 6 months of outreach support for each person placed in rooming house accommodation by government or its funded agencies that:

- Is ideally comprised of, or otherwise sufficiently connected with, well-resourced multidisciplinary supports including nurses, social workers, housing workers, social security officers, and mobile NDIS assessment services to help initiate and facilitate access to much needed support.
- During the period of support, the outreach support can assess the living conditions and immediately assist clients to complete a Priority Access Housing Application and link them in with all relevant supports as needed, and support their engagement with services.

Recommendation 9: That the Victorian Government advocate to the Commonwealth Government, through the National Federation Reform Council and other mechanisms, for an increase to JobSeeker and Commonwealth Rent Assistance commensurate with the rising cost of rents, including rooming house board.

Recommendation 10: That the Victorian Government and social housing sector work together to provide more affordable, supported and self-contained housing for people living with complex health and support needs, who subsist on JobSeeker.

Recommendation 11: That the Victorian Government fund the High Risk Accommodation Response, or similar programs, in order to connect rooming house residents with affordable community health supports.

Recommendation 12: That the Victorian Government amend the Victorian Housing Register (VHR) Offer of Housing Operational Guidelines so that residents who move into community housing-run rooming houses are not removed from the VHR waitlist for long-term social housing.

Recommendation 13: To support a consistent approach to enforcement activities relating to unregistered rooming houses, Consumer Affairs Victoria (CAV) should draft a Director's Guideline under the *Residential Tenancies Act 1997*, which clarifies the definition of 'rooming house' and includes examples of what might qualify as an unregistered rooming house.

Recommendation 14: That the Victorian Government consider a single regulator, or in the alternative a coordinated regulatory approach across the multiple regulatory agencies (possibly working with the Local Government Victoria in relation to the coordination of councils), for the rooming house sector. If a coordinated regulatory approach is adopted, this should be based on consultation, including with residents and their support workers, and include:

- More proactive monitoring, investigating, and enforcement activity.
- Improved coordination and collaboration between CAV and local councils, including the coordination of joint unannounced inspections of rooming houses.
- An information-sharing regime between CAV and local councils.
- An 'intelligence-led' approach, which requires closer work by regulators with residents and their support workers.
- An improved and transparent complaints-handling approach, as set out below.

Recommendation 15: That the Victorian Government establish a state-level rooming house consultative or advisory committee made up of all key stakeholders to provide oversight of the state-wide picture in relation to rooming house regulation.

Recommendation 16: That rooming house regulatory authorities develop and implement a consistent, simple and accessible complaints pathway for residents to report rooming house issues, which provides for:

- Proactive investigation of complaints, including where a complainant is only able to provide limited information.
- Clear guidelines on steps that may be taken in response to complaints, timelines, and provision for action where the rooming house operator is not responsive.
- Timely communication with complainants about steps taken and any outcomes.
- Monitoring, recording, and immediate referral of any retaliatory action by a RHO against a complainant.
- A strategic, systematic response that ensures the housing needs of residents are met where a rooming house must be closed, for any reason – for example, through early contact with housing and homelessness services within the local government authority.

Recommendation 17: We support the Legislative Council’s recommendation 38 in its *Inquiry into Homelessness Final Report*⁴ that the Victorian Government improve monitoring and compliance actions in relation to rooming houses, and in particular:

- Ensure the regulator of rooming houses is adequately resourced to monitor and inspect registered rooming houses to ensure the prescribed standards are met and to investigate and respond to reports of unregistered rooming houses.
- Promote information-sharing and collaborative responses between Consumer Affairs Victoria and local councils in order to target unregistered rooming houses.
- Investigate the potential for development of a standardised accommodation ratings system for private rooming houses.
- Review planning scheme provisions in relation to rooming houses to prevent a concentration in particular areas and to ensure they have connectivity to services.

Recommendation 18: That Consumer Affairs Victoria and local councils implement a more proactive enforcement approach to rooming house non-compliance, given the particular vulnerabilities of rooming house residents that makes reliance on individual action less appropriate in this sector.

Recommendation 19: That Consumer Affairs Victoria considers greater utilisation of the Director’s investigation power under section 131A of the *Residential Tenancies Act* to address serious non-compliance by rooming houses operators.

Recommendation 20: That the Victorian Government amend the *Public Health and Wellbeing Regulations 2009* to provide local councils with a similar investigative and directive power as in section 131A of the *Residential Tenancies Act* in relation to breaches of regulations 18 and 19 of those Regulations.

Recommendation 21: That both CAV and local councils have the power to issue ‘on the spot’ fines for breaches by rooming house operators of the *Residential Tenancies Act* and its regulations, and the *Public Health and Wellbeing Regulations 2009*.

Recommendation 22: That Victoria Police undergo training in relation to relevant parts of the *Residential Tenancies Act* and consequent orders that may be made by VCAT, particularly urgent restraining orders, to improve the proper enforcement and efficacy of these orders.

Recommendation 23: That the Victorian Government prioritise investment in sufficient, suitable and supported social housing so that all Victorians can live in safe, secure, and affordable housing, particularly those living with complex needs, now and into the future. This should include a priority on housing options for single people on the lowest incomes, including JobSeeker.

⁴ LCLSIC_59-06_Homelessness_in_Vic_Final_report.pdf (parliament.vic.gov.au)

1. Unsafe, unmaintained and unhealthy housing conditions

'I'd rather live on the streets than go to a rooming house'⁵

The *Residential Tenancies (Rooming House Standards) Regulations 2012* (Vic) prescribe rooming house minimum standards. These include lockable doors, kitchen, bathroom, dining and laundry facilities as well as fire, electrical and gas safety standards. All registered rooming houses are listed on Consumer Affairs Victoria's website – however, many unregistered rooming houses operate. Residents and their support workers can make complaints to Consumer Affairs Victoria where they consider rooming house standards are not being met. Rooming houses are also required to be registered with the relevant local council, who can inspect the property to ensure it complies with additional standards prescribed under the *Public Health and Wellbeing Regulations 2009* (Vic). Complaints can also be made to councils.

Despite this two-tier system of regulated standards for this sector, our experience is that many, in particular private, rooming houses fall far short of these standards. Since 2013, through our RHOP and general legal practice, rooming house residents regularly report unsafe and unhealthy living conditions including unsafe and poorly maintained internal and external areas, insufficient shared facilities, overcrowding, lack of cleanliness, and other issues. Two examples of this are set out below in the de-identified case studies relating to the premises at 'Apple St', which has been reported to regulators on numerous occasions, and the story of 'Rose'.

Case Study – Registered rooming house at 'Apple St' has seen no improvement since 2014

The RHOP has been visiting the private registered rooming house at Apple St, Cranberry, since 2014. There have been a number of outstanding repair and safety issues at that premises since that time. Over the years, our RHOP Worker has observed the following:

- Up to 10 people living in this house at times, including people in the garage.
- In around 2019-20, including during the initial COVID pandemic period, a piece of fabric was used to create two rooms out of one, and the two spaces were let out separately.
- There is a concertina toilet door with a big gap above it that is unable to be secured. At times there have been women living in the premises.
- Windows are replaced with board.
- The sideway and the rear of the premises was often piled up with rubbish that blocked access to leave the property if there was a safety issue.
- The rotten front-porch floor has had a rug nailed over it to keep it together. In the rain it is wet and slippery and residents have fallen and hurt themselves.
- A couple of years ago a female resident fell through the rotten bathroom floor and seriously injured her hip.

⁵ Robert Ashton from Community Housing Ltd giving evidence to the Victorian Legislative Council Inquiry into Homelessness, that many prisoners will say *'I'd rather live on the streets than go to a rooming house'*: Inquiry into Homeless – Final Report (2020), page 223: LCLSIC_59-06_Homelessness_in_Vic_Final_report.pdf (parliament.vic.gov.au)

- Fires were lit in the house and damage was not repaired.
- The long and thin hallway has no lighting, presenting a potential fire and safety issue.
- Bedroom door handles were broken off and not replaced.
- External side and back area of the premises were at times blocked due to rubbish.

At **Appendix A** we provide some images of this registered rooming house taken in October 2021.

The Tenants Victoria RHOP has referred this property to CAV and the local council on multiple occasions and requested enforcement action against the rooming house operator in relation to regulatory non-compliance and safety concerns. We understand that these regulators have over time contacted the operator to requests improvement but these requests have had minimal impact on the state of the property.

The following notifications had been made by Tenants Victoria in relation to this premises:

- In 2014, a notification was made to the council and CAV in relation to repair issues. In following years, this notification was followed up at numerous instances.
- In each of 2020, 2021 and 2022 notifications were again made to CAV and the council.
- In 2021, a notification to the Residential Tenancies Commissioner was also made.
- In 2021 a notification was made to DFFH in relation to overcrowding and safety issues during COVID, and a mobile COVID-19 testing unit was deployed to the premises.

In about October 2021, the RHOP notified the North and Western Homelessness Local Area Service Network (LASN) of the serious repair and safety concerns and requested that no referrals of new residents be made to this premises until further notice. An embargo on residents being placed at this premises was initiated and has remained in place since then. This has reduced the number of people with complex needs being placed in this premises, which in turn placed financial pressure on the operator, and so has resulted in some repairs. Unfortunately, some prisons and hospitals, which are not part of the LASN, continue to place people in this premises.

Despite the numerous reports over the years, the property remains in a state of serious disrepair. When the RHOP last visited this property, in about March 2022, the operator was moving residents in while undertaking his own renovations of the internal space.

The premises is an example of how enforcement and regulation fail to properly maintain or improve poorly maintained premises for the most vulnerable residents.

As set out above, known problem operators such as the one operating 'Apple St' continue to provide a profoundly substandard service to residents, with insufficient or ineffective action being taken by regulators to improve the amenity and safety of these premises on a day-to-day basis.

As in Rose's story below, residents also regularly described injuries they sustained while living in poorly maintained, badly run rooming houses. We note the duty in section 120 of the Residential Tenancies Act that a rooming house operator maintain a rooming house in good repair, and the requirements in regulations 18 and 19 of the *Public Health and Well Regulations 2009* that require rooming houses to be adequately maintained and cleaned. However, given the particular complex needs and vulnerabilities of many rooming house residents, and their reduced bargaining power given the lack of other housing

options – for many the choice is either life in a rooming house or on the streets – enforcement of such provisions through individual action at VCAT is unrealistic. Residents, such as Rose, often feel very unsafe if they speak of their legal rights, let alone attempt to uphold them.

Over the years residents have been violently assaulted, issued with notices to leave, and even locked out of properties for asserting their rights to repair. Therefore, as discussed in the ‘Enforcement’ part below, a more active and interventionist enforcement strategy is appropriate for the rooming house sector.

Case study: Rose’s story – distress following accident reduces confidence to take action

Rose is an older woman who moved into a registered rooming house in her mid-50s, then had two serious falls while she lived there. On both occasions she slipped down the back steps, which were rotten, and sustained significant cuts and bruising. It took her several weeks to recover each time.

When the issue was raised with the rooming house operator, rather than properly repairing or replacing the steps they banged a few nails in, which led to further falls. At the time the resident was so distressed about her living situation that she felt unable to take action to address this issue.

Our experience is that the most egregious contraventions of housing standards occur in the private rooming house sector, with less non-compliance than in rooming houses managed by social housing providers.

Given the above concerns in relation to privately managed rooming houses, we support consideration by government of whether it is appropriate that all rooming house management be brought within the realm of social housing registration and standards, and that preferably rooming house accommodation be transitioned to appropriate and supported self-contained housing. In the short-to-medium term, we also support consideration of a policy change that support agencies, particularly those that are part of, or funded by, government, have sufficient funding available and guidance that no individuals are placed in sub-standard rooming houses.

We therefore make the following recommendations:

Recommendation 1: That the Minimum Standards for Rooming Houses be reviewed by a consultative and human-designed process so that:

- They are brought in line with the current minimum standards for rental housing under the *Residential Tenancies Act 1997*.
- Rooming-house specific standards are strengthened: for example a minimum of one toilet for every five residents; a minimum of one shower for every five residents; continuous access to heating, cooling and cooking facilities; room numbers and separate mailboxes for each room; the provision of a washing machine as part of the laundry facilities.
- These standards be required in all rooming houses no later than January 2024.

Recommendation 2: That the Victorian Government consider whether, given the reliance on rooming house accommodation to house vulnerable Victorians who are eligible for social housing, all rooming houses should be required to be managed and operated by a registered social housing provider.

Recommendation 3: That the Victorian Government amend regulations so that any new purpose-built Class 1b (rooming houses with up to 12 residents) and Class 3 (rooming houses with more than 12 residents) are required to have fully self-contained rooms with some communal space.

Recommendation 4: That DFFH:⁶

- Update the Housing Establishment Fund (HEF) Guidelines to include a definitive statement regarding the use of HEF for accommodation that is appropriate to varying client needs, including clear definitions, using a rating scale, of what standard of accommodation is appropriate.
- Confirm in the HEF Guidelines that HEF should not be used to place a person where the cost of housing represents more than 30% of their income.
- Draft and promulgate a policy that it and its funded services cease the use of rooming houses as a purchased accommodation option unless they meet a sufficient rating standard of accommodation.
- Increase HEF allocation to services at a level commensurate with the aim that emergency accommodation interventions are not only safe and secure, but long enough to provide a stabilising pathway to better housing outcomes. Further, that the HEF increase is viewed as a temporary measure until sufficient funding is provided to enable an appropriate housing-first model for those experiencing homelessness.

2. Violence at home

In a 2019 study of a number of different renters' experiences undertaken by Consumer Affairs Victoria, it was noted that rooming house residents in particular recounted many 'harrowing' stories related to 'violence, drug use and filthy living conditions'. While this is not the experience of all residents, it has also been the experience of the Tenants Victoria RHOP that rooming house residents regularly report personal safety issues in the rooming houses they are placed in. The RHOP regularly hears stories of serious violence and physical safety issues occurring in rooming houses due to the actions of co-residents. Some residents have reported that to remain safe they would hide and often cook in their rooms – creating further safety issues.

Residents have also disclosed the significant health impacts of living with the constant threat of violence in rooming houses includes diagnosable medical conditions like Post Traumatic Stress Disorder (PTSD), anxiety and depression. One former rooming house resident, 'Rebecca', shared the following experience:

I felt like I was treading on eggshells a lot of the time. Everything you can imagine went on in that house. So much abuse. I tried to talk to the house manager about how unsafe it was lots of times but they didn't care and wouldn't do anything. I was chased by a very unwell resident on methamphetamine who tried to attack me with a machete. One time, someone smashed into my

⁶ This largely mirrors recommendations in the Northern and Western Homeless Network's 2019 *Crisis in Crisis* report.

room and beat the crap out of his partner, who we were trying to keep safe. It happens right in front of you and you can't do anything about it.

You lose trust in people. I wasn't like that before. The distrust builds and it makes it hard to trust services. I didn't know where to turn for help or support. It's done a lot of damage to my mental health. I lost all my confidence. I had anxiety and panic attacks, and it got to the point where I was scared to leave my room. I needed help to get out the front door. I had night terrors and flashbacks. I talked to my doctor about it and was diagnosed with anxiety, depression and PTSD.

Residents have also advised that pre-existing health conditions have escalated. Residents, such as 'Sean' in the case study below, report that operators do little to address these issues, other than telling residents to call the police where they have a safety concern. This places already vulnerable and frightened residents at increased risk.

Case study: Sean's story – significant violence in the home with no relief

Sean became homeless after his housemate moved out of their private rental after several years. He struggled with ADHD and was unable to sustain the rent. He used all of his savings to stay another six months in his rental then became homeless, living in cheap hotel rooms in the CBD. There were a lot of drug problems there and residents fought violently in the room next to him – one stabbed the other. He lived there for several weeks, trying every day to call through to the local homeless 'front door' intake point. It took him four weeks to get through. He called 26 times before he finally spoke to someone.

This service placed him in a rooming house in the west – an area he knew nothing about and had no connection with. He was in a 10-room property with one kitchen and one toilet, for two years. In this time his health issues escalated. No one helped him apply for longer term housing.

While living at the rooming house Sean witnessed a number of distressing incidents. Firstly, a group of methamphetamine users lived in and dealt drugs from the premises, so strangers were always coming and going. Often 2 or 3 people lived in each room, including people wanted by the police. The police attended the premises all the time.

When residents left they still had keys, often coming back whenever they wanted and creating problems. There was frequent fighting between residents and guests and regular violent assaults. A person who did not live there bashed a resident with a brick, breaking several ribs and puncturing his lung. At one point a young woman with serious mental health issues lived in the house – the only female resident. The young woman was very unwell and often appeared around the house with no clothes on. She had male clients attend her room for sexual favours. This was very distressing for other residents, who did not know how to respond, and whether help was required.

The rooming house operator was made aware of these issues but would claim that he did not know what to do. He had a security camera in the hallway so he could see who came in and out and even observe fighting and other issues but refused to use the footage to deal with the issues raised. He was, however, reported to use the camera to identify when it was safe for him to visit the property.

When issues were raised with the operator, he told frightened residents to call the police. In some instances, the police would attend and take people away. One of the factors that made this rooming house so unsafe was that the operator seemed to accept anyone willing to pay rent. There did not

seem to be any vetting of residents to consider whether they would be a good fit or whether they would be violent.

There is a real question about whether it is possible to ensure the safety of individuals who share common areas with others who engage in illegal and violent behaviour. One long-term solution is the procurement of a higher proportion of housing for singles that have self-contained facilities. Less clear is the short to medium-term solution to ensuring the safety of residents in rooming houses.

Recommendation 5: That DFFH, and its funded housing and homelessness services, prioritise the procurement of emergency accommodation options with self-contained facilities.

Recommendation 6: That DFFH undertake investigation into what policy or legislative reform may be required to ensure individuals are not placed in unsafe or hazardous housing. One option may be that any government-funded housing or support service (including housing services, mental health services, prisons and other health services) is unable to place people in rooming houses without undertaking an initial safety assessment that confirms: (a) the person's capacity to live independently in such a setting; (b) that the rooming house meets a particular rating standard of quality; (c) that the setting is sufficiently safe for the person, taking into account the other people placed in that premises where possible.

3. Need for internet connectedness as an essential service

One stark commonality in relation to rooming houses, and their residents, is the frequent lack of access to the internet. Given the increased reliance on web-connectedness by government and social services for the provision of essential support, this is critically important for rooming house residents, who often require connection to multiple support agencies. In one instance of support provided by our RHOP worker at a community housing-run rooming house, our client was required to pay a large fee to organise a router or pay for his own access to the internet on his mobile phone. We support internet connectivity being considered an essential service in rooming houses that should be provided at no, or low, cost to residents.

Recommendation 7: That high-quality access to the internet be considered an essential service in all rooming house properties and provided at no or low cost to residents.

4. Insufficient and non-coordinated support for residents

The vast majority of rooming house residents supported by Tenants Victoria describe multiple complex health needs or disabilities. Residents regularly report that living in a rooming house exacerbates pre-existing health issues and trauma. Often these conditions result in people becoming homeless. It is well

documented that prolonged periods of homelessness result in premature aging and reduced life expectancy.⁷

Despite multiple and ongoing health issues that could qualify them for the Disability Support Pension (DSP), most residents remain on JobSeeker without any support to help access more appropriate income support. Many do not even have a regular GP. Residents describe a myriad of barriers to accessing support and require considerable assistance and advocacy to access basic services that they are entitled to, including the National Disability Insurance Scheme (NDIS), the DSP and support completing Priority Homeless with Support Housing applications. Residents also report that life in rooming houses is so challenging and exhausting that finding the energy to seek support becomes difficult, and at times impossible. They also report that it is difficult to know where to seek help, and that calling repeatedly to try to get through to services without success is distressing, so they give up.

While our RHOP worker provides vital outreach support to rooming house residents in the north and west of Melbourne, and its sister program run by Peninsula Community Legal Centre does so in the south and east of Melbourne, this support does not extend to ongoing social security applications, NDIS applications, financial counselling, and other supports. Most homeless front-door services have no capacity to follow up with appropriate housing applications and support for residents.

Our experience has therefore been, and as evidenced in Tom's story below, that long-term case management services are insufficient to provide proactive support for rooming house residents with complex needs. Services that do attend rooming houses are often overstretched and under-resourced.

Case Study: Tom's story – insufficient early support to long-term rooming house resident with complex health needs

Tom has lived in multiple rooming houses for 15 years. He worked as a long-haul truck driver for a long time until he had his first stroke over a decade ago, which affected his memory and mobility and left him blind in one eye. He did not feel safe to drive any more. He approached Centrelink about DSP at this time and reports that he was advised that he could still drive and should continue to look for work. With the right advocacy at this time Tom might have been able to access DSP and much needed health support.

After this time Tom had two more strokes, further affecting his mobility and cognitive function before he finally accessed the DSP. He is eligible for NDIS support but is unable to arrange this for himself due to low literacy, lack of support and no internet access. He spent several weeks in a rehabilitation centre at the end of 2021 after his fourth stroke, at which point a social worker commenced the NDIS paperwork. However, he has not received an update on the status of this application and has no reference number to follow up. Tom did not know where to go or who to see to get help about this. He requires assistance with printing out forms and completing them.

Tom believed that public housing would be more expensive than his current rooming house accommodation and was unaware that he would be eligible for utilities discounts and vouchers to help him manage. For this reason he had never applied for public housing in the 15 years he has

⁷ See for example: <https://onlinelibrary.wiley.com/doi/full/10.1111/1753-6405.13038>

lived in rooming houses, during which time he reports often witnessing and experiencing terrible things and experiencing seriously declining health.

Many residents, like Tom, are under misapprehensions about public housing. They have not completed their Priority Housing Application when they meet with our RHOP worker after years of living in rooming houses or are unaware that they are eligible for this kind of housing application, even after many years in problem properties. Residents often report that they applied for housing decades ago and are confused about why they have not been housed. When this is investigated, some residents in this instance will only have a register of interest on the Victorian Housing Register rather than having made the much more urgent Priority Housing Application, which they are eligible for due to DFFH recognition that private rooming houses are not secure housing.

Recommendation 8: That the Victorian Government fund at least 6 months of outreach support for each person placed in rooming house accommodation by government or its funded agencies that:

- Is ideally comprised of, or otherwise sufficiently connected with, well-resourced multidisciplinary supports including nurses, social workers, housing workers, social security officers, and mobile NDIS assessment services to help initiate and facilitate access to much needed support.
- During the period of support, the outreach support can assess the living conditions and immediately assist clients to complete a Priority Access Housing Application and link them in with all relevant supports as needed, and support their engagement with services.

5. Rooming houses entrench poverty and disadvantage

Rooming houses are unaffordable

People on Jobseeker are virtually completely excluded from the private rental market. In Anglicare's annual rental affordability snapshot in April 2022, out of 45,992 listings, Anglicare found just seven rentals that were affordable for a single person on the JobSeeker payment.⁸ Private rooming house operators arguably exploit the lack of options available for this cohort by charging high rates– (between \$210 and \$250 a week – for a single room in the outer suburbs of Melbourne. For a person on JobSeeker with Commonwealth Rent Assistance at the highest rate,⁹ paying \$225 a week, this represents 57% of a resident's income.

Community housing providers have also reportedly charged more than \$200 a week for a single room in a rooming house, which represents 51% of a person's income if they are on JobSeeker. Residents paying \$225 a week in rent are left with \$338.50 a fortnight, or \$24.18 a day, to cover medical needs, food, a mobile phone, public transport costs, clothes and other necessities. In September 2021, the Henderson Poverty Line specified that a single person (not in the workforce) required income of

⁸ Rental-Affordability-Snapshot-National-report.pdf (anglicare.asn.au)

⁹ Currently JobSeeker is \$642.70/fn for a single with no children - How much JobSeeker Payment you can get - JobSeeker Payment - Services Australia. Rent assistance for a single with no children paying \$450/fn in boarding is \$145.80: How much Rent Assistance you can get - Rent Assistance - Services Australia

\$592.86 a fortnight to survive above the poverty line.¹⁰ This shows how those living in rooming houses are often further forced below the poverty line due to their rental hardship – a position that entrenches their poverty and disadvantage.

Recommendation 9: That the Victorian Government advocate to the Commonwealth Government, through the National Federation Reform Council and other mechanisms, for an increase to JobSeeker and Commonwealth Rent Assistance commensurate with the rising cost of rents, including rooming house board.

Recommendation 10: That the Victorian Government and social housing sector work together to provide more affordable, supported and self-contained housing for people living with complex health and support needs, who subsist on JobSeeker.

Consequences of rooming house unaffordability

Although rooming houses are deemed to be insecure, crisis, and short-term housing options, many residents live in these properties for years – even decades – if they find a way to maintain the rent, many only on a JobSeeker income. Given many residents are dealing with multiple complex health issues (sometimes diagnosed and sometimes not), these circumstances coupled with a very low disposable income make obtaining and maintaining work difficult, if not impossible.

Due to their low disposable income, very few residents can afford to run a car. Rooming houses are often located in back streets, in middle-ring and i outer suburbs, a long way from shops, other services and decent public transport. This situation, together with their lack of income, makes meeting Centrelink obligation requirements difficult, which in turn risks JobSeeker payments being cut off for weeks or sometimes months, and requires advocacy for the payment to be reinstated.

People in rooming houses have often had to choose between eating or recharging their phone. Our RHOP worker has regularly seen people weak from hunger while attending outreach visits. Although a number of food security services operate throughout the north-west of Melbourne, very few deliver to rooming houses or are even located close by. This makes accessing these services excessively difficult. However, as part of the COVID pandemic response, the High Risk Accommodation Response (HRAR) programs included rooming house residents among the vulnerable communities at risk of COVID. These responses have been wonderful at linking residents to community health supports and delivering food parcels and other important resources to them.

Recommendation 11: That the Victorian Government fund the High Risk Accommodation Response, or similar programs, in order to connect rooming house residents with affordable community health supports.

¹⁰ Poverty-Lines-Australia-September-2021.pdf (unimelb.edu.au)

Misunderstandings about housing status lock people into homelessness

The Victorian Housing Register (VHR) Offer of Housing Operational Guidelines¹¹ states that:

When an applicant enters into a renters' agreement with a social housing organisation their application will be removed from the register as their housing request is considered met.

This means that when a VHR applicant is housed in a community-managed rooming house, their application for long-term housing is closed, and they lose their place in the waitlist for this type of housing. This is despite the fact that they are housed in insecure, short-term housing that generally does not meet their needs (i.e., has communal facilities rather than a self-contained unit). Generally, residents placed in rooming houses do not understand this when they move in. The risk of violence and assaults and significant safety issues in rooming houses often result in these same residents again becoming homeless. In a recent RHOP case, a resident did not understand that he had been removed from the VHR when he was placed in a community rooming house. He fled after a violent assault, has been homeless for the last two years and is currently living in an unregistered rooming house. He was only now advised that if he had obtained a police report he could have applied for a priority transfer from the original premises on the basis of violence but did not obtain a report as he was not aware of that at the relevant time.

Recommendation 12: That the Victorian Government amend the Victorian Housing Register (VHR) Offer of Housing Operational Guidelines so that residents who move into community housing-run rooming houses are not removed from the VHR waitlist for long-term social housing.

6. Insufficient regulation and enforcement

Our RHOP worker routinely reports breaches of rooming house standards to both CAV and the local council. Our experience is that breaches of standards and regulations are rarely investigated, prosecuted, and enforced. If they are enforced, this does not occur in a timely manner. Problem operators are rarely if ever fined, despite continuing and serious breaches of legislation. One example of this is the Kornucopia case study (see section 7: Student focused rooming houses, below), where it is unclear whether enforcement action was taken by either CAV or the local council, despite potentially hundreds of student residents being impacted.

A success the RHOP has had in impacting system-wide change in relation to the state of rooming houses was in the Apple St case study (see section 1: Unsafe, unmaintained and unhealthy housing conditions), in which we advocated successfully for a network of homelessness services to impose an embargo on placing individuals in a list of sub-standard and unregistered rooming houses. This response was initiated as a result of the 2019 *Crisis in Crisis Report*¹², which documented the egregious conditions residents described in rooming houses.

Some thought needs to be given to how enforcement investigation occurs. Currently in most instances, councils and CAV will give the operator notice of their intention to visit. This is not useful, as residents

¹¹ 07_VHR_Offer_of_Housing_Operational_Guidelines_(accessible) 260321.docx (live.com), page 2.

¹² A crisis in crisis: the appalling state of emergency accommodation in Melbourne's north and west (apo.org.au)

tell us that the operator will prepare for these visits ahead of time, asking residents to leave for the day of the inspection, or to not to let council into the premises. In doing this rooming house operators are often able to conceal how many people live at a premises, and other breaches. In one matter, residents were asked to by a rooming house operator to sign a fake tenancy agreement as evidence that the property was a 'share house'. There have been cases of the operator boarding up additional rooms during an inspection and claiming that they are not used. In others, residents have described instances where they have converted a bedroom to a living room on the day of an inspection to make it look like there were fewer bedrooms for rent.

It is also our impression that there is no consistent understanding of what constitutes an unregistered rooming house across various enforcement agencies. The *Residential Tenancies Act* defines 'rooming house' in section 3(1) as 'a building ... in which there is one or more rooms available for occupancy on payment of rent ... in which the total number of people who may occupy those rooms is not less than 4'. This means that there is no requirement for there to be four separate bedrooms, as some rooms might be offered to couples or there might be shared rooms for students. In our experience, some councils will not determine an unregistered rooming house to be a rooming house unless there are four people residing in the premises in at least four separate rooms, which we argue is an incorrect approach.

We have also had an inconsistent experience in submitting complaints to regulators, both CAV and local councils, about rooming house breaches. When submitting complaints to some regulators, there is no response from the regulator on whether the complaint has prompted an investigation, and if it has, what the actions, timeline and outcomes may be. Some councils state that the Privacy Act does not allow them to provide feedback and updates about an investigation process to a support worker. However, if the support worker has consent to receive information in relation to an individual, this should not be an impediment to the provision of information.

Such responses discourage both residents, and their support workers, from bringing complaints to these regulators, diminishing the intelligence these regulators receive in relation to systemic issues. Given the often hazardous and unsafe conditions of rooming houses, and the vulnerabilities of those that live in them, this is of great concern. We would therefore welcome a more consistent, transparent, and accessible approach to complaints handling, as set out in the recommendations below.

Recommendation 13: To support a consistent approach to enforcement activities relating to unregistered rooming houses, Consumer Affairs Victoria (CAV) should draft a Director's Guideline under the *Residential Tenancies Act 1997*, which clarifies the definition of 'rooming house' and includes examples of what might qualify as an unregistered rooming house.

Recommendation 14: That the Victorian Government consider a single regulator, or in the alternative a coordinated regulatory approach across the multiple regulatory agencies (possibly working with the Local Government Victoria in relation to the coordination of councils), for the rooming house sector. If a coordinated regulatory approach is adopted, this should be based on consultation, including with residents and their support workers, and include:

- More proactive monitoring, investigating, and enforcement activity.
- Improved coordination and collaboration between CAV and local councils, including the coordination of joint unannounced inspections of rooming houses.

- An information-sharing regime between CAV and local councils.
- An ‘intelligence-led’ approach, which requires closer work by regulators with residents and their support workers.
- An improved and transparent complaints-handling approach, as set out below.

Recommendation 15: That the Victorian Government establish a state-level rooming house consultative or advisory committee made up of all key stakeholders to provide oversight of the state-wide picture in relation to rooming house regulation.

Recommendation 16: That rooming house regulatory authorities develop and implement a consistent, simple and accessible complaints pathway for residents to report rooming house issues, which provides for:

- Proactive investigation of complaints, including where a complainant is only able to provide limited information.
- Clear guidelines on steps that may be taken in response to complaints, timelines, and provision for action where the rooming house operator is not responsive.
- Timely communication with complainants about steps taken and any outcomes.
- Monitoring, recording, and immediate referral of any retaliatory action by a RHO against a complainant.
- A strategic, systematic response that ensures the housing needs of residents are met where a rooming house must be closed, for any reason – for example, through early contact with housing and homelessness services within the local government authority.

Recommendation 17: We support the Legislative Council’s recommendation 38 in its *Inquiry into Homelessness Final Report*¹³ that the Victorian Government improve monitoring and compliance actions in relation to rooming houses, and in particular:

- Ensure the regulator of rooming houses is adequately resourced to monitor and inspect registered rooming houses to ensure the prescribed standards are met and to investigate and respond to reports of unregistered rooming houses.
- Promote information-sharing and collaborative responses between Consumer Affairs Victoria and local councils in order to target unregistered rooming houses.
- Investigate the potential for development of a standardised accommodation ratings system for private rooming houses.
- Review planning scheme provisions in relation to rooming houses to prevent a concentration in particular areas and to ensure they have connectivity to services.

Recommendation 18: That Consumer Affairs Victoria and local councils implement a more proactive enforcement approach to rooming house non-compliance, given the particular vulnerabilities of rooming house residents that makes reliance on individual action less appropriate in this sector.

¹³ LCLSIC_59-06_Homelessness_in_Vic_Final_report.pdf (parliament.vic.gov.au)

Recommendation 19: That Consumer Affairs Victoria considers greater utilisation of the Director’s investigation power under section 131A of the *Residential Tenancies Act* to address serious non-compliance by rooming houses operators.

Recommendation 20: That the Victorian Government amend the *Public Health and Wellbeing Regulations 2009* to provide local councils with a similar investigative and directive power as in section 131A of the *Residential Tenancies Act* in relation to breaches of regulations 18 and 19 of those Regulations.

Recommendation 21: That both CAV and local councils have the power to issue ‘on the spot’ fines for breaches by rooming house operators of the *Residential Tenancies Act* and its regulations, and the *Public Health and Wellbeing Regulations 2009*.

7. Student-focused rooming houses

We have reviewed the WEStjustice *International Student Housing Project Report*,¹⁴ which focuses on student-specific rooming houses, and support and endorse the recommendations made in that report. We note that our experience of supporting international students through our International Student Rooming House Outreach Project, as well as through our general legal work, has raised similar issues to those raised in WEStjustice’s report. These include, in particular, unregistered rooming houses, overcrowding, bonds not lodged with the Residential Tenancies Bond Authority, and unsafe and non-compliant housing conditions.

Once particularly egregious example of this is the operation of a now-liquidated company called Kornucopia Pty Ltd, which was a rooming house operator that preyed on international students. One case study of assistance Tenants Victoria provided to six students impacted by this operator is set out below. There are 17 written decisions in relation to actions against this rooming house operator (and a related entity) at VCAT, with many unsuccessful appeals to the Supreme Court brought by the company. These are listed at **Appendix B**. Although the matter was referred to CAV it is unclear what, and at what stage, any regulatory action was taken against this company and its directors.

The Kornucopia story is another example of the lack of enforcement action taken against even systematic and egregious contraveners of residential tenancies and consumer protection legislation, and the reliance on individual renters and residents taking action against these companies, often to their overall detriment, given the limitations of the legal and enforcement system in such cases.

Case study: Unregistered rooming house operator ‘Kornucopia’ preys on international students

Six residents of an unregistered rooming house, all international students, were referred to Tenants Victoria by another legal centre. The rooming house was operated by a company called Kornucopia Pty Ltd. All six lived in a three bedroom apartment in the Docklands. At the time of the referral, the company which sublet the premises was also the tenant of many other properties in the same

¹⁴ westjustice_student_accom_web_2.pdf

apartment block and had reportedly been the respondent in nearly 150 matters at VCAT since the start of that year.

The residents became aware of an issue when the police knocked on the door with a warrant of possession. The residents were up to date with their rent but the company had not been paying this rent to the owner. The company owed the owner \$20,000.

The residents were referred to Tenants Victoria's Legal Service, which assisted them to obtain an interim and then final restraining order and advocated for the residents to be allowed to remain in the premises for the maximum 30 days whilst they explored other housing options. The company operator was very aggressive in response to the residents seeking legal support, illegally both evicting the residents in the middle of the night and removing all the furniture, with the support of Victoria Police.

This illegal eviction occurred after the residents had obtained an interim restraining order at VCAT, which was shown to the company operator. However, the police were still convinced by the operator to remove the residents in the middle of the night, despite the existence of the restraining order. Tenants Victoria lawyers then had to return to VCAT immediately to arrange for the residents to return to the premises the next day.

The residents were referred to the Salvos Places Program. This program managed to secure free bedding and furniture for the residents and have it delivered to their property within 24 hours after the furnishings were removed during the illegal eviction.

Recommendation 22: That Victoria Police undergo training in relation to relevant parts of the *Residential Tenancies Act* and consequent orders that may be made by VCAT, particularly urgent restraining orders, to improve the proper enforcement and efficacy of these orders.

8. Insufficient supported housing for people with complex needs

Many clients of the Tenants Victoria RHOP are placed in rooming houses by a range of referral streams including hospitals, mental health services, hospitals, prisons and homelessness front door services, often funded through the Housing Establishment Fund. Rooming houses are used by these services as a short to medium-term housing option for people at risk of or experiencing homeless, in the absence of suitable and affordable long-term supported options. Yet as the demand for crisis accommodation has escalated due to rapidly declining availability of affordable housing stock, there have been increasing pressures on social and affordable housing options and a ballooning Victorian Housing Register waitlist – particularly for one-bedroom properties. Therefore, despite rooming houses being generally considered a form of 'insecure', 'transitional', or 'emergency' housing, in many instances it is common for residents to report that they have lived in them for over a decade.

The Victorian Government response to COVID-19, in particular the From Homelessness to a Home (H2H) program, Homelessness Hotels Emergency Response, and Homelessness Emergency Accommodation Response Team (HEART), showed the potential for significant reform of government's approach to housing highly vulnerable members of our society. Given the significant ongoing concerns set out in our submission in relation to safety and poor conditions in rooming houses across large parts of the sector,

something echoed in previous reports by other organisations,¹⁵ we call on the Victorian Government to fund sufficient supported social and affordable accommodation such that no Victorian is forced to live in such conditions. All Victorians, in particular those with highly complex needs currently living in rooming houses, deserve access to suitable, supported, and affordable accommodation.

One example of a project that could be prioritised is the expansion of Ozanam House¹⁶ and similar services. Ozanam House is an example of purpose built, low-cost self-contained dwellings with support services and staff on site and a focus on ensuring residents are supported to complete their priority homeless housing application, address urgent health needs and link with ongoing support. One renter who Tenants Victoria provided support to, and who moved out of the rooming house sector and into subsidised private rental, said the following of that move:

Heaven! Moving here was the best thing ever. Such a big relief to have my own kitchen, my own bathroom, my own lounge room. I could relax. It's my own little joy.

We therefore make this final recommendation:

Recommendation 23: That the Victorian Government prioritise investment in sufficient, suitable and supported social housing so that all Victorians can live in safe, secure, and affordable housing, particularly those living with complex needs, now and into the future. This should include a priority on housing options for single people on the lowest incomes, including JobSeeker.

¹⁵ See above n 2.

¹⁶ “Ozanam House has flexible accommodation options for crisis, extended supported accommodation and Independent Living Units for over 55s with an emphasis on privacy, hygiene and security. All will include separate bathroom facilities and storage facilities, and some will include separate kitchenettes allowing for privacy and self-sufficiency”: Ozanam House accommodation and homelessness resource centre | VincentCare

Appendix A – photographs of premises at ‘Apple St’



Appendix B – list of Kornucopia cases

1. [Tse v Kornucopia Pty Ltd \(Residential Tenancies\) \[2019\] VCAT 537 \(11 April 2019\)](#)
2. [Effendy & Anggrek v Kornucopia Pty Ltd \(Residential Tenancies\) \[2019\] VCAT 1146 \(5 August 2019\)](#)
3. [Wong v Kornucopia Pty Ltd \(Residential Tenancies\) \[2019\] VCAT 915 \(21 June 2019\)](#)
4. [Hwang v Kornucopia Pty Ltd \(Residential Tenancies\) \[2019\] VCAT 1436 \(1 October 2019\)](#)
5. [Wirawan v Kornucopia Pty Ltd \(Residential Tenancies\) \[2019\] VCAT 1437 \(1 October 2019\)](#)
6. [Ye v Kornucopia Pty Ltd \(Residential Tenancies\) \[2019\] VCAT 824 \(3 June 2019\)](#)
7. [Effendy v Kornucopia Pty Ltd \(Residential Tenancies\) \[2019\] VCAT 1435 \(1 October 2019\)](#)
8. [Saenz v Kornucopia Pty Ltd \(Civil Claims\) \[2019\] VCAT 1069 \(19 July 2019\)](#)
9. [Li v Kornucopia Pty Ltd \(Residential Tenancies\) \[2019\] VCAT 877 \(14 June 2019\)](#)
10. [Ho v Kornucopia Pty Ltd \(Residential Tenancies\) \[2019\] VCAT 917 \(19 June 2019\)](#)
11. [Wei v Kornucopia Pty Ltd \(Residential Tenancies\) \[2019\] VCAT 878 \(14 June 2019\)](#)
12. [Li v Kornucopia Pty Ltd \(Residential Tenancies\) \[2019\] VCAT 697 \(13 May 2019\)](#)
13. [Wong v Kornucopia Pty Ltd \(Residential Tenancies\) \[2019\] VCAT 648 \(7 May 2019\)](#)
14. [Home Sweet Home Investments Pty Ltd v Kornucopia Pty Ltd \(Residential Tenancies\) \[2019\] VCAT 1438 \(1 October 2019\)](#)
15. [Wang v Efektiv Pty Ltd \(Residential Tenancies\) \[2019\] VCAT 1369 \(10 September 2019\)](#)
16. [Tam v The State Of Our Times Pty Ltd \(No. 2\) \(Residential Tenancies\) \[2019\] VCAT 1167 \(2 August 2019\)](#)
17. [Tam v The State Of Our Times Pty Ltd \(Residential Tenancies\) \[2019\] VCAT 1037 \(11 July 2019\)](#)