

Submission to the consultation on draft regulations to improve education requirements for property industry professionals

December 2025



Recommendations

Supporting renters to live in safe and energy efficient homes

1. Provide more resources and better guidance to self-managed rental providers so they can understand their legal responsibilities for providing safe rental properties.
2. Greater support for renters and rental providers to understand and navigate the Victorian Residential Tenancy laws. This should include providing clear definitions and guidance about legal entitlements or obligations, and the steps that need to be taken to maintain properties and to minimise the occurrence of emergency repairs.
3. Improve the effectiveness of the Residential Tenancies Regulations by updating the regulations to require rental providers to make a signed declaration at every change of tenant that acknowledges that the property meets the minimum standards, including such standards as ventilation, structural soundness and electrical safety. To help rental providers comply with their obligations, the standard format Condition Report should also be updated to include the minimum standards.
4. RACV supports the introduction of mandatory continuing professional development (CPD) for real estate agents, and the recommended option to introduce five CPD activities per year, with two mandatory activities.
5. RACV recommends that mandatory CPD activities for real estate agents include the following topics:
 - Safety checks and information disclosures when advertising a rental property
 - Minimum standards and repairs, and when building inspectors and qualified tradespeople should be used
 - Rights and obligations of renters and rental providers
 - Energy efficiency, thermal comfort and new minimum energy efficiency standards.
6. Align rental property energy safety regulations with the Energy Safety Review outcomes and incorporate new requirements into CPD for real estate agents.

Supporting the electrification transition

7. RACV calls on the Victorian Government to provide guidance to owners' corporations and strata residents on how to navigate the process to plan and install electric vehicle charging in existing apartment buildings.
8. RACV calls on the Victorian Government to incentivise the installation of electric vehicle charging in existing apartment buildings. This could be delivered by zero-interest loans or grants.
9. RACV supports the introduction of mandatory continuing professional development (CPD) for Owners Corporation Managers, and the recommended option to introduce five continuing professional development (CPD) activities per year, with two mandatory activities.
10. RACV recommends that mandatory CPD activities for Owners Corporation Managers include navigating solar and EV charging infrastructure voting, resolution and installation.
11. Align energy safety regulations with the Energy Safety Review outcomes and incorporate new requirements into CPD for Owners Corporation Managers to ensure the safety of energy storage systems and electric vehicle charging infrastructure.

Introduction

RACV welcomes the opportunity to respond to the Department of Government Services regarding the draft regulations aimed at improving education requirements for property industry professionals.

This submission draws on recent research commissioned by RACV, including surveys and focus groups with Victorian renters and rental providers, to highlight current challenges and opportunities in the property sector. It addresses the importance of continuing professional development (CPD) for real estate agents and Owners Corporation Managers, with a particular focus on safety, compliance with minimum standards, energy efficiency, and the transition to electrification.

RACV's recommendations are designed to support renters, rental providers (landlords), strata residents and property managers (real estate agents) in navigating evolving regulatory requirements, ensuring safer and more energy-efficient homes, and facilitating the adoption of new technologies such as electric vehicle charging and solar systems.

About RACV

Representing over 2.3 million members and an additional 500,000 customers, RACV exists to improve lives in the areas of home, cleaner energy, motoring, mobility and leisure.

RACV is committed to helping members at key stages in life's journey in the home. These include moving, renting, buying and selling a home, keeping the home safe, renovations and energy efficiency.

In the home, RACV delivers exceptional services to members and customers through a range of products and services. These include property and rental inspection reports, home and contents insurance, trades (for both emergencies and renovations), retail energy, solar, battery and EV charger installation solutions.

Helping Victorians is at the heart of RACV. In 2024-2025, RACV:

- provided 914,000 members with home insurance policies
- assisted with 56,000 home emergencies through Emergency Home Assist.

This means RACV is in a Victorian home every six minutes.

RACV Trades gives customers access to accredited, licensed tradespeople, providing quality work in an emergency and for everyday repairs and general maintenance around the home. RACV's workforce and extensive partner network ensure that we can reliably meet the needs of both metropolitan and regional members and customers.

Home Trades Hub Australia (HTHA) is RACV's 100%-owned subsidiary and home service delivery business which delivers a comprehensive range of repairs, maintenance, inspections and security services around the home through a national network of qualified tradespeople and professionals.

Established in 2020, HTHA is a national business operating in Victoria, New South Wales, Queensland and Western Australia.

Since 2020, HTHA trades and electrification service delivery includes:

- 95,000 properties attended for trade work
- 191,000 trade jobs quoted
- 321,000 trade jobs delivered
- 74,000kw of solar installations across 6,100 residential and commercial properties, offsetting the equivalent of 29,000 tonnes of CO2 emissions annually
- 25,600 property inspections
- 8,500 heating and cooling jobs.

Through a series of recent investments RACV is now one of the largest inspection businesses in Australia. This gives us a unique opportunity to support more Australian households to unlock the benefits of electrification.

Supporting renters to live in safe and energy efficient homes

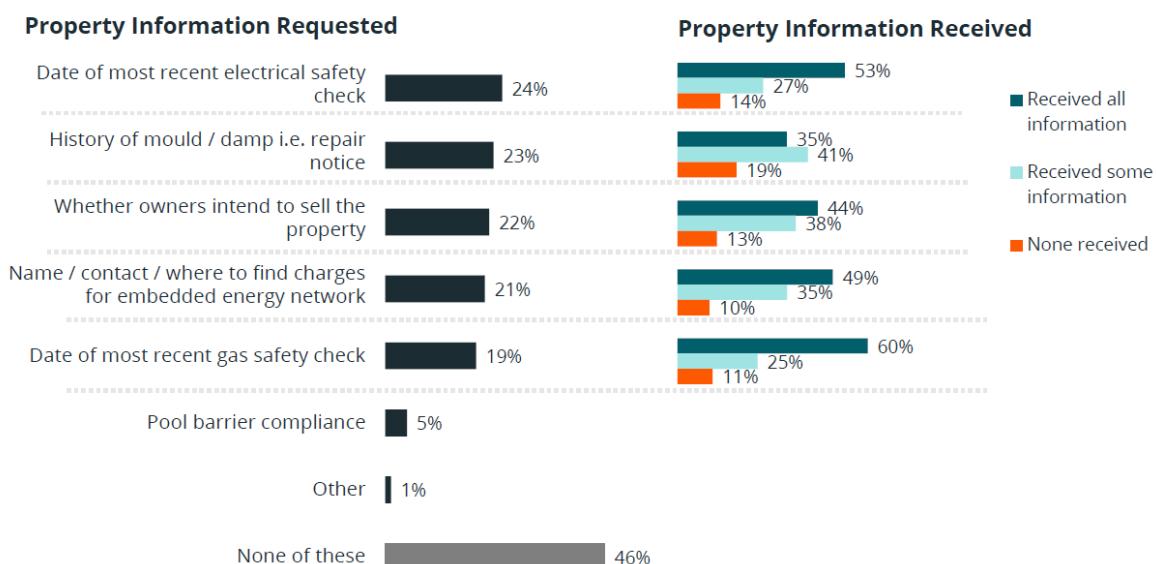
What renters and rental providers tell us

In mid-2024, RACV commissioned research into renting in Victoria. The research involved surveying 1,000 Victorian renters and 500 Victorian rental providers and focus groups with 24 renters and 12 rental providers. The research focused on rights and obligations, property condition, safety, minimum standards, repairs and energy efficiency.

Disclosing information about safety and compliance

Before a renter moves into a rental property there are disclosure requirements to ensure rental properties are safe. For rental providers using a property manager (real estate agent), their role in conducting open inspections for rental properties includes the provision of information to potential renters. RACV research indicates that less than a quarter of renters ask for this information, and less than half of those asking for this information received it. See figure 1 for a breakdown of the information requested and whether it was received.

Figure 1: Requesting information about a rental property¹



The Consumer Policy Research Centre² had similar findings about real estate agents not providing information to potential renters during open inspections. They found that half of the real estate agents could not provide information on the safety and compliance of a rental property, such as gas and electrical safety compliance, heater energy efficiency and mould history³.

Minimum standards and safety

Minimum standards ensure rental properties are safe, private and liveable, they were introduced in Victoria more than four years ago. In March 2025, the Victorian Government announced that from November minimum standards

¹ RACV Renters' Research 2024. Question: R8A ASK 'MOVED IN L12M': What information (if any) did you request prior to moving into your current rental property? Please select all that apply. ASK 'IN PROCESS OF MOVING': What information (if any) have you requested when inspecting properties you are interested in renting? Please select all that apply. / R8c Did you receive the information you requested? Base: Renters who have either moved to a new rental in the last 12 months and/or are in the process now of moving to a new rental n=332 / Those who requested information for each issue (range n=15*-81). *Note: pool compliance barrier sample size too low. Unsure / can't recall excluded from charts

² Consumer Policy Research Centre and Tenants Victoria, Is it liveable? A mystery shop of private rental properties. 2023.

³ The law requires that this information is provided to a renter before signing a rental agreement but does not stipulate it is to be provided at inspection.

would need to be met when rental properties are advertised for rent, an improvement on the previous requirement that stipulated compliance on or before the day a renter moves in. For renters already living in a rental property, property managers are their main contact to raise and resolve any issues about minimum standards.

While almost half of renters (48 per cent) say their rental property meets all minimum standards, a quarter of renters indicated that their property had two or more unmet minimum standards. Rental providers, however, have a more positive outlook on whether their property is compliant with the standards. Seventy-two per cent told RACV that their property meets all minimum standards, and six per cent said they had two or more unmet standards.

While most rental providers have a good understanding of their obligation to provide a rental property that meets the minimum standards, 29 per cent are not aware of this requirement⁴. Similarly, 26 per cent of rental providers were not aware that they are obliged to provide a property that is in a liveable condition. This is despite the majority of rental providers using a property manager and stating that their primary reasons for using a manager is to advise them of their legal obligations and check that the rental property is compliant with minimum standards⁵.

The Consumer Policy Research Centre (CPRC) had similar findings, reporting that a quarter of rental providers had low confidence in understanding their legal obligations⁶.

Rental providers who self-manage their rental property have a lower level of understanding of minimum standards, than those who use a property manager. Only 59 per cent recognised that they were responsible for ensuring that the rental property is compliant with minimum standards⁷. Again, CPRC had a similar finding with 45 per cent of rental providers who self-manage understanding their obligations (compared to 54 per cent who use a property manager).

There is a similar divergence in views on the presence of mould and safety checks:

- Around 80 per cent of rental providers stated that gas and electrical safety checks had been carried out in the last two years, compared to just over 60 per cent of renters saying these had occurred⁸
- Seventy percent of renters report that their property is free from mould and damp, compared to 88 percent of rental providers who state the same⁹.

In addition to disclosing information at the start of a rental agreement, and advising rental providers of their legal obligations, property managers also have an important role in maintaining the condition of rental properties and responding to repair requests. This is not an insignificant number, 72 per cent of renters reported that they had raised a repair request in the last two years¹⁰.

There is a significant portion of renters who experience difficulties getting their repair request resolved. Among renters who lodged a repair request (either urgent or non-urgent), 41 per cent experienced difficulties getting the repair completed¹¹. While 60 per cent of those with urgent repairs said the issue was resolved promptly and to an acceptable standard, nearly 40 per cent reported delays or said that the repair was not addressed¹².

⁴ RACV Rental Providers' Research 2024. Question: Q3 Below are some obligations and rights of renters in Victoria. Please indicate those that you were aware of before today. Select all that apply. Base: Total Rental Providers n=505 Total Renters n=1,003 Significance tested at 95% CI Note: NA is shown in chart for when statement was not asked of Renters. Research undertaken before requirement introduced for minimum standards to be met when property is advertised.

⁵ RACV Rental Providers' Research 2024

⁶ Consumer Policy Research Centre. Renting in Reality: Insights from Victorian landlords. October 2025.

⁷ RACV Rental Providers' Research 2024. Question: R11 Who do you think is responsible for checking that the rental property is compliant with minimum standards? / Q2 In general, where do you get information and advice about your rights and responsibilities as a Rental Provider? Base: Rental providers who self manage n=96

⁸ RACV Rental Providers' and Renters' Research 2024. Question: R9 Which of the following safety checks have been done to your rental property in the last 2 years. Please select all that apply. / R9A When was the last time the smoke alarm was checked in your rental property? Base: Total Rental Providers n=505, Total Renter n=1,003 Significance tested at 95% CI

⁹ RACV Renters' and Rental Providers' Research 2024. Question: P1. Does your current rental property have the following features and amenities? P2b You indicated your current rental property isn't free from mould and damp. Which best describes the status? Base: Total Rental Providers n=505 Total Renters n=1,003 / Those who indicated property isn't free of mould and damp Renters n=243/ Rental Providers n=48 Significance tested at 95% CI.

¹⁰ RACV Renters' Research 2024. Question: M2 Separate to any outstanding maintenance requests in your current property, have you raised other repair requests in the last 2 years? Note, this may be in your current rental property or another rental property? Base: Total Renters n=1,003 Chart above does not include None of these which was selected by 28%

¹¹ RACV Renters' Research 2024. Question: M6 Have you ever experienced any difficulties in getting repairs (either urgent or non-urgent) completed for a property you rent? M7 When you have experienced difficulties in getting repairs or maintenance completed, which of the following have you done to try to resolve the situation? Base: Total Renters n=1,003 / Those who took action/s n=411

¹² RACV Renters' Research 2024. Question: M4A. What was the outcome of your repair request for [INSERT M3 CODE]? Base: Raised the repair in L2Y n=713

Recommendations

1. Provide more resources and better guidance to self-managed rental providers so they can understand their legal responsibilities for providing safe rental properties.

Renters have limited options if a property doesn't meet minimum standards

Consumer Affairs guidance does not stipulate how information about minimum standards should be disclosed to potential renters. Renters are advised that they should inspect a property to make sure it meets minimum standards before they sign a rental agreement. However, based on RACV's assessment of the current minimum standards, six¹³ reflect technical requirements that would be difficult for an average person to assess and recognise if the standard was met, particularly in a short property inspection window. The introduction of the minimum energy efficiency standards – while a positive move for renters, raise questions on how compliance will be determined. It is unlikely that renters and rental providers could identify compliance with insulation (and the existing structural soundness standard), as such implementation guidance should specify a requirement to use appropriately qualified inspectors. This guidance should also include requirements for periodic servicing or re-assessment to ensure items remain in a suitable state or working order.

The establishment of a Renting Taskforce is a positive move to monitor the rental market and ensure properties are meeting the minimum standards, however further work should be done to build awareness of the rights and obligations of both renters and rental providers.

Where a property fails to meet the minimum standards (either at the commencement, or at any time during a rental agreement) a renter may request urgent repairs.

Urgent repairs, by definition, are anything that makes the property unsafe or difficult to live in and include the minimum standards. Rental providers are required to make urgent repairs immediately. If a renter has difficulty getting a rental provider to make an urgent repair, the following options are available:

- organise and pay themselves; up to \$2,500 if there has not been a prompt response, or
- if they are unable to pay \$2,500 or the repairs cost more than this amount, the renter can apply to VCAT for a repair order. VCAT will review the request within two business days and can order the rental provider to arrange and pay for the repairs.

While most jurisdictions have, or are introducing, minimum standards NSW is currently the only jurisdiction in Australia to include the minimum standards in the standard condition report.

The Residential Rental Agreement could be strengthened in how it references the minimum standards, and RACV notes that the standard condition report is silent on the minimum standards. Updating the Residential Rental Agreement and the standard condition report to reflect the minimum standards will encourage greater dialogue between providers and renters at the start of a rental agreement with the aim to improve the quality of rental properties and minimise the need for urgent repairs. This benefits both rental providers and renters.

¹³ Minimum standards difficult for an average person to assess compliance: ventilation, toilets (partially), structural soundness, mould and damp, electrical safety and heating.

Recommendations

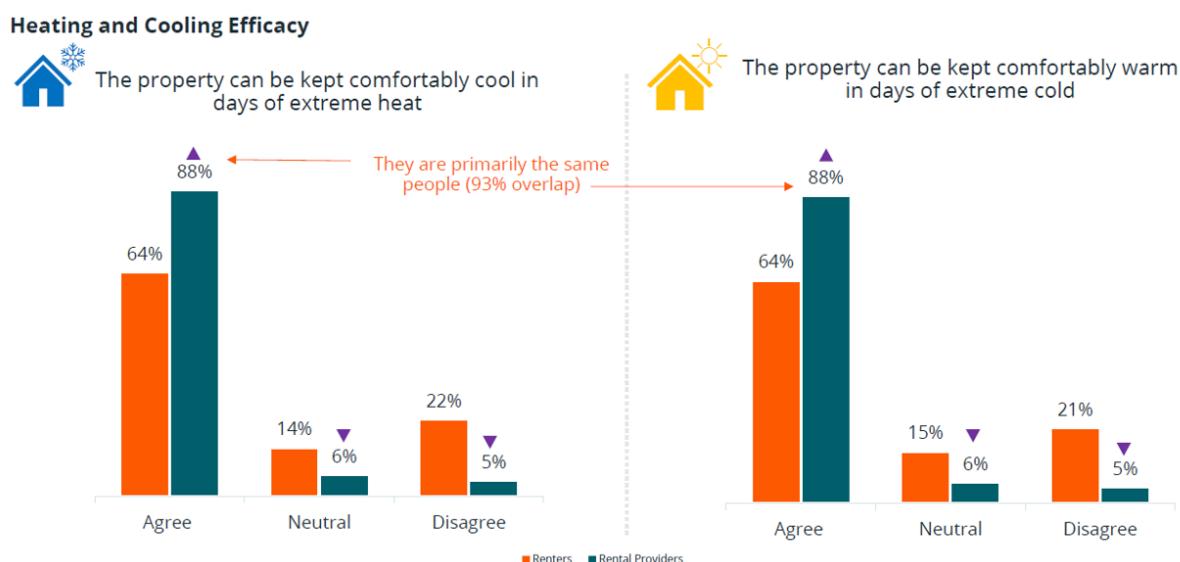
- Greater support for renters and rental providers to understand and navigate the Victorian Residential Tenancy laws. This should include providing clear definitions and guidance about legal entitlements or obligations, and the steps that need to be taken to maintain properties and to minimise the occurrence of emergency repairs.
- Improve the effectiveness of the Residential Tenancies Regulations by updating the regulations to require rental providers to make a signed declaration at every change of tenant that acknowledges that the property meets the minimum standards, including such standards as ventilation, structural soundness and electrical safety. To help rental providers comply with their obligations, the standard format Condition Report should also be updated to include the minimum standards.

Energy efficiency in rental properties

RACV research also explored whether rental providers were aware of the (at the time) proposed introduction of energy efficiency minimum standards¹⁴ for ceiling insulation, cooling, draughtproofing and electric hot water systems. One in four rental providers were not aware of any of the proposed standards.

Poor energy efficiency in rental properties, leading to energy hardship for renters, is a well-documented issue in Australian housing¹⁵. RACV research is consistent with this, one in five renters told us that they could not keep their home comfortably cool or warm on days of extreme cold or heat¹⁶. Consistent with their views on property condition, rental providers have a more positive view of the thermal comfort of their property. See figure 2.

Figure 2: Views on whether a rental property can be kept a comfortable temperature



Retrofitting can significantly reduce energy costs for renters and support a greater level of thermal comfort. While there is not a critical mass of rental stock in Victoria with home solar systems¹⁷, over time it is likely that this will increase.

¹⁴ RACV Rental Providers' Research 2024. Question: I6 Which (if any) of the proposed new minimum standards relating to energy efficiency for Victorian properties are you aware of? Please select all that apply Base: Total Rental Providers n=505 Significance tested at 95% CI

¹⁵ Australian Housing and Urban Research Institute (Warm, cool and energy-affordable housing policy solutions for low-income renters. 2020) and Consumer Policy Research Centre (Too Hot, Too Cold, Too Costly. 2024)

¹⁶ RACV Renters' Research 2024. Question: I1 Please indicate the extent to which you agree or disagree with the following statements about the ability to heat and cool your home. Base: Total Renters n=1,003. Significance tested at 95% CI

¹⁷ RACV Renters Research 2024, n=1,000. Nine per cent of renters indicated that their rental property had solar panels.

Education requirements for real estate agents

These insights point to the important role of property managers (real estate agents) in ensuring that rental properties are safe, private and meet minimum standards. By acting as a knowledgeable intermediary, property managers are expected to support rental providers in understanding their obligations, especially regarding property condition and energy efficiency, and ensure that renters' concerns are addressed. This is particularly vital given the gap in perception between rental providers and renters about property standards and thermal comfort.

Ensuring a base level of knowledge among real estate agents is critical to establishing a consistent understanding of minimum standards and safety requirements. By introducing continuing professional development (CPD) requirements agents can remain a trusted source of advice for rental providers. Given that agents are relied upon to guide rental providers through compliance and legal requirements, their competence directly impacts the quality and safety of rental housing. CPD may also serve as a mechanism to effectively implement any future regulatory changes.

RACV supports the introduction of mandatory continuing professional development (CPD) activities for real estate agents. Given the extent of legal requirements agents are expected to understand, and the expectations and reliance of rental providers in advising them of their legal obligations, RACV supports option two, which introduces five CPD activities per year, with two mandatory activities.

RACV recommends that mandatory topics include:

- Safety checks and information disclosures when advertising a rental property
- Minimum standards and repairs, and when building inspectors and qualified tradespeople should be used
- Rights and obligations of renters and rental providers
- Energy efficiency, thermal comfort and new minimum energy efficiency standards

RACV notes that the Victorian Government is undertaking an Energy Safety Review to ensure that energy safety frameworks keep communities safe during Victoria's energy transition. There may be implications for property managers if regulatory changes impact electric vehicle charging or home solar and energy storage systems.

Recommendations

4. RACV supports the introduction of mandatory continuing professional development (CPD) for real estate agents, and the recommended option to introduce five CPD activities per year, with two mandatory activities.
5. RACV recommends that mandatory CPD activities for real estate agents include the following topics:
 - Safety checks and information disclosures when advertising a rental property
 - Minimum standards and repairs, and when building inspectors and qualified tradespeople should be used
 - Rights and obligations of renters and rental providers
 - Energy efficiency, thermal comfort and new minimum energy efficiency standards.
6. Align rental property energy safety regulations with the Energy Safety Review outcomes and incorporate new requirements into CPD for real estate agents.

Supporting the electrification transition

Electric vehicle charging in existing apartment buildings

RACV supports the transition to electric vehicles. Electric vehicles provide Victorians with greater vehicle choice and contribute to reduced emissions and noise pollution, and improved air quality.

We know that efficient and reliable battery charging is a key facilitator for uptake, and that there needs to be a mix of charging infrastructure available to electric vehicle owners, including public charging infrastructure, kerbside charging, home charging and apartment building charging.

Installing electric vehicle charging infrastructure in existing apartment buildings can be challenging and complex as it requires navigation of strata rules and balancing potentially diverse views of residents.

The Australian Building Codes Board has provided technical guidance on charging installation. Fire services however have provided differing advice¹⁸ which allocates electric vehicle charging a 'special hazard' provision under the National Construction Code. In practice, this may lead to uncertainty on what fire safety measures are required.

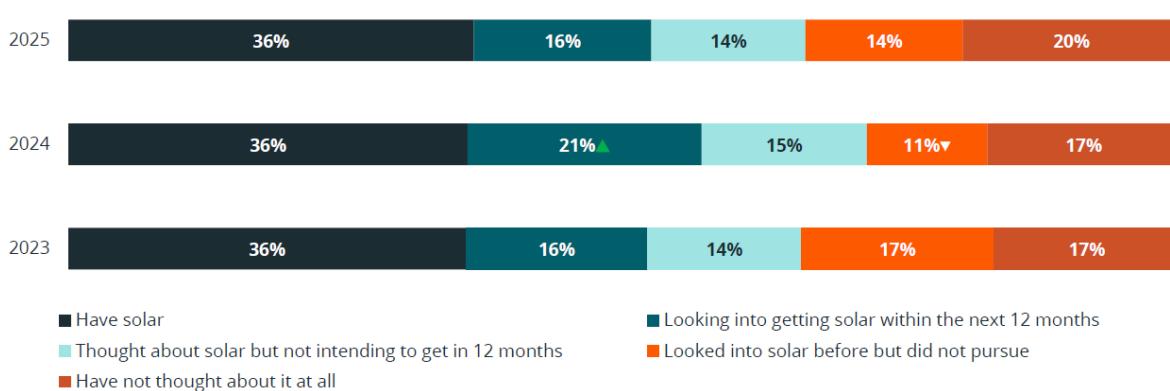
Recommendations

7. RACV calls on the Victorian Government to provide guidance to owners' corporations and strata residents on how to navigate the process to plan and install electric vehicle charging in existing apartment buildings.
8. RACV calls on the Victorian Government to incentivise the installation of electric vehicle charging in existing apartment buildings. This could be delivered by zero-interest loans or grants.

Installing solar systems

RACV research¹⁹ indicates that solar take-up is levelling out, with the number of people indicating that they have solar remaining unchanged over the last three years, while there is an increasing proportion who are not pursuing solar. Our research indicates that those who live in apartments are even less inclined to be thinking about solar. See figure 3.

Figure 3: Presence of solar amongst homeowners



¹⁸ AFAC. Electric Vehicles and EV charging equipment in the built environment. <https://www.afac.com.au/resources/4e128301-9ed6-4332-aafe-dc93c485369>

¹⁹ RACV Policy Sentiment Research 2025. Questions: H11Thinking of your current home, what plans do you have around solar? Note: 'Currently have solar' and 'Currently looking into it' codes combined in analysis. Base: 2023 Home owners n=716, 2024 Home owners n=646, Homeowners 2025 n=685. Significance tested to a 95% CI to previous time-period: ▲ / ▲ Note: Solar presence this is higher than what market penetration suggests, potentially due to question not specifying 'rooftop solar system'

Owners Corporation Managers have a role in providing guidance to residents about how to navigate solar processes, from voting and resolution through to installation. In research undertaken in 2023 and 2024²⁰, a small proportion of homeowners who were considering solar stated that a barrier to proceeding was difficulty in securing agreement with the owner's corporation.

Education requirements for Owners Corporation Managers

RACV supports the introduction of mandatory continuing professional development (CPD) activities for Owners Corporation Managers and recommends that mandatory topics include navigating solar and EV charging infrastructure voting, resolution and installation.

Owners Corporation Managers play a critical role in supporting sustainability and energy efficiency within strata communities, including facilitating the adoption of renewable energy solutions, EV charging infrastructure, and other green initiatives. They are required to balance potentially diverging views among residents, manage complex assessments, and understand compliance with safety standards and building regulations. This responsibility demands a nuanced understanding of technical, legal, and financial considerations, making ongoing professional development essential to equip managers with the skills to navigate these challenges effectively.

RACV notes that the Victorian Government is undertaking an Energy Safety Review to ensure that energy safety frameworks keep communities safe during Victoria's energy transition. There may be implications for Owners Corporation Managers if regulatory changes impact electric vehicle charging or home solar and energy storage systems.

Recommendations

9. RACV supports the introduction of mandatory continuing professional development (CPD) for Owners Corporation Managers, and the recommended option to introduce five continuing professional development (CPD) activities per year, with two mandatory activities.
10. RACV recommends that mandatory CPD activities for Owners Corporation Managers include navigating solar and EV charging infrastructure voting, resolution and installation.
11. Align energy safety regulations with the Energy Safety Review outcomes and incorporate new requirements into CPD for Owners Corporation Managers to ensure the safety of energy storage systems and electric vehicle charging infrastructure.

²⁰ RACV Policy Sentiment Research 2023 and 2024. Question: H12 If any, which of the following barriers have you experienced in purchasing solar panels? Please select all that apply. Base: Homeowners who are considering solar 2023 n=117, 2024 n=136
Significance tested to total a 95% CI and to 2023 at 95% CI