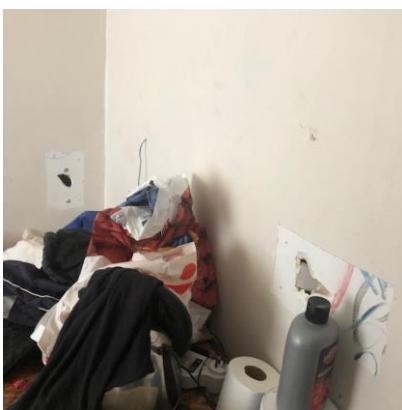




Western Homelessness Network submission to the Commissioner for Residential Tenancies Rooming House Lived Experience Project

'The landlord at the RH caused much trouble. she would open tenant's rooms and go through personal belongings stealing valuables. the landlord played tenants off against each other causing trouble. The house was dirty and unkempt. I have never felt so used and abused in my whole life.'

'You feel dirty and low and worthless when the place is dirty and no one is cleaning the place. Should supply cleaning products; ovens that work.'



Prepared by the
Western Homelessness Network

April 2022



For further information on or from the Western Homelessness Network, please contact Sarah Langmore, Western Homelessness Networker at sarah@wombat.org.au or on 0407 832 169.

Membership of the Western Homelessness Network



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1. Introduction

This brief submission has been drafted by the Western Homelessness Network (WHN) to contribute to the Commissioner for Residential Tenancies Lived Experience Project.

The Western Homelessness Network is the Network of 24 Specialist Homelessness Services, managing 114 programs and 10 allied services, in Melbourne's west. These services meet every six weeks to improve responses to people experiencing homelessness in Melbourne's West through management of coordinated homelessness service system arrangements, consumer consultation, linkages with allied service sectors and shared professional development.

Melbourne's west incorporates the Local Government Areas of Melbourne, Moonee Valley, Maribyrnong, Wyndham, Hobsons Bay, Brimbank and Melton.

1.1. Thank you

The Network would like to thank the Commissioner for undertaking this extremely important review of tenant experiences of rooming houses and for providing the Network with an opportunity to participate in this Review.

If you would like any more information about this submission, please contact: Sarah Langmore, Western Homelessness Networker at sarah@wombat.org.au or on 0407 832 169.

2. Context

2.1. Overview

Commentary in this submission is focused on private rooming houses. Agencies in the Western Homelessness Network most commonly intersect with these rooming houses is as a source of short term accommodation for single people and couples seeking homelessness assistance and it is from this context that the following information is derived.

Homelessness Access Point services operate as the front end of the Homelessness Service System, utilising Housing Establishment Funds (HEF) to purchase temporary accommodation, where they have capacity, for people who have nowhere to live.

In 2020, the Northern and Western Homelessness Networks released a report, *Crisis in Crisis II: The Way Forward*¹, which identified:

'There is significant concern about the suitability of private rooming houses as an emergency accommodation option when only one in every ten assists is to a provider offering a level of safety to residents perceived to meet even the barest of acceptable standards.

In the absence of viable alternatives, whether crisis or longer term options, rooming houses function as both an emergency and an ongoing accommodation option for certain cohorts.

The continuing short-term use of motels to accommodate adult singles is indicative that vacancies in rooming houses accessible to services can be in short supply. Vacancies are most likely to arise at rooming

¹ Northern and Western Homelessness Networks, *Crisis in Crisis II: The Way Forward* (Report of the Crisis Accommodation Options Project, Melbourne, 2020)

houses with the highest turnover of residents, with high turnover likely to be indicative of poor quality.

Issues such as lack of safety and security, poor cleanliness and amenity, unaffordability and lack of adherence to regulatory requirements remain widespread.

Clients reported the experience of rooming house accommodation remains very poor.'

Findings from the Crisis in Crisis II Report, include:

- The Sector lacks detailed information on the private options it uses, with significant divergence of perceived quality and suitability across services.
- By the Sector's own rating system, the vast majority of the accommodation purchased with HEF is considered 'inappropriate and unsafe' accommodation.
- Agencies' access to private emergency accommodation options is precarious and vulnerable to closures and withdrawal of service.
- Relationships with providers have largely been developed ad-hoc, and significant efforts are required to source, negotiate, and monitor options.
- The Sector lacks alternatives to private rooming houses, despite those in use by the Sector perceived as being unsuitable, unaffordable and unsafe by both clients and staff.
- Better quality private rooming house options are less accessible to the Sector, with operators reluctant to engage with the homelessness Sector.
- With insufficient capacity at specialist Crisis Supported Accommodation (CSA) facilities and a systemic lack of long-term options, suitable options for single-person households are particularly challenging to source and maintain, particularly for those with complex support needs.

Crisis in Crisis II also reports:

In 2017, a Launch Housing report on the experiences of clients supported by Launch Housing's Rough Sleepers Initiative (RSI) program found that households sleeping rough had commonly refused rooming house options in the past. Many clients declined these options due to prior negative experiences, concerns around safety, and wanting to avoid being around drug-use (Kolar, 2017). It was found that clients were also reluctant to explore rooming house options for fear of exacerbating their own mental health issues. CHP's 2014 rooming house report recorded similar feedback from its consultation, finding that 'the environment in rooming houses can be one which makes people feel incredibly unsafe', and that 'some individuals would rather sleep rough than stay in a rooming house' (CHP, 2014: 18). PCLC's 2020 report paints a similarly troubling picture of the experiences of residents. Almost half of all residents surveyed (48%) described their living conditions as 'very poor', 'bad' or 'unsafe', with data held by the PCLC's Rooming House Outreach Program indicating that more than 40% of rooming houses in its South-East suburban catchment were in 'a significant state of disrepair and lack of maintenance' (PCLC, 2020: 3).

Feedback from consumers about private rooming houses to Network sources is so poor that Network agencies only utilise private rooming houses in the absence of any other accommodation sources (See Section 2.5).

This feedback so distressing that the Network is divided on the question of whether or not referral to a substandard accommodation option is better than no option at all and will be seeking, with the Northern Homelessness Network, consumer feedback in 2022 to explore this question.

2.2. Homelessness in Melbourne's west

The rate of people experiencing homelessness has been increasing in Victoria in recent years. This holds particularly true for Melbourne's West, recording a 40% increase in the number of people experiencing homelessness between Census 2011 and 2016. This is a significantly higher increase than the rest of the state, which saw a rise of 14 per cent². In other words, 23 per cent of all the people experiencing homelessness in Victoria on Census night 2016, identified as being in Melbourne's west.

Anecdotally, the numbers of people experiencing homelessness in the West has continued to rise since 2016, well beyond a level at which the 114 Specialist Homelessness funded programs can respond.

The nature of homelessness in Melbourne's West has been changing significantly in recent years. The housing affordability issues that have affected the west have led to a surge in overcrowding³, with an increase of 80% between the 2011 and 2016 censuses⁴. The most visible face of homelessness, rough sleeping, increased by 120% in the same period⁵ and there was a 50% increase in people living temporarily with other households⁶.

2.3. Housing in Melbourne's West

This increase in the numbers of people experiencing homelessness in the West is a direct result of the housing crisis – both in terms of supply and affordability. The West has historically been one of the most affordable areas of Melbourne. This is no longer the case. Private rental vacancy rates are low in Melbourne (2.1%⁷) and rents are high and have now returned to pre COVID levels, following a slight decrease during 2020 and 2021. In March 2021 there were no private rental properties available in the West that were affordable for someone on Newstart or Youth Allowance⁸.

A key determinant in the increasing rate of homelessness in Victoria is the severe undersupply of social and affordable housing. There are 14,358 social housing properties in Melbourne's west however, given that movement into public housing is minimal, there are 9,708 on the waiting list for access to those properties in Melbourne's west.⁹ This represents nearly one fifth¹⁰ of those waiting for public housing in the State.

An absence of safe, affordable housing is driving these marked increases in the numbers of households experiencing homelessness and the high numbers of people approved for priority access to social housing. Our supply of housing is insufficient to house our population. Plan Melbourne estimates that Melbourne will need an additional 1.6 million new homes by 2051 in order to meet this current and growing need¹¹.

² Western Homelessness Network 2019, 'Ending Homelessness in the West' Western Homelessness Network, <http://www.nwhn.net.au/admin/file/content2/c7/Ending%20Homelessness%20in%20Melbourne's%20West%20Aug%202019_1571202882052.pdf>.

³ Defined by the ABS as dwellings that are four or more bedrooms short, allowing for gender and age.

⁴ WHN 2019a, 'Ending Homelessness in the West', p. 3.

⁵ Even taking into account the fact that the count of those sleeping rough in the West was a significant undercount, impacted by insufficient capacity to undertake the count.

⁶ WHN 2019a, 'Ending Homelessness in the West', p. 3.

⁷ Rental report, December quarter 2018, Department of Health and Human Services (2018)

⁸ Anglicare Australia, Rental Affordability Snapshot/National Report/April 2021 (Anglicare, 2021)

⁹ Homelessness Australia advises in the Everybody's Home campaign, that Australia will need 500,00 new social and affordable homes by 2026.

¹⁰ Homes Victoria, Total number of social housing applicants on the Victorian Housing Register - December 2021 (Homes Victoria, Melbourne, 2022)

¹¹ *Victoria in Future 2016* and Department of Environment, Land, Water and Planning, internal analysis, estimated employed persons derived

Melton and Wyndham, in Melbourne's west, are growing faster than any other area of Melbourne¹².

Lack of supply has resulted in an all-time low in private rental affordability. Whilst Melton and Brimbank still rate in the top 10 most affordable local government areas (LGAs) for people earning a minimum wage, none of the LGAs in the West are represented in the top 10 most affordable Victorian LGAs for people who are receiving Centrelink payments. This reflects a significant change for the West, which was one of the last bastions of affordability¹³ in Melbourne.

In 2020/21, the Network assisted 11,035 households. The housing market is so tight that, even with the assistance of the homelessness sector, 24% of households exited into homelessness (18.52% of those households exited homelessness assistance into temporary, improvised or inadequate accommodation) and 40% exited to a situation which poses an ongoing risk of homelessness.

Homelessness Services in Melbourne's west have identified, within this context of extraordinarily limited affordable housing options, that there is a particular dearth in housing resources for single people in the West. Anglicare identified in its *Rental Affordability Report 2021*¹⁴, that there were NO properties in Melbourne considered affordable for a single person on Jobseeker or Youth Allowance.

We know that it is in this environment of high need for affordable housing and low supply that options such as private rooming houses have thrived.

In a brief snapshot survey undertaken by the Sector in March 2020 prior, the data revealed that 75% of Housing Establishment Funds (HEF/purchased accommodation) assists logged were for single-person households, with the majority of these being single adult males.

'During the snapshot, \$6,160 of HEF was spent to provide 189 bed nights through 13 assists, or an average of 14.5 nights per assist [in rooming house accommodation]. The average cost of a bed night in a rooming house during this period was approximately \$33, or \$456 per fortnight. This is consistent with standard practice for Homelessness Access Points providing rent in advance (usually 2 weeks) in order to secure a household's tenancy in a rooming house, with most rooming house providers charging between \$200-\$250/week. 77% of assists into rooming houses were for male-identifying clients, while the remaining 13% was for female-identifying clients.

The experience of homelessness and inappropriate housing options leads to further trauma for many single people. While there is no single defining characteristic in common to this cohort, they frequently present with histories of trauma resulting in substance use, serious mental health issues or substantial physical health problems. For some, this can manifest in challenging behaviours that present a risk to themselves or others, leading to evictions or barring from accommodation options, and services have traditionally had great difficulty finding appropriate options for this cohort as a result. Rooming houses remain one of the few accommodation options available to this cohort -a highly vulnerable group of people who need stable accommodation with linked support to assist them to counteract the years of trauma that they have experienced.

from Victoria in Future 2016, quoted in Victorian State Government, *Plan Melbourne 2017 – 2050*, (Victorian Government, Melbourne, 2017

¹² NorthWest Primary Health Network, *North West Population Growth*, (NWPHN, 2019)

¹³ The National Minimum Wage as set by the Fair Work Commission, *Annual Wage Review 2017-2018*, (Fair Work Commission 2018)

¹⁴ Anglicare Australia, *Rental Affordability Snapshot/National Report/April 2021* (Anglicare, 2021)

2.4. Public funds to private rooming houses

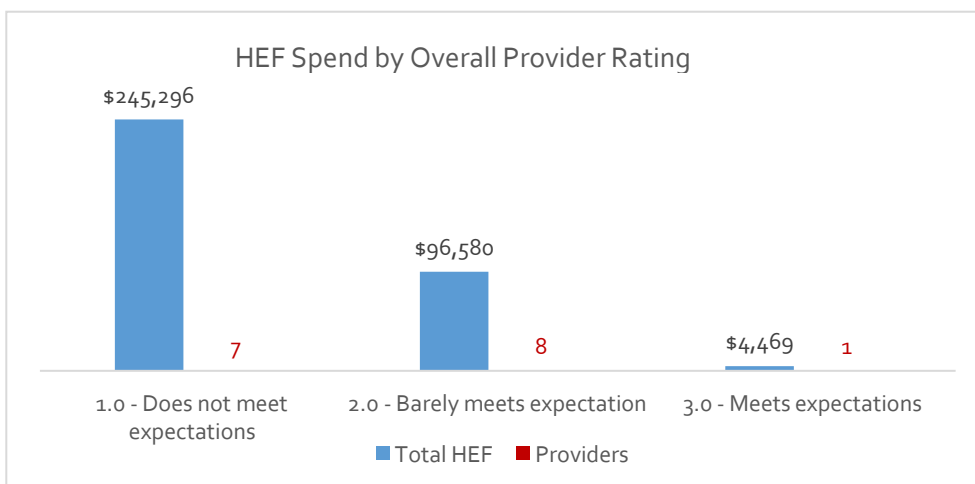
As a consequence of the lack of affordable housing in Melbourne’s west, services utilise public funds (HEF) to purchase private rooming house accommodation for single people and couples with nowhere to live.

In 2018/19 Homelessness Access Point services in Melbourne’s north and west purchased rooming house accommodation 1,426 times at a cost of \$424,097. These funds were directed to 51 different rooming house providers across the State. The top 3 providers accounted for **59%** of all assists, with almost half of all assists (46%) to one provider – North West Accommodation. Services commenced a boycott of this provider in 2020.

Services in the Northern and Western Homelessness Networks derived a rating scale (1 – Does not meet expectations-3 = Meets expectations) to identify how different accommodation sources measure up in comparison with facilities, identified by consumers, as key.

Across the top 20 most used private rooming houses during 2018-19 (by HEF spent), 70% of all HEF went to providers rated at 1.0 overall, accounting for over three-quarters of all assists. In terms of safety, 90% of assists were to providers rated at 1.0.

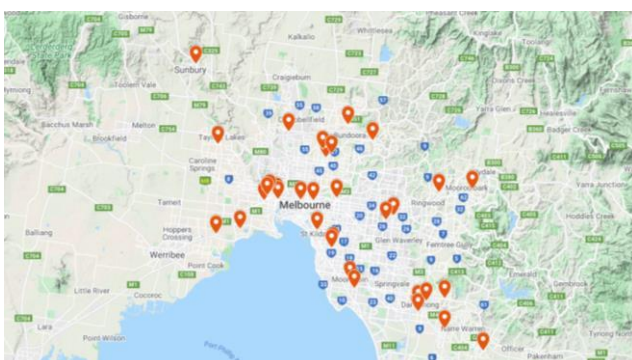
Figure 1: HEF Spend on Rooming Houses by Overall Provider Rating, NWLASNs 2018/19



This is an alarming figure, consistent with the concerns expressed in A Crisis in Crisis, and the Northern and Western Homelessness Networks’ consequent embargo action from March 2020 against the predominant rooming house provider in the region, NWA/SLM.

In 2018-19 the NWLASNs Access Point Services used 51 private rooming house providers on at least one occasion, and the geographic spread of these options was wide.

Figure 2: Map of Northern and Western Access Point rooming house referrals, 2018/19



NB. This map includes only those rooming houses where the data from APs provides sufficient detail to enable a correlation of specific property location with HEF spending and assists. Operators running multiple properties present a particular challenge in this regard, as in most such cases the HEF data as provided generally links spending/assists to the operator rather than a particular address.

Thankfully, use of public funds for purchase of rooming house accommodation is declining, as can be seen in Table 1, which shows the spending of one Homelessness Access Point on rooming house accommodation from 2018 – 2022. HEF spending on rooming houses has reduced, as proportion of spending from 21.63% in 2018 to 9.33% in 2022.

One of the few benefits of the recent pandemic was the increase in HEF provided to Access Point services, which facilitated the purchase of accommodation of slightly better amenity. One of the ongoing impacts of this has been that increasing numbers of those presenting to Access Point services for assistance are refusing referral to private rooming houses.

Table 1: Use of access point funds for purchase of rooming house accommodation, 2018-2022

Year	HEF provided	Payments	Distinct clients	RH payments	# payments	Distinct clients	Ratio of HEF to RH
2022	\$ 316,718.88	626	291	\$ 29,547.56	54	54	9.33%
2021	\$ 356,683.13	772	279	\$ 23,496.28	54	51	6.59%
2020	\$ 130,986.10	368	207	\$ 24,581.50	69	64	18.77%
2019	\$ 56,075.50	222	140	\$ 14,048.00	57	51	25.05%
2018	\$ 85,676.40	296	184	\$ 18,535.00	67	64	21.63%

2.5. Survey of rooming house tenants

Each year, the Northern and Western Homelessness Networks survey people who have accessed homelessness assistance through the 180 homelessness programs operating across Melbourne’s north and west.

For the first four years the consumer survey focused on consumer experiences of the newly coordinated homelessness service system. In the fifth year the survey was more qualitative, exploring the responses received in the previous four years. One of the themes that arose regularly through the early surveys was how distressing consumers’ experiences of purchased emergency accommodation is.

So, in 2017, which was sixth year, the survey focused specifically on consumers’ experiences of emergency accommodation. The following tables provide some of the information obtained from the 163 respondents to the survey. Of those respondents, 23% of the men and 14% of the women had stayed in a rooming or boarding house.

Figure 3: Proportion of consumers who stayed in rooming houses, Consumer Survey 2017

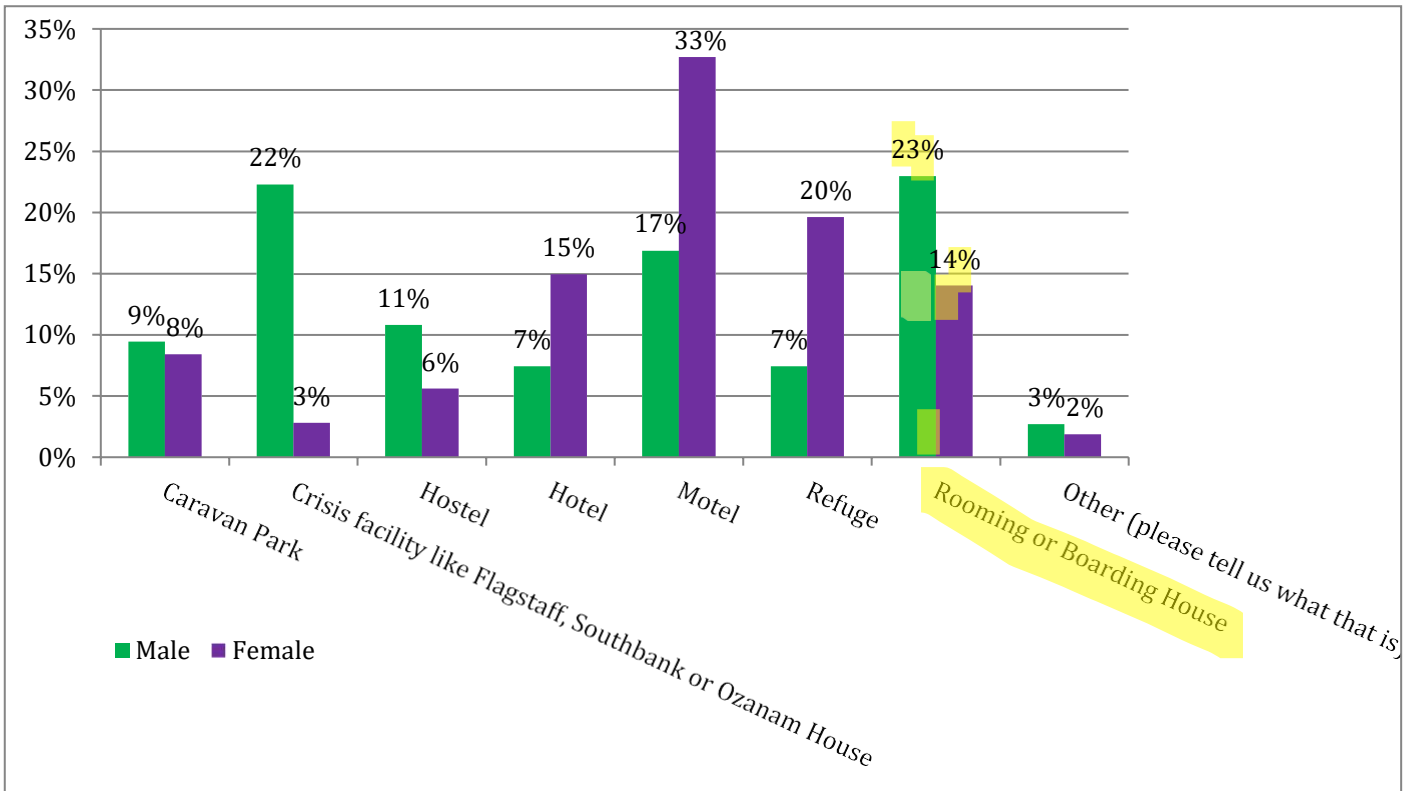


Table 2, below, shows that the most negative descriptions of the various forms of emergency accommodation relate primarily to experiences of rooming/boarding houses.

Table 2: Descriptions of crisis accommodations

	Crisis facility like Flagstaff, Southbank or Ozanam House	Hostel	Hotel	Motel	Refuge (e.g. Family Violence or Young People)	Rooming or boarding house	Caravan Park	Total Respondents
Supportive	39%	4%	5%	11%	39%	9%	4%	76
Difficult or stressful	12%	20%	19%	37%	11%	40%	16%	90
Dirty	6%	16%	15%	30%	3%	44%	15%	79
Unhealthy	9%	18%	12%	34%	5%	39%	14%	77
Overcrowded	11%	20%	11%	23%	11%	39%	18%	56
Expensive	11%	15%	19%	37%	5%	45%	14%	84
Didn't have the facilities or the amenities I need like kitchens, toilet, laundry or bathrooms	5%	11%	21%	48%	0%	26%	21%	61
I felt discriminated against	16%	24%	13%	24%	5%	47%	8%	38

Table 3 shows the perceived safety of various emergency accommodation types. The lower the percentage score, the less safe consumers felt. Men rated caravan parks and rooming/boarding houses as the least safe options and women rated rooming/boarding houses as the least safe option. Combined results identify rooming/boarding houses as being the least safe of each of the options.

Table 3: Perceptions of safety by accommodation type by gender

	Average score Overall	Average score Males	Average score Females	Trans score (1 respondent)
Caravan Park	34%	33%	41%	NA
Crisis facility like Flagstaff, Southbank or Ozanam House	66%	66%	97%	80%
Hostel	36%	37%	34%	50%
Hotel	46%	54%	39%	94%
Motel	48%	49%	47%	51%
Refuge	72%	67%	81%	100%
Rooming or Boarding House	33%	34%	35%	100%

Consumers were asked what was good about the places that they stayed in. The responses from those who stayed in rooming houses indicate a that what was good about the rooming house experience was primarily that it provided a roof.

What was good about the rooming house you stayed in?

- A roof – 7 responses
- A place to stay – 9 responses
- Got to meet people – 3 responses
- Privacy, more or less – 1 response
- A refuge from the world – 1 response
- Nothing – 11 responses

Did you ever feel discriminated against in the rooming house?

- *Discrimination against my skin being white of colour*
- *Felt like no-one cared*
- *Harassed for money, felt threatened*
- *I feel that the manager (Karen) didn't like myself and my family then proceeded to pick on my children.*
- *People living at the rooming house were bossy.*
- *STAND OVER TACTICS BY SOME FELLOW TENANTS*
- *the landlord (lady) drinking often and very aggressive behaviour while drinking plus allowed to forced confrontation between the residents. too much noise during evening. toilets and shower kept in ok condition*
- *The Australians were favoured in many cases mainly because they understand the language and they were controlling the places - very stressful*
- *The landlord at the RH caused much trouble. she would open tenant's rooms and go through personal belongings stealing valuables. the landlord played tenants off against each other causing trouble. The house was dirty and unkempt. i have never felt so used and abused in my whole life.*
- *The man was Jewish and hated non Jews*
- *Treated less than human*
- *Treatment from occupants I shared with.*
- *When staying at rooming house with family a lot of tension*
- *you feel dirty and low and worthless when the place is dirty and no one is cleaning the place. Should supply cleaning products; ovens that work*

We asked what it was like sharing facilities:

- *We just stayed in our room. We didn't want to make noise or be loud or upset anyone.*
- *Shit*
- *Too many drugs and people's issues*
- *Shared a bathroom and it's putrid*
- *Very bad*
- *Horrible*
- *Lots of noise*

- *Dreadful. Intimidating. Racist.*
- *Unhygienic and hard to share with someone who was not clean and respectful (poo on the doorhandles)*
- *This was difficult. Kitchens and bathrooms were unclean. Cigarette smoke and drugs cause many problems. People were not being responsible for their mess*
- *People are untidy and don't really respect the next person so things can be untidy and unclean*
- *Yes, Scary, other tenants were abusive.*
- *Difficult a little Kitchen stuff/food went missing*
- *terrible, not suitable for kids*
- *It was difficult because lots of people don't respect share facilities*
- *Horrible. Lots of trouble with other residents getting drunk. Lack of amenities and very dirty ie. Fridge*
- *terrible/ too many people, dirty, expensive, bad landlord*
- *Scary*
- *no one cleans places are dirty & smell too many people in one room. prison is better.*

2.6. Position of the Western Homelessness Network

In 2019, the Northern and Western Homelessness Networks released 'A Crisis in Crisis: The Appalling State of Emergency Accommodation in Melbourne's north and west'¹⁵. In this Report, the Networks identified that:

'Melbourne is experiencing a housing crisis.

As a result, the numbers of people who have no home are increasing. When people have nowhere to live, they often look to the homelessness service system for urgent support. Unfortunately, the Homelessness Service System across Victoria only has access to 423 government funded crisis beds. To make up a significant shortfall in crisis accommodation homelessness services utilise low end hotels and private rooming houses. This accommodation is extremely unsafe and typically of a very poor standard.

This report has been prepared by the Northern and Western Homelessness Networks in response to consumer feedback that highlights the crisis in crisis accommodation in Melbourne's north and west. This report highlights the appalling conditions that people are required to live in while they wait for more secure accommodation to become available, if at all.

The 2018 Victorian Homelessness and Rough Sleeping Action Plan offers an approach in which responses to all people experiencing homelessness, not just those sleeping rough, should be framed: intervening early to prevent homelessness, providing stable accommodation as quickly as possible and supporting to maintain stable accommodation. Currently, we are failing large numbers of people presenting to the system by providing sub- standard and potentially damaging emergency accommodation, with little or no immediate follow up support to access more suitable housing, and no support to maintain that housing once accessed.

We are contributing to peoples' experience of trauma and adding to their feelings of hopelessness. We must urgently address this situation by providing adequate funds to purchase better quality accommodation, and by increasing resources to support people to exit rapidly into sustainable long term housing.

The Northern and Western Homelessness Networks can no longer tacitly accept causing harm by accepting high cost, poor quality emergency accommodation as a necessary evil for those people who come to us for assistance because they do not have a home.

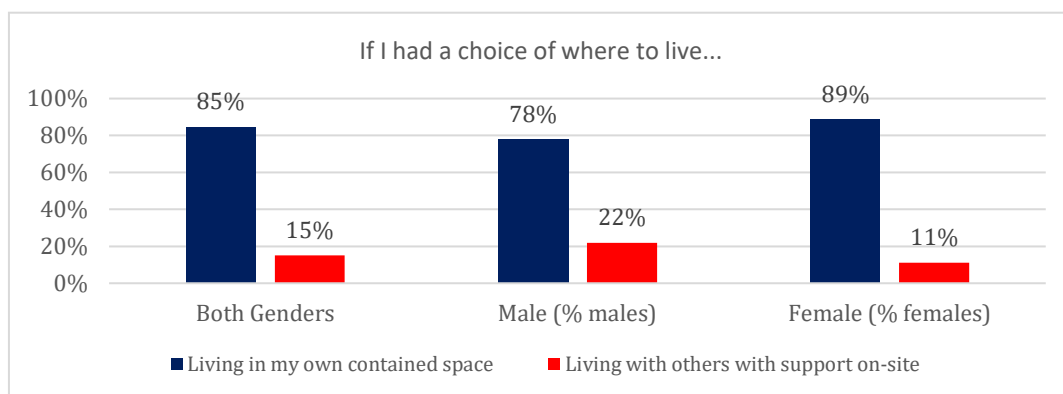
As a sector we are no longer prepared to refer people to substandard crisis accommodation, nor are we willing to participate in continuing to harm vulnerable people seeking our assistance.'

The Western Homelessness Network continues to hold this position. Too often the only sources of accommodation for those presenting to the Network for homelessness assistance are private rooming houses, often unregistered, which do not provide accommodation that is safe, affordable or appropriate. The Homelessness Sector may initially refer people into these rooming houses as a temporary form of accommodation, but the lack of affordable alternatives means that tenants are often trapped in rooming houses for years.

In 2017, we asked consumers whether they would you prefer accommodation that is self-contained space (even if it was very small) or living with others with support on site? 85% opted for self contained accommodation.

¹⁵ Northern and Western Homelessness Networks, A Crisis in Crisis: The Appalling State of Emergency Accommodation in Melbourne's north and west (Melbourne, 2019)

Figure 4: Preferred accommodation, by gender



The Network believes that all Victorians have the right to a home that is safe, affordable and clean with appropriate self contained facilities. Few rooming houses meet these criteria. The Network therefore strongly advocates for the development of sufficient affordable housing options to ensure that, as a Sector, we no longer have to refer people to private rooming houses.

2.7. Recommendations

The Western Homelessness Network reiterates the recommendations made in the 'Crisis in Crisis' Report:

1. The Victorian Government increases Housing Establishment Fund (HEF) brokerage funding across northern and western Melbourne to enable the purchase of safe and appropriate self-contained emergency accommodation as required.
2. The Victorian Government funds Crisis Accommodation Outreach Support workers at each homelessness access point in northern and western Melbourne (total of 12 FTE) to provide assistance aimed at rapidly rehousing people placed in emergency accommodation.
3. The Victorian Government sets social housing growth fund targets/KPIs for people experiencing homelessness.
4. The Victorian and Commonwealth Governments, in partnership, construct a variety of secure, self-contained, temporary accommodation options for individuals and families as a safe alternative to existing motels and rooming houses.
5. In line with the *Everybody's Home campaign*⁶, the Victorian and Commonwealth Governments, in partnership, construct sufficient social housing to enable rapid access to a 'Housing First' model of housing and support that eliminates reliance on private motels and rooming houses for emergency accommodation.

The Network also endorses Recommendation 13 from the Crisis in Crisis II Report:

'That NWLASNs' Access Points cease the use of private rooming houses as a purchased accommodation option unless they meet a rating of 3. Clients residing in these rooming houses are to be offered proactive support to help them find alternate accommodation.'

3. Western Homelessness Network Response to OCRT Review questions for support services

3.1. What do residents tell you about their experiences of living in rooming houses?

The following are responses to this question from homelessness services. They mirror the feedback obtained through the 2017 Consumer Survey, suggesting that standards in private rooming houses have not altered markedly in the past five years.

- Service providers identified that they have received feedback that private rooming houses are:
 - Very unclean.
 - Not affordable on Jobseeker/Youth Allowance.
 - Traumatizing.
 - Unhygienic.
 - That there is lots of drug and alcohol use amongst residents.
 - Expensive.
 - Unsafe for women and gender diverse folk.
 - Inappropriate for children.
 - Residents report not liking shared facilities.
- Women report that rooming houses are unsafe for them. Risk of sexual assault is high - women have reported rape by other tenants whilst living in a rooming house. Women have also reported that rooming houses are not affordable. No locks on doors, disconnected smoke alarms, lack of access to private space beyond a small bedroom, having to share facilities with people who may be dangerous, undesirable, unwell.
- Residents report being scared in the accommodation and too afraid to make complaints for fear of eviction and/or retaliation.
- Some residents do not feel safe to have their children visit.
- Residents report having to live in areas that are far away from their supports and families because of a lack of options.
- Women report medications and food being stolen.
- Storage facilities are inadequate.
- Residents report having been stood over by landlords and other tenants.
- Some properties have no door - anyone can walk in.
- Prices are unaffordable, leaving little money for medication and food.
- Hygiene standards are poor. Properties are not cleaned.
- Tenants report unlawful evictions, unlawful landlord entry and that landlords fail to report tenants of rental rights.

The Crisis in Crisis II report identified that:

‘Anecdotally, it is well known to workers in the Sector that tenancies in lower quality rooming houses break down frequently, with the client(s) sometimes unable to see out even the initial period paid for by the referring agency after encountering difficulties at a property. Operators are adept at turning over unused stays very rapidly, often vacated or unused beds will be made available later that same day or the following day as a vacancy for another client to be booked in.

Private rooming houses are in fact rarely ‘affordable’ under commonly agreed definitions, particularly for single people on Centrelink incomes. Data collected by the Project during EA mapping activities indicated that the weekly rents charged by commonly used private rooming house operators started at a minimum of \$200/week, with many operators charging more than this. During the first week of the CAOP snapshot period, the average rent recorded for a single room in a private rooming house was **\$456/fortnight**. For single adults in receipt of Jobseeker Allowance, this far exceeds the 55% affordability guidelines set out by [Homes Victoria], with respect to the Private Rental Assistance Program (PRAP) or bond loan eligibility and is nearly three times the 30%-of-income threshold commonly considered to place a household into rental stress. ‘

Andrew

Andrew is a 55-year-old male who has experienced a number of episodes of homelessness since undergoing a separation from his wife. Andrew originally lived with his family and children in the family home, though unfortunately due to a separation from his wife, he left the family home, approached a homelessness access point service for accommodation options and entered the homelessness system.

After accessing crisis arranged accommodation, Andrew has been technically homeless since 2018: he has moved from one shared/rooming house option to another. Between 2018 to the present, Andrew has accessed three different rooming house facilities. In this time, Andrew has reported having to contend with verbal threats /abuse, threats of physical violence, theft as well as witnessing on a daily basis in his first two share options, drug use and dealing by some of the other residents. Andrew reported that in his most recent share/boarding option, he has not had to contend with as much violence and other anti-social behaviour as has previously been experienced in his previous two shared options.

Andrew’s health in the time that he has been residing in share options, has been compromised due to renal failure. Subsequently, Andrew had to undergo lifesaving surgery and had a kidney transplant. Due to the very poor hygiene standards in the first two rooming houses, the Andrew was in constant fear that he could become seriously ill due to his compromised health, whilst also having to contend with other residents who presented with mental health and or substance use issues. Andrew reported on many occasions being depressed as well as fearful; finding it very hard to sleep at night as there was constant fighting most nights between other residents, and generally no peace.



Due to very limited options, the homelessness support service has developed an exit plan with Andrew that includes trying to access a shared house that had better standards, as well as applying for social housing through the Priority Homeless with Support Public Victorian Housing Register.

Andrew now lives in a little bit of hope that one day, he may be able to access suitable housing through the public housing waiting list, though he understands that the waiting list is very long, and that it may be some time before he can truly call anywhere home.

3.2. Are there common problems that are reported to you?

Providers identified that all the issues identified above are reported routinely to them. Common reports include:

- No locks on doors.
- Nowhere to store food.
- Other residents behaving in threatening ways and being unwell and/or substance affected.
- Theft of belongings.
- Accommodation that is so expensive that it is impossible to save for alternative accommodation.
- That it is hard to stay off alcohol and/or other drugs when others in the accommodation use substances.
- Fighting amongst residents.
- Threatening behaviour from landlords.
- Residents feeling culturally unsafe.

A further issue reported in Crisis in Crisis II is the practice, amongst private rooming house landlords, of moving tenants from registered to unregistered rooming houses:

‘While [Northern and Western Access Points] share a commitment to deal only with rooming house operators licensed by Consumer Affairs Victoria (CAV), and to refer only to properties listed on the CAV register, it is apparent that some operators continue to flout licensing and registration requirements while maintaining the appearance of legitimacy. As a result, the phenomenon of ‘meet and move’ whereby residents are moved by operators from registered to unregistered properties continues to persist. It is not a new phenomenon, and was detailed in the NWHNs’ 2011 Submission to the HEF Project:

‘IAP staff report that they have little or no reliable information about where they are sending clients in the private RH context. Often, the address that they are given by the private rooming house operator may not end up being the place the client is actually accommodated. IAP staff have no reliable information on the condition of the property, who else is living there or how many other residents there are at the property. It is therefore impossible to adequately assess risk in any real way.’

Tenants Victoria confirmed the continued and widespread existence of this practice among well-known and frequently used private rooming house providers. Clients are often moved between different rooming houses run by the same operator, in many cases into properties that are not registered with the local council. The practice is difficult to monitor and quantify, however, not least because those directly affected by it are often not in a position to make the requisite reports to CAV or other authorities. This practice was documented in CHP’s 2014 post-reform rooming house report, which found residents were often not reporting sub-standard conditions or illegal practices for fear of eviction and the risk of being left without any form of accommodation (CHP 2014: 21). ‘

John

John 38 originally from NSW came to Melbourne after relationship breakdown with arranged employment transfer. Because his relationship had ended, he decided to leave NSW earlier than planned and had been using his savings to self-fund in a motel.

John reached out to a homelessness support service for some support in the motel at the point of reaching the end of his savings. He explained that work was delayed and would need assistance with alternative accommodation. The local homelessness access point service sourced a rooming house paid for a two week stay. John stayed at the rooming house for three nights.

John reported that the property was uninhabitable for him. John returned back to the motel. A homelessness support service funded a two week stay in the hotel. In this time, John started work and was able to secure a private rooming house on his own with a supplier unknown to the homelessness service. No information is available about the quality of this accommodation.



3.3. Has your service ever reported a problem? What happened?

- One service reported to the local Council that a female resident of a rooming house had been sexually assaulted. The Council was unresponsive.
- An Access Point service referred a provider to Consumer Affairs. Provider in Meadow Heights. Three clients moved into the house, managed by a Real Estate Agent. Agent made abusive calls to workers, demanding that residents leave, threatened to change locks, threat of illegal evictions. The three clients were eventually locked out of their rooms. Service reported to Consumer Affairs, who were interested. No outcome as yet. Consumer Affairs Victoria (CAV) indicated that they are unlikely to provide feedback.
- Services report that a lack of follow up/feedback on outcomes from CAV and Councils is frustrating – leaving them unclear about whether any action has been taken in response to complaints made. Feedback from CAV would be so useful in providing information to inform referrals to rooming house providers. One service now requires written confirmation that repairs have occurred before further referrals are made to a provider reported to Council.
- One Access Point service reported concerning conditions in several private rooming house to the Local Council. One response from Council was that they can't act because it is not the working living there. A second response was a 'thank you for the information, you will be provided with an outcome', but no information was forthcoming. A third response was that the Council visited the property but again, there was no outcome.
- One tenant was encouraged to take their issues to VCAT but was threatened and bullied by the owner.
- Mornington Peninsula Council was responsive to complaints made by a homelessness service.
- Yarra Council is reportedly responsive to issues raised, undertaking an annual assessment of community managed rooming houses each year. Council also responded to a complaint from a resident.
- City of Moonee Valley conduct annual walk throughs with the community based rooming houses.
- There is no system for monitoring use of rooming houses across the homelessness system. Services are good at forwarding each other information about particularly inappropriate properties.
- Services don't have capacity to view properties in person so cannot monitor whether improvements follow complaints.
- Some services advice rooming house providers that they will withhold referrals and funding if maintenance is not undertaken.



3.4. Are there any impediments to effective oversight or regulation of rooming houses in Victoria?

- Health laws don't address landlord behaviour or challenging behaviour amongst other residents.
- Regulatory checks do not appear to be routinely undertaken.
- Many rooming houses are not registered.
- Annual inspections do not always seem to happen. The standards imposed, even when routine checks are undertaken, seem to be extremely low. Providers have unfortunately reported that standards can deteriorate rapidly, even after repairs made as a result of a regulatory visit.
- Standards must be extremely low if private rooming houses pass registration every year.
- The current system requires vulnerable residents to make complaints of issues outside the registration process. A tight regulatory framework should take the pressure off vulnerable residents.
- A more transparent regulatory system would be very useful. With adequate regulation and oversight, rooming houses can provide a stable home and community for residents.
- Councils have reported being too stretched to undertake regular regulatory visits.
- Regulatory visits cover registered rooming houses but so many are unregistered and invisible.

Crisis in Crisis II reports on the failure of the 2009 Rooming House review to make substantial difference to rooming house regulation:

'The 2009 "Call This A Home" campaign, and the subsequent Rooming House Standards Taskforce report (Rooming House Standards Taskforce, 2009) commissioned by the Victorian Government were watershed efforts to expose, document and improve the experiences of marginalised people living in private rooming house accommodation in Melbourne. The Taskforce report recommendations, informed by damning findings about the state of private rooming houses, ultimately led to the establishment of specific



legislation and regulatory controls over the licensing and operation of private rooming houses which aimed to improve safety, amenity and respect for the legal rights of residents, and put 'rogue' operators out of business.

In the years since the implementation of the rooming house reforms, however, evidence continues to suggest that many private rooming house residents remain subject to extortionate rents, unsafe and unsanitary conditions, and the persistent threat of violence and other disruption. CHP's 2014 post-reform Rooming House Project report (Council to Homeless Persons, 2014), *A Crisis in Crisis* (NWHNs, 2019) and the Peninsula Community Legal Centre's recently released report into rooming house accommodation in Melbourne's South-East (PCLC, 2020) all articulate themes of unaffordability, sub-standard quality, low levels of regulatory enforcement and, crucially, persistently poor experiences of private rooming house residents.

3.5. Have you noticed any changes in living conditions in rooming houses?

- Services are using different providers now, but they seem as poor as earlier providers.
- Regulatory action by Councils has increased a little.
- Since the pandemic, more consumers are refusing referral to rooming houses. Consumers have experienced a (hopefully) safe space of their own through the pandemic. Those who had experienced rooming houses pre pandemic, do not want to go back to rooming houses.
- The result is likely to be more people sleeping rough. Requests for homelessness assertive outreach support have risen markedly.
- The pandemic has highlighted poor health safety associated with rooming houses.
- The establishment of the High Risk Accommodation Response, through the pandemic, has provided an extremely valuable oversight and a level of health support to residents of registered rooming houses.
- Some rooming houses have been established with improved amenity by private landlords. However, these newer properties are targeted to people on moderate incomes. Homelessness providers have found that these options are quickly 'burnt' if services refer someone who then exhibits challenging behaviour in the rooming house.

Crisis in Crisis II reported:

'At an early stage of the Project's new accommodation options exploration, Project Workers were contacted by the owner of a brand new, purpose-built private rooming house in the outer Western suburbs. The property had nine rooms, each with ensuite bathroom, refrigerator, and microwave, with shared full kitchen and laundry facilities. While the quality and degree of self-contained amenity at the rooming house far exceeded what the Project Workers had found on offer at other RH properties, the owner made clear that they did not intend for the property to be used as crisis accommodation, the target market were to be low-wage workers seeking longer-term tenancies (6+ months). The owner indicated they were intending to charge rent of up to \$280 per week for a single room, which is unsustainable for most single households seeking assistance from services.'



Kerry

Kerry is a 46yo single woman, was living in a private rooming house in South Melbourne. Kerry disclosed that she didn't feel safe in her current housing due to the house mates trying to break into her room, steal her belongings, and asking for money. Kerry disclosed that there was a lot of drug use, violence, and arguments within the house. Kerry had a history of PTSD from historical past trauma and being itinerant. Kerry also had no family supports in Australia as she had fled Rwanda in 1994 after the loss of her entire family in the Rwandan Genocide.

Kerry had attempted to resolve her housing situation by contacting the landlord for assistance and asked if there was anything that could be done, the landlord seemed disinterested. Kerry asked if there was another house she could move into but there was no availability. Kerry really wanted her own accommodation; her income was not substantial enough for her to afford her own private rental.

The accommodation environment was impacting on her mental health with several visits from the CAT team. The case worker liaised with the homelessness access point and advocated for Kerry to receive crisis accommodation. Kerry was funded for 3 nights in Laverton.

Kerry attended many inspections for rooming and shared housing and was unsuccessful. Kerry found a share house that she was successful for and required assistance with RIA and bond. Kerry had already moved into the house and the case worker proceeded to gather all information to provide financial assistance. While acquiring the documents, it came to light that the tenant of the property was subletting to Kerry and in fact the property was a Public Housing property. Kerry still wanted to stay there once she had moved in and found it extremely difficult to be excepted for any accommodation. Kerry also advised that the access point service would no longer continue to assist her.

The case worker managed to provide some financial assistance but was unable to assist with the bond. Kerry made an agreement with the tenant that she would pay the bond off. Five days later Kerry went to the bathroom at 3 am and the male tenant requested that she have sex with him in return for the bond.

Through case worker advocacy Kerry was again provided with purchased motel accommodation through the access point. Kerry was admitted to the Psychiatric ward. On release, Kerry was provided with further purchased short term accommodation in an apartment. Kerry felt relieved as this was her own accommodation, and she was living alone. Whilst co contributing Kerry managed to secure part time employment which enabled her to look for private rental. Kerry was successful in securing a unit in Footscray and was assisted with RIA bond furniture white goods and material aid.

3.6. What would improve living conditions in rooming houses?

The Western Homelessness Network holds the view that, even with the most substantial improvements, private rooming houses will not provide appropriate accommodation.

Responses from homelessness workers about changes that could marginally improve the experience of living in a rooming house:

- Support for residents whilst in rooming houses. There is currently no available support capacity in the homelessness sector to proactively seek out rooming house residents. Many rooming house residents are loath to approach homelessness services for assistance, given the poor response that they have received in the past (generally referral into a rooming house). Many residents require support to address issues arising in their lives as a consequence of their experiences of homelessness and rooming house living.

Community rooming houses often have an office within them for permanent or visiting support staff. This provides a level of oversight and assertive support provision that could be replicated in private rooming houses. Staff can help residents address financial issues and respond to maintenance requirements.

- Regulatory checks to ensure that properties are up to code.
- Establishment of more women only rooming houses.
- Fewer people accommodated in each property.
- Properties that are appropriate to people of diverse gender identities and sexual orientations.
- Systems to vet and match residents.
- Animal friendly properties.
- Regular cleaners.
- Prompt maintenance – locks, mould, repairs.
- Adequate heating and cooling.
- Self contained facilities (bathroom, cooking facilities) – bedsits at the very least. Experience in community managed rooming houses indicates that demand for community managed rooming houses with self contained facilities (only shared laundry) is much higher than for those without.
- Provision of bed, full size fridge, couch, linen, crockery, food, toilet paper, laundry powder
- Visiting support, monitoring – preferably onsite support
- Increased Tenancy Plus type support to assist residents to manage issues that arise, such as hoarding.
- Keypad entries so that multiple people don't still have keys when they leave.
- Stocked kitchen with basics items. Secure food locker external to the bedroom. Access to a kettle.

Tenant feedback:

Respondents to the 2017 Northern and Western Homelessness Networks' Annual Consumer Survey identified things that they would like to change about rooming house accommodation and what their ideal accommodation would look like. As the responses below show, the expectations of ideal accommodation are not high and represent the least that most Victorians would expect of their home.

What would you change about the accommodation?

- *less rats in the walls cleaner*
- *Make it safer*
- *Everything' needs cleaning and products provided*
- *Security should be looked at and advise ahead of the drug issues and risk incurred*
- *make it clean, private, cheaper*
- *Better facilities, there was broken furniture and the house was run down*
- *I would make it more affordable*
- *Get rid of rooming houses- not a productive environment*
- *Matching people on suitability, e.g. drug pushers vs non-users/recovering. More security*
- *More cleanliness, protection from bed bugs.*
- *cheaper, get rid of junkies. clean them up*
- *Greater security for women*
- *not to have kids in a rooming house*
- *It was difficult sharing facilities with people that had complex mental health and addiction problems.*
- *Not run properly by the owners. Tenants are running wild.*
- *Cleanliness, no bed bugs, safety, female only sections*
- *more facilities; improved cleanliness*
- *Cleanliness and help*



The Network would like to finish with comments from tenants about what their ideal short term accommodation would be like:

As can be seen from the responses below, expectations of ideal accommodation are not high, nor are they any greater than the expectations that most Victorians would have of their home:

- *Rooms that lock. Clean, mutual amenities*
- *Supported, long*
- *Clean. Descent to live with*
- *A home*
- *Clean and safe*
- *Nice and safe*
- *Respectful staff and clean safe environment*
- *Social workers available. 24 hour surveillance Manager on property daily Better cleaners*
- *Comfortable and safe*
- *Safe, drug free and suitable facilities and clean, monitored by security.*
- *Safe and secure environment*
- *Just to feel safe and comfortable*
- *somewhere clean, where you can feel safe.*
- *Clean, private and safe*
- *Support onsite 24/7*
- *A nice, accommodating place to be and no-one to bother you. That would be the nicest thing*
- *I don't really know. Perhaps by yourself, safe and staff on board.*
- *Self contained unit*
- *safe and secure affordable and clean*
- *ACCORDING TO ME IT SHOULD BE SUPPORTIVE, SAFE, CLEAN, AND REASONABLE IN RENT*
- *Private space*
- *A place that feels like you are at home and where you have freedom to come and go as you like and not too crowded. And you have your own place.*

Attachment 1: Embargo documents



SERVICE ANNOUNCEMENT

Homelessness services have received strong feedback from our clients that some accommodation options have been very low quality and have put people at risk of harm.

In response, we are no longer using certain private providers.

We are working hard to find new options for people that are of a higher standard.



NORTH & WEST HOMELESSNESS NETWORKS NWHNs

Information Sheet: February 2020

'Crisis in Crisis' campaign and embargo of rooming house providers

Action

From 1st March 2020 the Northern and Western Homelessness Networks will place an embargo on referrals to some private accommodation providers.

We will not be referring anyone to facilities managed some low end rooming house providers. Homelessness services will work to assist any current residents of this group, who present to homelessness access points, to find alternative accommodation.

Why have homelessness services used rooming house accommodation?

Because there are no other options. As homelessness rises, crisis beds and shelters are full to overflowing, and registered rooming houses and motels are the only options left.

Homelessness services have sought to refer only to registered rooming houses, However, in many cases, services refer clients to a registered rooming house, and the client is intercepted by the landlord who redirects them to an illegal rooming house.

There are only 423 official crisis beds in the entire state, and 82,000 Victorians waiting for social housing. In one year alone, the Northern and Western Homelessness Networks had to make 10,000 referrals to emergency accommodation. No wonder rooming houses are booming.

The question we should be asking is why have Governments neglected to provide enough safe, affordable accommodation for people who have been pushed out of the private rental market. Illegal rooming houses are a symptom of a broken housing system.

According to the AIHW, 1-in-3 people seeking help are turned away from homelessness services due to the lack of accommodation.

Why an embargo?

The Northern and Western Homelessness Networks launched "A Crisis in Crisis – *the appalling state of emergency accommodation in Melbourne's north and west* report" in February 2019. Link: http://www.nwhn.net.au/admin/file/content2/c7/A%20crisis%20in%20crisis%20doc%20final%20040219_1550142202053.pdf

The report drew on consumers' experiences of emergency accommodation (low-end hotels and private rooming houses), which the Homelessness Service System are completely dependent on using to house people who have nowhere to live. As anticipated the consumer experience of these places was devastating.

Women reported that it was "horrible", "terrible" that they feared violence and rape (one woman reported a rape in a rooming house). Similarly, men reported that it was "difficult" "overcrowded", "scary", "impossible to cook", "violent".

Throughout 2019, the Networks advocated to the Department of Health and Human Services and all tiers of government, for the creation of appropriate emergency accommodation options for the thousands of people presenting to the homelessness service system each year with nowhere to live.

The Networks undertook a rating exercise in 2019 - rating the facilities that we refer/ HEF consumers to, against the amenities that consumers have identified as important in appropriate emergency accommodation.

Some private accommodation providers rated extremely poorly. Their facilities do not meet even basic expectations. The Networks have therefore made the decision to continue our "Crisis in Crisis" campaign with an embargo of facilities managed by these providers.

Outcomes

The embargo does not have an end date, as we do not anticipate the provider will upgrade their facilities to a reasonable level.

The Northern and Western Homelessness Networks will continue to advocate to State and Federal Members of Parliament - seeking a response to the housing crisis overall and to the lack of appropriate emergency accommodation in particular.

We need:

- a significant increase to affordable housing
- better quality purchased emergency accommodation
- more outreach resources for people in emergency accommodation to support them to exit homelessness.

Request

- **That you join us/support us in our campaign.**
- **That you explain the rationale for the boycott to consumers.**
- **That you raise the issues with your funding provider and discuss the issues with your local Members of Parliament.**

If you would like any further information, please contact:

Meredith Gorman 0424 112 445

or

Sarah Langmore: sarah@wombat.org.au (0407 832 169)