

18 December 2019

Regulation Policy and Governance Services,
Department of Justice and Community Safety

To whom it may concern,

Support for Council to Homeless Person's Response to Regulatory Impact Statement – Residential tenancies act regulations

I am writing on behalf of the Western Homelessness Network to thank you for undertaking a consultation on the proposed Residential Tenancies Regulations 2020 and to endorse the response to the Residential Tenancies Act regulations – Regulatory Impact Statement submitted by the Council to Homeless Persons: <https://chp.org.au/wp-content/uploads/2019/12/191213-Response-to-RTA-Regulatory-Impact-Statement-FINAL.pdf>

The Western Homelessness Network is a Network comprising of eighteen Specialist Homelessness and Family Violence Services (SHSs) managing 90 programs operating in Melbourne's West (comprising the Local Government Areas of: Maribyrnong, Melbourne, Melton, Moonee Valley, Hobsons Bay, Brimbank and Wyndham). These services meet every six weeks to manage the coordinated homelessness service system arrangements, undertake and respond to consumer consultation, improve linkages with allied service sectors and undertake shared professional and systems development.

As a Network we are acutely aware that one impact of the housing crisis in Melbourne is the consequent reliance on private rental as the key accommodation option for people experiencing homelessness. It is therefore essential that Victoria's private tenancy arrangements support the rights of tenants, who, in the case of those who have experienced homelessness, can be highly disempowered and vulnerable to exploitation.

Like CHP, the Western Homelessness Network is primarily concerned that that the exemption incorporated for crisis accommodation (Regulation 6, page 116 – 118 of the Regulatory Impact Statement) be narrowed, as it is only intended to cover existing crisis accommodation, not any housing provided by a homelessness agency for less than 6 months.

The Western Homelessness Network agrees that "the definition must be designed to reflect the existing supported crisis accommodation program of approximately 400 beds, without greatly expanding the exemption from the RTA, which would see people who had experienced homelessness denied the protection of the RTA."

Thankyou for your consideration,

Yours sincerely,

Sarah Langmore,
Western Homelessness Networker