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REVIEW OF THE RESIDENTIAL TENANCIES ACT

SYC appreciates the opportunity to respond to the Discussion Paper on the proposed changes to the *Residential Tenancies Act 1995 (SA)* (RTA) and the *Residential Tenancies Regulations 2010*.

SYC is a non-profit human services organisation founded in 1958 to support young people experiencing disadvantage in Adelaide. SYC now operates nationally supporting more than 57,000 people of all ages each year with housing, education, employment, justice, health and disability services.

SYC's response to the Discussion Paper is informed by our delivery of housing and homelessness support services to more than 16,000 people annually across South Australia. Services of most relevance to the legislative review are RentRight SA and the Lived Experience Engagement Service (LEES).

With funding from the SA Housing Authority, **RentRight SA** is a free independent service that supports people of all ages to secure and maintain tenancies in private rental, community or public housing. RentRight SA Tenancy Advisors provide advocacy, advice and support to people living in South Australia, including first-time renters, long-term tenants, and people experiencing housing insecurity or homelessness. While it is primarily a phone based 'call centre' service, Tenancy Advisors assist tenants at SACAT Hearings to achieve a positive outcome as well as intervene prior to a tenancy breakdown through negotiation with Landlords/Property Managers.

RentRight SA responds to an average of 42 calls from tenants each day. Enquires are predominantly from females (66%) with 1 in 4 enquires from people aged 50+ years. The provision of tenancy education is also a key element, with 50 education sessions delivered per annum to help inform and empower tenants with knowledge of their rights and responsibilities. We work collaboratively with legal, financial, homelessness and welfare support services as well as with real estate industry representatives, to help empower and improve the rights and safety of tenants.



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Complementing the work of RentRight SA is SYC's **Lived Experience Engagement Service** ("LEES"), an independent state-wide service that engages with people who have or are accessing the housing and homelessness system in South Australia. Funded by the SA Housing Authority as part of its reform agenda of the homelessness sector, LEES works collaboratively with the sector to embed client voices into service design and delivery, to produce a quality evidence base to inform decision making on policy and broader sector reform and to advocate for change alongside those with lived experience of housing stress and homelessness.

SYC's LEES has established an Aboriginal Lived Experience Reference Group (ALERG) and a Lived Experience Reference Group (LERG) ("LERGs"). These two LERGs provide an important lived experience advisory role and learning opportunity for the sector and housing providers.

The experiences and recommendations of LERG members, those with whom LEES has consulted in relation to the rental market, the thousands of tenants RentRight SA has assisted over the years and the insights of our staff has guided SYC's response to the RTA reform as follows:

1. Longer leases

- 1.1. The RTA should be amended to provide a prescribed reason for the termination of a periodic lease and the non-renewal of a fixed term tenancy agreement. Currently the RTA only requires tenants to provide a reason for breaking a lease. To introduce a requirement on landlords to provide a reason brings parity to the responsibilities of tenants.

Where there is a dispute as to whether the reason is reasonable, we ask the legislation first requires parties to enter a process of negotiation, rather than a tenant bearing the burden of taking the landlord/agent to SACAT for recourse. This is a deliberate strategy to help reduce the adversarial nature of the relationship between tenants and landlords. A significant power imbalance is felt by tenants in private and social housing. This has been exacerbated in recent years due to the lack of housing options and tenants being fearful of retribution should they exercise their rights by lodging a claim in SACAT.

We submit greater access to alternative conflict resolution process such as conciliation, negotiation, tenancy education and assistance to understand and exercise rights will reduce stress, cost and delay while improving access to justice for all parties, as well as reducing the workload of SACAT through diversion, earlier intervention and resolution.

- 1.2. SYC agrees for the RTA to be amended to accommodate longer fixed term tenancy agreements. We suggest tenants and landlords/homeowners be given discretion to negotiate their preferred length of lease rather than requiring a mandatory minimum or maximum term.



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We request the legislation consider the safety of tenants who may feel compelled to remain in a longer-term lease but who do not fall within the Domestic Violence provisions addressed below. Through our work with tenants, many have reported instances of violence or abuse from a non-intimate partner within the home, but due to the current 'break lease' provisions, have felt compelled to remain in a tenancy that is unsafe. A process for a tenant in this situation ensuring they are not unduly penalised for breaking a longer fixed term agreement needs to be considered in the RTA reform.

- 1.3. Currently the minimum notice period required prior to the non-renewal of a fixed term tenancy agreement is 28-days. SYC recommends this be extended to a 60-day notice period for consistency with the notice period required for the termination of a periodic lease. Consistency brings a level of equity between periodic and fixed term leases and acknowledges the significant impost on tenants to vacate their current home and find a suitable new abode, particularly in the current rental market climate of a shortage of rental housing stock.

2. Residential Bonds

- 2.1. We agree with raising the relevant limit as defined in s61(3) of the RTA from \$250 to \$800 to enable most tenants to pay a bond of no more than the equivalent of four weeks' rent and making allowance for a separate category of high-end rental properties where a higher bond may be permitted.

With the average rent price across South Australia in the range of \$380-\$420 per week, the Commonwealth Rental Assistance (CRA) is now out of step with the median rental property price. While recognising CRA is beyond the scope of the RTA reform, SYC requests Consumer and Business Services (CBS) note the September 2022 Report of the Productivity Commission and its call for a review to increase rent assistance¹.

- 2.2. We support the intent to minimise unclaimed bonds, the time it takes to release bonds to tenants and the requirement for additional tenant contact details to be registered for ease of bond return.

Many tenants SYC support erroneously believe that the bond sits with the homeowner/landlord and not with the Residential Bonds Online via CBS. SYC submits greater education of the bonds process targeting landlords, property managers and tenants is needed.

RentRight SA is an effective service in delivering tenancy education sessions particularly to people on lower incomes. SYC invites further discussion with CBS on the ways in which collaboration with RentRight SA could deliver increased levels of tenancy education to ensure a greater number and range of tenants have a better understanding of their capacity to initiate a bond release.

¹ <https://www.smh.com.au/property/news/rent-assistance-is-laughably-low-economists-warn-but-calls-for-an-increase-fall-flat-20220930-p5bmbt.html>



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We suggest the RTA not only requires tenants' details to be lodged with the bond, but to also provide tenants legal recourse to initiate a bond being refunded.

SYC also endorses encouraging tenants and landlords/property managers to complete their final inspection of the property at the same time with the intent to reduce bond disputes and subsequent delays in bond refunds. It will also assist in reducing tenant bond debt and enhancing tenants' capacity to secure a subsequent property.

The RTA does not currently stipulate a time frame within which a bond must be refunded to a tenant. SYC is aware of a tenant waiting 11 months for a bond to be released after initiating the process, causing significant financial hardship. SYC recommends a time frame of 2-4 weeks after the end of the lease to which the bond relates.

Alternatively, we encourage South Australia to adopt the practice used in Tasmania whereby the bond moves with the tenant rather than being connected to a specific property. We ask that this approach be explored to help reduce costs borne by tenants in establishing a subsequent tenancy.

Current practice enables SAHA to raise a bond debt for seven years. SYC is aware of people being deemed ineligible for other assistance from SAHA until such time as a repayment plan is created due to their bond rent debt. This includes eligibility for the SAHA Emergency Assistance Program (EAP) – the payment for a motel stay when a person is highly vulnerable and homeless. We ask that legislative reform addresses this perverse outcome.

We request an additional tab be added to the Residential Bonds Online enabling a tenant to inform CBS when a tenancy has started and to be given the capacity to lodge the bond themselves. Involving tenants from the very start of the process will help to redress the power balance between tenant and landlord and thus improve the operation of the RTA.

In any move to a digital platform and proposed cessation of manual bond lodgement processes, we ask that CBS remain mindful of the varying levels of digital literacy and access to technology in the community and ensure ease of access for all.

A further suggestion by SYC to assist in reuniting tenants with unclaimed bonds is creating an unclaimed bonds process analogous to that created for unclaimed super payments. We suggest modelling this on www.moneySMART.gov.au/find-unclaimed-money

SYC assists many tenants with a bond guarantee from SAHA through its Private Rental Assistance Program (PRAP). SYC is aware of landlords/property managers not accepting bonds from prospective tenants with a bond from SAHA due to their dislike of the SAHA process to get the bond back. Having a SAHA bond should not be a factor for discrimination.

3. Rent bidding

- 3.1. SYC is acutely aware of the prevalence of rent bidding, both explicit and implicit bidding. In this current climate of vacancy rates below 1% and even less in regional areas where there may only be 1 or 2 rental properties available at any given time, tenants are 'doing what it takes' to ensure they are the chosen candidate and feel obligated to offer a higher amount.

As such SYC endorses legislative reform preventing landlords/agents from advertising a property within a rent range, putting a property up for rent auction and soliciting offers to pay an amount above the advertised price.

Advertising a set price for a rental property will also serve landlords/property managers well when tenancy vacancy rates increase and the market 'cools'. The approach places the onus on the landlord to know the rental value of their property asset and the requirements for their investment in real estate to be financially beneficial. We understand the value of the Rent Roll to Real Estate Agents and would endorse an approach of CBS assisting the Real Estate Institute of South Australia (REISA) to professionalise the role of Property Manager, enabling agents to better assist and advise their clients to set and secure a fair market rental price.

4. Rooming houses and shared accommodation

- 4.1. SYC strongly supports legislative reform to improve the rights, safety and health of people residing in rooming houses and in shared accommodation. Amending the definition of a rooming house from "three or more rooms rented on a commercial basis" to "two or more residents" is a positive step towards achieving this.
- 4.2. Similarly, SYC supports a registration scheme for rooming houses however queries the rationale for the scheme to apply to houses that have 5 or more residents. The more unscrupulous providers may continue to offer unsafe rooming houses for 4 residents to avoid the proposed registration or licencing schemes. We ask the definition of rooming houses to relate to rooms rented on a commercial basis accommodating 2 or more people.

SYC supports the requirement for 'fit and proper' person checks for proprietors.

Furthermore, SYC encourages CBS to adopt the approach of New Zealand where a Rental Warrant of Fitness² certifies a property as being rental worthy. A rooming house proprietor should be required to display an annual certificate of compliance similar to the NZ Healthy Homes Standards Compliance in the common areas of the home.

² <https://www.nzrentalwof.co.nz/>

5. Renting with pets

- 5.1. Just as a homeowner needs to consider the size of their home, yard and capacity to care for and pay the associated costs of pet ownership prior to obtaining a pet, so should a tenant. What is reasonable for a homeowner to consider should apply equally to a tenant, rather than having pet ownership determined by housing tenure status.

Tenants should not unreasonably be denied a request for a pet. Factors for consideration when determining whether a pet can be kept should reflect the type of property being rented. Agents should be permitted to advertise whether a property is suitable for a certain sized dog or cat or other type of animal.

It is the current practice of RentRight SA to advise and assist tenants to create a Pet Application, giving landlords/agents details of the pet, by way of size, age, temperament, vaccination status, desexing and health status. SYC recommends enacting a standardised Pet Application Form for tenants seeking approval for a pet.

The Discussion Paper provides that a reasonable condition may include keeping the pet outside. The RTA defines a property as inclusive of the outside areas up to and including the fence line. We ask for greater clarity and education on the definitions of “property” and “outside” should conditions such as these be contemplated in the reform. The condition to “keep a pet outside a property” is otherwise nonsensical.

A simple, easy process should be enacted for tenants and landlords alike to pursue their statutory rights and resolve differences of opinion as to the reasonableness of a refusal or a condition, rather than placing the burden solely on the tenant to seek remedy in SACAT. With over 30% of all households now rentals³ and the growing rates of pet ownership, we suggest the legal requirement for disputes to be resolved in SACAT is no longer a contemporary approach.

Information, advice and support to exercise rights in a non-adversarial setting should instead be enacted. SYC recommends a service such as RentRight SA and its capacity to inform, advise and negotiate on behalf of tenants be utilised to support a tenant who has had their request for a pet refused or a seemingly unreasonable condition imposed.

In addition, funding to educate landlords and professional development for property managers would assist in the understanding of what is an unreasonable refusal or a reasonable condition. Renting is about providing homes for people including their pet family members, rather than it just being an investment opportunity. The RTA reforms would do well to reflect this.

- 5.2. SYC does not agree with the concept of a Pet Bond Scheme. It has a disproportionately negative effect on people of lower income as they are unable to afford both the pet bond and the rental bond.

³ https://www.sgsep.com.au/assets/main/SGS-Economics-and-Planning_Rental-Affordability-Index-2021.pdf



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6. Housing standards and retaliatory evictions

- 6.1. SYC strongly supports provisions in the RTA to ensure tenants can exercise their rights without risk of retaliatory eviction or rent increases.

Issues with maintenance being needed or incomplete is one of the primary presenting reasons for tenants to contact RentRight SA for advice and assistance. Of the 19,967 Enquiries received by RentRight SA (Oct 2020-Sept 2022), 1 in 7 were about maintenance issues.

It is a frequent occurrence for a RentRight SA Tenancy Advisor after having informed a tenant of their right to ask the landlord to fix an issue, for the tenant to then choose not to take any further action in relation to the maintenance issue for risk of their rent being increased or their lease not being renewed.

While clear permissible reasons for the termination or non-renewal of a tenancy agreement will assist in reducing retaliatory evictions, it does little to address the retaliatory actions.

Until such time as there is greater parity in the power dynamics between tenant and landlord/agent, and the rental market being regarded less as a commodity and more about the provision of homes for people, will we see a reduction in these such retaliatory actions. Legislative reform, education and licensing requirements to professionalise the private rental sector will go a long way towards achieving this.

As would less adversarial means for people to exercise their rights. We understand that VCAT and QCAT require conciliation to be undertaken prior to a matter being lodged for resolution in Court. In contrast, current practice in South Australia sees only Bond Disputes diverted from SACAT to conciliation. Extending the use of simpler, easier ways to access justice, and timely dispute resolution prior to a tenancy breaking down is in the interests of tenants, landlords and property managers alike.

- 6.2. We endorse the suggestion for the RTA to impose minimum energy efficient standards in rental properties and for such standards to be monitored and enforced. To align with the current climate, both environmental and political, it would be beneficial to introduce a minimum energy efficiency star rating and to have these ratings included in rental advertisements, taking into account the appliances included with the home, lighting, heating, cooling, insulation, solar panels, window glazing, water efficiency and the like.

SYC suggests South Australia enact the approach of NZ and its rental warrant of fitness inspection whereby on each occasion a property is vacated or during the course of a tenancy, an inspection is conducted to ensure the property meets agreed minimum standards. SYC understands a repair order can be raised to ensure maintenance or improvements are carried out. If an order is not fulfilled yet a new bond is lodged for that property, the property cannot be re-let.



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In adopting such an approach, the RTA would need strengthened 'retaliatory rights' provisions, to increase tenants' confidence in exercising their rights and to enable fast resolution of disputes to allow rental properties to be re-let more quickly.

In South Australia, the National Tenant database known as TICA is a register of tenants who have been 'blacklisted' for certain types of tenancy failure. However, there is no equivalent for landlords. Given the growing prevalence of rental households, we suggest exploring a database for landlords who have not maintained their properties to an agreed standard – a star rating of sorts, enabling tenants to make choices as to who they may wish to rent from.

7. Safety modifications and minor changes

- 7.1. SYC agrees for the RTA to be amended to prevent the unreasonable refusal of safety modifications and minor changes including the installation of wall anchors, child safety gates, childproof latches, wireless outdoor cameras, shower heads and internal window coverings.

Due to our work in RentRight SA and LEES we know that retaliatory action is synonymous with requests by tenants for safety modifications and minor changes. As outlined in our response to Section 1, 5 and 6 of the Discussion Paper, the RTA needs reform to encourage timely use of easily accessible processes for tenants, agents and landlords to resolve issues raised during a tenancy as to the reasonableness of the request or refusal.

Clarity on what constitutes a safety modification or minor change and establishing a clear process for tenants to request more extensive modifications would also ensure the RTA is easily understood and correctly applied. For example, we suggest a process be specified requiring a tenant and landlord to liaise as to the obtaining of quotes as a means of ensuring quality of workmanship for modifications made to the home.

8. Start of tenancy requirements

- 8.1. SYC strongly supports the RTA requiring prospective tenants to use a standardised application form in applications for a private rental property, with questions restricting the amount of personal information a landlord/agent can gather from prospective tenants to only those questions which materially relate to tenants' capacity to pay the rent and to maintain the property.

We are aware from our work with tenants that they are being asked to provide bank statements with individual transactions and spending habits questioned by landlords/agents in consideration of tenancy applications. This is a breach of privacy with judgements, bias and prejudice directly or implicitly influencing consideration of applicants.



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The RTA does not clearly stipulate what information is obligated to provide leading to landlords/agents taking liberties with what they are requesting, and tenants feeling

obligated in the current rental market to provide extraneous information in the hope of securing the tenancy. Financial information collected should only relate to proof of income demonstrating tenant's capacity to pay the rent.

SYC understands that some online application forms ask tenants to declare if they have been to SACAT. There is no scope on the form to provide details of the reason for SACAT attendance leading to potential discrimination against tenants who exercise their legal rights or assumptions that a tenant failed to discharge their responsibilities.

With the current plethora of application forms in use, tenants advise SYC of the amount of time, stress and cost experienced in applying for a home. Many tenants apply for between 30-70 properties in their search for a home. A high level of English literacy, access to technology, persistence and resilience is increasingly required, leaving more vulnerable prospective tenants especially those from non-English speaking backgrounds and with lower digital access and literacy skills increasingly locked out of the rental market.

Data access should not be grounds for discrimination for those without the capacity or means to use online processes.

SYC requests the RTA be amended to require a standardised rental ledger. This is to assist tenants to exercise and enforce their legal rights when advised by a landlord/agent of being in rental debt as part of SACAT proceedings to end the tenancy. Tenants advise that rental ledgers are difficult to read, adding undue stress. We suggest SACAT be empowered to declare use of non-standardised rental ledgers as invalid.

In addition to comments below in Section 12 (Third Party Payments), SYC is acutely aware of the increasing use of third-party applications requiring extensive information be provided by a tenant. Tenants are advised these pre-prepared online background checks are preferred but not compulsory. However, in the current rental market, we are aware of tenants who have not completed these Checks being not considered for properties.

Similarly, tenants have reported after completing an online pre-application form being held to a lease agreement if they change their mind about the property after having viewed it. This is another example of the confusion and power imbalance felt by tenants caused, in part, by the unregulated use of third-party applications and the different business practices of landlords/agents.

A standardised Rental Reference addressing matters of relevance is all that should be asked of a tenant and their referee. SYC is aware of referees being asked to comment on irrelevant matters such as the cleanliness of a tenant-applicant's desk in their workplace, or if they have attended SACAT.



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Legislative reform to enhance the professional development and standards of the real estate industry would be beneficial to tenants, landlords and agents. Tenants have advised SYC of agents declining to provide a reference due to the time it takes to complete and it being beyond the scope of their role. Regulations governing industry standards and expectations would protect and guide all parties.

- 8.2. SYC agrees Part 5A of the RTA should be amended to prohibit landlords, land agents and database operators from charging a fee to a person who requests a copy of the personal information about themselves that is listed on a residential tenancy database.

9. Domestic Violence provisions

- 9.1. We make the following suggestions to strengthen the financial protections for Domestic and Family Violence (D&FV) victims within the RTA:

- Establish a fund to enable tenants on low incomes experiencing D&FV to access the fund to pay for repairs to damage to the property caused by the perpetrator. Often this cost is borne by the victim on the occasions when they remain in the home. We suggest this fund be administered by a non-profit such as the Women's Support Service of SA or similar.
- The fund could also be utilised by a victim for their proportion of the bond claimed by the landlord pursuant to an order of SACAT for the costs owed in excess of the perpetrator's portion of the bond.

We suggest the following additional non-financial protections for victims of D&FV:

- A landlord/agent should not be permitted to withhold a positive reference (if one is applicable) in the circumstances of a victim of D&FV needing to break a lease or remove their name from a lease. We suggest REISA offer education and professional development to property managers to assist them in this, by way of drawing distinction between a person's proficiency as a tenant and the damage or otherwise caused by the D&FV.
- Remove the current requirement in the RTA on a victim to provide proof of an Intervention Order against the perpetrator and/or link with a D&FV support service. There are a multitude of reasons as to why a person may not be able to obtain an Intervention Order or to obtain assistance from a D&FV Service. Victims should not be prejudiced by the circumstances of the abuse and controls inflicted by the perpetrator nor the eligibility criteria or capacity of D&FV services to provide support.

- 9.2. We are pleased with the SA Government's establishment of a taskforce focussed on housing security for older women.



In 2021 SYC's LEES published an [Ageing, Housing and Wellbeing Report](#)⁴. Recommendations from the Report appropriate for inclusion in the reform of the RTA include:

- Investment in professional, responsive and routine maintenance services.
- Mandatory risk assessments of social housing properties to ensure older people are given safe and appropriate housing for their needs.
- Development of specific standards and guidelines around hoarding and squalor.

9.3. Young people face specific challenges in accessing and securing rental properties, including affordability given the lower rates of Youth Allowance, Austudy/Abstudy and wages in entry level or graduate roles, lack of rental history, inexperience and knowledge of tenants' rights and responsibilities, age-based discrimination, and power imbalances when attempting to access the private rental market.

If there was scope for the RTA to require landlords to provide information to a young person as to why their application was rejected, it may serve to 'humanise' their application and encourage greater confidence amongst agents in recommending landlords lease to a younger aged tenant.

10. Water billing

10.1. Water billing is often a cause of complaint expressed to SYC in our work with tenants. Amending the RTA to require landlords to provide tenants with a copy of any water bill the tenant is required to pay, within 30 days of receiving the water bill would significantly reduce frustrations and bring greater equity between landlord and tenants.

We suggest taking the RTA one step further by requiring that all water bills are placed in the name of the tenant. This would enable the tenant to view all usage charges, concessions applied and be empowered to make enquiries to SA Water should need arise, such as making payment arrangements or reporting problems with supply.

10.2. The responsibility for the payment of the water supply fee should be borne by the landlord to bring South Australia in line with other jurisdictions. National consistency in relation to water billing, supply fees and excess water payments would improve understanding and compliance with tenancy laws.

10.3. Where a tenant has reported a water leak and excess water charges arise from a water leak that remains unrepaired, the landlord should be responsible for full payment of any excess water charges. The RTA would need to define how excess

⁴ https://syc-holding.squarespace.com/s/SYC-Lived-Experience-Report_Ageing-Wellbeing-and-Housing-Support.pdf



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charges are identified. We suggest the excess amount be calculated by making comparison to previous water bills from the same period. Any difference to the

average, taking into account increases in water charges or household size (where for example a larger sized household was in residence at the same period 12 months prior) should be considered the excess and be the responsibility of the landlord.

Amending the RTA in this way would have the secondary benefit of increasing the onus of tenants and landlords/agents to increase communication and establish effective working relationships. Where tenants are required to have genuine involvement in caring for their home by bearing the onus of reporting issues to avoid financial impost (rather than the RTA contributing to commoditising the rental market), we suggest this is beneficial to all parties and makes the rental sector a place where people want to live or work in the case of the property management profession.

We encourage the State Government and CBS to consider greater investment in education for tenants' responsibilities. SYC offers RentRight SA as a state-wide State Government commissioned service to be one such service outlet. REISA and its capacity to support property managers to inform and advice landlords of their rights and responsibilities would also significantly increase compliance with any new provisions in the RTA.

11. Illegal drug activity

- 11.1. Where landlords know or suspect that illicit drugs have been manufactured or regularly smoked in their properties, they should be required to undertake necessary remediation before re-leasing the property.

We ask whether the proposed changes to rental properties align with the requirements of vendors to take remedial action prior to placing the property on the market for sale. Tenants and prospective homeowners should have the same level of consumer protections.

12. Third party payments

- 12.1. The rental market is modernising at pace with the advance of various technology platforms. While electronic means of rental payments are a positive initiative, those which pass on the collection fee to tenants, or which discriminate against those without digital access and literacy are not a welcome addition.

SYC believes the cost of third-party platforms should be borne by the landlord/agent and not the tenant.

Tenant should have the choice of not just a fee free option but also rental payment options that are easily accessible, for people of all ages and from diverse cultures.



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13. Modernisation of Language

- 13.1. We support modernising the language of the RTA. With record high levels of rental households, the increased and broadened application of the RTA to people from all ages, demographics and cultures, the RTA needs to be worded in as plain language as possible.

This would also help improve compliance with the RTA by those who do not engage an agent to manage their property but lease directly to the tenant.

We suggest the retention of the term Property Agent but replace Tenant for Renter, and Lease Agreement with Rental Agreement.

To remove gendered language from the RTA, SYC asks the term Landlord to be replaced with Property Owner or Homeowner.

The legal use of the term 'reasonable' can be confusing the laypersons. We submit the RTA should wherever possible provide a specific timeframe or set of standards to improve understanding of rights and expectations. For example, we ask the Regulations include objective standards of cleanliness, specific timeframes in which to provide quotes for requested maintenance and commencement of maintenance and specific timeframes for a bond to be returned to a tenant.

In conclusion, we thank Consumer and Business Services for leading a public consultation on the RTA on behalf of the SA Government. We trust the submission of SYC provides insights on the areas for law reform most in need and look forward to reviewing the Residential Tenancies Amendment Bill in due course.

SYC and members of the LERGs would be pleased to meet with CBS representatives to discuss any aspect of our submission in further detail.

Yours sincerely,

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