



Submission in response to the draft *Residential Tenancies (Rooming House Standards) Regulations 2022*

30 January 2023

About Tenants Victoria

Tenants Victoria is the peak body for the state's renters, who number almost 2 million people. Our vision is for safe, secure and affordable homes for Victorian renters 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.

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.

Endorsements



WEstjustice



Acknowledgments

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Safe, secure and affordable homes
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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. Since 2013, this support has included a Rooming House Outreach Program (RHOP) in the north and west metropolitan region, currently 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 than the mainstream population 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. This submission draws on the client and worker experience of that program.

The rooming houses our RHOP worker visits are often described as ‘new model’ or ‘mini’ rooming houses – existing residential houses that have been converted into rooming houses, and may have undergone modifications, such as the partitioning of what would have been common living areas to make more bedrooms. These rooming houses are often used by the homelessness sector to house people experiencing and living with complex needs. As set out below, the overwhelming majority of residents we assist through the RHOP program highlight safety concerns, together with the state of disrepair or poor maintenance of the premises, as primary issues.

Introduction

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

We welcome the proposed updates to the Rooming House Standards (currently in the *Residential Tenancies (Rooming House Standards) Regulations 2012* (the **current Regulations**) set out in the draft *Residential Tenancies (Rooming House Standards) Regulations 2022* (the **draft Regulations**). However, as we submit below, some of the updates do not go far enough to ensure safe and dignified living arrangements for rooming house residents.

Rooming house residents regularly report to us of living with, and living with other people with, 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 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.

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, 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. Residents, particularly those on JobSeeker, pay a significant portion of their income (as much as 60%) on rent. Therefore, improving the amenity of their rooming house is beyond the financial means of most, if not all, residents, and they are particularly reliant on the rooming house operator for the proper upkeep of the premises.

Revising the *Residential Tenancies (Rooming House Standards) Regulations 2012* is of course welcome. However, a much broader review of the regulatory framework relating to rooming houses is required to bring the majority of these premises into line with what ordinary Victorians would expect are the conditions in which we house the most vulnerable in our society. Importantly, standards are only as effective as the degree to which they are complied with. Voluntary compliance has not been achieved in the rooming house sector, as set out in this submission. Therefore, significant further regulatory resources would be required to be allocated to enforcing standards in rooming houses in order to see a real change in practice, particularly in many long-noncompliant premises.

Summary of recommendations

Recommendation 1: That regulation 7 of the draft Regulations is amended to require that all ‘doors used for entry to and exit from a room provided to a resident of a rooming house’ and locks fitted on those doors meet an Australian standard that ensures they are able to withstand forced entry.

Recommendation 2: That consideration be given to how a ‘change of lock framework’ could be established for rooming houses when there is a need to limit access of previous residents to the premises: i.e., when there has been a personal safety order obtained by a resident or when a resident has been removed from the premises for safety reasons (danger, etc.) but their key has not been recovered.

Recommendation 3: In relation to power outlets, that:

- Regulation 8 of the draft Regulations be amended to require at least 2 double power points be located in each resident’s room of at least a total capacity of 10 amps per room, preferably at different locations in the room.
- If the word term ‘electrical power outlet’ is used that this is defined as a double power point.

Recommendation 4: In relation to bathrooms, that regulation 12 of the draft Regulations be amended to require that:

- Bathroom screens be of a standard that minimises slip hazards for residents.
- If a shower is installed, it has floor-level entry with a maximum of clearance of 150mm.
- Bathroom fans are sufficiently powerful to service high-volume usage and effective at preventing mould growth (if this is not covered by the ventilation standard).

Recommendation 5: In relation to cupboards and fridges, that proposed regulation 13 of the draft Regulations be amended to require the following:

- Suitable cupboard storage with a lock within each resident’s room.
- A fridge of at least 120 litres within each resident’s room, or, alternatively, that 100 litres of fridge capacity be provided within communal facilities for each resident within a rooming house (including those after the first 4 residents, who are afforded 100 litres of fridge capacity each under the current proposed drafting).

Recommendation 6: In relation to dining facilities, that proposed regulation 14 of the draft Regulations be amended to ensure there is a dedicated dining area, or areas, with sufficient space to accommodate the required table and chairs.

Recommendation 7: That proposed regulation 15 of the draft Regulations be amended so that:

- regulation 15(1)(c) requires a clothesline or other clothes-drying facility to be ‘sufficient for the maximum amount of residents within the rooming house’;
- regulation 15(2) reads that the provision of the laundry facilities in (a) and (b) is required for ‘every 12 or fewer’ residents; and
- regulation 15(2)(b) require that the washing machine be in ‘good working order’.

Recommendation 8: That proposed regulation 18(b)(iii) of the draft Regulations be reviewed in light of Energy Safety Victoria’s ban on compact residual current circuit breakers (RCBOs) and additional testing requirements on remaining RCBOs.

Recommendation 9: That consideration be given as to how continuous access to heating, including heating appliances, can be afforded to rooming house residents.

Recommendation 10: That the Victorian Government:

- consider the removal, or limitation to exceptional circumstances only, of the exemption provisions in the Regulations;
- alternatively, consider amendment of the exemption process such that an application for an exemption order is made to VCAT, and any order granting an exemption is required to be published on a public register.

Recommendation 11: That the Victorian Government amend the draft Regulations to specify that they expire on the day which is the fifth anniversary of the Regulations’ making (rather than the tenth anniversary, which is ordinarily the case).

Recommendation 12: That the draft Regulations be amended to include the following:

- the requirement of a dedicated living space;
- a minimum standard that the premises be free of pest infestation;
- the introduction of personal mailboxes and room numbers on each room;
- the introduction of a central communication board, highlighting key contacts including regulatory authorities;

and that these be required to be implemented no later than 26 February 2024.

Recommendation 13: That the Regulations be amended to require the provision of high-quality access to the internet as an essential service in all rooming house properties at no or low cost to residents.

Door locks

In our service experience, we have found that many rooming house doors and door locks are of poor quality and are very easy to open with limited force even when they are secure. Residents have described attempts at forced entry of their rooms that are regularly successful, slow response on repair of door locks and having to place additional locking devices on their rooms to keep them secure.

In addition, locks are often not changed on the main doors when violent residents leave properties. They often leave in a hurry without returning keys. Residents are fearful about former residents returning and retaliating in response to being evicted. Residents have described strangers entering the premises with keys who are thought to be former residents or associates of former residents. This is understandably a frightening and disconcerting experience for rooming house residents.

We suggest that there is need for a 'change of lock framework' for rooming houses when there is a need to stop access by previous residents to the premises: i.e., when there has been a personal safety order obtained by a resident or when a resident has been removed from the premises for safety reasons (danger, etc.) but their key has not been recovered. However, whether that framework would best be placed within the Regulations, or the *Residential Tenancies Act*, requires further consideration.

We therefore make the following recommendations:

Recommendation 1: That regulation 7 of the draft Regulations is amended to require that all 'doors used for entry to and exit from a room provided to a resident of a rooming house' and locks fitted on those doors meet an Australian standard that ensures they are able to withstand forced entry.

Recommendation 2: That consideration be given to how a 'change of lock framework' could be established for rooming houses when there is a need to limit access of previous residents to the premises: i.e., when there has been a personal safety order obtained by a resident or when a resident has been removed from the premises for safety reasons (danger, etc.) but their key has not been recovered.

Power outlets and electrical safety

Residents report to our service that they spend much time in their rooms, and this was exacerbated by the COVID-19 pandemic. Residents report that they might have 2 power outlets, but one does not work. Other residents have advised that they have a single switch with 2 outlets. This is problematic as residents report using cords and power-boards all over the room. This is a tripping hazard and a safety issue.

During visits to rooming houses, our RHOP worker has seen electrical cords threaded externally outside windows from one room to another, as in the images below of a registered rooming house. This highlights some urgent safety issues and the lack of power switches more generally.



Power supply in rooming houses is often an issue with the safety switch tripping constantly because the electrical system does not properly meet the demands of multiple residents. This issue is particularly bad in rooming houses where no heating or cooling is provided for the entire premises and residents are using individual heaters in their rooms.

Recommendation 3: In relation to power outlets, that:

- Regulation 8 of the draft Regulations be amended to require at least 2 double power points be located in each resident's room of at least a total capacity of 10 amps per room, preferably at different locations in the room.
- If the term 'electrical power outlet' is used that this is defined as a double power point.

Bathrooms and toilets

Residents regularly report an extremely poor level of repair in bathrooms. This is significant given that the *Public Health and Wellbeing Regulations 2009* (PHW Regulations) require only one toilet, bath or shower, and basin, for up to 10 residents. The most pertinent issues include inappropriate ventilation – fans not working or insufficient for the large number of people that use the amenity. This leads to further issues including the growth of black mould.

Many rooming house residents live with a degree of physical disability or frailty. Therefore, where showers are provided, if these are within a bath they are often difficult to access for residents with physical disabilities. We therefore urge consideration is given to how necessary disability modifications can be more easily accessed by rooming house residents who live with disabilities but are not be able to avail themselves of NDIS funding.

Broken or unsuitable shower screens are also regularly reported. This leads to water pouring all over the floor. The flooding of bathrooms is also a physical safety issue in terms of slipping. Residents describe having to mop bathrooms before they can use them. In addition, residents report that a lack of cleaning and a significant state of disrepair result in residents being unable to safely use the limited bathrooms that are provided.

In one registered rooming house, residents reported that the toilet in the property had a concertina door with no latch for about 9 years, without change. There were gaps above and below the door. The

concertina door did not properly fit the frame. In another rooming house, a resident reported that she fell through the bathroom floor while walking across it, because the floor had rotted.

Much could be done to improve safety and amenity in rooming house bathrooms. However, in relation to this essential amenity (as well as kitchens and laundries), there is significant interdependence between the Regulations and the PHW Regulations. Without reviewing the density limit for bathrooms in rooming houses in the PHW Regulations (we recommend the density requirement be amended from 1 toilet, bath or shower, and basin for up to 10 residents currently, to 1 of each of these facilities for up to 5 residents), and the cleaning obligations in relation to bathrooms (also currently only covered in the PWG Regulations), amendments to the Regulations in this area may have only limited impact in terms of amenity for residents.

Recommendation 4: In relation to bathrooms, that regulation 12 of the draft Regulations be amended to require that:

- Bathroom screens be of a standard that minimises slip hazards for residents.
- If a shower is installed, it has floor-level entry with a maximum of clearance of 150mm.
- Bathroom fans are sufficiently powerful to service high-volume usage and effective at preventing mould growth (if this is not covered by the ventilation standard).

Refrigerators and lockable cupboards in residents' rooms

Residents in rooming houses, including in registered facilities, report that shared fridges (even compliant ones) are not big enough to accommodate all the residents' food. Food is often stolen, and residents will keep food in their rooms without safe and suitable storage, creating the risk of pest infestations. It is not uncommon for residents to move into a rooming house without being provided with a cupboard at all or being provided with one that is not secure (no functional locking device or key provided).

We are supportive of expanding the requirements of fridge capacity, as set out in proposed regulation 13(e) of the draft Regulations. However, we query the rationale, and inequity, for why every additional resident after the first four receive only an additional 28.5 litres of capacity, while the first four residents are entitled to 100 litres of capacity each. This might have been drawn from a CHOICE article on choosing fridge size according to household size¹. However, we note that that article assumes a joint household, in which refrigerated items are shared, whereas the same cannot be assumed of rooming house residents, who may or may not effectively be separate households living together.

Recommendation 5: In relation to cupboards and fridges, that proposed regulation 13 of the draft Regulations be amended to require the following:

- Suitable cupboard storage with a lock within each resident's room.

¹ Fridge size and dimensions: the ins and outs you need to know | CHOICE

- A fridge of at least 120 litres within each resident's room, or, alternatively, that 100 litres of fridge capacity be provided within communal facilities for each resident within a rooming house (including those after the first 4 residents, who are afforded 100 litres of fridge capacity each under the current proposed drafting).

Kitchen and food preparation facilities

Our service experience is that kitchens in rooming houses are often cleaned and maintained to a poor standard. In one registered rooming house inspected by our worker the stovetop, which was on an old school desk at thigh height, was connected to a gas bottle inside the kitchen. This was referred to relevant regulators at the time. When our service conducted a further visit of this premises, well after the regulator complaints were issued, the facilities remained the same.

We note this is likely in breach of the PHW Regulations, which require sufficiently regular cleaning of kitchen facilities. Given the lack of specificity of those Regulations on the regularity of cleaning required, it may be useful that those regulations also be reviewed to complement the work done through this review. We note that without aligning the various instruments impacting on rooming houses, and allocating sufficient regulatory enforcement resourcing to ensure compliance, amendments to the Regulations may be insufficient to result in significant improvement in amenity for residents.

Dining facilities

We have recently introduced a compliance checklist for our review of rooming houses we visit, in which we review each rooming house against all Regulation and PHW Regulation requirements. All 5 properties reviewed in this way were found to have insufficient chairs for all residents in the house to sit on. Often there was only one or sometimes none. Residents have often reported this over the past several years, particularly in converted smaller dwellings where all living spaces are converted to bedrooms. In some rooming houses there is no room for a table and chairs anywhere in the common area.

Recommendation 6: In relation to dining facilities, that proposed regulation 14 of the draft Regulations be amended to ensure there is a dedicated dining area, or areas, with sufficient space to accommodate the required table and chairs.

Laundry facilities

We welcome proposed regulation 15(2) of the draft Regulations, which introduce the requirement of a washing machine in rooming houses. Our service experience was that during the COVID-19 pandemic lockdowns in 2020-21, many rooming house residents were making expensive and unsafe trips to the laundromat to do their washing because the rooming house operator did not provide a machine for resident use. Where machines are provided there is a notable improvement in the hygiene and cleanliness of the premises.

We note 3 small drafting queries in relation to proposed regulation 15. Firstly, that proposed regulation 15(1)(c) does not specify that the clothes-drying facilities must be sufficient for the amount of residents

in the rooming house. Secondly, that currently the regulation reads as requiring at least 12 residents to meet the requirement for a washing machine. We hope the intention of the drafters was that these facilities would be available for ‘every 12 or fewer residents’. Thirdly, that the requirement for the washing machine in regulation 15(2)(b) doesn’t specify that it be in ‘good working order’, as is done in relation to other appliances’ requirements within the Regulations.

Recommendation 7: That proposed regulation 15 of the draft Regulations be amended so that:

- regulation 15(1)(c) requires a clothesline or other clothes-drying facility to be ‘sufficient for the maximum amount of residents within the rooming house’;
- regulation 15(2) reads that the provision of the laundry facilities in (a) and (b) is required for ‘every 12 or fewer’ residents; and
- regulation 15(2)(b) require that the washing machine be in ‘good working order’.

Electrical requirements

In many instances, rooming house are merely converted former single residential properties. In these houses, former living or dining areas are frequently converted to bedrooms. While the living density of these properties increases, often the core electrical infrastructure that delivers power to the property remains unaltered, resulting in frequent power tripping and outages caused by overloading. The regulations should specify that rooming house switchboards must have a capacity rating that accords with the expected use of the property as a rooming house and not merely a capacity that would accommodate its use as a single residential property.

We therefore welcome the expansion of proposed regulations 21 and 22, particularly in relation to the safety checks of gas and electrical appliances, which will in our view enhance the safety of residents living in premises with precarious electrical arrangements.

We query the inclusion of ‘Residual current operated circuit-breakers with integral overcurrent protection for household and similar uses (RCBOs)’ in proposed regulation 18(b)(iii) relating to permitted switchboard-type residual current devices within rooming houses, given Energy Safety Victoria (ESV) banned compact RCBOs in Victoria in 2020 and imposed additional testing requirements on remaining RCBOs². In light of this we recommend a review of this proposed inclusion.

Recommendation 8: That proposed regulation 18(b)(iii) of the draft Regulations be reviewed in light of Energy Safety Victoria’s ban on compact residual current circuit breakers (RCBOs) and additional testing requirements on remaining RCBOs.

² <https://esv.vic.gov.au/technical-information/electrical-appliances-and-equipment/rcbo-prohibition/>

Heating

Some rooming house residents report that there are limited hours within which they are able to use a communal heater, the cord to the communal heater is cut, prohibiting its use, or power outlets are intentionally limited within rooms in order to limit electricity usage, including in relation to personal heaters. We note section 121 of the *Residential Tenancies Act* requires 24-hour access to bathroom and toilet facilities and submit that a similar principle should apply to heating, as well as, arguably, cooling. We therefore submit that consideration should be given to whether section 121, or the Regulations, should be amended to require this continuous access.

Additionally, we note that the draft Regulations include the following within the definition of “energy efficient fixed heater”:³ gas space heaters (2 star or above), ducted heating (gas or otherwise), or a “domestic solid fuel burning appliance” (including, i.e. a wood fireplace). We understand this aligns the rooming house standards with the *Residential Tenancies Regulations 2021* standard on heating (cl 14, Schedule 4). Firstly, we query the inclusion of “domestic solid fuel burning appliance” within this definition given the evident health safety risks associated with this form of heating.⁴ Additionally, we note with concern the steady growth of evidence on the health risks of gas heating and appliances,⁵ and the repeated requirements in academic and government-issued guides that such appliances be used according to instructions, not for long periods, and that they be regularly serviced to be safe.⁶ We therefore query, given our service experience of low compliance to standards in the rooming house sector, and the nature of rooming houses as high-density accommodation for residents with complex needs and at times chaotic lives, whether gas appliances are appropriate in this context. We would also welcome consideration of whether gas heating is appropriate for renters more broadly.

Recommendation 9: That consideration be given as to how continuous access to heating, including heating appliances, can be afforded to rooming house residents.

Ventilation

As discussed above, there are regular issues in rooming houses with a lack of bathroom ventilation and mould, as discussed in relation to bathrooms, above. It is unclear whether this is the result of inadequate ventilation standards, or their enforcement.

During the COVID-19 lockdowns, there were instances of all residents in a rooming house becoming ill with COVID-19, and there are concerns that poor ventilation (including boarded down windows) was a contributing factor. We welcome the proposed update to cover the field of rooming houses to ensure each has a relevant ventilation standard. However, given the complexity of ventilation standards in the Regulations (as well as the *Residential Tenancies Regulations 2021*), which refer to the Building Code of

³ The standard that must be met by all rooming houses by 26 Feb 2025 unless the very limited exemption for non-class 1b buildings applies.

⁴ Wood heaters’ toxic air pollution results in deaths and reduced life expectancy, study finds (smh.com.au)

⁵ See i.e. RACGP - Health risks from indoor gas appliances; Gas heating - health and safety issues - Better Health Channel; Kicking the Gas Habit: How Gas is Harming our Health | Climate Council; Heating your home safely with gas – Energy Safe Victoria (esv.vic.gov.au).

⁶ Ibid.

Australia (BCA) (which in turn often refer to Australian Standards, which are generally only accessible for a fee) and so do not specify the complete actual ventilation requirements, it is currently impossible for residents to assess whether their rooming house meets standards. In light of this, consideration should be given about how clarity and accessibility of ventilation standards for rental properties, including rooming houses, can be afforded. We also query whether some further education around ventilation standards would be useful in the rooming house context.

Lighting, external windows, and entrances

There is a lack of enforcement of these standards. Residents regularly report broken windows replaced with board, as in the photographs below. This has also regularly been observed by our RHOP worker. Breaches of this prescribed standard are incredibly common, particularly in converted, smaller premises, including by registered providers. Some properties have multiple windows replaced with board. This reduces access to natural light for residents and also increases issues around hygiene, ventilation and safety – the broken windows that are not properly repaired cannot be easily opened or closed but they can be easily broken into.



Exemptions

Given the basic requirements of the rooming house standards, and their intention to provide a merely basic degree of housing dignity for residents, we query the basis for allowing exemptions to the standards to be granted. We further note that we understand no exemptions are currently in place. As no similar process exists for exemptions from private rental minimum standards, we submit it is appropriate to align the rooming house sector with the private rental sector in this regard, and either remove this option in the case of rooming houses, or otherwise limit it to exceptional circumstances only.

Alternatively, an option to increase the transparency of the process would be to amend regulations 26-29 of the current Regulations to require an application for an order for an exemption to VCAT (which would allow residents to make submissions, as relevant), and where that order would be placed on a public register, rather than a relatively inaccessible process where an application is made to the Director and the exemption is entered in the Government Gazette (regulation 30).

Recommendation 10: That the Victorian Government:

- consider the removal, or limitation to exceptional circumstances only, of the exemption provisions in the Regulations;
- alternatively, consider amendment of the exemption process such that an application for an exemption order is made to VCAT, and any order granting an exemption is required to be published on a public register.

More regular review of rooming house standards necessary

The current Regulations sunset on 27 February 2023, after being in operation for close to 11 years, as their operation was extended for 12 months beyond the general 10-year period prior to expiry provided under the *Subordinate Legislation Act 1994*. During this period, much has changed in relation to building standards and expectations of what constitutes adequate housing, both generally, but also particularly in the ever dynamic and evolving rooming house sector. We note considerations of energy efficiency and climate change, shifts in thinking about the cost of homelessness and insecure or sub-standard housing, a stronger understanding of the connection between housing and public health (given the COVID pandemic), and other factors. Given this dynamism, we submit that the rooming house standards would be more appropriately reviewed every 5 years, rather than the regular 10-year sunset provision. This would allow better adaptation to and alignment with the sector's broader social context, as well as the rapid changes occurring within the rooming house sector.

Recommendation 11: That the Victorian Government amend the draft Regulations to specify that they expire on the day which is the fifth anniversary of the Regulations' making (rather than the tenth anniversary, which is ordinarily the case).

Further updates required

We are supportive of the following further updates being included in the draft Regulations:

- The requirement of a dedicated living space, which would have the advantage of promoting social wellbeing of residents and possibly be combined with a dedicated dining space;
- A further alignment of the rooming house standards with the rental minimum standards, in particular providing a standard in relation to the premises being free of pest infestation (acknowledging the introduction of proposed regulations 28 and 29, we query why an explicit standard in relation to pest infestation was omitted);
- The introduction of personal mailboxes and room numbers on each room⁷;
- The introduction of a central communication board, highlighting key contacts including regulatory authorities⁸.

⁷ This draws on the recommendations and evidence base set out in: Peninsula Community Legal Centre's 2020 report [Open the Door! The Resident's View of Life in a Rooming House](#) – PCLC

⁸ Ibid

Each of these, if implemented, would raise the standard of amenity in rooming houses such as to enhance wellbeing of residents, and afford them a greater degree of dignity of housing.

We note, in particular, instances in which the absence of an individual mailbox has led to unfair terminations and evictions of rooming house residents. For example, residents have reported missing VCAT Notices of Hearings, and then not receiving a copy of an order and missing out on an opportunity to reopen an order. This is compounded by the lack of internet access (addressed below) and reliable alternative ways to be contacted for many residents.”

In addition, we would recommend a date by which these standards be implemented, for example no later than 26 February 2024 to align with other provisions within the Regulations.

Recommendation 12: That the draft Regulations be amended to include the following:

- the requirement of a dedicated living space;
- a minimum standard that the premises be free of pest infestation;
- the introduction of personal mailboxes and room numbers on each room;
- the introduction of a central communication board, highlighting key contacts including regulatory authorities;

and that these be required to be implemented no later than 26 February 2024.

High quality internet an essential service

In addition, we would note the frequent lack of access to the internet in rooming houses. 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 13: That the Regulations be amended to require the provision of high-quality access to the internet as an essential service in all rooming house properties at no or low cost to residents.

Managing excessive heat

There is a mounting body of research which sets out the increasing impact of climate change on renters in particular through excessive heat⁹, as well as the adverse health and wellbeing impacts of poorly

⁹ See Hot homes: Renter Researchers' experiences of summer 21-22 - Better Renting; MalleeFamilyCare_PublicHousing_Report_2019.pdf; Renters suffer more in extreme heat, study shows (smh.com.au)

insulated and cooled homes¹⁰. We therefore note, with concern, the absence of minimum standards in relation to cooling, insulation, and thermal-blocking window-coverings for all premises covered by the *Residential Tenancies Act* and its Regulations. We would welcome the Victorian Government's consultation on this rapidly escalating issue in the near future.

¹⁰ Ibid. See also: [Feeling-the-Heat.pdf \(vcoss.org.au\)](#)