

12 December 2025



The Victorian Housing Registrar
Department of Treasury and Finance
Level 5, 1 Treasury Place, Melbourne, 3002
By email housingregistrar@dtf.vic.gov.au

Dear Victorian Housing Registrar

The current performance standards, established under 93 of the *Housing Act 1983 (Vic)*, were made in 2015 (current performance standards). Your office is now consulting on new performance standards (draft performance standards) (**Attachment 1**). It is understood that the draft performance standards will replace *both* the outcomes and indicators in the current performance standards. It is not proposed to change the Key Performance Measures currently used in public reporting on community housing organisation.

1. Executive summary

The proposed update to the social housing performance standards appears to have been conducted without reference to the Social Housing Regulation Review (SHRR), in response to which the Victorian Government committed to consistent performance standards for public and community housing.

The SHRR had several purposes, and perhaps most significant is a material improvement in standards within the community housing sector, which have regularly been observed, including by some parties to this submission, to offer less fair treatment to residents than public housing does.

As the Victorian Government now prioritises the delivery of new community housing over new public housing, it is imperative that these two housing systems (including the experience and rights of their residents and applicants) should be truly comparable. It is no longer tenable to present public and community housing as interchangeable when renters in community housing continue to experience more variable and, at times, lower service standards.

The creation of consistent performance standards between the two housing systems, and especially performance standards that can be individually enforceable when renters believe that their circumstances are inconsistent with the standard, is one of the most powerful steps that the Victorian government can take towards a more equal social housing system.

The absence of a consistent and individually enforceable set of performance standards for all social housing, risks entrenching a two-tier system in which community housing renters are subject to very different policies, and continue to experience lower and less consistent service standards than public housing renters.



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Safe, secure and affordable homes

Disappointingly, it creates significant uncertainty as to how or whether the Victorian government will achieve a more equal system of social housing.

We recommend that significant additional work is required on the new draft performance standards, including a reorientation of the goals of this project towards a better community housing system consistent with the renter experience of the public housing system.

Section 4 of this submission provides feedback on the proposed draft performance standards as currently drafted for community housing but is also relevant for consistent performance standards that apply to all social housing.¹

2. Recommendations

Recommendations 1-6 address the current approach to developing the draft performance standards and how they should apply to public and community housing.

Recommendation 1: Do not proceed with the new draft performance standards in their current form and instead develop sufficiently detailed consistent performance standards that will govern all social housing – both public and community housing.

Recommendation 2: The draft performance standards should establish, and publicly report on, consistent performance measures across social housing to promote transparency and accountability.

Recommendation 3: Develop reportable performance indicators that allow renters, advocates, and the Victorian community to understand a social housing provider's level of achievement of the standards.

Recommendation 4: Develop performance standards and subsidiary indicators in conjunction with Homes Victoria to support the development of a new and individually enforceable Charter of Service for social housing renters.

Recommendation 5: Consult with public and community housing renters and Victorian Housing Register applicants on the development of performance standards, performance indicators and Charter of Service.

Recommendation 6: Report publicly how each housing provider meets tenancy sustainment, evictions and allocations performance standards according to key demographics and Victorian Housing Registrar prioritization category.

Recommendations 7-15 relate to the proposed performance standards as currently drafted whether applying to all social housing (as we recommend) or only to community housing (not recommended).

¹ In this document, relevant recommendations from the SHRR and Government's response are boxed out in the text and the term 'renter' has been used unless the term 'tenant' is used in a quoted document.

Recommendation 7: The performance standards should require social housing providers to develop, apply and support a human rights framework, particularly in respect to tenancy sustainment.

Recommendation 8: Consistent performance standards on tenancy sustainment require social housing providers to :

- **develop risk assessment frameworks to guide tenancy sustainment strategies and supports for individual renters**
- **have board level oversight of any eviction that results in homelessness**
- **collect data about the reasons people exit social housing, why eviction could not be avoided so tenancy sustainment can be managed [see Recommendation 3.6 SHRR Report] and**
- **provide this data promptly to the regulator for public report by housing provider.**

Recommendation 9: Embed renter engagement in the performance standards as suggested by the SHRR Final Report:

- **support to renters to engage – it should not be sufficient for providers to establish mechanisms for engagement but have little uptake because tenants do not feel supported**
- **a renter engagement strategy – this should be accessible, and articulate the ways in which the agency will engage with tenants, and support them to do this**
- **demonstration of how renter input has been used and its impacts on their operations**
tenant involvement should lead to demonstrated effects, rather than being tokenistic. ²

Recommendation 10: The performance standards require all social housing providers undertake accessibility modifications without delay.

Recommendation 11: Embed the model complaints policy developed by the Victorian Housing Registrar with the Victorian Ombudsman or a comparable standard (such as the Australian/New Zealand standard for complaint handling recommended by the SHRR Report), in the performance standards).

Recommendation 12: Include a specific requirement in draft Standard 2 – Housing Assets to promote energy efficiency and keep records that allow providers to report publicly on their progress.

Recommendation 13: Include an additional requirement in draft Standard 2 – Housing Assets, that social housing providers have a system in place to notify the regulator of all reported fires (including causes and consequences).

Recommend 14: Require social housing providers to keep an assets and liabilities register in the performance standards. The register should include details of property ownership, associated

² Social Housing Regulation Review Final Report page 51

debt, status as social or affordable or a mix, obligations related to use, building condition, maintenance plans and tenancy obligations.

Recommendation 15: Consult the Victorian Aboriginal Legal Service (VALS) in the development of the performance standard on cultural safety, equity and inclusion, in addition to First Nations social housing renters and organisations already listed.



3.1 Common performance standards

While the performance standards for community housing organisations are remade every 10 years, these new performance standards are being developed in the context of the Government’s implementation of the Social Housing Regulation Review Final Report (the SHRR Report). However, the new performance standards do not appear to take SHRR Report or Government’s response to that review, into account.

The SHRR Report recommended a fundamentally different approach to the regulation and delivery of social housing in Victoria and a principled move away from ‘business as usual’ in the social housing sector.

The SHRR was specifically tasked with assessing whether “public housing activities should be covered in common regulatory arrangements with the community housing sector, including asset, financial, performance, resident and housing services and reporting”.³ It concluded:

Both public and community housing should be regulated by a common set of performance standards for service delivery and asset management. These standards would ensure an appropriate minimum level of performance for all social housing tenants, regardless of who their landlord is, and would also ensure the regulator can monitor issues arising in both sectors.⁴

This approach was strongly supported by the tenancy sector as fairer and better for all social housing renters. This is particularly important as the 2021 Inquiry into Homelessness in Victoria found that the Victorian Government had an increased reliance on community housing as a source of long-term housing, rather than public housing.⁵

- The Government released its response to the SHRR Report in late 2024 and Homes Victoria is leading the Whole of Government (WoG) implementation. A key recommendation of the SHRR was the establishment of a single independent regulator for social and affordable housing to drive social housing consistency. The Government lists that recommendation as ‘under consideration’.

Given this, implementing common performance standards for public and community housing (Recommendation 2.1), which the Government supports in part, is one of the most critical regulatory reforms to come from the SHRR.

We have reviewed the draft performance standards in light of the Government’s commitment to:

establish, and publicly report on, consistent performance measures across social housing to promote transparency and accountability. We will consult with renters to ensure the measures reflect what is important to them.⁶

³ Social Housing Regulation Review Final Report, Appendix A page 185.

⁴ Social Housing Regulation Review Final Report page 62

⁵ Parliament of Victoria Legislative Council Legal and Social Issues Committee (2021). Inquiry into homelessness in Victoria Final Report. [Weblink](#).

⁶ Victorian Government Response to the Social Housing Regulation Review, page 2

Consistency for social housing performance standards

Recommendation 2.1 Establish common performance standards for social housing (Government supports in part)

Develop a common set of service delivery performance standards for public and community housing activities through a consultative process with stakeholders. These standards should include governance, tenancy management, allocations practices, dwelling standards, safety, cultural safety and asset management.

Enshrining social housing performance standards in regulation would assist to clarify their legal status including in relation to residential rental agreements under the Residential Tenancies Act.

Performance standards should form part of a process of continuous improvement and reviewed at appropriate intervals.

This recommendation is fundamental to driving consistency in the social housing renter experience, so renters can expect the same renting standards and level of service, whether the provider is Homes Victoria or a community housing organisation.

Despite this drive for consistency, these draft performance standards have been developed solely for the community housing sector and the “applicability of the revised standards for public housing activities will be considered through this consultation process”.⁷

In our view, new consistent performance standards that are fit for purpose in a social housing sector of both public and community housing, requires collaboration in the development process.

The aim of common performance standards was for consistent and higher service standards across the sector. The SHRR Report clearly envisaged that “[T]he standards should draw out the best of both systems and consider best practice in other jurisdictions”.⁸

Public housing often offers a better social housing experience with more favourable provisions for renters in organisational policies than community housing does, particularly in relation to tenancy sustainment. Developing the new performance standards for community housing and then assessing their applicability to public housing, runs the risk that:

- High quality public housing practices and policies may not become part of the common performance standards for community housing providers, and
- Public housing may not adopt draft performance standards or may add or change draft standards, further embedding disparity across social housing types.

⁷ Email from Housing Registrar to tenant advocacy organisations inviting feedback on the draft performance standards. Dated 6 November 2025

⁸ Social Housing Regulation Review Final Report page 62

Either way, the drive for consistency is undermined. If the performance standards are developed as currently proposed, assessment of their applicability to public housing must prioritise the importance of consistency of performance standards across all social housing and to the highest standard. High performance standards that apply across all social housing should remain a key aim of this assessment process.

Consistent performance standards are also essential to delivering SHRR Recommendation 5.4 which calls for a uniform reporting framework across social housing. Substantial variation in the performance standards between public and community housing will make efforts to compare performance across the social housing sector more difficult.

Recommendation 1: Do not proceed with the new draft performance standards in their current form and instead develop sufficiently detailed consistent performance standards that will govern all social housing – both public and community housing.

Recommendation 2: The draft performance standards should establish, and publicly report on, consistent performance measures across social housing to promote transparency and accountability.

High level performance standards vs specific expectations

The draft performance standards consist of high-level **outcomes** and broad **requirements** and remove the detail found in the 2015 Performance Standards **indicators**.

The Victorian Housing Registrar conducts nuanced assessments of current performance standards based on the size, type and complexity of a housing organisation. We understand that strict compliance with indicators is not required, but achieving an indicator may show that an outcome is met. Accordingly, inclusion of indicators not necessarily prescriptive. In our view, the detail in the indicators is a valuable guide for performance standards and consistency across social housing providers. We believe the level of detail in the indicators should be retained and recommend that additional indicators be added to reflect specific recommendations in the SHRR Report for performance standards, particularly in relation to tenancy sustainment, fire safety, and disability modifications (see discussion in section 4).

Performance standards govern the relationship between the registered agency and the Victorian Housing Registrar.⁹ But they also play an important role in how renters understand what they can expect from their housing providers. The SHRR Report recommends that a Customer Charter of Social Housing Service Standards (Charter of Service) be developed (recommendation 1.2) to *outline the key service standards that tenants can expect under the performance standards for registered housing agencies*, and rights contained in other relevant legislation such as the Residential Tenancies Act 1997. [our emphasis]. This was supported in principle by the Government.

We are concerned that the draft performance standards without the indicators, are so high-level that it will be difficult to translate them into Charters of Service in a way that explains what renters can consistently expect to experience as a social housing renter.

⁹ Performance Standards for Registered Housing Agencies 2015, Victorian Housing Registrar, page 2

This inter-relationship between the consistent performance standards and the Charter of Service underlines the importance of Homes Victoria and the Victorian Housing Registrar working closely together to link these two workstreams in the WoG project.

In line with Recommendation 1.3 of the SHRR Report, we advocate that both public housing renters and community housing renters should be extensively consulted on the proposed performance standards and how these finalised performance standards will be described in the proposed Charter of Service.

Recommendation 4: Develop performance standards and subsidiary indicators in conjunction with Homes Victoria to support the development of a new and individually enforceable charter of service for social housing renters.

Recommendation 5: Consult with public and community housing renters and Victorian Housing Register applicants on the development of performance standards, performance indicators and charter of service.

Key Performance Measures

We understand that although it is proposed to update the performance standards, no changes will be made to Key Performance Measures (KPM). These are listed at **Attachment 2**. In section 4 we advocate for more specific and detailed performance standards, particularly in relation to tenancy sustainment, fire safety, disability modifications and renter engagement. We believe it is important that performance of these standards are reflected in additional KPMs.

For example, work by the Unison RMIT Housing Hub has studied the factors that influence the end of a tenancy by renter characteristics. It confirmed that the renter group is not homogenous and different factors ‘push or pull’ a person from secure tenancy. Importantly, it found that evictions only account for approximately one third of tenancies that end for unfavourable reasons.¹⁰

A KPM of tenancy sustainment (which we argue below should be a performance standard) would be more nuanced than the current KPM for Eviction and allow for comparisons of how different parts of the sector and different housing providers sustain tenancies, particularly for vulnerable renters with a history of housing instability.

We consider that the underlying aims of the SHRR will not be met if community housing residents do not have an equivalent experience of their tenancy as public housing residents. Reporting by provider on tenancy sustainment, evictions and allocations, based on KPMs, will be key to achieving this aim.

¹⁰ Sustaining tenancies: Issues and challenges for social housing providers; Prepared for the Social Housing Regulation Review panel by Sarah Taylor & Guy Johnson, Unison Housing Research Lab, RMIT University February 2022, page 11; Also see Social Housing Regulation Review Final Report page 85-86.

Tenancy sustainment and allocations performance standards should be publicly reported by key demographic indicators, and Victorian Housing Registrar prioritization category.

This would also acquit Recommendation 3.6:

Recommendation 3.6: Enhance the measurement of tenancy sustainment [Government supports in full]

Develop an approach to measuring performance in tenancy sustainment, which:

- draws on the principles of survival analysis, to account for differences in tenant mix across providers, and durations of maintained and exited tenancies*
- accounts for the positive and negative reasons that tenants leave social housing*
- uses data that is already collected where possible.*

This approach should be developed by the regulator in consultation with providers and other relevant stakeholders.

Performance of social housing providers in relation to tenancy sustainment should be published

Recommendation 6: Report publicly how each housing provider meets tenancy sustainment, evictions and allocations performance standards according to key demographics and Victorian Housing Registrar prioritization category.

3.2 Application of the Charter of Human Rights

Recommendation 3.7: Require registered community housing agencies to apply human rights principles in decision making [Government supports in full]

Require registered agencies to apply a human rights framework that is relevant and adapted to housing, and to put in place processes within their organisation to support its application.

The framework and processes should be developed through a consultative process with the regulator, tenants, providers, and sector advocates, and adapted for the provision of social housing

Clarify the status and applicability of the Charter of Human Rights and Responsibilities Act 2006 to registered community housing agencies.

As a public authority, Homes Victoria must observe *Charter of Human Rights and Responsibilities Act 2006* (Vic) (the Charter). The Charter has been used in public housing to ensure certain renter protections and prevent unnecessary evictions. However, the obligations on community housing providers under the Charter are unclear. This means that **Standard 1 Tenant and Housing Services - Requirement 1** “...comply with relevant law and policy” will not apply the Charter to community housing organisations.

The SHRR Report advises how a human rights approach should guide the development of the common performance standards (see Appendix E):

In developing new standards, the regulator will need to ensure that the standards are compatible with the *Charter of Human Rights and Responsibilities Act 2006*. This will be especially relevant when considering standards that relate to tenancy sustainment and related issues. A number of rights set out in the [Charter] Act will be engaged including:

- s.13 - right to privacy - this includes the right not to have a person's privacy, family or home unlawfully or arbitrarily interfered with
- s.17 - right to protection of families and children
- s.19 - cultural rights, including the distinct cultural rights of Aboriginal persons
- s.20 - property rights
- s.24 - right to a fair hearing

We advocate for Recommendation 3.7 to be implemented in full and for consistent performance standards to require social housing providers to develop, apply and support a human rights framework in an organisation's work, particularly in respect to tenancy sustainment. This is the best way to embed a human rights approach into the everyday work of social housing providers.

Recommendation 7: The performance standards should require social housing providers to develop, apply and support a human rights framework particularly in respect to tenancy sustainment.

4. More specific performance standards

The draft performance standards prescribe eight high-level *Outcomes* and a number of broad *Requirements* to achieve those *Outcomes*.

The SHRR Report made a number of specific recommendations for inclusion in the new common social housing performance standards. While some of these could be inferred as included in the high-level *Outcomes*, we recommend making these explicit *Requirements* in the performance standards. We also believe that the performance indicators should be retained and updated to reflect these more specific *Requirements* so performance can be monitored.

4.1 A more detailed standard about tenancy sustainment

Recommendation 3.8: Strengthen tenancy sustainment practices in social housing [Government supports in principle]

Create a tenancy sustainment performance standard consistent with a 'no evictions into homelessness' policy, which includes:

- guidance on roles and responsibilities in establishing tenancies
- a requirement to undertake individual risk assessments to identify support needs and risks for the particular tenant and their household when establishing a tenancy and at regular intervals, that includes but is not limited to:
 1. support services
 2. cultural safety
 3. dwelling features and facilities, including a thermal regulation and accessibility needs
 4. fire and building safety, including outstanding essential repairs

5. requirement to apply a framework that reflects and gives effect to human rights principles to 6. decision making about evictions and transfers

7. provision for tenancy transfers with support as an alternative to eviction

As part of this process the broader policy settings needed to minimise evictions into homelessness should be considered, including any amendments to the Residential Tenancies Act 1997 to allow providers to transfer tenants to alternative accommodation.

Data collected on the support needs of tenants through the Victorian Housing Register should be made available to housing providers to allow them to assess the support needs of tenants (with privacy safeguards in place).

The draft **Standard 1 Tenancy and Housing Services** describes the Outcome as:

Providers support stable tenancies and deliver quality housing services that comply with the Housing Act and Residential Tenancies Act with the following Requirements:

1.5 Support tenancy sustainment through early intervention and referral and support services

1.6 Manage tenancy disputes lawfully and proportionately, ensuring that eviction is a last resort and tenants with complex needs are supported.

The Indicators from 2015 Standards which are proposed to be removed currently provide:

- The registered agency has policies and procedures which strive to sustain tenancies.
- Enforced transfers are minimised and eviction is treated as a mechanism of last resort.

Another Indicator in the current performance standards in relation to Rent provides that:

- The registered agency has policies and strategies to deal with tenants in financial difficulties and with arrears of rent.

Terminology like “eviction as a last resort” can be ambiguous, particularly if it is not backed up by a policy consistent with ‘no eviction into homelessness’, informed by a human rights approach.

The SHRR Report acknowledges the challenges of implementing a ‘no eviction into homelessness’ policy and that any such policy must be carefully and sensitively applied. Recommendation 3.8 however clearly calls for a “tenancy sustainment performance standard consistent with a ‘no evictions into homelessness’ policy” and provides detailed guidance on such policies including a risk assessment framework to identify the particular needs of individual renters to maintain tenancies. We do not believe that the draft performance standards would meet the performance standards described in Recommendation 3.8 of the SHRR Report which Government supports in principle. We recommend that social housing providers be required under the consistent performance standards to adopt a human rights approach and:

develop risk assessment frameworks to guide tenancy sustainment strategies and supports for individual renters

have board level oversight of any eviction that results in homelessness

collect data about the reasons for people exit social housing, why eviction could not be avoided so tenancy sustainment can be managed [see Recommendation 3.6 SHRR Report] and

provide this data promptly to the regulator for public report by housing provider.

Two other new draft standards may impact how tenancies are sustained. **Standard 7 Financial Viability** includes a Requirement that the housing provider, “Optimise revenue through effective management of tenancies, tenants mix and where appropriate, diversified income streams...”.

Standard 3 — Engagement & community cohesion requires that the housing provider address anti-social behaviour affecting or involving tenants through timely, proportionate action and partnership with relevant bodies.

There is an extent to which these two proposed standards might be viewed as competing with a standard consistent with ‘no evictions into homelessness’. We propose that this tension can be managed with a human rights approach and stronger and more detailed Requirements for tenancy sustainment in the common performance standards. This will help manage any pressures that arise when balancing tenancy sustainment and financial viability or the rights and needs of other renters affected by anti-social behaviour.

Recommendation 8: Consistent performance standards on tenancy sustainment should require social housing providers to:

- **develop risk assessment frameworks to guide tenancy sustainment strategies and supports for individual renters**
- **have board level oversight of any eviction that results in homelessness**
- **collect data about the reasons for people exit social housing, why eviction could not be avoided so tenancy sustainment can be managed [see Recommendation 3.6 SHRR Report] and**
- **provide this data promptly to the regulator for public report by housing provider.**

4.2 A new standard requirement for a renter engagement strategy

Recommendation 1.4 Strengthen the requirement for tenant involvement in housing providers’ activities and operations [Government supports in principle].

*Develop a new standard for tenant involvement with registered agencies, in consultation with tenants and other stakeholders. This should require providers to have a tenant engagement strategy, and to demonstrate the influence that tenant involvement has on their organisations
Update guidance on best practices in tenant involvement.*

Standard 3 – Engagement and community cohesion requires a community housing provider to ‘engage tenants meaningfully in decisions that affect them’ and ‘engage with tenants and local stakeholders where relevant to support safety, inclusion and community cohesion’.

Homes Victoria has supported CHIA Vic to develop an engagement framework and action plan to guide capacity building for organisations and renters to build renter voice in planning, developing, and

managing social housing. The training developed aims to create opportunities for renters to influence and shape the planning, development, and management of social housing.

This is a welcome development. However, the proposed performance standard should specifically embed this type of effective renter engagement in all facets of social housing - planning, development and management. The performance standards should require support for renter engagement, a strategy to achieve renter engagement and demonstration of effective renter engagement.

It is recommended that **Standard 3 – Engagement and community cohesion**, have a Requirement that includes the following features suggested by the SHRR Final Report.

- support to tenants to engage – it should not be sufficient for providers to establish mechanisms for engagement but have little uptake because tenants do not feel supported
- a tenant engagement strategy – this should be accessible, and articulate the ways in which the agency will engage with tenants, and support them to do this
- demonstration of how tenant input has been used and its impacts on their operations tenant involvement should lead to demonstrated effects, rather than being tokenistic.

The performance standard should make clear the scope of renter engagement to inform and influence thinking **and** decisions about planning, development and management of social housing. This will go a long way to promote the Government’s stated aim of creating a *renter-centred system*.¹¹

A more specific performance standard will also promote a consistent understanding across social housing providers of what constitutes effective renter engagement and ensure public reporting across organisations is comparable.

Recommendation 9: Embed renter engagement in the performance standards as suggested by the SHRR Report:

- **support to renters to engage – it should not be sufficient for providers to establish mechanisms for engagement but have little uptake because tenants do not feel supported**
- **a renter engagement strategy – this should be accessible, and articulate the ways in which the agency will engage with tenants, and support them to do this**
- **demonstration of how renter input has been used and its impacts on their operations tenant involvement should lead to demonstrated effects, rather than being tokenistic.**¹²

4.3 A standard for accessibility modifications

Recommendation 3.5: Ensure needed accessibility modifications to social housing properties are made promptly [Government supports in principle]

¹¹ Victorian Government Response to the Social Housing Regulation Review page 2

¹² Social Housing Regulation Review Final Report page 51

Require through performance standards that all social housing providers undertake accessibility modifications without delay, to be accompanied by funding from the Victorian Government, in the absence of an alternative funding source.

Work with the Commonwealth to establish a mechanism that will allow needed accessibility modifications to be undertaken without delay by social housing providers, and which ensures funding by the appropriate source.

Draft Standard 1 - Tenant and Housing Services requires providers to support stable tenancies and deliver quality housing services that comply with the Housing Act and Residential Tenancies Act. It requires that community housing ‘Provide responsive and accessible customer service, with clear service standards and multiple contact options’.

But neither the draft performance standards or the Requirements mention responding to the needs of renters with a disability. This is particularly concerning given rates of disability and an aging population. The SHRR Report at Appendix E clearly envisages that disability modification will be part of performance standards.

We recommend a further Requirement be included in the draft performance **Standard 1 – Tenant and Housing Services** to require that all social housing providers undertake accessibility modifications without delay.

Recommendation 10: The performance standards require all social housing providers undertake accessibility modifications without delay.

4.4 A performance standard for complaint handling

Recommendation 4.2: Strengthen complaints management processes for registered community housing agencies [Government supports in full]

Base the performance standards for registered agencies on the Australian/New Zealand standard for complaint handling. Require agencies to report on how they have implemented the principles.

Require agencies to link tenants making a complaint with advocacy support and inform them of their options for external dispute resolution.

Two of the draft performance standards and Requirements refer to disputes and complaints

Standard 1 – Tenant & housing services: 1.6 Manage tenancy disputes lawfully and proportionately, ensuring eviction is a last resort and tenants with complex needs are supported.

Standard 3 – Engagement & community cohesion 3.3 Provide effective complaints and appeals processes that are easy to use, timely and fair, and that drive improvement.

The Victorian Housing Registrar has developed a model complaints policy in collaboration with CHIA Vic and supported by the Victorian Ombudsman in line with best practice guidelines. We recommend that

the performance standards specifically require any complaint handling process to apply this model complaints policy or a comparable standard (such as the Australian/New Zealand standard for complaint handling referred to in the SHRR Report recommendation 4.2). This will ensure consistency across all housing providers in how these Requirements are met and reported on publicly.

Recommendation 11: The performance standards should specifically require any complaint handling process to apply the model complaints policy developed by the Victorian Housing Registrar with the Victorian Ombudsman or a comparable standard (such as the Australian/New Zealand standard for complaint handling recommended by the SHRR Report).

4.5 A standard on energy efficiency

Recommendation 3.1: Monitor and report on energy efficiency in social housing [Government supports in principle]

Require social housing providers to report on the energy efficiency of their housing stock, as well as heating and cooling facilities, as part of their requirement to maintain an accurate and current list of properties owned and managed.

Although the SHRR Report did not recommend a separate standard for energy efficiency, it did envisage ‘energy efficiency and heating/cooling performance’ would be part of performance standards developed by the regulator.¹³

The Homes Victoria *October 2025* Sector recommendations update reporting on Government’s implementation of the SHRR Report states:

Energy efficiency will be considered as part of the proposed performance measures as part of the response to Recommendation 2.1: Establish common performance standards for social housing.

The proposed draft Requirement under **Standard 2 – Housing Assets** requires compliance with building, property safety, and essential services obligations. However, in a time of climate change and extreme weather, it is important that the energy efficiency of social housing is closely monitored and reported on to ensure vulnerable groups are not disproportionately impacted by climate change.

Recommendation 12: The new draft Standard 2 - Housing Assets include a specific Requirement to promote energy efficiency and keep records that allow providers to report publicly on their progress.

4.6 Monitoring fire safety

Recommendation 3.4: Regulator to monitor fire safety in social housing properties [Government supports in full]

¹³ Social Housing Regulation Review Final Report Appendix E

Require social housing providers to notify the regulator of all reported fires (including causes and consequences).

The regulator should make and publish any related findings, including the degree to which the provider assessed the fire risk associated with the tenancy, and what actions were taken to address the risks. Recommendations should be included.

Require social housing providers to assess fire risk as part of the general needs assessment at the beginning of a tenancy and at reasonable intervals throughout (Recommendation 3.7)

The SHRR Report did not specifically recommend a performance standard about fire safety in its formal recommendations, but it assumes ‘fire risk assessment and reporting’ will form part of common performance standards developed by the regulator.¹⁴ It also recommends that social housing providers monitor all reported fires including their causes and consequences.

Standard 2 – Housing Assets includes a Requirement to ‘comply with all building, property safety and essential services obligations, and keep accurate compliance records’. However, this does not ensure the type of monitoring and investigation that the SHRR Report recommended is achieved.

Recommendation 13: Standard 2 – Housing Assets include an additional Requirement that social housing providers have a system in place to notify the regulator of all reported fires (including causes and consequences).

4.7 A standard about a register of assets and liabilities

Recommendation 6.6: Registered agencies to develop and maintain an up-to-date assets and liabilities register [Government supports in full]

Require registered agencies to develop and maintain an up-to-date assets and liabilities register that contains details of property ownership, associated debt, status as social or affordable or a mix, obligations related to use, building condition, maintenance plans and tenancy obligations.

The draft performance **Standard 2 - Housing Assets** and **Standard 7- Financial Viability** include requirements in relation to assets and financial accountability however there are no requirements that would require the register described in recommendation 6.6 (above). This will be particularly important to ensure the performance of each housing provider can be fairly compared in public reporting.

Recommend 14: The performance standards require an assets and liabilities register to be kept by relevant organisations, including details of property ownership, associated debt, status as social or affordable or a mix, obligations related to use, building condition, maintenance plans and tenancy obligations.

¹⁴ Social Housing Regulation Review Final Report Appendix E

4.8 Cultural safety

We are pleased to see **Standard 8 – Cultural safety, equity and inclusion** and note it will be the subject of consultation with Aboriginal Housing and Homelessness Forum. We note that the Victorian Aboriginal Legal Service (VALS) also deals extensively with Aboriginal renters in social housing.

Recommendation 15: Consult the Victorian Aboriginal Legal Service (VALS) in the development of the performance standard on cultural safety, equity and inclusion, in addition to First Nations social housing renters and organisations already listed.

Signatories



Inner Melbourne Community Legal



Justice Connect

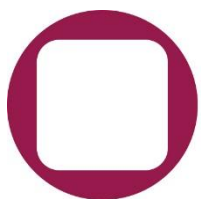


Tenants Victoria



**Victorian
Aboriginal
Legal Service**

Victorian Aboriginal Legal Service



Victoria Legal Aid

Victoria Legal Aid



West Heidelberg Community Legal



Attachment 1 Performance Standards

Standard 1 — Tenant & housing services

Outcome: Providers support stable tenancies and deliver quality housing services that comply with the Housing Act and Residential Tenancies Act.

Requirements:

1. Maintain fair, consistent and transparent tenancy management processes that comply with relevant law and policy.
2. Provide responsive and accessible customer service, with clear service standards and multiple contact options.
3. Manage allocations effectively and efficiently so applicants are housed promptly in homes suited to their needs.
4. Set, explain and apply rents and charges lawfully and transparently, providing tenants with clear information.
5. Support tenancy sustainment through early intervention and referral to support services.
6. Manage tenancy disputes lawfully and proportionately, ensuring eviction is a last resort and tenants with complex needs are supported.

Standard 2 — Housing assets

Outcome: Homes are safe and well-maintained across their life cycle.

Requirements:

1. Maintain and implement a documented asset strategy and long-term plan aligned to tenant needs and financial capacity.
2. Monitor asset performance (condition, failures and costs) and use insights to optimise outcomes across the life of the asset.
3. Comply with all building, property safety and essential services obligations, and keep accurate compliance records.
4. Deliver timely responsive repairs and planned maintenance so that housing is kept at or above required standards.

Standard 3 — Engagement & community cohesion

Outcome: Providers engage meaningfully with tenants and stakeholders, contribute to safe, inclusive neighbourhoods, and work with partners to improve local outcomes.

Requirements:

1. Engage tenants meaningfully in decisions that affect them.
2. Provide accurate, accessible information on rights, services, standards and how to engage or complain.
3. Provide effective complaints and appeals processes that are easy to use, timely and fair, and that drive improvement.
4. Address anti-social behaviour affecting or involving tenants through timely, proportionate action and partnership with relevant bodies.
5. Engage with tenants and local stakeholders where relevant to support safety, inclusion and community cohesion.

Standard 4 — Governance & Board accountability

Outcome: Governance is effective, lawful and transparent, with competent oversight of strategy, risk and performance.

Requirements:

1. Maintain a capable governing body with the skills, diversity and information needed to discharge its duties.
2. Set strategy and manage risk; oversee performance, compliance, and the integrity of reporting.
3. Ensure policies, delegations and controls, including for conflicts, related-party and group-entity dealings, support lawful, ethical decision-making and protect tenant rights.
4. Obtain independent assurance (e.g. audits or reviews) commensurate with size and risk, and act on findings promptly.
5. Ensure transparency and accountability to tenants, funders and the Registrar.

Standard 5 — Probity & ethical conduct

Outcome: High standards of integrity protect tenants, public resources and sector reputation.

Requirements:

1. Prevent, detect and respond to fraud, corruption and misconduct, and maintain appropriate controls and training.

2. Identify and manage conflicts of interest, and manage gifts, benefits and hospitality transparently.
3. Procure goods and services fairly and competitively, with value for money and appropriate due diligence.
4. Protect whistleblowers and investigate disclosures appropriately.

Standard 6 — Management, risk & oversight

Outcome: Structures, systems and capability underpin reliable service delivery and sound risk management.

Requirements:

1. Maintain a fit-for-purpose organisational structure, policies, systems and workforce.
2. Actively identify, manage and report risks, including financial, service, health & safety, ICT and cyber security risks.
3. Store and handle information securely and lawfully, protecting personal and sensitive data.
4. Oversee the performance of third parties (including ICT and maintenance providers) to ensure service quality and compliance.
5. Continuously improve service delivery through internal performance monitoring and timely operational adjustments.
6. Use tenant feedback, complaints and performance data to drive continuous improvement in housing services and outcomes.
7. Submit complete, accurate and timely regulatory data to the Housing Registrar, retaining supporting evidence.

Comply with legal requirements and relevant government policies.

Standard 7 — Financial viability

Outcome: The provider remains financially viable at all times.

Requirements:

1. Maintain adequate solvency, liquidity and cash reserves to meet all financial obligations.
2. Prepare budgets and forecasts based on sound assumptions. Monitor actual results against budgets and forecasts and take timely action to address material variances.

3. Manage and monitor financial risks – including counterparty/credit, project funding adequacy, interest rate, covenant and refinancing risks – supported by appropriate stress testing, mitigation strategies and contingency planning.
4. Optimise revenue through effective management of tenancies, tenant mix, and, where appropriate, diversified income streams. Manage expenditure efficiently through effective use of resources.
5. Produce accurate and timely financial reports and comply with audit and regulatory reporting requirements.

Standard 8 – Cultural safety, equity & inclusion

Outcome: Services, homes and engagement are culturally safe, trauma-informed and inclusive.

Requirements:

1. [This section will be developed by the Aboriginal Housing and Homelessness Forum]

Resourcing – the number of full-time equivalent (FTE) staff in frontline tenancy management roles and all other roles at the end of the financial year.

Re-let time – the average number of days taken to re-let homes that were ready for occupation (tenantable) or required maintenance before occupation (untenantable).

Occupancy rate – the proportion of days homes were occupied, based on the average maximum tenancies in the last two financial years.

Rent arrears – rent overdue at 30 June as a percentage of total rent charged during the financial year.

Eviction rate – total evictions¹ during the financial year as a proportion of tenancies at 30 June.

Repairs completed on time – the percentage of urgent repairs completed within 24 hours and non-urgent repairs completed within 14 days of receiving a tenant request for maintenance.

Complaint resolution – the percentage of complaints from tenants and prospective tenants resolved within 30 days.

Tenant satisfaction – registered agencies are required to survey tenants at least once every two years regarding their housing services, complaints management, repairs and maintenance, and tenant engagement. Total satisfaction score is calculated using a scale where 4 is very satisfied and 0 is very dissatisfied.

¹Evictions are defined under this KPM as being where ‘a warrant of possession is issued (purchase of warrant) and the tenancy is subsequently terminated’