

January 2023



Submission

Council to Homeless
Persons response to the
Residential Tenancies
(Rooming House Standards)
Regulations 2022 –
Regulatory Impact Statement

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Introduction

Council to Homeless Persons (CHP) welcomes the opportunity to comment on the effectiveness and impact of the current rooming house regulations, the proposed updates and prescription of further standards in the 2023 proposed regulations. People living in rooming houses are defined as experiencing homelessness under the Australian Bureau of Statistics' definition of homelessness.

The experience of homelessness is often deeply transient. The loss of a stable home typically involves the utilisation of a range of accommodation options that do not represent an end to a person's homelessness, merely being homelessness in a different setting. A person who loses access to a stable home may seek to 'couch surf' with friends and family, may live entirely in public as a rough sleeper, or may live in inadequate accommodation, such as rooming houses.

We know that 25 per cent of rooming house residents come directly from rough sleeping,ⁱ while 25 per cent of rough sleepers were last housed in rooming houses.ⁱⁱ These relationships are multidirectional.

It is possible to conceive of a rooming house standard, where residents are not considered homeless; where dwellings are adequate and allow residents access to and control of space for social relations.

The options provided in the Regulatory Impact Statement (the RIS) do not meet this standard. It is positive that the Regulatory Impact Statement provides an option to provide for greater alignment between the minimum standards in rooming houses and general residential tenancies, and CHP supports this option among those provided. However, no option provided in the RIS has holistically sought to consider whether rooming houses meet community expectations for minimum standards of privacy, security, safety and amenity, as directed by the Residential Tenancies Act (the Act).

This is disappointing. The standards that exist today were implemented following recommendations from the 2009 Rooming House Standards Taskforce, which found that standards in rooming houses were far too low. Upon reaching the sunset period for these regulations, it was incumbent upon Consumer Affairs Victoria (CAV) to review whether the standards as currently exist sufficiently achieved the aims of the Act. The RIS does not reflect that this has been meaningfully achieved. The RIS provides significant comment on the lack of privacy, security, safety and amenity experienced by rooming house residents today, but the options contained therein are insufficient to address these issues.

In this submission, CHP advocates for a significant improvement in the rooming house minimum standards. High standards are warranted, especially given the high level of vulnerability of rooming house residents. Some 62 per cent of rooming residents have health issues, 65 per cent are experiencing family breakdown

and/or family violence, and 62 per cent have substance use issues.ⁱⁱⁱ With many highly vulnerable people living in close proximity to each other, tenants are also often at risk from other tenants or visitors, or from unscrupulous operators.

Yet despite the high level of need of rooming house residents, since the introduction of the rooming house standards ten years ago, rooming houses have been left behind. Upon the introduction of these regulations rooming houses were held to a higher minimum standard than general residential tenancies. Today, general tenancies have higher minimum standards than rooming houses. While we endorse option 2 to bring rooming house standards into greater alignment with residential tenancies, the nature of these forms of accommodation (and their residents) means that rooming house minimum standards must be higher than those for general tenancies. This option is not canvassed in the RIS.

Currently, residing in a rooming house is often a deeply negative experience. It is hoped that this might be addressed in part through higher minimum standards.

Recommendation 1: That option 2 is adopted as the preferred option from the RIS, but that further recommendations from this submission are adopted in addition to option 2.

Recommendations

Recommendation 1: That option 2 is adopted as the preferred option from the RIS, but that further recommendations from this submission are adopted in addition to option 2.

Matters contained in the RIS

Recommendation 2: The standard for lockable doors should stipulate that locks and doors be installed by a qualified professional.

Recommendation 3: Adopt the proposed changes to power outlets in a resident's room in Option 2.

Recommendation 4: Increase the required number of available power outlets to four.

Recommendation 5: Adopt the proposal that a bathroom door and lock should be installed by a suitably qualified person.

Recommendation 6: Consider providing greater clarity around the proposal to exempt certain properties from installing a bolt or latch.

Recommendation 7: Bring forward the implementation date for this standard to August 2023.

Recommendation 8: Adopt the proposal for water efficient showers, at least insofar as it relates to separately metered bathrooms, or those subject to a service charge.

Recommendation 9: Increase the provision of bathroom facilities in a rooming house from one for every ten people, to one for every four people.

Recommendation 10: Create a specific standard of lighting in and around bathrooms.

Recommendation 11: Adopt the proposed change to refrigerator, oven, and cooktop access.

Recommendation 12: Adopt a standard for personal lockable cupboards and refrigerators in residents' rooms.

Recommendation 13: Adopt the proposed changes to the minimum standards for laundry facilities.

Recommendation 14: Adopt a ventilation standard, including against mould and damp, consistent with the standard in general tenancies.

Recommendation 15: Adopt a standard for window latches in residents' bedrooms that is equivalent to that proposed for bathrooms.

Recommendation 16: Bring forward the implementation date for this standard to August 2023.

Recommendation 17: Adopt to proposed changes to the regulations regarding window coverings.

Recommendation 18: Introduce a standard for fly wire screens.

Recommendation 19: Adopt the Coroner's recommendations regarding corded window coverings.

Recommendation 20: Adopt a minimum standard for heating in rooming houses aligned with that for general tenancies. This includes aligning with energy efficiency standards for general tenancies.

Recommendation 21: that CAV seek expert advice on the appropriate frequency of gas safety checks for rooming houses, and implement the more frequent of that standard, or every 2 years.

Recommendation 22: that electrical safety checks be conducted by an electrician.

Recommendation 23: that CAV seek expert advice on the appropriate frequency of electrical safety checks for rooming houses, and implement the more frequent of that standard, or every 2 years.

Recommendation 24: That the proposed changes to the requirement to keep records of gas and electrical safety checks be adopted.

Recommendation 25: implement the proposed standard for structural soundness.

Recommendation 26: Implement the proposed new standard against mould and damp caused by the building structure.

Matters not contained in the RIS

Recommendation 27: Implement a specific standard for the locks on external doors, and that they should be installed by a qualified person.

Recommendation 28: Consider a standard that external doors should be fitted with security doors.

Recommendation 29: Implement a safety standard that rooming houses should keep first aid kits, specifically including naloxone.

Recommendation 30: Consider the need for standards for outdoor lighting, specifically considering pathways and undercover areas.

Recommendation 31: Substantially increase the number of rooming house inspections.

Recommendation 32: Implement a standard for weekly cleaning.

Recommendation 33: Institute a minimum standard whereby pest control work must be undertaken by a qualified professional.

Recommendation 34: Implement a standard for external, lockable, personal mailboxes.

Recommendation 35: Incorporate the Public Health and Wellbeing Act standards into the Residential Tenancies Act standards.

Recommendation 36: Ensure that rooming house residents' right to privacy extends to in-home and in-reach supports for which they might be eligible, such as those funded through the NDIS or Victorian Government.

Matters contained in the RIS

Door to a resident's room

Council to Homeless Persons does not provide any comment on the proposal to clarify that certain electronic forms of room access meet the definition for a lock that can be operated by a key.

However, the regulations should stipulate that all locks and doors should be installed by a qualified professional. Rooming house residents report that despite the existing standard, it remains common for people to break locks and enter other people's rooms. It is clear, that the current standard regularly fails to meet community expectations of safety or privacy.

While room break-ins are often in furtherance of theft, it is also far too commonly a precursor to physical violence. In addition to the direct ramifications of violence, this has a psychological impact on residents.

"I know that when I was staying in a rooming house that the rooms were easily broken and stuff got stolen. And that safety and security factor is huge- especially if you've come from living on the streets."

Nigel Pernu, consumer / advocate

Recommendation 2: The standard for lockable doors should stipulate that locks and doors be installed by a qualified professional.

Power outlets in resident's room

Council to Homeless Persons supports the proposed changes to stipulate that the two power outlets in each resident's room should be otherwise unoccupied (and hence available for the use of the resident), and that electrical outlets must be installed by a qualified electrician. The first change makes the existing amenity standard clearer and thus more enforceable, while the second is an important safety measure.

In addition to this, feedback from former rooming house residents has suggested increasing the number of unoccupied outlets to four. This would provide many residents with greater control over their space for social relations, a key difference in determining whether a form of accommodation constitutes homelessness.

Recommendation 3: Adopt the proposed changes to power outlets in a resident's room in Option 2.

Recommendation 4: Increase the required number of available power outlets to four.

Lighting in a resident's room

Council to Homeless Persons supports in-principle the proposed change to update the minimum standard for lighting to a resident's room by giving the standard greater specificity . CHP does not make any comment on the appropriateness or otherwise of the BCA Volume 2 standards outlined in the proposed regulation.

Toilet or bathroom facilities

CHP strongly supports the proposed change to specify that a bathroom door and (bolt or latch) lock should be installed by a suitably qualified person. This will be an important change in support of reducing the incidence of violence and sexual violence that is at present far too high in rooming houses.

It may however be necessary to reconsider the exemption in instances where it is unreasonable to install a bolt or catch. It is not presently clear what would represent a "significantly higher cost than the average price of installation". CHP contends that the safety of rooming house residents in rooming house bathrooms and toilets is of the utmost importance. This includes when it is necessary to rehang a door such that the hinges are on the opposite side to where they are currently located, so that a bolt can be installed. This may also include the installation or replacement of architraves that allow for the installation of a bolt, or the hiring of a tradesperson who can safely use a hammer drill to drill into brick or concrete. Options such as these would be more expensive than simply installing a lock, but should be reasonable in the circumstances.

Council to Homeless Persons supports the creation of a standard for water efficient showers in line with the minimum standards for general tenancies, insofar as it relates to separately metered facilities or social housing properties with a service charge. CHP does not make any comment on this standard in instances where water is not separately metered.

CHP further advises that the existing standard of one bathroom for every ten people, as set out in the *Public Health and Wellbeing Act (PHWA)* regulations is insufficient, and that it would be appropriate for this to be addressed as a safety and amenity issue under the *Residential Tenancies Act*. Rooming house residents should have a right to start their day with meaningful access to a shower.

Option 2 proposes a specific (rather than general) standard for lighting in a resident's room. However this option does not update the lighting standards for the rest of the house. A specific standard of lighting should be set for bathrooms, and the hallways outside of bathrooms. As the sites of significant physical violence, lighting these areas is an important safety measure.

Recommendation 5: Adopt the proposal that a bathroom door and lock should be installed by a suitably qualified person.

Recommendation 6: Consider providing greater clarity around the proposal to exempt certain properties from installing a bolt or latch.

Recommendation 7: Bring forward the implementation date for this standard to August 2023.

Recommendation 8: Adopt the proposal for water efficient showers, at least insofar as it relates to separately metered bathrooms, or those subject to a service charge.

Recommendation 9: Increase the provision of bathroom facilities in a rooming house from one for every ten people, to one for every four people.

Recommendation 10: Create a specific standard of lighting in and around bathrooms.

Kitchen and food preparation facilities

CHP supports the proposed change to increase the required fridge capacity a rooming house provides on a per person basis. We further support in-principle the change to provide oven and stovetop facilities at 1.5 times the rate currently provided. In this instance, we have been unable to consult with rooming house residents and former rooming house residents as to whether the proposed standard of one oven and 4 cooktop burners for every 8 people is sufficient, though we do note that it is an improvement.

It is unfortunate however that the RIS does not include options to address the two greatest issues that rooming house residents report having in relation to shared kitchen facilities: cleanliness and the theft of food. It is clear from our consultations that the existing standards around lockable cupboards, and general cleanliness are failing to have the desired effect, and the result is that rooming house residents often find shared kitchens unusable. It is common for former rooming house residents to report a significant deterioration in their physical health during their time in a rooming house, due to the difficulty of securely storing healthy food and ingredients. Instead, they report finding it practical to rely on unhealthy ready-to-eat meals.

“Nothing goes far beyond storage. When you’re in a situation where you can’t cook, unhealthy meals become a routine, and it’s really hard to shake – and when you can’t cook or store healthy food, you just go get a couple of pies. My choices are being limited, because there’s nowhere to store food, not even peace of mind. It’s really really hard. It’s tough. And it shouldn’t be.”

Jason Russell, consumer / advocate

By including a standard for personal lockable cupboards and refrigerators in residents’ rooms, the regulations can improve their ability to store healthier foods, and greatly increase residents’ amenity and wellbeing.

Recommendation 11: Adopt the proposed change to refrigerator, oven, and cooktop access.

Recommendation 12: Adopt a standard for personal lockable cupboards and refrigerators in residents' rooms.

Dining facilities

CHP does not provide any comment on the proposed change to the standard around dining facilities.

Laundry facilities

CHP strongly supports the proposal to specify a standard of one set of laundry facilities for every 12 residents, noting that the Government has already publicly committed to this change. We are further pleased to support the proposed change that specifies that laundry facilities must be in good working order.

Recommendation 13: Adopt the proposed changes to the minimum standards for laundry facilities.

Ventilation

CHP supports the inclusion of a ventilation standard for rooming houses. While we don't have specific expertise in the adequacy or otherwise of the Building Code of Australia standards proposed in the RIS, we note that the standard for general tenancies includes the prevention of mould and damp. If the proposed standard does not currently meet the standard for general tenancies, it should include the prevention of mould and damp.

Recommendation 14: Adopt a ventilation standard, including against mould and damp, consistent with the standard in general tenancies.

External windows

CHP supports the proposed changes in Option 2 to ensure that windows can be secured against external entry. This brings the standard for rooming houses up to those now implemented for general tenancies, but is also a very important safety and security measure, working to deter theft and violence.

CHP notes however that the proposed standard does not specify that the latch should meet a certain standard and be installed by a professional, as the RIS proposes for bathroom doors. The same standard that applies to bathroom doors should be applied to bedroom windows, reflecting the increased vulnerability of people who are asleep or in their bedrooms.

Recommendation 15: Adopt a standard for window latches in residents' bedrooms that is equivalent to that proposed for bathrooms.

Recommendation 16: Bring forward the implementation date for this standard to August 2023.

Window coverings

CHP supports the option to update the standard for window coverings such that coverings are of a kind ordinarily acquired for personal, domestic, or household use. The intention is to effectively address the issue of operators using bedsheets and other household objects in lieu of curtains and blinds.

CHP also supports the option to provide window coverings in other communal spaces, consistent with the standard in general tenancies.

CHP also notes that residents in general tenancies may add fly wire screens to their homes without the permission of a landlord, reflecting the significant amenity and low impost of these fittings. Given that rooming house residents are almost exclusively low-income, the inclusion of fly-wire screens on bedrooms should be a minimum standard for rooming houses.

“If you're in Australia you definitely need fly wire, there's flies around for three quarters of the year.”

Nigel Pernu, consumer / advocate

Recommendation 17: Adopt to proposed changes to the regulations regarding window coverings.

Recommendation 18: Introduce a standard for fly wire screens.

Corded internal window coverings

Given that the Coroner has recommended that blind chord anchors be mandated in all residential rental properties, CHP supports the option that rooming houses should meet this standard.

Recommendation 19: Adopt the Coroner's recommendations regarding corded window coverings.

Heating

Council to Homeless Persons supports the recommendation that a minimum standard for heating be adopted in rooming houses, consistent with that in general tenancies.

CHP advises that to ensure that the heating standard in rooming houses does not again fall behind the standard in general tenancies, the heating standard for rooming houses should be pegged to that for general tenancies. This includes meeting the energy efficiency standards that apply to heating in general tenancies, noting that this is likely to mean that split-cycle systems are the most cost effective means of achieving this standard, further benefiting residents.

Recommendation 20: Adopt a minimum standard for heating in rooming houses aligned with that for general tenancies. This includes aligning with energy efficiency standards for general tenancies.

Gas safety checks

CHP supports the proposed change to require gas safety checks every two years, in accordance with the minimum standards in general tenancies.

It is unclear whether expert advice has been obtained as to whether the nature of rooming houses requires more regular checks than this, but such advice should be sought before this regulation is applied.

Recommendation 21: that CAV seek expert advice on the appropriate frequency of gas safety checks for rooming houses, and implement the more frequent of that standard, or every 2 years.

Electrical safety checks

CHP supports the proposed change to require electrical safety checks every two years, in accordance with the minimum standard in general tenancies. CHP further supports the proposal to require electrical safety checks be conducted by a licensed or registered electrician.

It is unclear whether expert advice has been obtained as to whether the nature of rooming houses requires more regular checks than this, but such advice should be sought before this regulation is applied.

Recommendation 22: that electrical safety checks be conducted by an electrician.

Recommendation 23: that CAV seek expert advice on the appropriate frequency of electrical safety checks for rooming houses, and implement the more frequent of that standard, or every 2 years.

Requirement to keep record of gas and electrical safety checks

Council to Homeless Persons supports the proposed changes to the requirement to keep records of gas and electrical safety checks, which bring them into alignment with the standard for residential tenancies.

Recommendation 24: That the proposed changes to the requirement to keep records of gas and electrical safety checks be adopted.

Structural soundness

Council to Homeless Persons strongly supports the proposed inclusion of a standard for structural soundness and weatherproofing in rooming houses. Not only will this bring the minimum standard for rooming houses into alignment with the standard for general tenancies, but will help address the mould and dampness we discuss immediately below.

Recommendation 25: implement the proposed standard for structural soundness.

Mould and dampness

Council to Homeless Persons strongly supports the proposed inclusion of a standard against mould and dampness in rooming houses. Not only will this bring the minimum standard for rooming houses into alignment with the standard for general tenancies, but it will also address the longstanding issue of mould and damp caused by building structure in rooming houses.

It is plain that mould is a significant problem in Victorian rooming houses. Mould in buildings can have a range of causes, and the efficacy of mould treatments differs based on the cause of the mould. In some instances, mould can be treated with over-the-counter cleaning products, in others, rooms require greater ventilation, while in yet other instances, structural repairs to properties are required.

“Having a pulmonary condition as well as a cardiac condition, the black mould can’t have been good for me”

Nigel Pernu, Consumer / Advocate

In addition to mould and damp caused by building structure, it is important that the ventilation standard proposed above also consider damp and mould.

Recommendation 26: Implement the proposed new standard against mould and damp caused by the building structure.

Matters not contained in the RIS

External entrances

Rooming house residents report that the existing standard for locks on external doors has not increased the perception of their safety. CAV should further consider a standard for security doors at external entrances, installed by a qualified professional.

One factor that is likely to improve both the perception and reality of safety in rooming houses is a minimum standard for lockable security (screen) doors. This would ensure that residents have an opportunity to determine whether a potential guest (without a key) may be admitted to the property.

Recommendation 27: Implement a specific standard for the locks on external doors, and that they should be installed by a qualified person.

Recommendation 28: Consider a standard that external doors should be fitted with security doors.

First Aid

One option not canvassed in the issues paper, is standards around first aid availability. CHP recommends that rooming houses be equipped with first aid kits, and specifically, that those kits should include naloxone, a treatment for opioid overdose.

Rooming houses can be sites of significant drug use, and overdoses (and even deaths) in rooming houses are not uncommon. Ensuring that rooming houses contain naloxone is an important safety measure that can reasonably be expected to save lives.

Recommendation 29: Implement a safety standard that rooming houses should keep first aid kits, specifically including naloxone.

Lighting

CHP supports the existing lighting standards, while recommending the inclusion of new ones. As mentioned earlier in this submission, a standard should be implemented for lighting outside of bathrooms, to improve natural surveillance and the perception of safety.

This review should further consider standards for outdoor lighting, including along pathways, and in undercover areas such as verandahs. Pathway lighting is a safety measure, while undercover area lighting is a safety and amenity issue.

Recommendation 30: Consider the need for standards for outdoor lighting, specifically considering pathways and undercover areas.

Enforcement

It is essential to the successful operation of rooming house minimum standards that rooming houses are regularly inspected, in order to ensure that standards are being upheld. As the RIS has identified, there is a significant power imbalance between residents and rooming house operators, who have an inherent incentive to skimp on meeting the standards. Despite this power imbalance, the RIS identifies that in the face of strong growth in rooming house numbers, the number of inspections by government officials conducted annually is around one seventh of the number that occurred at the peak, and a third of the number that occurred following the introduction of the minimum standards. Inadequate staffing levels within government to undertake inspections is likely to be a major contributor to the pervasive issue of very low standard in rooming houses.

Recommendation 31: Substantially increase the number of rooming house inspections.

Cleanliness

CHP supports including a regulation that rooming houses should provide for at least weekly cleaning of communal areas.

Existing standards of cleanliness have not proven effective, and the issue of uncleanliness is ongoing, widespread, and a significant source of concern to rooming house residents. While it is evident in law that the responsibility for the cleanliness of communal areas falls on the rooming house operator, in practice there is an ongoing culture of expecting residents to take full responsibility for the cleanliness of the property. Given the personal hardships most rooming house residents are experiencing, this practice has not proven effective. It is evident that this is one of the key contributors to a lack of amenity in rooming houses, and that more effective standard must be put in place.

“The Aboriginal hostel is the best rooming house... Carpeted, clean, a place to entertain, you could have pets. It was that comfortable – we’d always come together to eat, if you had to go to work you could take a meal away. It’s how things should be done.”

Jason Russell, Consumer / Advocate

Recommendation 32: Implement a standard for weekly cleaning.

Pest control

Pests are a pervasive issue in rooming houses, despite the existing standards that properties be in good repair and for cleanliness. As a result, CHP recommends implementing specific and higher standards regarding pests.

An ongoing factor in pest control in rooming houses is poor treatment and management methods. Regulations should specify that pest control must be conducted in response to pest infestation, and that it must be provided by a qualified professional. This would have an immense impact on the amenity of rooming houses by addressing one of the most distressing low standards.

“If they’re going to fumigate they should do the whole thing in one go. If something is done for one complaining resident, it should be done for the whole place... Any action taken should be for the whole house, and not just one room.”

Jason Russell, Consumer / Advocate

Recommendation 33: Institute a minimum standard whereby pest control work must be undertaken by a qualified professional.

Personal mailboxes

While recognising that CAV has identified barriers to the implementation of a standard for personal, lockable, external mailboxes for each room in a rooming house, CHP continues to recommend that such mailboxes be implemented as a minimum standard.

The loss of privacy and amenity that comes with a shared letterbox has a significant impact on rooming house residents, who report having mail go missing or being stolen. The loss of important letters can create significant difficulty in a person’s life, especially as they seek to resolve the factors that led them to being without a home, and ultimately to exit the homelessness that they continue to experience in a rooming houses.

Recommendation 34: Implement a standard for external, lockable, personal mailboxes.

Incorporating the Public Health and Wellbeing Act (PHWA) standards

CHP strongly recommends that this review incorporate the rooming house minimum standards under the PHWA into these RTA regulations. An ongoing issue with enforcement of rooming house standards exists, wherein standards are unable to be enforced by government officials, as the relevant standard falls under the PHWA.

From the perspective of rooming house residents, this looks a lot like being told that a property which plainly fails to meet liveability standards is considered to be okay for them to live in. It is not a fair and reasonable expectation that rooming house residents should have to become familiar with which Act of Parliament under which a standard falls in order to enforce their rights.

While it is true that both sets of regulations should incorporate the other for the benefit of the end user, it is within the scope of this review to amend the RTA standards, in order to improve the amenity of rooming houses.

Recommendation 35: Incorporate the Public Health and Wellbeing Act standards into the Residential Tenancies Act standards.

Access for service providers

CHP is aware that some rooming houses have house rules that limit a resident's right to have visitors. This can mean in practice that residents are unable to access in-home and in-reach supports for which they qualify, such as those funded by the National Disability Insurance Scheme (NDIS), or those funded by the Victorian government. A minimum standard for privacy should be implemented such that residents have a right to visits from NDIS and government funded service providers.

Recommendation 36: Ensure that rooming house residents' right to privacy extends to in-home and in-reach supports for which they might be eligible, such as those funded through the NDIS or Victorian Government.

References

i The Salvation Army Adult Services, 2011, 'No room to move? Report of the Outer West Rooming House Project', p.15

ii Bevitt, A., et al., 2015, 'Journeys Home Research Report No.6; Complete findings from Waves 1 to 6', p.19

iii The Salvation Army Adult Services, 2011, 'No room to move? Report of the Outer West Rooming House Project', p.16