

Review Panel for the proposed Minimum Standards for Rental Properties and Rooming Houses
Victorian Department of Government Services
08/07/2024

Dear Review Panel,

Re: Submission to the proposed Minimum Standards for Rental Properties and Rooming Houses

Jesuit Social Services welcomes the opportunity to comment on the Victorian Government's proposed Minimum Standards for Rental Properties and Rooming Houses (proposed Regulations).

Jesuit Social Services is a social change organisation. We have been working for 47 years delivering support services and advocating for improved policies, legislation and resources to achieve a just society where all people can thrive. We work with some of the most marginalised individuals and communities across Victoria and other parts of Australia. This includes people facing poverty, financial and housing stress, people with disabilities, and people disproportionately impacted by climate change. Our experience reinforces our belief that no person can thrive without adequate and safe housing.

Since 2012, one of the key focus areas for our service delivery, research, and advocacy is climate and ecological justice. This includes establishing the [Centre for Just Places](#), and other place-based work in Western Sydney, the Northern Territory and Victoria. As part of our climate and ecological justice approach, we invite discussion and advocate for practices, policies and actions can be taken by governments, individuals, organisations and the community services sector within Australia, to build an ecologically just society.

Jesuit Social Services frequently works with those who are least responsible for ecological and economic risks and threats, but heavily affected by their emergence. We recognise that environmental challenges pose particular risks to the communities with whom we work.

Since 1999, Jesuit Social Services has been researching how a complex web of entrenched social and economic disadvantage constrains a small number of communities in Victoria and New South Wales. In 2007 this work, known as [Dropping Off the Edge \(DOTE\)](#), was expanded to measure disadvantage in every postcode across the country and in 2021 incorporated indicators of environmental disadvantage for the first time. The 2021 edition of DOTE shows how place-based disadvantage intersects with climate change impacts, and is compounded by higher rates of poverty, and less access to education, employment and services such as public transport and healthcare.

Jesuit Social Services saw the intersection of place-based, entrenched disadvantage and climate change in Melbourne's western suburbs through our 2022 work on the [Collaborative Action Plan for climate justice in Melbourne's west](#). Our research found that Melbourne's western suburbs, including Brimbank, Melton, Maribyrnong and Wyndham, have higher rates of poverty and other forms of

entrenched disadvantage. They also have less green canopy cover - in fact the [lowest tree cover](#) in greater Melbourne - and a high built up and industrial environment. The average temperatures in these areas are 8-11 degrees Celsius higher than non-urban areas. However, the intersecting disadvantages faced in these areas intensify the negative impact on [health and wellbeing](#). Having a home which can provide respite from such temperatures is vital to the ability for people living in such areas to live and thrive. This is particularly true as climate change worsens and living costs rise.

Jesuit Social Services supports the introduction of the Regulations proposed by the Victorian Government. We believe the Regulations can simultaneously reduce cost of living pressures, minimise the disproportionate burden of climate change on vulnerable groups, and improve the health, safety and wellbeing of Victorians. Our response is informed by:

- our support for the rights of renters in Victoria
- our advocacy to improve access to safe and affordable housing, including public and social housing
- our ongoing advocacy for a just transition in the context of a changing climate

While we support the proposed Regulations, we believe they can be strengthened in the following ways:

1. The obligation trigger date for the proposed minimum standards should consider that extended exposure to extreme hot or cold temperatures is a risk to health. The worsening of climate change will see more extreme summer temperatures, and heatwaves are a [higher cause of death](#) in Australia than other disasters or weather events. Further, exposure to high temperatures poses a [greater risk](#) for more vulnerable population groups including those with existing health issues, disabilities, elderly people and children. For example, about a [third of people with disabilities](#) in Australia live in rental properties. If the installation of the minimum standard for fixed cooling systems is delayed until late 2027, it will continue to risk the health and wellbeing of vulnerable people for another three summers. Delayed trigger dates risk landlords and proprietors 'dragging their feet' on compliance. We therefore recommend obligation triggers be as early as possible and that additional incentives be applied, encouraging implementation as quickly as possible.
2. Enforcement and monitoring of the Regulations will be critical to their impact, and to ensuring accountability for compliance is on landlords and proprietors, rather than burdening renters. Existing laws and regulation of rental property standards have insufficiently enforced compliance by landlords and proprietors, which has led to a significant power imbalance between tenants and landlords, and an onus on renters to raise issues of quality and safety. Renters face an already difficult rental market. Therefore, the proposed Regulations need to ensure clearly articulated renter rights, and enforcement must ensure landlords and proprietors are informed of their obligations and the consequences of inaction.

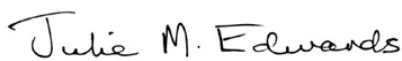
3. Renters must be protected from potential rent increases or eviction by landlords and proprietors who may be avoiding accountability or seeking to subsidise costs in relation to the Regulations. Residents and renters who already face disadvantage, such as those demonstrated through our DOTE study, are particularly vulnerable. Protection for renters should be specified within the Regulations, and caps to rent increases should be introduced.

In summary, our recommendations are:

- 1. The obligation triggers should be brought forward and additional incentives applied, encouraging implementation of the minimum standards as quickly as possible.***
- 2. Monitoring and enforcement of the Regulations must ensure accountability on landlords and proprietors for implementation of the minimum standards, so responsibility does not fall on renters, risking further rental stress. Enforcement must also ensure landlords and proprietors are informed of their obligations and the consequences of inaction.***
- 3. Renters must be protected from potential rent increases or evictions by landlords and proprietors following the introduction of the Regulations. Protection for renters should be specified within the Regulations, and caps to rent increases should be introduced.***

We thank you for the opportunity to respond to the proposed Regulations. We welcome further discussion with the Victorian Government regarding the feedback detailed in this letter.

Yours sincerely,



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