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Residential Tenancies Act review
Dispute Resolution Issues Paper

This submission is a response by Housing for the Aged Action Group (**HAAG**) to the 'Dispute resolution' issues paper forming a part of the review of the Residential Tenancies Act (**RTA**).

HAAG would like to acknowledge that the submission was compiled with contribution from our members and that this forms the foundation of our response.

Introduction

No matter the tenure type disputes and conflict cause significant concern for older tenants and can exacerbate feelings of insecurity. The nature of housing disputes can be especially stressful and the intimidation and fear often felt by this group can mean they will not access justice, or attempt to resolve disputes, to avoid repercussion and consequences.

"The importance of stable and secure accommodation for older people can make them exceptionally vulnerable to accommodation-related legal problems. Legal issues which may threaten the stability of accommodation arrangements may present a greater level of stress and anxiety to older people than other age groups."[1]

Where landlords, managers and operators lack the necessary skills to understand their responsibilities and the rights of residents, and where tenants lack information about their rights and responsibilities, dispute resolution can be very difficult to obtain. The current systems do not properly support and encourage residents to exercise their rights and challenge those who fail to comply with the law.

[1] Ellison et al, 2004, p 149

3. What features do you consider important for effective residential tenancies dispute resolution mechanisms?

For older tenants, the key elements of an effective residential tenancy dispute resolution system are accessibility, transparency, and consistency.

4. How would you rank the importance of these features?

The inherent power imbalance that occurs between tenants and landlords/managers/operators is a significant obstacle in dispute resolution. The status of older tenants is often precarious. Where a landlord, manager or operator views the relationship as a business transaction, for an older tenant they view any housing conflict or dispute as a potential threat to their home and security. Therefore the approach towards disputes between the two parties can vary greatly.

A residential tenancies dispute resolution system should aim to be fair and equitable, with attempts made to overcome the power imbalance. It should be easily accessible which means it must be affordable, easy to navigate and easy to understand. It must be appropriate and respond with speed and efficiency.

There must be a strong legislative and regulatory framework to guide it, with effective compliance and enforcement mechanisms. There must be clear information accessible about rights and responsibilities and services that can support tenants to access and utilise the system.

There must be flexible pathways and a range of options to encourage positive outcomes and experiences within the system so as not to deter tenants from exercising their rights and seeking resolution to disagreements.

All of these aims and features are equally important in order to provide a robust and holistic dispute resolution system.

6. How could the existing services be improved?

Older tenants often report significant barriers in accessing TAAP services: long wait times for phone advice, difficulty navigating complex websites to access information online, and inability to access more detailed advice or advocacy without attending drop-in locations. Older tenants, particularly those with limited mobility and a fixed income, require appropriate outreach services if they are to assert their rights effectively.

7. What alternative or additional tools or initiatives could assist parties, including vulnerable and disadvantaged tenants, to independently resolve disputes?

For HAAG's tenancy and retirement housing services, funded by Consumer Affairs Victoria (**CAV**) under the Tenancy Advice and Advocacy Program (**TAAP**), information and advice comprises over 50% of the total assistance provided to older tenants. The effectiveness of HAAG's information and advice service according to our members, as compared to other avenues, is that we have specialised knowledge and can tailor information according to an individuals needs. HAAG understands the needs of older tenants and provides an in-depth support service that caters to the needs of each person and focuses on making decisions with the tenant.

An assessment is made each time an older tenant contacts HAAG to determine what type of housing they live in, so as to understand their rights in the correct regulatory context. Sometimes this requires viewing agreements and documents in order to provide the appropriate advice for their circumstances. Sometimes this also involves referring them on to a more relevant service.

HAAG members have commented that CAV does not provide information that is as relevant and appropriate due to the wide scope of consumer information they must cover and understand. It is not always obvious that CAV has the same level of understanding to be able to provide the correct advice due to the limited enquiry time, and extent of knowledge required, for such interactions.

Services funded by the TAAP program can provide a much more in-depth service to tenants, especially those who are more vulnerable. The focus should be on improving support and funding for this program to ensure this focused and expert approach continues to be accessible to tenants that most need it.

For example HAAG is the only older persons' specific housing information and support service and as such is best placed to work with older tenants on a range of issues and disputes because of the level of support we can provide, such as outreach, compared to other services.

CAV can provide basic information but often cannot deal with the complexities inherent in the sector. For example experiences by some tenants of residential parks show a lack of overall understanding or disconnect from CAV about this housing type. HAAG has undertaken many talks in residential parks providing information to site tenants about their rights and responsibilities. Especially in regional areas HAAG has always tried to invite CAV along. There have been a number of sessions where CAV has spoken about rights in general but was unable to address more detailed, complex questions or they spoke about retirement villages rather than addressing the correct regulatory framework.

The role of the Dispute Settlement Centre of Victoria (**DSCV**) is unique and very worthwhile in providing a well-rounded dispute resolution system. That being said HAAG members have expressed on numerous occasions that mediation is often ineffective. This is a result of the power imbalance between parties as well as the voluntary participation component and the lack of binding powers contained in mediation agreements.

Many older tenants require support to resolve disputes due to added vulnerabilities that come with age but also due to complex tenure arrangements. Most will choose not to pursue a remedy to a dispute without the support and assurance of an advocate.

For example caravan park residents often "have fewer rights and protection than tenants in private rental and therefore occupancy is more precarious and less stable"[2]. They are usually a more vulnerable group with a fixed income, such as the age or disability pension.

Dispute resolution is a big concern for many site tenants in residential parks. Many site tenants feel they are up against a 'big business' that can afford to hire solicitors and advisors and this imbalance of power is often the aspect that deters people from challenging the park operator. There has been a history of fear within residential parks, mostly concerning the repercussions that might arise from seeking advice and taking any formal action. Without support people will often opt to put up with issues of concern rather than challenge the manager or operator.

Independent Living Unit (**ILU**) tenants are often the most fearful of exercising their rights, alongside rental village tenants, because of their vulnerability and lack of security. Although all RTA dispute resolution processes are available to them they often do not understand their rights and are not willing to challenge the operator.

These issues highlight how difficult it can be for older tenants to resolve disputes on their own, especially where arrangements are more complicated and legalistic. The emphasis needs to be on providing affordable, easy to access information and support services to assist people who are affected by disputes.

[2] Goodman, 2012, p15

Case study – DSCV Mediation:

One site tenant was the president of the residents committee, and had been for a number of years. The caretaker appointed during that time decided he did not particularly like this person which resulted in strained communication and comments made by the caretaker about this person behind her back. This meant she could not fulfil her role properly and made it difficult to achieve any meaningful outcomes within the park.

HAAG supported the site tenant and tried to negotiate with management that the caretaker's conduct was inappropriate and there needed to be some resolution to move forward. The correspondence resulted in mediation between the site tenant and the caretaker.

HAAG attended the session as an observer and although it appeared to be somewhat successful it did not provide any long lasting change because there was no binding agreement at the end. In fact not long after the site tenant resigned from her role as president of the committee partly because of the stress she had undergone during this process (which lasted over a number of months) and partly because her health was failing.

11. What alternative tools could assist parties, including vulnerable and disadvantaged tenants, to resolve disputes quickly and informally, and to prevent their escalation?

The issues paper mentions that the Frontline Resolution (**FLR**) service offered by CAV reached an agreement in 87.5% of the total residential tenancies cases handled in 2014-2015. Unfortunately the issues paper is also clear that agreements are not binding and do not require compliance by either party. There is no information about how many actually adhered to those agreements and resolved the dispute in real terms. This is research that would be highly beneficial for CAV to follow up to assess whether the FLR service is truly effective.

What is also unclear is how a tenant with an unresolved dispute following FLR knows who to contact if they wish to pursue the matter further. Again this is something that would benefit from clarification to better understand the overall effectiveness of the service.

Some HAAG members have accessed CAV's conciliation service in the past. Tenants have commented that in some matters the service has been helpful and able to resolve the dispute - to a limited extent. In other circumstances tenants have found it to be unproductive leaving the dispute unsettled.

The most frustrating element for older tenants is once again the lack of binding powers on any agreement made within the conciliation process, as well as the process being voluntary which has also sometimes resulted in parties not being

willing to participate. The issues paper mentions that in 2014-2015 of the residential tenancies matters conciliated 40 out of 43 were resolved or withdrawn. Once again it is unclear is whether there is follow up undertaken to prove matters were truly resolved and what protocol CAV adopts when the conciliation process is unsuccessful and whether tenants are guided as to how to take the matter further if they choose to.

As mentioned previously the same applies to the DSCV service. Where agreements are not binding how is success measured and what occurs if mediation is unsuccessful? Does the DSCV provide guidance to tenants about who to contact to take their matter further should they require it?

Overall there appears to be a lack of clarity around the true effectiveness of the third-party assistance services above. This area could do with some further research and follow up to measure whether disputes had been resolved in real terms. From the results the services could be better reviewed and reformed if required.

Negotiation forms a large part of the tenancy and retirement housing service provided by HAAG. Often attempts made by older tenants to negotiate themselves will be unsuccessful, especially where communication is lacking and relationships have broken down. Fear and a lack of understanding around rights and responsibilities often result in tenants being unable to undertake negotiations without support.

HAAG members have often commented that just the presence of a third-party in the dispute sometimes effectively resolves the situation. In addition having a knowledgeable advocate to act on their behalf assists older tenants to feel more comfortable exercising their rights and often results in tenants feeling less direct confrontation and stress. HAAG members have also expressed that having someone to discuss their concerns with alleviates some of the stress and worry that accumulates from disputes and conflicts.

Other services, such as legal aid and Justice Connect, are also appropriate, effective and able to assist with residential tenancies disputes.

HAAG members have stated that an alternative mechanism that would appeal to them to assist in resolving disputes more quickly and informally would be an ombudsman. Especially in relation to older persons' specific housing, such as residential parks and ILUs, an ombudsman with retirement housing expertise would benefit older tenants significantly.

Older tenants have voiced they feel most comfortable accessing an ombudsman because it is non-confrontational, free, independent and expert. It allows for more timely resolution of disputes and assists to address the imbalance of power between the parties.

"A retirement housing ombudsman could be government-run or an industry funded scheme comparable to existing operations like the Energy & Water Ombudsman Victoria or the Public Transport Ombudsman Victoria".[3]

The availability of this type of Alternative Dispute Resolution (**ADR**) process would encourage older people to access justice. It would assist residents to overcome fears and may empower them to better understand their rights. It would provide a service that is easy to engage with.

It must also be noted though that an Ombudsman would not be effective until legislation provides clear and robust protections for residents.

12. How effective are CAV's inspections activities in facilitating both independent resolution of disputes and resolution of disputes at VCAT?

CAV inspectors often seem, by necessity, generalists who are being asked to respond to specific questions. With respect to complex repairs, for example, CAV inspectors are rarely able to offer detailed advice as to what work needs to be undertaken. Repair inspection reports often simply restate the information from the notice the tenant has already given their landlord, making them redundant. Where a tenant reports an intermittent fault, inspectors are rarely able to investigate sufficiently to identify or even directly observe the problem, leaving them to make only extremely vague recommendations – for example, that the landlord 'investigate'. In general, it is unclear why these reports (and the time it takes to obtain them) are necessary or useful, and why tenants could not simply provide their own evidence in support of applications for nonurgent repairs.

Similarly, inspectors do not seem sufficiently familiar with local rental markets to assess fair market rents on their own. In our experience, they rely on information from local real estate agents – that is, they base their decisions as to how much a landlord should be allowed to increase the rent on the opinions of landlords' agents, who have a direct commercial interest in ensuring any limit on rent increases be set as high as possible.

13. How could CAV's inspections activities be improved?

CAV repair inspections would be more useful if inspectors had, or had access to, specialist knowledge and skills to specifically address the faults in question. The very general information provided in inspection reports is frequently redundant – especially when tenants are capable of producing their own evidence of the need for repairs, as is often the case. For example, tenants with mould problems sometimes obtain CAV reports because they believe the mould derives from a repair problem (perhaps with ventilation, faulty range hoods, leaks, etc). But CAV inspectors, in our experience, are not able to specify the cause of the mould and may leave tenants frustrated. Tenants may be left in a position where, to obtain a

[3] Consumer Action Law Centre, 2015, p 4

repairs order, they will have to organise specialist reports to provide the appropriate evidence at their own expense – with costs that are frequently prohibitive for vulnerable and disadvantaged consumers.

14. How could CAV's inspections activities be of greater benefit to vulnerable and disadvantaged tenants?

Although the process to have a rent increase investigated through CAV is fairly clear, often the responses provided to residents by CAV inspectors, and the criteria utilised for assessment, appear inappropriate or insufficient to provide for a reasonable evaluation.

For example in relation to caravan and residential parks the assessment criteria needs to take other parks into account less and focus more on whether improvements were undertaken in the park over the previous 12 months, whether services are being appropriately provided within the park, such as the maintenance of common areas and facilities, location and access to external services and the hardship or disadvantage an increase might have on a pensioners income affordability.

There have also been cases where inappropriate comparisons have been made by CAV when assessing the rent level.

Case study- Rent assessment:

One group of site tenants received a rent increase they felt was excessive so they decided to seek a rent assessment. The CAV inspector came out to the park and following his inspection he provided the site tenants with a report stating the rent was not excessive. Unfortunately his conclusions were drawn from some comparisons that were inappropriate.

Rather than just considering other residential parks he included a retirement village in his report, and this aided him in deciding that the increase was not excessive.

It appeared he did not understand the difference between the two forms of housing and the fact that fee models are completely different. Although the site tenants could have taken the matter to VCAT and argued the CAV report was undertaken incorrectly they did not feel confident that VCAT would take their word over CAV's, which is understandable as a challenge to an increase is much more effective with a supportive CAV report.

In relation to non-urgent repair assessments when it comes to caravan and residential park residents who own their dwelling it is often unclear what assessments they can request. There are actually no repair or maintenance provisions in Part 4A of the RTA in relation to residential parks.

In essence this process is not very effective in relation to these types of tenure. Even where an assessment has occurred in a caravan park the manager has been unwilling to respond which required the older tenant to take the matter to the VCAT. As will be highlighted in the next section this is not a step many tenants are willing to take which unfortunately leaves the situation in the same state in which it began.

CAV should have the power to ensure a landlord/manager/operator complies with any requirements of the RTA. At present CAV only seems to act when the matter if more systemic and prefers to take a softer approach with smaller landlords and operators. Enforcement should occur regardless of the size of the matter, where a clear lack of compliance is evident.

16. How effective are the ADR, hearings and other services provided by VCAT?

VCAT often provides a highly useful forum for older tenants to assert their rights, and to contest unjustified claims made by their landlords.

However, VCAT decisions often appear to be inconsistent, with different members making very different rulings on particular points in apparently comparable circumstances. Different members rely more or less on the commentary in interpreting the Act so that, for example, different members may make different rulings as to the level of detail required in a notice to vacate, or the date on which a notice to vacate under s261 may terminate. Such inconsistencies can make it very difficult for parties to understand their rights and responsibilities.

VCAT's lack of consistency seems to stem, or to be enabled, by the general lack of oversight of VCAT decisions; few tenants can seriously consider taking a matter to the Supreme Court even where they may believe they have identified an error of law.

VCAT also sometimes fails to provide appropriate interpreting services, even where these have been requested. In some instances, where VCAT has failed to book an interpreter as requested, this means an otherwise unnecessary adjournment. In other cases, VCAT books interpreters but because hearings times can often be delayed, the bookings end before a hearing commences. Once VCAT referred a matter involving a non-English speaking tenant to a full-day compulsory conference, but only made their standard one-hour booking for the interpreter – who then had to leave for another job. In this case, VCAT insisted on proceeding without an interpreter, meaning the tenant was unable to participate fully or appropriately in their own hearing conference.

In general, VCAT listings seem to struggle with longer or more substantial matters. From time to time we make applications which we recognise will take longer than the standard 15-20 minutes VCAT generally allocates, and so request longer hearings. These requests are not generally granted. Recently one of our clients obtained the consent of their landlord to adjourn a complex application for possession so that it could be listed for an hour. Although this need for extra time was the explicit basis of the request for the adjournment, VCAT granted the

adjournment but still listed the matter for 20 minutes. Failure to schedule longer hearing times in these cases result in long waiting times and delays, and often mean adjournments become necessary on the day.

17. How could VCAT's services be improved?

VCAT's lack of consistency seems to stem, or to be enabled, by the general lack of oversight of VCAT decisions; few tenants can seriously consider taking a matter to the Supreme Court even where they may believe they have identified an error of law.

An opportunity for parties to seek leave to make an internal appear to the Tribunal based on a possible error of law, similar to that offered by NCAT in NSW, would improve the consistency and integrity of VCAT decisions.
VCAT could also take steps to ensure they provide adequate interpreting services, and – regardless of any resulting inconvenience – ensure that hearings and conferences do not proceed without appropriate interpreters.

The Tribunal would also benefit from reviewing its listing practices with a view to reducing unnecessary delays.

18. What are the obstacles (if any) to tenants or landlords in taking appropriate matters to VCAT?

Older tenants consistently report that they find the prospect of a Tribunal hearing intimidating based on the complexity of the application process and formality of proceedings. They often find it difficult to attend particular hearings due to inflexible scheduling (VCAT will generally not adjourn a hearing in advance, even with strong, documented evidence of a compelling reason a tenant will be unable to attend on a given date, unless both parties consent to an adjournment) and what are, increasingly (particularly since Australia Post extended standard delivery times) very short notice periods. Many reasonably fear retaliatory action by their landlords if they do seek to enforce their rights, including notices to vacate and notices of rent increase. They also frequently express the fear that the Tribunal may be biased in favour of landlords, or that they will be unable to effectively contest the arguments or evidence of professional real estate agents. Finally, they fear the orders made in their favour will not be effectively enforced.

20. What particular or additional barriers or obstacles are there for vulnerable and disadvantaged tenants in accessing or utilising VCAT's services, or defending cases that have been brought to VCAT against them, and how can these be addressed?

Although tenant advocate services, such as HAAG and community legal services, can assist tenants with residential tenancies disputes sometimes the most effective way to obtain a legally binding outcome is via VCAT. Many older tenants do not feel comfortable taking matters to VCAT and will often decline this course of action.

The current justice system can be intimidating and often people are hesitant to exercise their rights. Especially in tenure with more complex arrangements, such as residential parks, tenants have many uncertainties when considering avenues of dispute resolution and a lack of clear protections leaves people feeling doubtful they will have success. For older people the risk often feels greater should there be an unsuccessful outcome.

VCAT's original premise of justice being available and affordable for the average person, with no legal representation has changed. Solicitors are often present to represent parties such as park operators and this causes tenants to feel threatened. Even the obvious imbalance when estate agents act on behalf of landlords can intimidate tenants.

Older people prefer a non-confrontational approach to dispute resolution that is low, to no, cost and provides expert advice. Although alternative dispute resolution pathways, such as ombudsman services, are more preferable to HAAG members they recognise that VCAT must still be available and accessible to them. VCAT's processes and procedures need to be reviewed in order to make it more user-friendly, timely and effective.

Case study- Hearing for possession:

A caravan park resident had received a notice to vacate and a hearing was set for the park operator to obtain a possession order.

The hearing was scheduled for 10:30am at the Dandenong law courts.

Due to a mix up in the overall proceedings of the day, and the delay caused by one matter in particular, the case was only heard at 3:30pm. This meant 6.5 hours of the day were spent at the courts which resulted in a very stressed and wrung out resident.

Tenants often lack information and understanding about their rights and responsibilities. Nowadays although there is often a greater confidence amongst tenants in facing disputes there is still an underlying fear and concern that pushing a matter too far might result in eviction or being ostracised as a 'troublemaker'.

Case study - Trouble:
HAAG has worked with many residents who have exercised their rights, or made an attempt to, and as a result other residents viewed them as 'troublemakers' and did not want to be seen to be involved with their actions.

A meeting was held at one residential park where a member of the residents committee stood up demanding to know who had placed meeting notices in the letterboxes. Their attitude was intimidating to other residents and they had been known to bully residents who had spoken out in the past. As a result many people felt afraid to do anything that would gain them unwanted attention and generally chose not to do anything at all.

HAAG members have often stated that although VCAT is meant to be more informal and accessible they still find the process overwhelming and stressful. VCAT is still considered a 'court' process by older tenants and therefore comes across as frightening and difficult. With support some older tenants are more willing to take action but without support, and with a lack of information, the majority do not feel confident enough to utilise the system.

For tenants of residential parks one aspect lacking from the VCAT system is the ability for a group of tenants, most likely the residents committee, to take legal action on behalf of the majority of the park. Tenants feel more confident when acting together rather than facing the Tribunal alone. It creates a less confronting process and reduces the possibility of retribution being focused on an individual therefore decreasing fear and uncertainty.

In South Australia the *Residential Parks Act 2007* allows for a group application to be made to the tribunal in the case of parks rules thought unreasonable.[4] This is in essence a class action. In Victoria there is no such power but there should be.

Another aspect of VCAT that older tenants often express concern about relates to the confidentiality of compulsory conferences. In the case of residential parks with more complex arrangements and regulations often VCAT orders compulsory conferences to try and resolve the matter more efficiently.

Unfortunately due to the fear experienced by tenants towards taking legal action one tenant may be challenging an issue that is relevant to a larger group and yet any discussion and agreement made within a compulsory conference cannot be shared or utilised further. There should be provision for compulsory conferences outcomes to be made public especially if it can be shown other tenants would benefit from the results.

22. How could CAV's compliance and enforcement functions be improved?

[4] *Residential Parks Act 2007*, (SA), section 9(1)

As mentioned previously CAV can often take a softer approach, especially with landlords and operators that manage smaller businesses or where the matter does not impact on the larger community. In the event of a lack of compliance that may only affect one tenant, one park or one village CAV often hesitate to take any enforcement action. CAV should exercise their powers and take action against any non-compliant entity to ensure legislation is adhered to.

Another approach CAV often takes is that of education and information preferring to inform landlords and operators of their responsibilities but not enforcing those if they are found to purposely disregard them. Although CAV also provide information and education to tenants they are often not undertaken concurrently. In order to achieve a more empowered and confident sector, no matter the tenure type, both parties must understand their rights and responsibilities and it should be made clear that a lack of compliance has real consequences.

28. What features and considerations would be important for a compulsory mediation or conciliation step to be effective in resolving residential tenancies disputes?

As mentioned previously older tenants would prefer having access to an ombudsman to assist with their disputes. The most appealing aspects of this type of scheme for older tenants provide for a non-confrontational, free, independent and expert service. It allows for more timely resolution of disputes and assists to address the imbalance of power between the parties.

Adding an additional step for compulsory mediation or conciliation would potentially also be of benefit to older tenants but currently due to the non-binding nature of agreements and often the inability to involve an active advocate older tenants feel these ADR pathways are ineffective. If the process allowed for the support of an advocate, and provided binding agreements with enforcement provisions to follow up on a lack of compliance, then older tenants would be more supportive of these procedures.

Conclusion

"Unresolved legal problems cause significant social, health and financial costs to individuals and the community".[5]

Effective dispute resolution comprises of being able to access strong legal provisions, timely and efficient courts and tribunals, as well as being able to secure information, advocacy and legal advice and representation. It is also includes understanding the processes and procedures that surround the justice system, and being able to understand the rights and responsibilities contained within it.

Effective dispute resolution must also cater specifically to older tenants by providing flexible and alternative pathways towards resolution and the system needs to be

[5] Community Law Australia, 2012, p 10

able to overcome the inherent power imbalance that exists between tenants and landlords (managers and operators). It needs to be a fair, equitable, affordable, timely and efficient system.

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Bibliography

Community Law Australia. 2012. *Unaffordable and out of reach: the problem of access to the Australian legal system*, National Association of Legal Centres, Sydney.

Consumer Action Law Centre. 2015. *Retirement Housing Ombudsman*, Consumer Action Law Centre, Melbourne.

Ellison, S, Schetzer, L, Mullins, Perry, J & Wong, K. 2004. *The legal needs of older people in NSW*, Law and Justice Foundation of NSW, Sydney

Goodman, R, Dalton, T, Gabriel, M, Jacobs, K & Nelson, A (2012). *Marginal rental housing in Australia,* AHURI positioning paper No. 148. Australian Housing and Urban Research Institute, Melbourne.

Residential Parks Act 2007 (SA)