



Promoting opportunities. Protecting rights. For older Victorians.

COTA Victoria & Seniors Rights Victoria

Submission on CAV's Funded Services Program Reviews

To:

Consumer Affairs Victoria

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Contents

1	About us	3
2	About this submission	3
3	Submission	4
4	Context.....	4
4.1	<i>A growing number of older Victorians are facing housing insecurity</i>	<i>5</i>
4.2	<i>There is a connection between housing insecurity and elder abuse.....</i>	<i>7</i>
4.3	<i>Ageism in the rental market limits housing choices and accessibility for older renters</i>	<i>8</i>
4.4	<i>Older Victorians with diverse identities face greater barriers in finding secure housing</i>	<i>8</i>
4.5	<i>Older renters struggle to have their homes adapted for their health and mobility needs</i>	<i>9</i>
5	Principles.....	9
6	Recommendations	10
7	Conclusion	12

1 About us

[Council on the Ageing \(COTA\) Victoria](#) is the leading not-for-profit organisation representing the interests and rights of people aged over 50 in Victoria. For over 70 years, we have led government, corporate and community thinking about the positive aspects of ageing in the state.

Today, our focus is on promoting opportunities for and protecting the rights of people 50+. We value ageing and embrace its opportunities for personal growth, contribution, and self-expression. This belief drives benefits to the nation and its states alongside communities, families, and individuals.

[Seniors Rights Victoria \(SRV\)](#) is a program of COTA Victoria and the only state-wide community legal centre dedicated to advancing the rights of older people and the early intervention into, or prevention of, elder abuse in our community.

SRV has a team of experienced advocates, lawyers, and social workers who provide free information, advice, referrals, legal advice, legal casework, and support to older people who are either at risk of or are experiencing elder abuse. SRV supports and empowers older people through the provision of legal advice directly to the older person.

2 About this submission

Today's housing landscape presents critical challenges for older renters, who represent a growing and diverse demographic with specialised, and often intersecting, needs. This submission seeks to advocate for a renter service model that considers the housing needs of older people as crucial elements to the ongoing health, safety, and quality of life for ageing Victorians.

The rising costs of living, limited affordable housing, and digital accessibility barriers create unique challenges for older renters that, if left unaddressed, will continue to lead to profound impacts on the well-being and stability of Victoria's growing population of older people. By outlining the unique challenges older renters face, this submission underscores the urgency for a specialised, multi-faceted approach to housing support for older people.

3 Submission

The rental and housing affordability crisis is increasingly impacting older Victorians.

As a growing number of older people turn towards rental housing, with a 77% increase in renters over the age of 55 between 2011 and 2021 alone¹, it is vital that the unique set of vulnerabilities they face are considered and that measures are taken to mitigate these harms.

Many older renters live on fixed incomes, and face additional challenges such as health, mobility, and digital accessibility issues; thereby limiting their housing options and increasing their vulnerability to displacement. This is especially true for historically marginalized groups, including Aboriginal and Torres Strait Islanders, people with disabilities, LGBTQIA+ individuals, women, single people, and pension recipients².

As Victoria's rental market tightens, older renters, often reliant on government pensions, are struggling to absorb rising rents and remain in areas where essential services and social support networks are located. In the same vein, housing insecurity increases their risk of experiencing some form of abuse, and prevalent ageism places older adults at a heightened risk of living in unsafe, inaccessible or less stable housing. These challenges are compounded by a lack of awareness and accessibility to programs like the Retirement Housing Assistance and Advocacy Program (RHAAP), which are already overstretched and unable to meet the growing demand.

For older Victorians, housing insecurity affects more than their immediate living condition - it impacts nearly every facet of their lives, from financial security to physical and mental health. This submission offers Consumer Affairs Victoria (CAV) context regarding the challenges faced by older renters and outlines several recommendations to help CAV address these interconnected issues. It emphasises the need for targeted funding for outreach and intervention programs tailored to older renters, as well as improvements in service accessibility.

4 Context

As Victoria's aging population grows and more older adults turn to rental housing, housing insecurity among seniors is rising. Housing plays a critical role in the health and wellbeing of older adults; as a safe, accessible, and supportive environment can significantly impact people's ability to age well. With age, people's needs change, requiring homes that adapt to potential mobility limitations and that incorporate features that support independence and

¹ Housing for the Aged Action Group. (2024). *Plan for Victoria: Housing solutions for older Victorians*. https://oldertenants.org.au/sites/default/files/plan_for_victoria_final.pdf

² Council On the Ageing Federation. 2023. State of the Older Nation Report. COTA Federation. Retrieved from: <https://www.cota.org.au/wp-content/uploads/2023/05/SOTON-2023-Full-Report.pdf> (16 June 2023)

community connection. Moreover, the Victorian Government's *Ageing Well Strategy* is predicated on people remaining in their own home or communities, rather than moving into institutional care or away from their communities.

This approach to ageing well hinges on accessible, affordable and safe housing and support services. However, access to these resources can vary widely, with many seeking support from already overstretched services, hindered by digital and physical barriers. This underscores the need for actions that facilitate safe and sustainable ageing at home and in the community for people of all ages.

4.1 *A growing number of older Victorians are facing housing insecurity*

The cohort of older renters in Victoria is steadily increasing, driven by rising life expectancy, declining homeownership rates, and the ongoing housing affordability crisis. Between the 2011 and 2021 censuses, the population of renters aged 55 and over in Victoria grew by 77%³, a trend that reflects broader national shifts as more Australians enter retirement without owning a home⁴.

With Victoria's population ageing, this trend is only going to continue⁵. The growing demand for rental housing is exacerbating pressures on a system already struggling to accommodate older renters' specific needs.

Rising rents are consuming a disproportionate share of older peoples fixed incomes – and affecting previously financially stable Victorians

Low-income older renters in Victoria are increasingly unable to keep up with escalating rental costs on fixed incomes like the Age Pension and Commonwealth Rent Assistance, which have not kept up with rental or general inflation.

For example, Melbourne's median rents have risen more than \$134 per week over the last two financial years⁶. However, the Age Pension, of which nearly two-thirds of Australians depend on as their main income source, increase for couples was limited to just \$24 per fortnight, highlighting the gap between income and housing costs. Consequently, rents often consume a disproportionate share of this income, with some older Victorians spending up to 80% of their

³ Housing for the Aged Action Group (HAAG). (2024). *Plan for Victoria: Housing solutions for older Victorians*. Housing for the Aged Action Group https://oldertenants.org.au/sites/default/files/plan_for_victoria_final.pdf

⁴ Barrie, H., Cebulla, A., Lange, J., Faulkner, D., & Sharam, A. (2023). *Mapping Australia's older, low-income renters* (AHURI Final Report No. 405). Australian Housing and Urban Research Institute Limited. Retrieved October 2024, from <https://www.ahuri.edu.au/research/final-reports/405>.

⁵ Department of Families, Fairness and Housing. (2022). *Ageing well in Victoria*. Victoria State Government. Retrieved July 3, 2023, from <https://content.vic.gov.au/sites/default/files/2022-06/Ageing%20well%20in%20Victoria.pdf>

⁶ Department of Families, Fairness and Housing Victoria. (2024). *Past rental reports*. <https://www.dffh.vic.gov.au/publications/past-rental-reports>

pensions on housing alone⁷. This rental stress leaves little for other essentials which also are increasing in price, pushing more of older renters into housing insecurity.

In search of affordable options, many older Victorians are relocating from their established communities to peri-urban and regional areas. However, as more people move into these areas, rental prices there have also surged, with outer Melbourne suburbs seeing increases of up to 13.1%⁸. This shift means that even those who sought cheaper housing are now facing renewed housing insecurity.

Housing insecurity is no longer limited to low-income seniors; middle-class older renters, previously financially stable, are now affected as well. Many of these individuals, with modest savings or assets, do not qualify for traditional housing support programs and are now at risk of displacement due to surging rent costs.⁹ This widening socio-economic gap is putting additional strain on support services.

Existing support services no longer meet the demand of older adults facing housing insecurity

Thirty-seven percent of older Victorians are born overseas, and 18% speak a language other than English—a trend that is increasing¹⁰. As older renters become increasingly diverse, they often require specialised support and targeted outreach to access support services. Without such outreach, some may face heightened housing insecurity due to inaccessible support services, when compared to their English-speaking counterparts.

Thus, the support services those struggling with housing insecurity lean on no longer meet the scale of need and diversity required by Victoria's ageing population. As such, many older Victorians are left in precarious housing situations – impacting their physical safety, mental wellbeing and ability to age-well and with stability.

Older Victorians continue to be impacted by a lack of retirement housing protections and support

For those living in retirement villages, complex contracts with hidden fees, unclear exit

⁷ Power, E. R. (2020). *Older women in the private rental sector: Unaffordable, substandard and insecure housing*. Western Sydney University. Retrieved October 2024.

<https://researchdirect.westernsydney.edu.au/islandora/object/uws:56836>

⁸ CoreLogic. (2024, May). *CoreLogic rental market update*. CoreLogic. Retrieved October 2024, from https://www.corelogic.com.au/_data/assets/pdf_file/0021/22656/2405-CoreLogic-RentalMarketUpdate-Final2-web.pdf

⁹ Housing for the Aged Action Group. (n.d.). *Submission 130, Inquiry into the worsening rental crisis in Australia*. Retrieved from <https://www.aph.gov.au/DocumentStore.ashx?id=b49ddc75-c354-4705-b83e-25ae1853863f&subId=748177>

¹⁰ Australian Institute of Health and Welfare. (2022). *Older Australians: Culturally and linguistically diverse people*. Older Australians. Retrieved from <https://www.aihw.gov.au/reports/older-people/older-australians/contents/population-groups-of-interest/culturally-linguistically-diverse-people>

arrangements, and high upfront costs, are a common occurrence and leave residents feeling financially stranded¹¹. We are still waiting on new legislation regarding retirement housing and villages, despite work on this beginning over 7 years ago.

Recent coverage of examples of older people having negative experiences demonstrates why this is required and the potential risk of ‘corporatised elder abuse’¹². The retirement village sector is positioning itself as addressing the shortage of age-friendly housing options and is keen to increase the number of homes available¹³. However, the lack of clear regulations and protections in the retirement housing sector leaves residents vulnerable to exploitation, while long waiting lists for aged care and public housing further complicate their search for secure and affordable accommodation.

An increase in retirement housing means that there will be increasing demand for support in coming years, especially without strong additional protections and regulations.

4.2 *There is a connection between housing insecurity and elder abuse*

Cost of living pressures and surging rents are causing adult children and other family or family-like individuals to move into the homes of older Victorians, including those that rent. Housing insecurity is a contributing factor for elder abuse, with family members sometimes either looking to exploit the increased value of property by selling, or taking on living in a property, depriving an older person of their assets.¹⁴ This arrangement has in some circumstances led to these individuals exerting influence over the older person’s housing or financial decisions, against their wishes. Such restrictions can compromise the older renter’s ability to improve their housing security, while also straining their income and increasing their long-term risk of housing instability, as elder abuse also makes a person more vulnerable to homelessness¹⁵. Additionally, shared living situations have been identified as a risk factor for someone perpetrating or experiencing elder abuse¹⁶.

¹¹ Housing for the Aged Action Group. (n.d.). *Retirement housing campaign*. Retrieved from <https://www.olderrenters.org.au/retirement-housing/retirement-housing-campaign>

¹² ABC. (2024, October 7). *Retirement villages put on notice after being accused of gouging*. ABC News. Retrieved from <https://www.abc.net.au/news/2024-10-07/retirement-villages-put-on-notice-after-being-accused-of-gouging/104434494>

¹³ Realestate.com.au. (n.d.). *Victoria retirement living: Advocates urging for planning shake-up amid desperate need for new villages*. Retrieved from <https://www.realestate.com.au/news/victoria-retirement-living-advocates-urging-for-planning-shakeup-amid-desperate-need-for-new-villages/>

¹⁴ Seniors Rights Victoria. (2023, June 29). *Victorian Government Inquiry into homelessness*. Seniors Rights Victoria. Retrieved from <https://seniorsrights.org.au/wpcontent/uploads/2021/03/2020January22PolicyHomelessnessInquiryVicGov.pdf>

¹⁵ Ibid.

¹⁶ Qu, L., Kaspiew, R., Carson, R., Roopani, D., De Maio, J., Harvey, J., & Horsfall, B. (2021). *National elder abuse prevalence study: Final report* (Research Report). Australian Institute of Family Studies.

There is a correlation between rising rents and rising demand for elder abuse services. For instance, SRV has seen a dramatic increase in calls since 2022¹⁷; CAV also saw a dramatic increase in service demand from that period¹⁸. The demand for SRV's services has been connected to cost of living and housing pressures¹⁹. SRV has struggled to meet demand for its services and has had to prioritise directly supporting older Victorians ahead of third-party consultations, highlighting a critical gap in support for vulnerable older people. This trend in service demand is reported throughout the elder abuse sector, highlighting that there is a correlation between elder abuse and housing insecurity.

4.3 Ageism in the rental market limits housing choices and accessibility for older renters

Ageism in the rental market is a barrier for older renters, leading to unfair discrimination in rental applications²⁰. Older adults can be perceived as high-risk tenants, and landlords may dismiss their applications, even when they are financially viable. This discrimination limits housing options, forcing some older renters into unsuitable or insecure housing. The issue is becoming more prominent, with COTA Victoria's older person helpline reporting an increasing number of older renters facing such discrimination.

4.4 Older Victorians with diverse identities face greater barriers in finding secure housing

Housing insecurity affects older Victorians disproportionately, especially those from marginalised groups. COTA's 2022 Alliance State of the Older Nation (SOTON) survey highlights that certain communities are more likely to rent and face disproportionate levels of housing insecurity: 55% of Aboriginal and Torres Strait Islander people, 47% of those not in paid employment, 38% of people with disabilities, 38% of LGBTQIA+ individuals, 37% of singles, and 34% of government²¹. These figures underscore how the housing crisis disproportionately

¹⁷ COTA Victoria & Seniors Rights Victoria. (2023). *Seniors Rights Victoria and COTA Victoria annual report 2023-2024*. Retrieved from <https://seniorsrights.org.au/policy/publication/seniors-rights-victoria-and-cota-victoria-annual-report-2023-2024/>

¹⁸ *The Guardian*. (2023, November 1). *Victorians lodge record 5,400 challenges to rent increases over past 12 months*. Retrieved from <https://www.theguardian.com/australia-news/2023/nov/01/victorians-lodge-record-5400-challenges-to-rent-increases-over-past-12-months>

¹⁹ ABC News. (2023, June 18). *Calls to Elder Abuse helpline increase by 40 per cent amid cost-of-living crisis*. Retrieved from <https://www.abc.net.au/news/2023-06-18/elder-abuse-seniors-rights-victoria-helpline-calls-increase/102478102>

²⁰ Housing for the Aged Action Group. (n.d.). *Realities of being a renter in later life* (A HAAG Research Report). Retrieved from https://www.olderrenters.org.au/sites/default/files/pictures/realities_of_being_a_renter_in_later_life.pdf

²¹ Council on the Ageing Federation. (2023, June 16). *State of the older nation report*. COTA Federation. Retrieved from <https://www.cota.org.au/wp-content/uploads/2023/05/SOTON-2023-Full-Report.pdf>

affects marginalised communities in Victoria. Gender also plays a critical role. Women over 55 are the fastest-growing group at risk of homelessness²².

4.5 *Older renters struggle to have their homes adapted for their health and mobility needs*

Older adults often have specific health, and mobility needs that require housing adaptations and personalised services. Unfortunately, existing support services for renters frequently fail to address these needs, leaving many older renters without suitable homes. Physical limitations can also prevent older renters from accessing in-person support, exacerbating their difficulties in finding or maintaining appropriate housing.

As more older renters move to outer and peri-urban areas in search of affordable housing, the demand for local support services has increased. However, essential services in these areas are often at capacity, leading to longer waiting times and reduced availability²³. Furthermore, fewer accessible transport services in these outer regions may also contribute to reduced support service access, particularly in cases where digital barriers are at play. The strain on local services, in addition to their accessibility, worsens the living conditions and well-being of older renters, leaving older renters without timely assistance.

Substandard rental conditions are another significant challenge. COTA Victoria's helpline has seen a rise in reports of broken heating, leaky taps, and poor insulation. Older renters also mention encountering landlords who fail to make necessary repairs or modifications to rental properties²⁴. For older renters with existing health conditions, these issues pose serious risks, potentially exacerbating chronic illnesses or causing injuries. Many renters lack the resources to address these problems or advocate for repairs, leaving them in unsafe living conditions with few options for improvement.

5 Principles

To better support older renters, COTA Victoria suggest that CAV consider the following principles:

²²City of Melbourne. (2023, June 30). *Alternative housing pathways for women*. City of Melbourne. Retrieved from <https://www.melbourne.vic.gov.au/community/health-support-services/for-older-people/Pages/housing-older-women.aspx>

²³SGS Economics and Planning. (2023). *Melbourne's Development Opportunities: Towards a more productive, livable and sustainable city*. Retrieved from: https://sgsep.com.au/assets/main/Publications/SGS-Economics-and-Planning_Melbournes-Deveopment-Oppotunities-Report.pdf

²⁴RACV. (2024). *7,000 Victorians share insights about home safety, renting and future homes in RACV My Home survey*. RACV. Retrieved from <https://www.racv.com.au/royalauto/news/community/my-home-survey-results-2024.html>

1. Prioritise policies that protect older renters' rights, prevent age discrimination, and provide outreach and support.
2. Ensure older renters with disabilities have access to housing that meets their health and mobility needs, with reasonable accommodations.
3. Provide support through multiple channels—face-to-face, phone, and digital—to cater to renters with varying needs.
4. Use a “warm referral” process to directly connect renters with services, ensuring continued support.

6 Recommendations

In response to the critical challenges facing older renters in Victoria, and in line with our recent 2025/26 Victorian State Budget submission, COTA Victoria recommends that CAV consider the following recommendations:

Older Victorians to be identified as a priority group within CAV-funded renter services

- Action: Older renters (50+) to be identified as a priority group for and within CAV-funded renter services. As the state ages, and more older Victorians require renting or retirement housing support, it is essential that older Victorians are prioritised as a cohort for these renter support services. Older Victorians are increasingly accessing rental support services but have also proven to be a difficult cohort to engage for these services. Age creates unique requirements, while it increasingly interacts with other intersectional factors to impact how an older Victorian experiences housing insecurity or fails to connect with available support. While many renters are younger, the impact of housing on ageing and people’s experience of ageing means this is a key demographic that needs greater support.

Increase the funding for CAV-funded renter services

- Action: Increase²⁵ funding to expand the Retirement Housing Assistance and Advocacy

²⁵ In 2021 there was 160,100 Victorians over 55 renting, an increase of 77% since 2011. In 2023, 14.5% of older people were identified as living in poverty in. While the data is not specific to Victoria, we can expect approximately 23,000 older Victorians to be living in poverty – many of whom will be renting. 2021 Census, Australia. (2021). *Population of Victoria*. Retrieved from <https://profile.id.com.au/australia/population?WebID=110#:~:text=Victoria&text=The%20Census%20usual%20resident%20population,average%20household%20size%20of%202.52> and Australian Council of Social Service (ACOSS). (2023). *Trends in poverty amongst older people*. Poverty and Inequality Australia. Retrieved from <https://povertyandinequality.acoss.org.au/poverty/trends-in-poverty-among-older-people/>

Program (RHAAP) and Tenancy Assistance and Advocacy Program (TAAP). This expansion should include requirements for these services to increase their focus on, and support for, older Victorians.

Require and support CAV-funded renter services to increase their proactive outreach

- Action: Require CAV-funded renter services, as part of the program expansion identified above, to increase their proactive outreach initiatives aimed at increasing awareness among older people about the existing services and resources that support their housing security. This should include awareness campaigns, stronger integration and connection with adjacent services, and community education and engagement sessions, with a focus on non-digital engagement. There should also be consideration of who is best placed to deliver different aspects of the outreach, including utilising community services with existing connections, such as for older renters from CALD backgrounds. It is vital this information reaches older people in accessible formats, including in their preferred language. Outreach also needs to include appropriate support for these potential users to navigate the renter services application and system.

Support the industry workforce to increase their knowledge regarding elder abuse

- Action: Provide training opportunities for the industry workforce to increase their knowledge and awareness of elder abuse, and its signs and impact. With ongoing housing pressures, the ageing population and the increasing number of older renters, the rental industry, including CAV-funded renter services, will increasingly see people at risk of, or experiencing, elder abuse. With housing insecurity being a key risk factor and driver of elder abuse, it is vital that frontline staff can recognise it. Due to the complex nature of elder abuse, in comparison to other forms of family violence, specific training is required on how to identify and sensitively approach this issue.

Fund legal services to support older renters experiencing abuse in connection with housing insecurity

- Action: Fund SRV to expand their existing elder abuse services to provide dedicated support for older adults experiencing, or at risk of, elder abuse in connection to, or exacerbated by, housing insecurity through their provision of essential legal advice, case work, advocacy, and emergency assistance. Integrated legal services, supported by a mix of legal and non-legal staff, are a great location to provide key rental services and support like this because they can handle the complexity of the potential legal issue, while ensuring a holistic approach to the broader needs of the older person. A dedicated function within SRV can support identified and referred older people but also provide support and professional consultations to the sector and CAV-funded renter services.

Develop a proactive housing support and early intervention service focused on older Victorians

- Action: Develop a proactive outreach program focused on housing support, tenancy advice, and individual advocacy for older Victorian renters. This program should be aimed at the identified ‘missing middle’ older renters, who are increasingly requiring further support. The program should be focused on ensuring they receive support before they become eligible or require more acute support, such as CAV-funded renter services. This should take a holistic approach and work across portfolios, working seamlessly with non-CAV support. Such a program could include pre-emptive check-ins for older renters identified as at-risk, ensuring potential issues are addressed early. Community legal services could provide guidance to help older renters understand their rights and manage rental agreements and disputes. Funding for such a service could be outcomes-based or based on funding arrangements utilised as part of the Early Intervention Investment Framework.

Explore a broader review of available rental supports and services

- Action: A broader review is required to enable effective discussion and consideration of how rental services can support renters, particularly older renters. We want to see increased investment in proactive housing support, community education, and individual advocacy for older people at risk, which is beyond the scope of this review. It is hard to consider how services can be integrated if some are not even part of the discussion. For instance, this includes Housing for the Aged Action Group’s ‘Home at Last’ service and the Rental Stress Support Package.

7 Conclusion

Addressing the housing affordability and insecurity crisis for older renters requires a balanced approach with both short and medium-term interventions. The proposed actions aim to provide timely support while also ensuring that the housing system evolves to meet the specific needs of an aging population. These measures, from expanding specialised programs to advocating for accessible housing options, are vital steps to help older Victorians remain secure and well-supported in their communities as they age.