

01 July 2024

To Whom it May Concern,

The Antipoverty Centre was established to counter problems with academics, think tanks, charities, bureaucrats and others in the political class making harmful decisions on behalf of people they purport to represent. We are a collective of activists, advocates and researchers with direct, contemporary experience of poverty and unemployment.

We have deep expertise in poverty because we live it. We defend and fight for the rights of people like ourselves who experience violence at the hands of an economic system designed to oppress us. It is our mission to shift how people speak about and respond to poverty and unemployment in this colony.

We work closely with peer support groups, activists and grassroots civil society organisations to complement their work. Our goal is to help ensure the voices and rights of people on the lowest incomes are at the centre of social policy development and discourse. We believe there should be no decision made about us without us.

Low income people are the most important stakeholders in this process as we are living in the lowest quality homes, are least able to absorb rent increases and the costs of moving house, and most likely to be exploited by landlords seeking to opportunistically profit from the implementation of new minimum standards.

Our contribution to this inquiry builds on our past work advocating for every person's right to a safe and liveable home. Please refer to the attached submission to the 2023 federal rental inquiry in addition to our recommendations below.

Minimum Standards for Rental Properties and Rooming Houses

Recommendations

1. The Antipoverty Centre supports stringent minimum standards to ensure that everyone has a safe and healthy environment to call home.

2a. Ensure renters are protected from eviction resulting from compliance with minimum standards. Close loopholes that incentivise landlords to avert 'no grounds eviction' protections. Upgrades



to a property to meet minimum standard requirements is not a valid reason to end a tenancy arrangement at the end of the lease.

2b. Landlords must not be allowed to increase rent until their property is compliant with all minimum standards. After the property is compliant, rent increases must be limited to no more than the annual consumer price index or wage price index (whichever is the lower), ensuring that rents are not increased so that tenants end up bearing the cost of required changes to meet minimum standards.

3. We endorse the call for strong enforcement measures from the Renters and Housing Union, Sweltering Cities and other groups who represent the interests of renters. In addition to this, the Antipoverty Centre recommends that an independent regulator conduct rental surveys to ensure minimum standards are being met and invite tenants to contact them to begin an audit of the amount of rental properties that are meeting current and future minimum standards.

Position on minimum standards

The Antipoverty Centre supports strengthening minimum standards to ensure the health and safety for renters. We strongly support desperately needed improvements in rental standards, and new minimum standards must come with protections from unfair rent increases and eviction to ensure no one is made homeless by improvements in renters' rights.

Renters in the private market are financing other people's investments and long term wealth generation. We are funding their lifestyles and should be entitled to a safe and comfortable environment in a secure home.

We are concerned that the regulations create loopholes in the no grounds eviction protections for renters. The regulations allow for landlords to terminate tenancies to upgrade their property, essentially evicting people from the home for a landlord to appreciate their asset and increase the asking rent, leading to an increase in rent, in order to meet minimum standards. Adjustments to the regulations must afford protections to renters in that adhering to the minimum standard regulations tenants have protections that allow them to remain, or return once the upgrades are complete.

Given that there is very little protection against increasing rents the Victorian government has the opportunity to insert protections against rent increases as a part of this regulation. It is no secret that property assets are rising at an alarming rate so the costs of the upgrade are negligible in the long run given that most property sales incur a profit once the asset is sold. So there should be no costs passed on to tenants as a part of the minimum upgrades.

Despite rental reforms of recent years, many landlords are still failing to comply. If the government is going to the effort of regulating private rentals it must invest adequately in enforcement measures to ensure standards are upheld. Currently, inadequate enforcement means that when tenants advocate



for their rights, including for minimum standards to be applied, there is little protection from being punished by real estate agencies and landlords.

The goal of these changes should be to ensure that everyone has access to a safe and comfortable home. Without any changes to, or additional regulations put in place, the government's proposed minimum standards cannot achieve this goal.

While Victoria is the leading jurisdiction in so-called Australia in establishing rights and protections for renters, these do not go nearly far enough. The sector needs far greater regulation, oversight and controls to be truly effective and to protect the rights of renters who are holding up an investment class that relies on exploitation and extraction.

Regards,

Jay Coonan.