

Draft Submission to the Statutory Review of the Boarding Houses Act 2012

October 2019

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Opening

Local Government NSW (LGNSW) is grateful for the opportunity to make a submission in response to the Statutory Review of the *Boarding Houses Act 2012* (BH Act).

LGNSW is the peak body for local government in NSW, representing NSW general purpose councils and related entities. LGNSW facilitates the development of an effective community-based system of local government in the State.

This is a draft submission awaiting review by the LGNSW Board. Any revisions made by the Board will be forwarded.

Purpose

This draft submission outlines LGNSW's response to the August 2019 Discussion Paper for the Statutory Review of the BH Act.

Section 105 of the BH Act requires that the Act be reviewed five years after its date of assent to determine whether its policy objectives remain valid and whether the terms of the Act remain appropriate for securing those objectives. This review is now underway, and the Discussion Paper is part of that process.

This submission will primarily respond to questions in the Discussion Paper on general boarding houses, which are the main focus of local government regulatory responsibility under the BH Act.

Response to Discussion Paper

1. Are the objects of the Boarding Houses Act 2012 still valid?

Section 3 of the BH Act provides that:

The object of this Act is to establish an appropriate regulatory framework for the delivery of quality services to residents of registrable boarding houses, and for the promotion and protection of the wellbeing of such residents, by:

- (a) providing for a registration system for registrable boarding houses, and*
- (b) providing for certain occupancy principles to be observed with respect to the provision of accommodation to residents of registrable boarding houses and for appropriate mechanisms for the enforcement of those principles, and*
- (c) providing for the licensing and regulation of assisted boarding houses and their staff (including providing for service and accommodation standards at such boarding houses), and*
- (d) promoting the sustainability of, and continuous improvements in, the provision of services at registrable boarding houses.*

The objects of the BH Act remain generally valid, although they would perhaps benefit from recognition of the importance of boarding houses for housing affordability. It is also arguable

that in some respects the existing objects are not being met. Challenges with the operation of the BH Act will be dealt with throughout this submission.

Housing affordability is a matter of concern for communities across NSW. When the Boarding Houses Bill was passing through Parliament in October 2012, the then Minister with responsibility for boarding houses was the Hon. Andrew Constance MP, and he stated in his second reading speech:

The key purpose of the Boarding Houses Bill 2012 is to protect the rights of residents living in all boarding houses through the introduction of major reform to the industry and to promote the sustainability of the boarding house industry New South Wales. Boarding houses play an integral role in the provision of low-cost, affordable housing, particularly for people who may otherwise struggle to afford private accommodation.¹

Boarding houses are a key segment of the low-cost housing market, providing accommodation and stability for people who may otherwise not be able to gain access to privately or publicly provided accommodation. Generally, boarding houses are accessible, and are available to those on low incomes, with a limited (or no) tenancy history, recently arrived in Australia, or those who require a low-cost place to stay while searching for more permanent living arrangements.

However, there has been a recent trend towards development of ‘new generation’ boarding houses that do not meet the needs of vulnerable people, as the Act had intended, but rather appear focussed on meeting demand for market-priced studio apartments. The extent to which boarding houses developed by the private sector are providing housing that is affordable is an ongoing issue of concern for councils. This concern is not addressed in the BH Act, nor in the relevant planning instruments, including the State Environmental Planning Policy (Affordable Rental Housing) 2009 (AHRSEPP). The Department of Planning, Industry and Environment (DPIE) has been working with a group of councils to address various concerns with the boarding house provisions in the ARHSEPP.

At LGNSW’s 2018 Annual Conference, councils resolved to note the crisis of housing affordability and homelessness in NSW, which creates unique challenges for both regional and urban areas. Councils also resolved to call on the NSW Government to develop strategies to support councils to increase affordable housing in their local government areas.

Given the intent reflected in the second reading speech in parliament, and given the ongoing crisis of housing affordability in NSW, the BH Act would benefit from explicit recognition of the essential role boarding houses have in providing for affordable housing.

Recommendation 1: The BH Act should clearly set out that one of its objects is to provide low-cost, affordable and quality housing options for people who may otherwise struggle to afford private accommodation.

¹ The Hon. Andrew Constance MP, NSW Parliamentary Hansard, Legislative Assembly, 17 October 2012, available at: www.parliament.nsw.gov.au/permalink?id=HANSARD-1323879322-50292

2. Are there any types of premises which should be included in or excluded from the Act?

Councils have expressed concern with the definition of boarding house in the BH Act and other relevant legislation. The BH Act defines ‘boarding premises’ as follows:

Boarding premises means premises (or a complex of premises) that:

- (a) are wholly or partly a boarding house, rooming or common lodgings house, hostel or let in lodgings, and*
- (b) provide boarders or lodgers with a principal place of residence, and*
- (c) may have shared facilities (such as a communal living room, bathroom, kitchen or laundry) or services that are provided to boarders or lodgers by or on behalf of the proprietor, or both, and*
- (d) have rooms (some or all of which may have private kitchen and bathroom facilities) that accommodate one or more boarders or lodgers.²*

Section 5 of the Act further clarifies the definition by requiring the beds to be provided for a fee for use by five or more residents, and explicitly excludes from the definition hotels, motels, bed and breakfast accommodation, backpacker hostels, residential care facilities, crisis accommodation and a range of other accommodation types.

Confusingly, the NSW planning system – under which boarding houses require development approval – uses a slightly different definition of boarding houses. In the Standard Instrument (Local Environmental Plans) Order 2006 (SI LEP), boarding houses are defined as follows:

Boarding house means a building that:

- (a) is wholly or partly let in lodgings, and*
- (b) provides lodgers with a principal place of residence for 3 months or more, and*
- (c) may have shared facilities, such as a communal living room, bathroom, kitchen or laundry, and*
- (d) has rooms, some or all of which may have private kitchen and bathroom facilities, that accommodate one or more lodgers,*

but does not include backpackers’ accommodation, a group home, hotel or motel accommodation, seniors housing or a serviced apartment.³

Confusion arises distinguishing between shared accommodation (in which sub-let tenancies and landlords are subject to residential tenancy agreements under the *Residential Tenancies Act 2010*) and boarding houses (in which residents and proprietors are subject to occupancy agreements under the BH Act).

Councils have also raised concerns about proposed reforms to the regulation of short-term rental accommodation (STRA) in NSW and whether these reforms may have unintended consequences for the regulation of boarding houses. The planning framework proposed by the NSW Government includes:

² Section 4, *Boarding Houses Act 2012*

³ Dictionary, Standard Instrument (Local Environmental Plans) Order 2006

- A new definition for STRA.
- New 'exempt' and 'complying' approval pathways that enable STRA within day limits:
 - Where the host is present, STRA is 'exempt development' for 365 days per calendar year.
 - Where the host is not present, and the site is not on bushfire prone land or a flood control lot, STRA is 'exempt development' for:
 - 180 days in Greater Sydney
 - 365 days in regional areas; except where a council varies this to no lower than 180 days.
- Where the host is not present, and the booking is for 21 or more consecutive days, the booking will not count towards the above day thresholds.
- Minimum safety and evacuation requirements for dwellings used for STRA.⁴

There are many accommodation circumstances akin to boarding houses that would appear to fall under the STRA criteria. For example, a dwelling that housed 12 individuals with a live-in host ('manager' under the BH Act) may be considered STRA under the reforms. Already, councils are reporting that boarding house operators are often unaware that they require development approval for a boarding house under the *Environmental Planning and Assessment Act 1979* (EP&A Act), as well as registration of the boarding house under the BH Act. A definition of STRA that overlaps with that of boarding houses may lead to further confusion.

Recommendation 2: The definitions of boarding house in NSW legislation (BH Act and SI LEP) should be made consistent, to include and exclude the same types of accommodation and avoid confusion.

Recommendation 3: The BH Act should clearly exclude short-term rental accommodation from its provisions, and the NSW Government must ensure that short-term rental accommodation reforms do not have unintended consequences that permit boarding houses to avoid registration under the BH Act.

3. What are the benefits of the two-tier system in NSW? How does it compare with systems in other jurisdictions? Please provide comments.

The two-tier system of boarding house regulation in NSW distinguishes between two categories of boarding houses:

- **general boarding houses**, which make up the vast majority of boarding houses in NSW, and

⁴ NSW Government, Discussion Paper – Short-term rental accommodation, a new regulatory framework, August 2019, available at: <https://pp.planningportal.nsw.gov.au/exhibition/proposed-short-term-rental-accommodation-reforms>

- **assisted boarding houses**, which are premises that provide beds for use by two (2) or more persons with additional needs and require authorisation by the Department of Communities and Justice (formerly FACS).

Assisted boarding houses are subject to additional legislative requirements under the BH Act, and these requirements are regulated by the Department of Communities and Justice. Under the BH Act it is an offence for a boarding house to be used as an assisted boarding house unless the boarding house has been authorised as such by the Department of Communities and Justice.

When inspecting boarding houses, the Department of Communities and Justice asks that council officers contact the Department if the officers observe two or more frail, elderly or disabled residents who need help or support with daily care. Council staff do not need to make their own detailed assessment of residents, but just need to alert the Department of the possible presence of residents with these support needs. This is appropriate, given the specialised nature of assisted boarding houses and that inspecting council staff with experience in fire safety or public/environmental health will not have specialised skills or experience to make such assessments.

Any future expansion of BH Act regulation to include accommodation of people with Supported Independent Living packages funded under the National Disability Insurance Scheme (NDIS), must not become the regulatory responsibility of councils, and must remain the responsibility of the Department of Communities and Justice, or other NSW Government agencies.

Recommendation 4: Any expansion of BH Act to include regulation of accommodation of those with NDIS packages must remain the responsibility of the Department of Communities and Justice, or other NSW Government agencies, and must not be transferred to or regulated by local government.

4. Should anything be changed in, or added to, the list of information provided to the Commissioner?

Council feedback indicates there are multiple examples of boarding houses that have registered with the Commissioner for Fair Trading, without the necessary planning approval to operate a boarding house. Registration with NSW Fair Trading can result in boarding house operators believing that they have the required permissions to operate when this is not necessarily the case.

Prospective boarding house operators should be required to provide to the Commissioner a copy of their planning approval, so that eligibility to operate a boarding house can be verified by NSW Fair Trading. If this is not possible, at the very least prospective boarding house operators should be required to provide their planning approval number so that NSW Fair Trading can use this number to locate the planning approval and verify the eligibility to operate a boarding house in the proposed location.

Recommendation 5: Prospective boarding house operators should be required to provide the Commissioner with evidence of planning approval for a boarding house, prior to the Commissioner accepting registration of a boarding house.

5. Is the information on the public register sufficient? Why or why not? What other information could be added to, or removed from, the public register?

At present, the public register contains fields for:

- Full trading name
- Address
- Name of boarding house proprietor
- Proprietor address
- Class of boarding house (general or assisted)
- Website (if available).

Many entries on the register appear incomplete or incorrect. In addition to improved accuracy, council feedback indicates that there are a number of additions that may increase the utility of the boarding house register publicly hosted on the NSW Fair Trading website, for the benefit of boarding house residents and to assist councils in their regulatory responsibilities.

The register should include precise information on boarding house ownership (as council feedback indicates that there can be challenges in contacting owners), the date of planning approval and also the date of registration (as councils are required to undertake an initial inspection of boarding houses within the first 12 months following registration). Further, NSW Fair Trading should directly notify councils whenever a new boarding house is added to the register, or an existing boarding house's details are updated. Automatic notification systems are simple to introduce, and far less administratively burdensome than requiring councils to manually check the register for any updates.

Where boarding houses have been found to have breached safety or accommodation standards, information on the breach should be included in the public register, in the same way that food safety inspection breaches are included on the NSW Food Authority's 'name and shame' register of penalty notices. Public reporting of breaches and enforcement action will provide prospective boarding house residents with important information prior to selecting a boarding house, and would also function as a deterrent to boarding house operators.

Recommendation 6: The public register should include:

- Precise information on boarding house ownership
- Date of planning approval
- Date of registration
- Breaches of safety or accommodation standards, or any enforcement action taken against a proprietor.

Recommendation 7: NSW Fair Trading should ensure that councils are automatically notified of any updates to the register for boarding houses within their local government area.

6. Should the Commissioner have the power to remove the details of a boarding house from the public register under prescribed circumstances, if it has ceased to be used as a boarding house?

Yes. Councils have voiced concern with the accuracy and currency of information on the public register and the impact this has on the ability of councils to efficiently inspect and regulate boarding houses.

Recommendation 8: The Commissioner should have the power to remove details of a boarding house from the public register where it has ceased to be used as a boarding house, and should notify the relevant council of the removal.

7. How could we improve the local regulation of boarding houses?

Councils face particular challenges in resourcing compliance and enforcement activities under the BH Act and in particular in regulating unregistered or illegal boarding houses. The ways in which the local regulation of boarding houses could be improved are set out in recommendations throughout this submission, and as follows.

Inadequate resourcing for councils and cost shifting

During the passage of the Boarding Houses Bill 2012 through Parliament in October 2012, repeated concerns were raised during the second reading debate that councils were not being provided with adequate funding to meet the additional regulatory responsibilities imposed by the legislation:

... we are yet to hear of funding for councils to help them monitor boarding house compliance. Additional resources will clearly be required for this.

...it is important that additional funding be provided to local government.

...I am also a supporter of the boarding house register and inspections; however, it comes at a cost. The Government must ensure that councils will not bear any more cost shifting in undertaking these responsibilities—they are already under stress from the cost shifting that has already occurred.⁵

Unfortunately, councils were not provided with additional funding to meet these new inspection and regulatory responsibilities and the concerns expressed in parliament have come to pass. Councils in NSW operate in a constrained financial environment as a result of rate-pegging, cost shifting onto local government and state and federal funding arrangements that are no longer fit for purpose. Cost shifting can result in councils being forced to cut other services for the community and is estimated to exceed \$820 million per year.

The post-registration compliance check by councils requires inspections from at least two specialist council workers, to ensure compliance with building and fire safety requirements of

⁵ Various Members of the Legislative Council, NSW Parliamentary Hansard, Legislative Council, 18 October 2012, available at: www.parliament.nsw.gov.au/permalink?id=HANSARD-1323879322-50462.

the EP&A Act and the standards for places of shared accommodation that are set out in Schedule 2 of the Local Government (General) Regulation 2005. In addition to the extensive fire safety inspections and ensuring the premises complies with its planning approval, council staff must ensure accommodation standards are adequate, which includes council staff investigating:

- Maximum number of boarders and lodgers (and ensuring it does not exceed a formula based on the minimum floor area within a room in accordance with relevant provisions of the *Public Health Act 2010*)
- Required notices are in place
- Light and ventilation
- Kitchen facilities
- General cleanliness
- Furniture and fittings
- Adequate storage space, beds, clean blankets and curtains or window screens for privacy.

Following a 2014 LGNSW Annual Conference resolution on this matter, LGNSW wrote to the then Minister with responsibility for boarding houses, asking the NSW Government to review the role of councils in managing compliance and in particular the costs to local government. The Minister responded that:

*Under Part 2 of the Act, local councils have responsibility for undertaking initial compliance investigations and are the only agency authorised to issue penalty notices in relation to the registration of boarding houses. I am advised a council may charge and recover an approved fee under section 608 (Council fees for services) of the Local Government Act 1993 for the conduct of an initial compliance investigation.*⁶

While it is true that councils can charge and recover approved fees for services under provisions of the *Local Government Act 1993*, councils report a number of issues that prevent this from addressing resourcing matters. Firstly, councils do not want to harm the financial viability of boarding houses that provide accommodation for some of most vulnerable members of their communities, and councils may avoid passing on to proprietors the total cost of providing inspection and regulatory services. A typical approach for councils is not to apply penalties at first but to give a boarding house time to upgrade, only applying penalties in situations of extreme risk. By providing advice and assistance where possible, councils can work to avoid creating homelessness.

Secondly, no such inspection fees can be charged for gathering the circumstantial evidence required for investigating unregistered boarding houses. More generally, compliance, enforcement or legal action (whether under the BH Act or under unauthorised use provisions of the EP&A Act) is often lengthy and very expensive for councils, and councils rarely recover the costs of such action – particularly for matters related to unregistered boarding houses. (See further information on particular challenges with unregistered boarding houses below).

⁶ Letter to LGNSW from the Hon. Jon Ajaka, MLC, Minister for Ageing and Disability, 20 February 2015.

Recommendation 9: The NSW Government should consider how regulatory responsibilities may be better distributed between councils and the NSW Government to take into account limited council resources and to ensure that lodgers benefit from a safe and quality standard of accommodation.

Recommendation 10: The NSW Government must provide councils with adequate resources to meet the costs of BH Act regulation, taking into account the number of boarding houses within each local government area as well as funding for action against unregistered or illegal boarding houses.

Recommendation 11: The BH Act should be amended to make it easier for councils to issue penalty infringement notices where necessary, which would reduce the need to take a matter to court (and avoid associated costs).

Unregistered or illegal boarding houses

Councils face particular challenges regulating unregistered boarding houses. While the number of unregistered boarding houses is of course unknown, a July 2019 research report stated that ‘in all likelihood it is larger – perhaps multitudes larger – than the number of registered boarding houses’.⁷ Councils also report that they receive many more complaints each year about unregistered boarding houses, than they do for registered boarding houses.

It is not always easy for council staff to identify an unregistered boarding house – especially where proprietors of unregistered boarding houses are deliberately trying to avoid scrutiny or oversight.

Further, councils have very limited powers to inspect unregistered boarding houses and scarce resources with which to do so. The powers of entry in the BH Act do not apply to unregistered boarding houses. Rather, the powers only apply to *registered* boarding houses⁸ and *assisted* boarding houses (which number fewer than 20 across NSW).⁹

While this submission is made to a review of the BH Act and not the Local Government Act, the BH Act makes clear in section 26 that it is intended to operate alongside the powers and functions of councils under the Local Government Act. As such, it is appropriate for this review to consider the powers of entry under that Act, and how other pieces of legislation interact with the BH Act.

Recommendation 12: The review of the BH Act should consider how that Act interacts with other pieces of legislation, including the *Local Government Act 1993*, the *Environmental Planning & Assessment Act 1979* and relevant planning instruments.

⁷ Chris Martin, UNSW City Futures Research Centre, Boarding houses in New South Wales: growth, change and implications for equitable density, July 2019, available at: <https://cityfutures.be.unsw.edu.au/research/projects/boarding-houses-new-south-wales-growth-change-and-implications-equitable-density/>

⁸ Section 17, Boarding Houses Act 2012

⁹ Sections 76 to 78, *Boarding Houses Act 2012*

When LGNSW wrote to the then Minister with responsibility for boarding houses in 2014, raising difficulties with the operation of the BH Act, the Minister raised council inspection powers as one measure that could assist councils to inspect unregistered boarding houses:

I also note that Section 191 of the Local Government Act 1993 enables local council officers to inspect premises at any time, and Section 194 of this Act also provides for use of force in carrying out this power. While the Office of Fair Trading hosts the boarding house register, it has no function in relation to enforcing the Act.¹⁰

Unfortunately, this assessment of local government inspection powers does not accurately reflect the legislative restrictions on council officers. Councils do not have the unfettered right to enter residential premises on the suspicion that a property may be a boarding house. Indeed, the Local Government Act qualifies the powers noted in the Minister's letter as follows:

200 In what circumstances can entry be made to a residence?

The powers of entry and inspection conferred by this Part are not exercisable in relation to that part of any premises being used for residential purposes except:

- (a) with the permission of the occupier of that part of the premises, or*
- (b) if entry is necessary for the purpose of inspecting work being carried out under an approval, or*
- (c) under the authority conferred by a search warrant.¹¹*

This provision makes clear that where a person does not give permission for a council inspection of what is purported to be residential premises, the council would likely require authority of a search warrant to gain entry to the property.

In recognition of the difficulties in obtaining evidence, the BH Act does permit court and tribunal proceedings, as well as search warrant applications, to rely on circumstantial evidence gathered by a council. The Act helpfully lists examples of the kinds of circumstantial evidence that may be relied upon:

- (a) evidence of the premises being advertised expressly or implicitly for the purposes of a general boarding house or assisted boarding house (including advertisements on the premises, on public notice boards, in newspapers, in directories or on the Internet),*
- (b) evidence relating to internal and external signs and notices at the premises (including price lists, notices to occupants and offers of services) that is consistent with the use of the premises as a general boarding house or assisted boarding house,*
- (c) evidence of the layout of rooms, and the number and arrangement of beds, at the premises that is consistent with the use of the premises as a general boarding house or assisted boarding house,*

¹⁰ 20 February 2015 letter to LGNSW from the Hon. Jon Ajaka, Minister for Ageing and Disability.

¹¹ Section 200, *Local Government Act 1993*

(d) evidence relating to persons entering and leaving the premises (including the depositing of luggage) that is consistent with the use of the premises as a general boarding house or assisted boarding house.¹²

It is clear that evidence types (b) and (c) would be difficult to gather without entry into a suspected boarding house, and that generally council staff would need to spend an inordinate amount of time and resources gathering sufficient circumstantial evidence even to seek a warrant.

Repeated council feedback indicates that establishing that premises are an unregistered boarding house can take months – if not years – of time spent gathering evidence to build a case. Challenges gathering evidence can be compounded where unregistered boarding houses are located in secure, multistorey buildings where council employees cannot clearly view the property from neighbouring properties, and coming and goings are less easily observed.

Even where council employees are able to gain entry to a suspected boarding house, feedback from councils indicates that syndicates running unregistered boarding houses aimed at students know that if they do not put up partitions, it is less likely that they will be found in breach of planning laws, and less likely to be subject to an order under the EP&A Act to remove unlawful alterations.

Further, residents of these properties often have an interest in misleading council employees as to the nature of their accommodation (as they wish to continue residing in the premises), and may, for example, advise that they are friends of a tenant rather than a lodger, in an effort to avoid classification of the premises as a boarding house.

If councils had streamlined powers of entry for suspected unregistered boarding houses, administration of the BH Act would be less onerous for councils and more efficient in ensuring that dangerous or unlawfully altered properties are not used as unregistered boarding houses.

Recommendation 13: The BH Act should be amended to provide councils with additional powers of entry to premises they reasonably suspect are operating as an unregistered boarding house with failure to allow a council officer to enter an unregistered boarding house an offence under the Act.

8. Should councils be required to notify NSW Fair Trading of enforcement action against boarding houses, so that it can be recorded in the Register?

Yes (see response to question 5).

¹² Subsection 100(2), *Boarding Houses Act 2012*

Summary of recommendations

Recommendation 1: The BH Act should clearly set out that one of its objects is to provide affordable and quality housing options.

Recommendation 2: The definitions of boarding house in NSW legislation should be made consistent, to include and exclude the same types of accommodation and avoid confusion.

Recommendation 3: The BH Act should clearly exclude short-term rental accommodation from its provisions, and the NSW Government must ensure that short-term rental accommodation reforms do not have unintended consequences that permit boarding houses to avoid registration under the BH Act.

Recommendation 4: Any expansion of BH Act to include regulation of accommodation of those with NDIS packages must remain the responsibility of the Department of Communities and Justice, or other NSW Government agencies, and must not be transferred to or regulated by local government.

Recommendation 5: Prospective boarding house operators should be required to provide the Commissioner with evidence of planning approval for a boarding house, prior to the Commissioner accepting registration of a boarding house.

Recommendation 6: The public register should include:

- Precise information on boarding house ownership
- Date of registration
- Breaches of safety or accommodation standards, or any enforcement action taken against a proprietor.

Recommendation 7: NSW Fair Trading should ensure that councils are automatically notified of any updates to the register for boarding houses within their local government area.

Recommendation 8: The Commissioner should have the power to remove details of a boarding house from the public register where it has ceased to be used as a boarding house, and should notify the relevant council of the removal.

Recommendation 9: The NSW Government should consider how regulatory responsibilities may be better distributed between councils and the NSW Government to take into account limited council resources and to ensure that lodgers benefit from a safe and quality standard of accommodation.

Recommendation 10: The NSW Government must provide councils with adequate resources to meet the costs of BH Act regulation, taking into account the number of boarding houses within each local government area as well as funding for action against unregistered or illegal boarding houses.

Recommendation 11: The BH Act should be amended to make it easier for councils to issue penalty infringement notices where necessary, which would reduce the need to take a matter to court (and avoid associated costs).

Recommendation 12: The review of the BH Act should consider how that Act interacts with other pieces of legislation, including the *Local Government Act 1993*, the *Environmental Planning & Assessment Act 1979* and relevant planning instruments.

Recommendation 13: The BH Act should be amended to provide councils with additional powers of entry to premises they reasonably suspect are operating as an unregistered boarding house with failure to allow a council officer to enter an unregistered boarding house an offence under the Act.

* * *

LGNSW would welcome the opportunity to assist with further information during this review to ensure the views of local government are considered.

To discuss this submission further, please contact LGNSW Strategy Manager Damian Thomas on 02 9242 4063 or at damian.thomas@lgnsw.org.au.