



13 November 2014

UN Special Rapporteur on adequate housing
Office of the High Commissioner for Human Rights
Special Procedures Branch
Palais Wilson, Room 3-077
CH – 1211, Geneva 10
Switzerland

By email srhousing@ohchr.org

Dear Special Rapporteur,

Contribution to the study of the responsibilities of sub-national governments with respect to the right to adequate housing

Kingsford Legal Centre (**KLC**) thanks you for the opportunity to provide a contribution to the study of the responsibilities of sub-national governments with respect to the right to adequate housing.

This contribution is based on submissions KLC has prepared for various other New South Wales (NSW) government inquiries into the provision of affordable housing. We are aware that The Tenants' Union NSW, the peak non-government organisation for tenants in NSW, has submitted responses to the questionnaire on the challenges faced by States in relation to the implementation of the right to housing at a subnational level. If needed, KLC can provide further information to the study.

Kingsford Legal Centre

KLC is a community legal centre which has been providing legal advice and advocacy to people in need of legal assistance in the Randwick and Botany Local Government areas in Sydney NSW since 1981. KLC provides general advice on a wide range of legal issues, including housing matters, and undertakes casework for clients, many of whom live in public housing, are homeless or are at risk of becoming homeless.

KLC also has a specialist employment law service, a specialist discrimination law service (NSW wide) and an Aboriginal Access Program. In addition to this work, KLC also undertakes law reform and policy work in areas where the operation and effectiveness of the law could be improved.

There are almost 2,000 public housing tenants living in the Randwick and Botany Local Government areas. In 2013 KLC provided 199 advices in relation to tenancy law, which was almost 11% of all advice provided (1804 advices). Of the advice provided in 2013, almost 39% of people advised rented in the private market, 18% lived in public housing, 3% boarded and 11 people identified as homeless.

KLC's advocacy on behalf of public housing tenants is generally directed to Housing NSW, an agency of the NSW Department of Family and Community Services (FACS). Housing NSW is responsible for providing public housing, community housing and Aboriginal housing to residents of NSW who meet its criteria. It receives funding from both the NSW and

Commonwealth Government under the Commonwealth State Housing Agreement, which is the only source of funding to the public housing sector.

An overview of housing and homelessness

Homelessness remains a major problem in Australia. According to the 2011 Census of the Australian population, over 100,000 people were classified as homeless on Census night, a rate of 49 persons for every 10,000 persons. This represents an overall increase in homelessness of 8% from the 2006 Census. In NSW, there was an increase of 20% or more. Aboriginal and Torres Strait islanders make up 2.5% of the Australian population, yet they account for 25% of all homeless people.¹

There has been a sharp drop in the number of people who were classified as living in some form of marginal housing, but who were not classified as homeless. However, there has been little change in the number of people living in caravan parks and overcrowding has increased dramatically.²

Access to public housing remains out of reach for many vulnerable people. According to Housing NSW, there are nearly 60,000 applicants awaiting public housing, with nearly 4000 having been assessed as priority. In the Eastern suburbs district of Sydney, which includes the Randwick and Botany Local Government areas, the number of applicants awaiting housing is 1650. Waiting times to secure housing vary depending on the district. In the Eastern suburbs the wait time exceeds 10 years. In many rural and regional areas of NSW there are simply no properties available.³

Affordable housing crisis

There is a lack of affordable housing in NSW and this undermines the right to adequate housing. National headlines in Australia decry the lack of 'housing affordability', but focus primarily on the difficulties faced by first home owners in purchasing their own home. In reality housing affordability most significantly affects also a growing number of disadvantaged Australians who do not own their home but must try to maintain some form of secure housing through renting in the private market or public or community housing.

Between 1960 and 2006 average household incomes increased by 1.9% annually, whereas house prices increased by an average of 2.6% annually.⁴ Between 2001 and 2006 gross income grew by 31.2%, whereas housing costs grew by 62%.⁵ The growing gap between household income and housing costs has increased the demand for affordable housing.

¹ Australian Bureau of Statistics 2049.0 Census of Population and Housing: Estimating homelessness, 2011
<<http://www.abs.gov.au/AUSSTATS/abs@.nsf/Latestproducts/2049.0Main%20Features22011?opendocument&tabname=Summary&prodno=2049.0&issue=2011&num=&view=>>

² Australian Bureau of Statistics, Feature Article" a spotlight on 'severe' crowding
<<http://www.abs.gov.au/AUSSTATS/abs@.nsf/Latestproducts/2049.0Feature%20Article12011?opendocument&tabname=Summary&prodno=2049.0&issue=2011&num=&view=>>

³ Housing NSW, Expected Waiting Times for Social Housing 2014 – Overview
<<http://www.housingpathways.nsw.gov.au/NR/rdonlyres/9C300EE3-F53A-46C9-A43B-48A8CBA05003/0/EWTOverviewJune14.pdf>>

⁴ Yates, J. and Milligan, V. with Berry, M., Gabriel, M., Phibbs, P. Pinnegar, S. and Randolph, B. (2007) Housing Affordability: A 21st Century Problem: National Research Venture 3: Housing Affordability for Lower Income Australians, Melbourne: Australian Housing and Urban Research Institute. See
<http://www.ahuri.edu.au/downloads/NRV3/AHURI_Final_Report_No105_Housing_affordability_a_21st_century_problem.pdf>

⁵ Ngu, Q., Harding, A., Tanton, R., Nepal, B. and Yogi, V. (2008) *Advance Australia Fair?* Canberra: National Centre for Social and Economic Modelling (NATSEM) and AMP. See <<https://www.amp.com.au/wps/amp/au/FileProxy?vignurl=/vgn-ext-templating/fileMetadatalInterface?ids=7f8a3c9f195c2210VgnVCM10000083d20d0aRCRD>>.

Tax concessions made available by the Commonwealth Government to home owners and investors are driving investment in, and demand for, housing.⁶ Demand for housing is not being met by supply of housing stock, causing the cost of housing to increase at a rate that has exceeded the growth of household incomes.⁷

As the purchase of homes is entirely market driven, the cost of buying homes has increased at an exponential rate, with significant speculation by investors in this market. This has made buying a home more unaffordable and out of reach with many people renting for longer periods, which has the effect of increasing the demand and cost of private rental accommodation. Disadvantaged people on low incomes must also compete for rental accommodation with better resourced people who still cannot afford to buy a home. This has made the private rental market extremely competitive.

Commonwealth Rent Assistance (CRA) which assists toward private rent has not increased proportionately to the increase in renting costs. Between 2000 and 2005, rents in the private rental market increased by an average of \$64 per fortnight compared with an average increase in CRA by \$18.⁸ Furthermore, the CRA does not account for the differences in rental costs in different locations. For example, private renters in Sydney, an area with high rental costs, are eligible for the same maximum CRA as renters in areas where the average rent is much lower. CRA does not effectively work to increase affordability.

As a result of a lack of supply and a lack of investment in affordable housing competition for property is intense and anyone in receipt of government benefits, such as older people, young unemployed people, single parents, people exiting prisons and people with disabilities, face extreme difficulty obtaining private rental accommodation. In KLC's catchment area, there is also fierce competition with many well-resourced domestic and international students who are seeking accommodation near the University of New South Wales (UNSW). There is also widespread discrimination in the private rental market against people in receipt of Government benefits and the competition for properties amongst potential renters allows this discrimination to proliferate. This type of discrimination is currently not unlawful in Australia.

The housing affordability crisis in NSW is also felt acutely by a wide range of other groups, including less well-resourced students, community workers, low paid and casual workers and people with a less than perfect renting record. Many low-paid workers travel long distances to and from their work as they cannot afford to live close to their jobs. In KLC's experience there is also a hidden group of people who are moving constantly from insecure accommodation, to insecure accommodation and in some cases into hospitals or prison and back into insecure accommodation.

Despite this growing and well documented need for affordable housing, there has been decreasing investment in building new public housing stock. The current public housing stock is decaying and is not being inadequately maintained. At the same time, the criterion to be eligible for public housing has become much more stringent.⁹

In KLC's experience public housing is now only available to people with severe and multiple disabilities and disadvantage. Once housed, these extremely disadvantaged tenants face

⁶ Yates, Judith for the Brotherhood of St Laurence, 'Tax expenditure and housing' Australian Housing and Urban Research Institute' (2009). See <http://www.bsl.org.au/pdfs/Yates_tax_expenditure_and_housing_2009.pdf>. Hodgson, Helen, 'Explainer: why negative gearing is bad policy' (2014) The Conversation <<https://theconversation.com/explainer-why-negative-gearing-is-bad-policy-21882>> at 24 March 2014.

⁷ Ibid.

⁸ Ibid.

⁹ Morris, Alan (2010) 'The lack of a right to housing and its implication in Australia' *Journal of Australian Political Economy* No 65. See <<http://search.informit.com.au/fullText;dn=388386634519941;res=IELBUS>>.

poor administration of public housing and inadequate accountability and oversight mechanisms regarding Housing NSW decision making.

Shrinking eligibility for public housing

A large proportion of KLC's clients are socially and financially disadvantaged, and housing issues are at the core of the many legal problems that they face. Shrinking public housing eligibility makes it extremely difficult for some of KLC's vulnerable and disadvantaged clients to secure and maintain adequate housing.

Most **clients who receive social security** are finding it incredibly difficult to secure private and/or public housing.

April

April is 65 years old and currently lives with her son. Her son is getting married and wants her to move out. Her sole source of income is the aged pension. She has a number of credit card debts.

She applied and was approved for public housing but not for priority housing because Housing NSW calculated her rental affordability to be \$320 per week and advised her that she could find suitable private rental accommodation in the Eastern Suburbs while she waited on the public housing list.

Housing NSW's most recent rent and sales reports identify that the median price for a one bedroom house in the eastern suburbs is \$490, while a two bedroom house is \$625.

The current rate of the disability support pension and the aged pension is \$751.70 per fortnight. Rent assistance is \$124 per fortnight. The current rate of the Newstart allowance is \$501 per fortnight.

Housing NSW also does not take into account April's personal debts when determining whether she can afford to rent in the private market.

Peta

Peta is 67 years old and was living with Sarah in public housing. Sarah was the tenant and Peta was an authorised occupant, providing Sarah with full time care. Sarah passed away and Peta had to move out of the property.

Peta's sole source of income is the aged pension. Housing NSW deemed she was eligible for housing, but not priority housing because they believed that she could afford to pay private rent of \$240/week, that being 60% of her income.

The manner in which public housing has been administered in NSW in recent years has been to significantly decrease eligibility for public housing. This has primarily occurred through the application of housing policy around criteria such as whether an applicant has demonstrated "need" for public housing and whether they are able to resolve this need in the private rental market.¹⁰

The application of this policy has become narrower and narrower, and now determines that an applicant is able to resolve their need in the private rental market if there are private

¹⁰ Housing Pathways, *Eligibility for Social Housing Policy* (2014)
<<http://www.housingpathways.nsw.gov.au/Ways+we+can+Help/Social+Housing/Eligibility+for+Social+Housing+Policy.htm>> at 30 October 2014.

rental properties that would cost 50% of their income in rent.¹¹ This is despite all recognised housing affordability measures placing housing affordability at the allocation of 30% of income to rent.

The policy also fails to consider the real financial circumstances of applicants by excluding factors such as debt, and often takes an approach that suggests that applicants should simply move to wherever there is cheaper private rental accommodation.¹² In Sydney this is a difficult proposition as more and more suburbs become unaffordable.

The application of this policy also fails to consider whether an applicant is actually able to secure a private property, which for many people on low income is extremely difficult. This is especially the case for people with specific housing needs, including people with disabilities and people who require housing in a particular locality (for proximity to medical services or schools) or for people with poor private rental histories (often due to rent arrears as a result of financial instability)

Domestic and family violence is one of the leading causes of homelessness in Australia, however **women escaping domestic violence** continue to face significant barriers trying to obtain affordable housing.

Meena

Meena arrived in Australia from China in 2012 on an 'Other Family (Class BO) Carer (Subclass 116)' visa. This visa gives Meena permanent residency.

Meena was providing full-time care for her husband, who suffers from schizophrenia, until he started to become violent. As a result of this domestic violence, Meena had to move out of the home she was sharing with her husband and now lives in crisis accommodation for single women escaping domestic violence, which is provided by a charity organisation.

Her son currently lives overseas with family, who are no longer able to care for him due to illness. Meena's current housing provider does not provide accommodation for children, so she will not be able to continue to live in her current accommodation once her son arrives.

Meena applied for public housing but was rejected because Housing NSW policy states that people on carer's visas' are not eligible for public housing until they have lived in Australia for 10 years.

Meena currently receives a Special Benefit Payment from Centrelink and, due to her limited English language skills, is unlikely to be able to find work to support herself and her son in the private rental market. Meena and her son face the very real prospect of homelessness once he arrives in Australia.

The rationale for denying people on subclass 116 visas access to public housing is that they are not eligible for social security and could not sustain a tenancy. However, Meena's case demonstrates that that rationale is flawed. This policy is also inconsistent with Commonwealth immigration law that recognises the rights of migrants who experience domestic violence.

In our experience, women who escape domestic violence, even with children and on Government benefits, are unlikely to be eligible for public housing unless they or their children have multiple disabilities.

¹¹ Housing Pathways, *Social Housing Eligibility and Allocations Policy Supplement* (2014)

<<http://www.housingpathways.nsw.gov.au/Ways+we+can+Help/Social+Housing/Social+Housing+Eligibility+and+Allocations+Policy+Supplement.htm#ftmidtrp>> at 30 October 2014.

¹² Ibid.

It is also often difficult for victims of violence to satisfy Housing NSW that they need priority housing due to domestic violence. Housing NSW often requires excessive documentary evidence of domestic violence, such as evidence that the perpetrator has been charged with a domestic violence offence, before they will approve priority housing, even though their policy, which sets out the evidence requirements for priority housing, does not require evidence of charges or convictions.¹³ These evidentiary expectations are inconsistent with the common understanding that victims of domestic violence are often reluctant to report violence to the Police because they fear the violence will escalate.

Tightening the eligibility for housing is not helping to reduce the number of people on the waiting list for housing. Rather, it is rather increasing the number of people experiencing housing stress in the private market and is forcing people to live in unstable housing arrangements and is making more and more people homeless.

Poor administration of public housing

The high needs of public housing tenants, in conjunction with the under resourcing of Housing NSW, has fundamentally affected the manner in which public housing is administered.

Support for vulnerable tenants to maintain their tenancies

People who are extremely vulnerable and disadvantaged are being penalised through eviction and increases in their rent to unaffordable levels. This has become a key feature of the recent administration of public housing in NSW. This strategy appears to be used as a tool to reduce public housing waiting lists; however it is failing to do so and arguably will continue to fail to do so.¹⁴

KLC often works with extremely vulnerable clients who have no support from any services and who are facing the real threat of eviction as well as clients who are already homeless. In our experience, people with significant disabilities, who live in public housing, often struggle to maintain their tenancies and are not provided with any additional support from Housing NSW or referral to appropriate services.

Sen

Sen is 30 years old. His mother was an alcoholic and was murdered when he was 18 years old. He suffers from anxiety, panic attacks and other psychiatric disorders. He engages in sex work to fund his drug and alcohol addiction.

Neighbours assaulted him in his public housing complex. People began staying in his public housing unit without his permission. Fearful of them he left his unit for a period of time. When he returned his unit was trashed.

Housing NSW evicted him from his property and he is now homeless and ineligible for public housing because he breached his residential tenancy agreement.

The Housing NSW policy, which determines that former Housing NSW tenants are ineligible for public housing, does not adequately take into account the tenant's circumstances.¹⁵ In our experience, it serves to entrench discrimination and disadvantage against people with extremely complex needs who should not be excluded from public housing.

¹³ Ibid.

¹⁴ Audit Office of New South Wales, New South Wales Auditor-General's Report Performance Audit Making the best use of public housing: Housing NSW Land and Housing Corporation (July 2013) Figure 4, p 45. See https://www.audit.nsw.gov.au/ArticleDocuments/280/01_Public_Housing_Full_Report.pdf.aspx?Embed=Y.

¹⁵ Above n 11.

In our experience, public housing is not administered in collaboration with other government services, and public housing tenants, by and large do not receive the necessary social, medical and mental health support they require to maintain successful tenancies and which are necessary to create positive communities. It has been well documented that while public housing is now only available to people with more complex needs, there has been no associated service strategy to assist in the provision of housing to this group. Likewise, Housing NSW does not administer and service this group with any real expertise in dealing with the complex issues faced by their tenants, and instead often takes a punitive rather than a health approach to issues such as mental illness.

Enforcing landlord's rights without taking into account vulnerable tenants' needs

Liliana

Liliana is in her late sixties and in receipt of Age Pension. Her spoken English is basic, and she cannot read or write English. She had been living in a social housing flat for over 8 years when she came to us. The lease was in her husband's name only. Her relationship with her husband was a difficult one, characterised by verbal abuse, intimidation and physical assaults, none of which she reported to the police at the time. After the last physical assault her husband left the flat, and Liliana was unsure if he was going to return. A few months later he told her he would not return, and that he would ask Housing NSW to transfer the lease to her, not realising that this was not in accordance with Housing NSW's policy. Liliana was told by Housing NSW she had a "provisional lease" to stay in the flat, and did not realise that Housing NSW would not be finding another place for her to move to at the end of the lease. She was eventually sent letters advising her that she needed to move out of the premises, and that she had no right to social housing in her own name as she had not put in a separate application. Liliana was suffering acute depression and anxiety at this time, including suicidal ideation. Housing NSW eventually applied to the Tribunal for possession of the flat.

KLC assisted Liliana in lodging an application for social housing in her own name, advocating on her behalf to secure accommodation through the Rental Subsidy Scheme and advocating on her behalf in relation to the Tribunal proceedings. We also linked her with counselling, medical and other support services.

The situation in this case study could have been avoided entirely if Housing NSW had acted earlier to address the client's need for long-term housing assistance. Her case is an example of the lack of support provided to vulnerable tenants and a deficit in the administration of public housing. It should have been clear to Housing NSW when they were advised that her husband had moved out that she was still in need of social housing. She should have been assisted to apply for social housing in her own right at that point, rather than being served with an eviction notice several months later. Instead, she was placed in a situation of extreme stress over the eviction proceedings that had a deleterious and long-term effect on her mental health.

Sebastian

Sebastian is over 80 years old and lives with a vision impairment and significant mental illness. His English is limited. He lived in a Housing NSW flat with his partner, who was also his primary carer. The lease for the flat was in his partner's name. While in hospital for treatment his partner took out an interim AVO against him which meant that he could not return to the flat. He did not have any family he could stay with. The Hospital's Social Worker became aware of the housing situation, but could not extend his stay at the Hospital. The Social Worker and KLC assisted Sebastian to apply for social housing in his own right, but Housing NSW advised that it could be over a year before he was found a place to live.

Sebastian was offered limited emergency housing in motels, but this eventually ran out. He began to sleep in parks or on friends' couches.

KLC advocated on Sebastian's behalf with Housing NSW, and co-ordinated support letters from medical professionals and social workers. Because of his age, disability and basic English he was unable to do this himself. After daily contact from KLC for over three weeks Housing NSW eventually offered him the lease to a unit. In the meantime he experienced more than a month of homelessness sleeping in parks, friends' couches or hospital, a truly appalling situation for an elderly blind man.

Community services have often become the services of last resort for public housing tenants who are facing significant difficulties in their lives, and are often inadequately resourced to deal with the complexity of the issues these clients face.

Repairs and maintenance

We are also concerned about Housing NSW's failure to maintain the quality and quantity of their housing stock. **Tenants with disabilities and health problems** suffer extreme hardship living in decaying, dangerous and inappropriate public housing.

Housing NSW is regularly not complying with their obligation under the *Residential Tenancies Act 2010* (NSW) to maintain their housing stock in a reasonable state of cleanliness and fit for habitation.¹⁶ The shortage of public housing stock has also meant that many people live in unsafe and inappropriate housing because they have nowhere else to go.

The failure of Housing NSW to be a 'best practice' landlord is especially problematic when the vulnerable and disadvantaged nature of the tenant group is considered. Taking action to enforce their tenancy rights is particularly challenging for public housing tenants. Even when they do so, it is our experience that there is routine non-compliance with Tribunal ordered repairs, often due to more significant and problematic structural issues than cannot be resolved easily.

The value of public housing stock depreciates the longer it remains in disrepair, getting to a point when it more beneficial to sell the property than repair it. The underinvestment in public housing has meant that when housing stock is sold, it is rarely replaced with the same amount of housing stock, which again puts more pressure on the public housing system, people needing to access to public housing and people living in public housing.

David

David is 67 years old and has lived in public housing for the past 8 years. His home is covered in mould. Housing NSW painted his property four times in the last year to try to cover the mould but nothing has worked. He won't have friends and family over because the mould is unsightly and smells.

Social workers from the hospital are concerned about his health and have been trying to help him to get Housing NSW to transfer him to another property. He is on the transfer list but has been advised it may take some time to find him a property to move in to.

Modifications for people with disabilities

¹⁶ *Residential Tenancies Act 2010* (NSW) s 52(1). See <http://www.legislation.nsw.gov.au/maintop/view/inforce/act+42+2010+cd+0+N>.

Housing NSW has a policy of providing home modifications for people with disabilities, or transferring them to a more suitable property if modification is not financially viable. Housing NSW also has obligations under the *Disability Discrimination Act 1992 (Cth)*¹⁷ to make reasonable adjustments for tenants with disabilities. However achieving necessary modifications can be a long and challenging process for tenants who are already struggling to live with their disability on a low income.

George

George is a 50 year old man who has had a progressive decline in his mobility due to a degenerative condition. He can no longer work and needs to use a motorised wheelchair. His only income is the disability support pension. He lives alone in a Housing NSW unit and wants to continue to be independent for as long as possible.

Following a report from an Occupational Therapist, modifications were made to the bathroom in George's unit so that he could safely transfer to the shower from his wheelchair. As part of the modifications the contractors tiled the bathroom in such a way that water pooled on the floor, making it hazardous for George to use the bathroom. After months of complaints to Housing NSW, and after the intervention of a disability advocate, the bathroom floor was retiled. However, several new problems were created by the poor workmanship. An Occupational Therapist made over 10 recommendations for changes, but these were not done for more than a year.

Further problems arose that impacted on George's ability to even enter his home because of a faulty automatic door. The remote controlled automatic door opener was installed by a contractor who had never fitted such a device before and it did not work reliably. Other short-cuts were taken in relation to the Occupational Therapist's recommendations which resulted in George not being able to access his backyard. George's disability advocate made constant requests for these matters to be rectified.

Several years after the problems first arose George instructed a community legal centre lawyer to lodge a Disability Discrimination complaint with the Australian Human Rights Commission. It was only after the complaint was settled that Housing NSW agreed to widen the front door, replace the faulty door opening mechanism, create level access to the whole backyard, and make other modifications. Although Housing NSW estimated that the agreed work would be completed in 6 weeks, four months after the agreement was signed the works are not yet completed.

George has experienced great distress and frustration in his dealings with Housing NSW – constantly having to repeat his story to different staff, having poor quality work done and then having to struggle for months or years to have it rectified, and having to live with the danger and inconvenience while waiting for problems to be fixed.

Communication

In requesting repairs, maintenance or modifications for disability, Housing NSW tenants have to deal with a long chain of people and organisations. A tenant will first speak to a Housing NSW Customer Service Officer. They may then deal with a staff member from NSW Land and Housing Corporation as the Asset Manager. NSW Land and Housing Corporation will request work to be done by a principal contractor. The principal contractor will then sub-contract the work. The sub-contractor will attend the tenant's home. If the tenant perceives

¹⁷ *Disability Discrimination Act 1992 (Cth)* ss 5, 6. See <http://www.legislation.nsw.gov.au/maintop/view/inforce/act+42+2010+cd+0+N>.

any problems with the work, or if the sub-contractor does not attend as arranged, or attends without arrangement, the tenant has to make their way along the chain of parties to try and sort out the problem.

Inadequate accountability and oversight mechanisms

We are concerned that people applying for public housing and living in public housing do not have adequate means to seek to review decisions made by Housing NSW.

Currently, people applying for public housing and living in public housing have rights to apply for an internal review of some Housing NSW decisions. If they are not satisfied with the outcome of the internal review, they may be able to appeal to the Housing Appeals Committee (**HAC**).

HAC can review some Housing NSW decision but does not have the power to make binding orders, it only has recommendatory powers. Housing NSW is not obliged to implement their recommendations.

As appropriate and stable housing is an essential part of life, people should have the opportunity to have decisions made by Housing NSW about their housing reviewed by a low cost, user-friendly independent body that has the power to make binding decisions.

KLC hopes this contribution assists the Special Rapporteur's on adequate housing to understand the particular challenges faced by the Australia Government in implementing the right to adequate housing. Please do not hesitate to email at legal@unsw.edu.au if you would like to discuss the content of our contribution further.

Yours faithfully,
KINGSFORD LEGAL CENTRE



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