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Committee Secretariat
Social Services and Community
Parliament Buildings
Wellington

Submission: Residential Tenancies (Registration of Boarding House Landlords) Amendment Bill

Tēnā koutou

Age Concern New Zealand (ACNZ) welcomes the opportunity to submit comments on the *Residential Tenancies (Regulation of Boarding House Landlords) Amendment Bill*.

We are pleased that Hon. Jenny Salesa proposed the Bill to Parliament and acknowledge the support given by other political parties through to the Select Committee stage.

ACNZ **strongly supports** the establishment of a register of boarding houses and boarding house landlords.

The Amendment Bill will increase the oversight of boarding houses in Aotearoa New Zealand. Boarding houses currently operate with little if any regulation. Some are well run while others are not. They often operate under the radar so by establishing and enforcing registration, boarding house landlords will be accountable for the health and safety of tenants and tenants will be better protected.

Boarding houses form part of the varied housing landscape in Aotearoa. They provide housing for people who find themselves unable to access or afford other housing options. Aotearoa New Zealand's housing shortage is well-documented and boarding houses may provide both a positive housing choice and a safety net for some of our more vulnerable community members who may otherwise be homeless. Tenants living in boarding houses are often people who don't have many other options, for example, with low or no income, leaving prison or other institutions, previous experience of homelessness, and/or experiencing mental health and addiction issues

The 2023 census recorded 372 boarding houses with approximately 4,500 residents in total, of whom 70% were male.¹ One quarter of boarding house residents identified as Māori, 16.9% as Pasifika and 20% Asian. One in ten boarding house residents identified as a member of the rainbow or takatāpui community.

Stats NZ further reported that 561 people aged 65 years identified as living in a boarding house. The 2023 data showed that boarding house tenants had a higher median age than the usual resident population, and residents lived in these dwellings for long periods, even though they are not designed for long-term living.

This has implications for people of all ages who may be ‘ageing in place’ as boarding house tenants. For older people to successfully age in place, they require housing that is safe, affordable, accessible, and secure.

Given living in a boarding house is often temporary or transitional we would like to see tenants remain on the Housing Register so that they are eligible for long-term housing.

Stats NZ advises that census data is likely to be under-reporting the numbers of boarding houses and boarding house tenants.² Some estimates have the number of boarding houses ranging from 500 to 800.³

Establishing a register of boarding house landlords and implementing requirements in the Amendment Bill under *Record Keeping Obligations* (66ZK and 66ZL) would enable much more accurate data to be held. This would improve the standards across boarding houses and may help agencies to put in place support that would benefit boarding house tenants.

The tragic fire that engulfed Loafer’s Lodge boarding house in Newtown Wellington in 2023 raised the profile of boarding houses. Five people were killed and 20 were injured, with four of the five residents who died aged 64 and above and the fifth person aged 50 years.⁴ Those living in boarding houses deserve to be safe and for regulations to be in place to protect them.

Following the Loafers Lodge fire, the Ministry of Business, Innovation and Employment investigated similar buildings and found “a lack of basic compliance with the Residential Tenancies Act displayed by many boarding house operators in relation to the

¹ <https://www.stats.govt.nz/reports/housing-in-aotearoa-new-zealand-2025/>

² <https://www.stats.govt.nz/assets/Reports/Housing-in-Aotearoa-New-Zealand-2025/Housing-in-aotearoa-new-zealand-2025.pdf>

³ <https://www.stuff.co.nz/national/132095216/boarding-houses-a-problem-weve-always-needed-to-fix>

⁴ <https://www.stuff.co.nz/national/wellington/132145838/what-we-know-about-the-loafers-lodge-victims>

Healthy Homes Standards.” Another finding was “a lack of ability from territorial local authorities to clearly identify boarding houses operating in their region”.⁵

Our feedback on the *Residential Tenancies (Registration of Boarding House Landlords) Amendment Bill* is based on insights from our mahi with New Zealanders aged 65 and above. It is also informed through research data and our participation on various housing networks including the Tenants Advocacy Network.

Who we are

Age Concern is a trusted charity working in local communities throughout Aotearoa to support older people, their friends and whānau. Our values – Dignity, Wellbeing, Equity, and Respect for older people are our guiding lights and underpin everything we do. We aim to ensure older New Zealanders get the best advice and support no matter where they live in Aotearoa.

With a network of 28 local Age Concerns operating in 38 locations, and a national office based in Wellington, we are the place to go for services and information about issues for older New Zealanders.

We are proud of our heritage in standing up for the rights of older New Zealanders for more than 75 years. As an organisation, our focus is contributing to the overall health and wellbeing of older New Zealanders. We work to prevent the abuse and neglect of older adults; improve their health and wellbeing; reduce loneliness and social isolation; and provide advocacy for older people’s rights.

Our Comments

1. Every New Zealander has the right to a warm, safe, affordable and secure home, wherever that may be. This includes tenants living in boarding houses.
2. We agree with boarding houses being a housing option within Aotearoa New Zealand but want to see them improve in the service quality and consistency provided to tenants i.e. safe, affordable and secure. There is an opportunity to promote examples of well-run boarding houses as part of this process, demonstrating best practice.
3. As stated in the Amendment Bill, boarding house tenants include some of Aotearoa New Zealand’s most vulnerable. However, the current low level of monitoring, registration, and regulation has resulted in unsafe, unhealthy, and dangerous housing in some

⁵ <https://www.building.govt.nz/managing-buildings/report-into-safety-assessments-of-boarding-houses>

instances. In May 2026, the Tenancy Compliance and Investigations Team reported that they found ‘significant non-compliance with the Healthy Homes standards during inspections of a selection of Auckland residential boarding houses in April.’⁶

4. Research findings of Aspinall (2013) remain relevant to both older people living in boarding houses and the growing ageing population in Aotearoa New Zealand. Aspinall’s research identified specific concerns from boarders, health workers, landlords and managers about the suitability of boarding houses for older people because the building designs did not take their needs into account. Respondents considered that the increased support needs or deteriorating health of older boarding house tenants was going unnoticed.

Our recommendations

1. That the Residential Tenancies (Registration of Boarding House Landlords) Amendment Bill is passed. We recommend the following aspects of the Bill in particular:
 - a. Section 66ZA that sets out the grounds for disqualifications from registration.
 - b. Sections 66ZB and 66ZC that cover the criteria for application for registration as a boarding house landlord along with the information and material to be included in the application.
 - c. Section 66ZF that states that registration expires after 12 months. annual confirmation of registration is an appropriate requirement.
 - d. Section 66ZH that outlines the criteria for cancelling registration of a boarding house landlord.
 - e. Sections 66ZK and 66ZL that cover in detail the records that every boarding house landlord must maintain.
 - f. Section 66ZM that provides for the appointment of the Registrar of Boarding House Landlords.
2. That boarding house tenants remain on the Housing Register and remain considered at risk in social housing assessments, enabling them to be eligible for permanent or long-term housing.
3. That data on the demographics of boarding house tenants is gathered securely and made available in anonymised form to agencies and organisations that can provide essential support for tenants

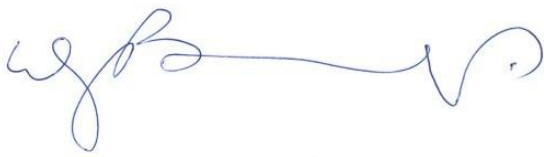
⁶ <https://www.tenancy.govt.nz/about-tenancy-services/news/tenancy-compliance-disappointed-to-find-significant-non-compliance-in-auckland-boarding-house-inspections/>

Closing Comment

Thank you again for the opportunity to provide our submission on the *Residential Tenancies (Regulation of Boarding House Landlords) Amendment Bill*.

As a trusted charity working in local communities throughout Aotearoa New Zealand, we have a keen interest in this consultation process and potential improved outcomes for older New Zealanders.

Nāku noa, nā,



Karen Billings-Jensen
Chief Executive
Age Concern New Zealand