

# **ANNUAL REPORT** 2024–2025









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## The stories behind the cover photos



**Sandra Olarte** is a Sydney renter, international student and community champion who co-chaired one of our Renters' Forums in 2024. We organised the forums together with Sydney Alliance, NSW Fair Trading, and Tenants Advice and Advocacy Services (TAASs). In April 2025 we published a report on the outcomes of the forums, **Listening to Renters' Voices**, along with an Organiser's Guide, and a set of short videos. See more on page 20.



**Charles Joseph Warren** (or 'Joey' as his friends know him), is a Tenants' Union client and protected tenant in Catherine Hill Bay. An ex-miner, he has lived his whole life in the former mining town and wished to stay and enjoy the serenity of his home for his remaining years. Unfortunately, his developer landlord took action which could have resulted in him being evicted. Following a long-fought legal battle, Joey secured his ability to stay in his family's home of more than 100 years through a Fair Rent Determination. See more on page 21.



**Noleen Robinson** has been living in a land lease community in Lake Macquarie for over 24 years and has been a resident advocate for nearly the same amount of time. Noleen is a long-term member of the Residential Land Lease Communities Forum, facilitated by the Tenants' Union. We interviewed Noleen for **Outasite 12** — our print magazine for land lease communities — she asserted, "Together we are a stronger force. We have a greater chance in having politicians hear our concerns. This can lead to changes in the law."



**Sarah** is an Inner West renter who shared her story with our **Make Renting Fair campaign**. In general she liked her Stanmore unit, however during summer it became unbearably hot. Sarah asked her real estate agent and landlord if an airconditioner or at least ceiling fans could be installed. They refused. Nevertheless her rent was raised multiple times. Sarah decided to give up the fight and move out when her lease ended.

# **ACKNOWLEDGEMENT OF COUNTRY**

The Tenants' Union acknowledges that Aboriginal and Torres Strait Islanders were the first sovereign Nations of the Australian continent and its adjacent islands, and that these lands were possessed under the laws and customs of those Nations. The lands were never ceded and always remain Aboriginal and Torres Strait Islander Country. Our office is on the Country of the Gadigal people of the Eora Nation.

We acknowledge that the land, sea, sky and waterways are of spiritual, social, cultural and economic importance to Aboriginal and Torres Strait Islander Peoples and support their right to culture, language, land and various notions of self-determination.

We acknowledge that as a result of government policies and practices, Aboriginal and Torres Strait Islander Peoples have been dispossessed from Country without compensation.

Aboriginal and Torres Strait Islander Peoples are also over-represented in NSW renter households. We acknowledge the present and historical disadvantage experienced by Aboriginal and Torres Strait Islander Peoples and the role of government policies, past and present and racism throughout Australia in creating this disadvantage and the impact of this disadvantage on tenancy and housing issues.

We acknowledge that a lack of support for non-tenancy issues such as intergenerational trauma, mental health issues, financial hardship, substance dependence, family violence, and disabilities can often lead to an escalation of tenancy issues and result in tenants receiving termination notices and/or suffering other negative outcomes such as accruing large rent arrears.

We recognise, respect and value Aboriginal and Torres Strait Islander Peoples and their communities and will work in partnership with them and their advocates to deliver appropriate advice and advocacy for all Aboriginal and Torres Strait Islander tenants.

The Tenants' Union supports the reforms called for in the Uluru Statement from the Heart. We actively support Aboriginal people in their struggle for Treaty, Voice and Truth.





Tenants' Union and Inner City Legal Centre stall at Yabun, January 2025.



Tenants' Union stall at NAIDOC event, July 2025.

# **WHO WE ARE**

#### The Tenants' Union of New South Wales is a Community Legal Centre specialising in NSW residential tenancies law. We are accredited by Community Legal Centres Australia.

We work to promote the interests of all renters facing housing disadvantage, including:

- Aboriginal tenants
- Boarders, lodgers, & other marginal renters
- Private rental tenants
- · Public and community housing tenants
- · Land lease community residents.

We are the main resourcing body for the Tenants Advice & Advocacy Services (TAASs) across New South Wales.

We are an independent, secular, not-for-profit membership-based co-operative under the *Co-operatives (Adoption of National Law) Act 2012 (NSW).* 

### **Our Vision**

# 'We seek a future where all renters have the home they want.'

The Tenants' Union works with and for renters for housing justice. We work to ensure renters, particularly those in need, have homes that are safe, secure, affordable and sustainable.

#### To achieve our vision:

- We inform tenants, Tenant Advocates, and community workers.
- We educate Tenant Advocates, community agencies and government departments.
- We advise and assist tenants, Tenant Advocates and community workers.
- We advocate for systemic change in law and policy so tenants have more safe, secure, affordable and sustainable homes.
- We listen to and are accountable to renters.







Getting ready to celebrate 30 years of the Tenants Advice and Advocacy Program (see more on page 24).

# **CHAIRPERSON'S MESSAGE**

As we reflect on the past year, I am proud to share the remarkable progress we have made together in advancing housing justice for renters across New South Wales.

The abolition of 'no grounds' evictions stands as a landmark achievement – nearly five decades in the making. It is a testament to the persistence of countless advocates, community partners, and renters who shared their stories and stood firm in the belief that every person deserves a secure home. While this reform is cause for celebration, we know our work is far from over.

Beyond legislative wins, we continued to deliver on our core mission: informing, advising, and assisting renters. Our website sessions numbered over 1.1 million, and our factsheets were viewed more than 1.5 million times, ensuring renters have access to clear, accurate information when they need it most. Our legal team provided thousands of advices and referrals, supporting tenants through complex and often stressful situations. We also strengthened our education programs, training hundreds of Tenant Advocates and community workers, and producing new resources to help renters navigate the significant law changes.

None of this would be possible without the dedication of our staff, volunteers, and the Tenants Advice and Advocacy Services network. I extend my heartfelt thanks to our partners, supporters, and members who share our vision of a future where all renters have the home they want. I would also like to thank my colleagues on the Board, and in particular Hayley Winchcombe and Brendon McKeon who step down at our AGM in 2025. Hayley's contributions as Treasurer, and her sharp focus on technology and innovation, have been of enormous value to the Board and the Tenants' Union. Brendon has been a stalwart for the full term, guiding us with expertise and compassion when considering employment strategies, particularly as we negotiated our enterprise agreement.



As we look ahead, we remain steadfast in our mission. Together, we will continue to fight for fair, secure, and affordable housing for all.

Thank you for standing with us.

Melissa Brooks

Chairperson

Tenants' Union of NSW

# **CEO REPORT**

This was a year of change in the rental landscape in New South Wales. Of course as we make progress we are rewarded with new challenges. The rental reforms were introduced to Parliament, passed and became live law over this year, with some hiccoughs along the way. We completed the renter forums across Sydney, the Hunter and the Illawarra – one of my favourite projects both to watch develop and participate in – and look for the opportunity to do even more.

We are now in the position of both remaining champions for the reforms and watching and listening closely to renters and their advocates about how the reforms are being experienced. Again and again, the need for homes that deliver affordability, stability and quality comes up as work still to be completed.

Our expertise and values equip us well to keep moving forward. We are providers of legal, educational, and analytical services, as well as a peak body, and representatives of both members and a movement. Each year, the wonderful group of people who make up the Tenants' Union staff display their passion for life and justice in and out of the workplace.

Unfortunately we don't always to get to enjoy their passion in the workplace forever. During the year, our Policy & Advocacy Manager Jemima Mowbray moved to a role with Homes NSW, helping guide the development of a new approach in public housing. Jemima was with the Tenants' Union for nearly 13 years and made a powerful contribution across the organisation — starting out volunteering on our Advice Line, working with residential land lease communities, before ultimately leading our policy and advocacy work — especially challenging during these COVID years. We wish her all the very best and know she will continue to strive to make a positive difference to renters, especially in public and community housing.



We continue to work with and seek out friends and allies who, like us, believe rental homes are homes to be protected – to be respected – and we look towards our next chapter in working with and for renters across the state.

Leo Patterson Ross **CEO** 

Tenants' Union of NSW

# **WE INFORM**

We give accurate, timely information on tenancy law to:

- Tenants, land lease community residents, and other renters
- Advocates in the 19 Tenants Advice & Advocacy Services (TAASs) across NSW
- Community workers and other people working with tenants



## tenants.org.au



Views: 3.6 million

Sessions: 1.1 million Active users: 674.577

Factsheets unique page views: 1.5 million

**Most popular topics**: Repairs and maintenance, Ending tenancy early, Landlord ends agreement, Bond, You want to leave, Sale of rented premises, Rent increases, Access & privacy, Mould, NCAT.



### **Tenant News** email newsletter



Subscribers: 4,412 (10% increase)



Issues over the year: 10

Average open rate: 41%



## This Renting Life - Tenants' Union blog



Views: 66,181



Active users: 25,530

Posts over the year: 8



## The Noticeboard - land lease communities



**Views**: 95,826 (59% increase)



Active users: 21,181 (60% increase)



Outasite print magazine: 1 issue, 6,100 copies



Outasite lite email newsletter: 1,798 subscribers (3% increase). Issues: 2. Average open rate: 55%

# **WE INFORM**



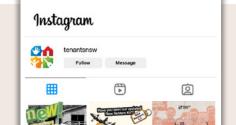
## **Media appearances**



Total mainstream media appearances: 103

• **Print**: 62

• TV and Radio: 41



### **Social media**

**Facebook**: 9,607 followers (1% increase)

**Instagram**: 1,344 followers (19% increase)

in LinkedIn: 1,214 followers (51% increase)

X: 2,987 followers



#### **New Renters Kit**



**Views**: 11,178

Active users: 4,365



## Rent Tracker postcode tool



Views: 40,176

Active users: 13,115



## Rent Increase Negotiation Kit



**Views**: 31,058

Active users: 10,515



## **Housing News Digest email**



Subscribers: 1,374 (13% increase)

**Issues**: approx 50 (one per week)

# **WE ADVISE AND ASSIST**

We are a Community Legal Centre and give expert legal advice and assistance to:

- Tenants, land lease community residents, and other renters
- Advocates in the 19 Tenants Advice & Advocacy Services (TAASs) across NSW
- Community workers and other people working with tenants

## Legal advice & assistance at a glance



9,834 total referrals (including social media)

- 811 information/referrals by Tenants Union staff outside of advice line hours
- 9,023 by the Tenants' Union Digital Assistant



**583 advices to TAASs** 

(to over 90 Tenant Advocates in 19 TAASs across NSW)



197 advices to Aboriginal TAASs



**849 advices on the Advice Line** (direct to renters)



44 additional advices direct to renters

in support of local TAASs during service difficulties



45 advices to other organisations

(e.g. other Community Legal Centres)



220+ advices to Residential Land Lease Community residents



**287 other services** (e.g. title searches)

# **WE ADVISE AND ASSIST**

#### **Advice line case studies**

A Sydney renter called our advice line about a **bond issue** they were having at the end of their tenancy. They were confused because not only was the real estate agent insisting on an unreasonably high level of cleanliness but specifically they asked the tenant to dismantle part of the property to replace an air conditioning filter vent that was affixed to the wall. We confirmed what the tenant suspected, they are not required to improve the property or return it in a condition better than when they first moved in. Under tenancy law, fair wear and tear is expected with ordinary use of the property, including natural buildup on fixtures like AC vents and it is unreasonable to expect a tenant to dismantle a wall in this way.

An elderly renter living in regional NSW called our advice line about a **termination notice** they had received from their landlord. The tenant had seen on the news that rental laws had changed and wanted to check if their notice was valid. The tenant's notice stated the reason for termination was that the landlord's family wanted to move into the property but it did not include a termination information statement or the required evidence. We advised that under the changes to tenancy law in NSW for a

termination notice like this to be valid it must have a termination information statement attached that includes not only the reason for termination but also the prescribed evidence to show that the reason is genuine. The tenant said they felt confident to write to the landlord outlining that the notice of termination was not valid.

We spoke to a tenant living in community housing who was facing eviction and a return to **homelessness**. The community housing provider had instigated termination proceedings at the Tribunal arguing substantial rent arrears. The tenant insisted that they were not in rent arrears and that when they had reported a change in their income many months before the representative from the provider told them they would be better off to stay on the same rent calculation, as if they were employed. Regardless of the tenant asking over and over again for their rent to be calculated on their actual income, the provider refused and the arrears kept increasing. We assisted the tenant to draft an internal appeal asking the provider to look at their decision not to undertake a rent review when the tenant's income changed, resulting in the accrual of miscalculated rent arrears, a large potential debt and termination proceedings. The matter is ongoing.



# **WE ADVISE AND ASSIST**

## **NCAT Aboriginal Tenancy List**

The NSW Civil and Administrative Tribunal (NCAT) introduced a fortnightly Aboriginal Tenancy List day in 2023. Since then the Tenants' Union, Welfare Rights Centre, Financial Counsellors from Salvation Army, Centrelink and the Network of TAASs and Aboriginal TAASs have proudly supported Aboriginal renters on each List Day.

The Aboriginal Tenancy List continues to provide a space where parties are given time and support to address legal issues within a culturally sensitive framework. This usually leads to improved outcomes for renters. For anyone looking to have their matter included on the Aboriginal Tenancy List, you can nominate your case: email AboriginalTenancyList@ncat.nsw.gov.au after an application is lodged with NCAT. Be sure to include your case number, hearing date, and a request for your matter to be heard in the Aboriginal Tenancy List. For advice before your Tribunal hearing, reach out to your local TAAS.

#### **Aboriginal Tenancy List case study**

The Tenants' Union Aboriginal Legal Team represented an elderly vulnerable client at the NCAT Aboriginal Tenancy List Day. The matter had been before the Tribunal on a number of occasions with the tenant attempting to get a long list of repairs completed including roofing, bathroom and severe mould remediation. The condition of the property was abhorrent and the tenant had been asking for the repairs for over 12-months. Through extensive negotiations with the Housing Provider, we were able to secure a timetable for all the repairs to be completed at the property within a 60-day period. We were also able to negotiate a 50% rent reduction for the tenant backdate for the 12 month period amounting to a \$13,500 rent credit. The landlord also agreed to a payment of \$2,000 for economic and non-economic loss for damage to the tenant's goods and for the distress and inconvenience caused by their failure to repair and maintain the property. The tenant was elated with the Tribunal outcome and looks forward to having her home back in a livable condition.



#### We provide training and support to:

- Advocates in the 19 Tenants Advice & Advocacy Services (TAASs) across NSW
- Community workers and other people working with tenants
- Community legal education for advocates, community workers, and renters

During 2024-2025 we focused on educating renters and community workers on the major changes to both residential tenancies law and land lease communities law. In addition, we maintained our usual training calendar. Our educational work helps community workers and renters build the knowledge and confidence they need to navigate the rental system.

## 2024-2025 education highlights



#### 1,600+ participants in community legal education sessions

- 784 participants across 5 webinars
- 309 participants at 9 face-to-face presentations for community workers and tenants
- **59** participants across **3 one-day workshops** for community workers
- 167 participants across 9 presentations for land lease residents
- 285 people connected with us at 2 community stalls



#### 391 participants in our TAAS trainings

- 107 TAAS workers trained
- 45% participants from regional locations
- 4.5% from Koori TAASs
- **27 training sessions** multiple sessions on the new legislation, both online and face-to-face, ranging from 1 hour to 3 days.



### New and updated resources

- We updated the majority of our 30 key factsheets on renters rights to ensure legal accuracy and usefulness to renters.
- We updated **12 factsheets for land lease community residents**.
- We produced multiple **new resources** dedicated to the law changes including a **factsheet**, a **blog post**, 3 short **animations**, and 2 recorded **webinars** one of which was also released as a **podcast** with Legal Aid NSW (see more detail on the next page)

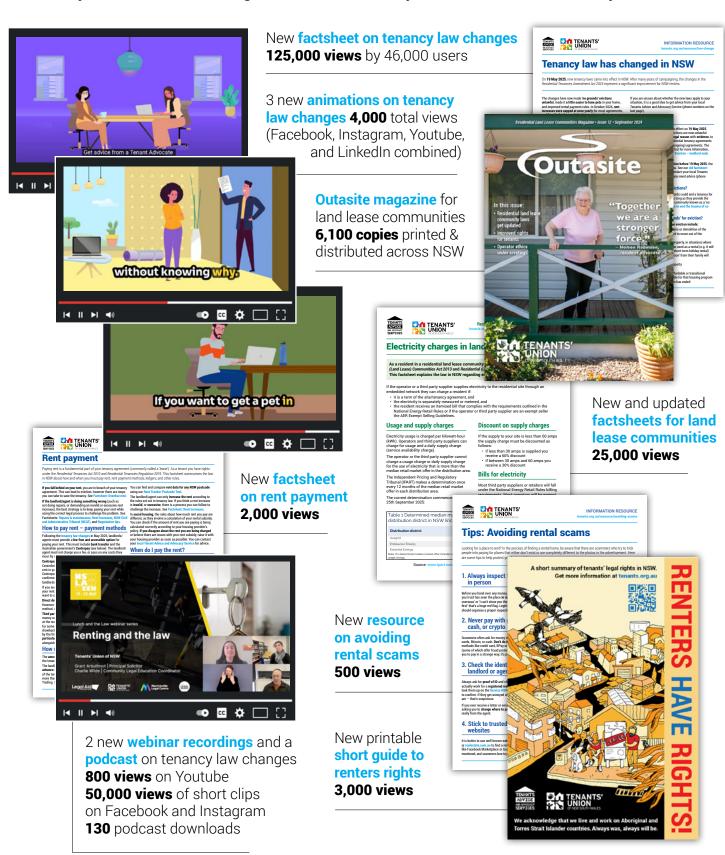


#### 44,357 views of the TAAS Portal

The TAAS Portal is our resource website for Tenant Advocates.

#### New resources for new laws

We produced multiple new resources, and updated existing resources, to educate renters and community workers about the changes to residential tenancy law and land lease community law.



#### Feedback on our education sessions

#### **Tenancy Law for Non-Lawyers**

"Fantastic knowledgeable engaging facilitators."

"Overall, I'd recommend this course to anyone working with tenants or in social services who needs a solid foundation in tenancy law. It gives you the confidence to handle common issues and really support your clients effectively."

"The trainers were knowledgeable and approachable, always open to questions and eager to help us really understand each topic. They provided useful resources like sample letters and links to tenant support sites, which I found very practical and ready to use right away."

"Tenancy Law for Non-Lawyers course has been incredibly valuable! The course does a fantastic job of breaking down tenancy laws in a way that's clear and easy to understand, even if you don't have a legal background. I especially appreciated the practical tools and real-life examples they used throughout the sessions – these made it easy to see how to apply the information in actual tenancy situations, like helping clients with rent issues or understanding repair rights."

"They both did an excellent job.

Made a dry topic very engaging and interesting."

### **Social Housing training**

"Provided a good overview and helped to show some of the minefields of social housing."

#### **Tenancy Advice and Advocacy**

"A big thank you. It's so nice to see people who are very passionate about their work. Very nice training."

"Thank you for being patient & helping everyone expand their knowledge on each subject."

#### Residential Tenancies Act Amendments

"Great day, I've come away more hopeful than I was."

"Thank you for your amazing knowledge and always happy to share!"

#### Introduction to the Tribunal

"I really enjoyed the training, thank you. I love having the training available online as it saves time on travel."

## **TAAS Network Meetings**

The 2024 TAAS Conference took place on Kamilaroi Country, in Tamworth. This year's theme was 'Standing Together. Action for Housing Justice.' It was attended by 60 Tenant Advocates from across NSW.

In addition to the major reforms to the *Residential Tenancies Act*, topics included changes to Aboriginal Housing Office policies, helping older renters, experiences with NCAT in regional areas, and writing effective case notes.

As part of the TAAS Conference we also seek to learn about, and pay respect to, the Aboriginal Country and communities we are visiting. This year we were honoured to have an excursion to Boundary Rock, Kamilaroi, with Uncle Len Waters.

In May 2025, the Network came together again for our online Network Meeting, attended by 77 advocates.

#### **Tenant Advocate Skills Review**

Together with the TAAS Network, we have initiated an Advocate Skills Review project.

The aim of the project is to evaluate the skills needed to be an effective Tenant Advocate and to amend our training program to better meet the needs of Advocates. At this stage of the project we are concentrating on new Advocates' skills and the training needed to ensure a sufficient level of preparation for the job. This will increase Advocates' skills, knowledge and confidence.



Tara Vella, Executive Director Housing Services, Homes NSW, presenting at the TAAS Conference.



Trina Jones, NSW Rental Commissioner, presenting at the TAAS Conference.



Tenant Advocates visiting Boundary Rock, Kamilaroi.



## **Goodbye no-grounds!**

Reaching the point of 'no grounds' evictions being abolished in the law was nearly 50 years in the making. Countless meetings, submissions, talking points, and at least two iterations of the Make Renting Fair campaign all culminated in the successful change that renters have been waiting for and advocates have been calling for – for decades.

Once the Amendments to the *Residential Tenancies Act 2010* were finally passed in October 2024, many thought no-grounds evictions were officially a thing of the past. Except, of course, that was not where the journey to abolish no-grounds evictions ended.

To the disappointment of renters who'd hoped to avoid termination without cause immediately, the new laws, although passed, were not yet in effect.

Continued...





For the new, reasonable grounds termination laws to commence, the government had to introduce Regulations that turned the newly passed laws into an enforceable policy environment. As the peak community organisation representing renters in NSW, the Tenants' Union had further advocacy work to do to ensure the rules governing new termination laws were applied fairly.

Over the course of five months, the Tenants'
Union policy and campaigns team participated
in stakeholder consultations with NSW Rental
Commissioner Trina Jones and her team to help craft
the regulations guiding the use of the new laws by
landlords, real estate agents, and renters. We engaged
in sector-wide meetings and reviews of the proposed
regulations, submitting feedback and suggestions
on how to make new laws clear and effective.

Together with the RSPCA, we advocated for reasonable guidelines on applying for permission to keep a pet in a rental, including advocating for a reasonable number of pets in a home to be set at four, a broad range of fencing to be considered when looking at 'suitable enclosures' for different animals, and the inclusion of 'highly probable' when considering potential damage to premises. We also engaged in multiple discussions about terminations for major renovations or repairs (see more on page 18).

On 19 May 2025, after months of anticipation by the renters and advocates alike, the new rental laws regulation came into effect. No-grounds evictions were no more! We celebrated in style: friends and partners of the Make Renting Fair campaign, rousing speeches, a novelty-sized farewell postcard to send no-grounds evictions off with, and cake (below).













#### The 'renovictions' threat

Our joy and celebration of the end of no-grounds evictions was short-lived. A month after the new laws came into effect, without warning or explanation, the office of the Minister for Fair Trading issued a change to the regulation governing termination provisions. Without any consultation, the evidence requirements for terminations for major renovations or repairs were reduced from a letter from the landlord describing their intention to carry out the works, accompanied by one piece of evidence (such as a quote from a builder or a bill for materials purchased), to a letter from the landlord alone.

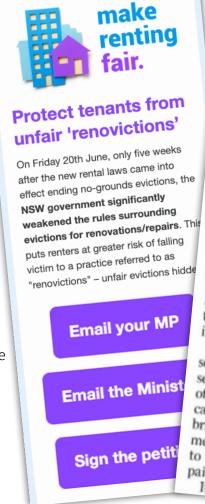
During the consultation period, terminations for major renovations or repairs had been the subject of numerous discussions among the policy team and advocates in the network. As a group, the TAAS Network considered what evidence would be sufficient to prove the landlord's intention of thorough renovation of the property. The consensus reached was that genuine renovation planning

required permits (such as a Development Application) or a specific works plan by a licensed builder, together with receipts for materials purchased. Collectively, we agreed that the landlord had to have made a financial commitment to the renovation project for it to be a legitimate venture, rather than merely a ruse to evict the tenant and then promptly relist the property at an inflated price. This was particularly important, given that the government wanted the exclusion period for reletting the property, which was to be emptied for major renovations, to be only four weeks.

As soon as we heard about the change to evidence requirements, the policy and campaigns team went to work to investigate the reasons behind this sudden change and advocate for the reinstatement of the original evidence rules. It was our belief that the watering down of the regulation on terminations for renovations would lead to the phenomenon dubbed 'renovictions,' a practice prevalent in Canada, where similarly liberal rules are applied, and which sees renters forced out of their homes by unscrupulous landlords seeking to raise rents above what would be considered reasonable for a sitting tenant.

A story outlining the Tenants' Union's concerns was published in the Daily Telegraph, and we launched a petition and email campaign targeting the Minister and the Premier, with complaints from renters worried about the security of their tenure. In a short time, we coordinated over 300 signatures, 200 emails and a joint letter by 32 community organisations stressing the very legitimate concerns about the sudden change to the regulation and the lack of transparency on the reasons behind the change. This created a strong environment for the Motion to Disallow the changes to be put forward in the NSW Parliament Legislative Assembly on the 6th of August. The motion narrowly failed to pass, and was then put forward by Cate Faehrmann Greens MP in the Legislative Council but again the motion did not get the necessary votes.

Despite the laws being amended and regulations published, the work of advocating for fair terms of lease terminations in NSW continues. With the threat of 'renovictions' not defeated, we are monitoring any cases where renters lose their homes due to a major renovation that turns out to be an excuse to evict them and relist the property at a significantly higher rent.



# Renters let down by quiet backflip

EXCLUSIVE Elizabeth Pike

More than 20 organisations from the legal, social and union sector have accused the Minns government of quietly walking back a key plank of its rental reforms, only four weeks after the "landmark" changes came into effect.

Community centres, legal services and charities, representing hundreds of thousands of people across the state, have called on the government to bring back evidence requirements for landlords who want to evict their tenants to do repairs and renovations.

## **Mandatory energy efficiency standards**

Early in 2025 the Tenants' Union signed onto a statement with 120 other civil society groups, renter advocates, and industry leaders to call for urgent action on improving the quality, affordability, and energy efficiency of rental homes.

The statement from the Healthy Homes for Renters collaboration urged the Federal Government to provide funding and support to States and Territories to implement mandatory minimum energy performance standards in rentals. The joint statement outlined key measures the Federal Government should take to help renters, and landlords, cut climate change emissions.

A few months later Tenants' Union staff and Tenant Advocates from local Tenants Advice and Advocacy Services (TAASs) attended the Sydney Alliance Pre-Federal Election Assembly. Part of the assembly involved negotiations with Minister Chris Bowen who was asked to commit to bringing in enabling measures to assist NSW to introduce mandatory energy efficient standards in rental homes.



Tenants' Union staff, Tenant Advocates, and Make Renting Fair supporters at the Sydney Alliance Pre-Federal Election Assembly, March 2025.



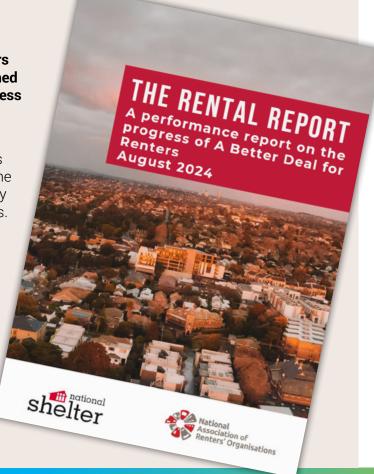
Leo Patterson Ross, Tenants' Union CEO, speaking at an Energy and Water Ombudsman roundtable, June 2025.

## **Federal advocacy**

In partnership with the National Association of Renters Organisations (NARO) and National Shelter we launched The Rental Report: A performance report on the progress of the Better Deal for Renters, in August 2024.

This report assessed each State and Territory's commitment to the Better Deal for Renters 12 months on from its announcement by the National Cabinet. The report highlighted the inconsistent approach nationally and where there had been a failure to meet obligations.

In April 2025 NARO provided a **brief snapshot** of the progress 18 months on in the lead up to the Federal election and this highlighted again a lack of progress by many jurisdictions and also a lack of a national coordinated approach. NSW has met some of the Better Deal principles, particularly those it had committed to before the Better Deal began, but NARO is advocating for the additional principles outlined in our National Nine report to also be implemented. This importantly includes introducing fair limits on the amount rents can be increased in NSW to address the growing affordability pressures.



## **Data Highlights**

Data resources and data analysis play an important role in our policy work.

The **NCAT Snapshot** has been updated through June 2025, showing the frequency of tenant and landlord applications to the tribunal and their reasons. The **NCAT Evictions Map** has also been refreshed through June 2025. We continue to monitor the locations of eviction applications and their occurrence rates.

The End of Tenancy Survey offers insight into the reasons landlords and tenants give for ending a tenancy and has been updated to include most of the 2024/25 financial year. This will be the final update before the complete set of new grounds is added to the survey. The Tenants' Union will closely monitor this survey, as it will be our first look at how often these new termination grounds are being utilised.

The Tenants' Union has begun a project to address the high rates of tenants losing their bonds in Western Sydney. This **Bond Smart** project aims to identify where bond loss significantly affects tenants and address knowledge and capacity gaps, particularly in relation to new rental reforms, to provide effective and targeted community education to the most affected communities and empower people to retain control over their finances.

# Additional public submissions to Government

- Pre Budget 2025-2026
- Review of NCAT's role in disputes
- · Homes for NSW Plan
- NSW Homelessness Strategy 2025-35
- NSW Audit Office Social Housing
- Transport NSW Council parking Permits
- Companion Animals law review
- Better Energy Customer Experience (jointly with Justice & Equity Centre)

#### **Renters Forums**

In April 2025 we launched Listening to Renters Voices

– a report which explores the key outcomes from
the series of innovative Renters Forums that we held
between May and November 2024.

The forums were organised by the Tenants' Union in partnership with Sydney Alliance and the NSW Rental Commissioner, NSW Fair Trading. The central purpose of these forums was to directly engage renters across NSW, particularly those from often marginalised communities, to share their experiences and propose solutions related to the challenges of renting.

At the launch we heard some of the key findings from the Forums and heard from Sandra Olarte, Community Champion and Trina Jones, NSW Rental Commissioner on their experience of the Forums.

The Renters' Forums were developed as an alternative model to the traditional government consultation. The process of shaping the events' formula was documented in **Sparking a Conversation** – an organiser's guide to help facilitate events similar to the forums and allow organisers to continue to use and develop the model.



## **Strategic litigation highlights**

"It's not a house. It's a home."

In a great victory following a long-fought legal battle, Tenants' Union client Mr Charles Joseph Warren secured his ability to stay in his family's home of more than 100 years through a Fair Rent Determination.

Mr Warren, or 'Joey' as his friends and family know him, has been in and out of court for years with his landlord, including fighting for his right to stay. An ex-miner, he has lived his whole life in the former mining town of Catherine Hill Bay. Now an elderly man 80 years in age, with declining health, Joey wished to stay and enjoy the serenity of his home for his remaining years. Unfortunately, his developer landlord, Wallalong Land Developments, had taken action which could have resulted in him being evicted from his home.

Joey's home is an old cottage which dates back as a family home more than 100 years. Joey is the third and last generation of miners at the Bay. The cottage was passed down from generation to generation in the family, starting from his late grandfather who worked at the mines at the turn of the last century to late Grandma Walton and then to Joey in the 1960s. Mining operations ceased in the early 2000s.

Catherine Hill Bay is a heritage-listed 'Company Town'. Wallalong Land Developments purchased the land and aims to build a large-scale residential community. Joey's home is an impediment to their plans. In November 2021 Wallalong commenced proceedings in the Supreme Court to evict him. However, Joey is what is known as a 'protected tenant' under the Landlord and Tenant (Amendment) Act 1948 (the '1948 Act').

The 1948 Act provides enhanced rights and protections particularly around rent and evictions compared to current tenancy legislation. The 1948 Act was amended numerous times over the years and narrowed in phases until eventually no new protected tenancies may be created post 1 January 1986.

Still, a small number of tenants of residential premises across NSW live in premises covered by the 1948 Act. The 1948 Act was repealed in 2019 but savings provisions continue in operation for a narrow class of elderly tenants.

In earlier proceedings (2021-2022) Wallalong sought Joey's eviction in the Supreme Court. Wallalong discontinued their application on the first day of the hearing and agreed to pay Joey's costs of that case. The Tenants' Union represented Joey in those proceedings.

Continued...



However in August 2023, the landlord once again commenced action, this time in the Local Court, seeking an increase to Joey's rent of approximately 4,500%! Represented by the Tenants' Union, Joey fought this application and almost a year later, the Belmont Local Court handed down the decision setting Joey's rent at his current rate without any change. The Court observed that the action by the developer landlord was an attempt to increase the rent substantially and potentially to such a level which might force Joey to vacate his home. In applying the 1948 Act the Court noted, "The protections conferred by the Act allow Mr Warren the opportunity to continue to enjoy the 'serenity' of his home for his remaining years."

We are pleased to see this outcome for Joey. This was a drawn-out legal struggle between an elderly pensioner and a multi-millionaire developer landlord. Like all renters, Joey deserves a secure place to call home, and protection from unfair eviction.

After close to a year of application for our costs, and responding to the landlord's appeal on costs, we were finally successful in obtaining our costs in the prior Supreme Court proceedings.

We see the 'Protected Tenants' protections as really important for this group of people who have been in their homes for a very long time. They are almost exclusively now elderly people who really would struggle to find a home in the private rental market.

The Tenants' Union is committed to fighting for people like Joey who face uncertainty or challenges to their right to stay. We will continue to fight for tenants rights to ensure that renters can enjoy the "serenity" of a secure place to live. As the Court noted, even for tenants like Mr Warren, the importance of their residence cannot be overstated – "It's not a house. It's a home."

#### Unfair land lease contract terms

The decision of the Tribunal in Anderson v Kincumber Nautical Village Pty Ltd [2025] NSWCATCD 90 was finally delivered on 26 September 2025 just over 12 months after the formal hearing in Gosford.

The parties were legally represented, and the Tenants' Union represented the home owner – who was successful in his application.

The multi-element fixed method term to the home

owners site agreement was found void as an unfair contract term under section 23 of the *Australian Consumer Law (NSW)*.

The Tribunal also found the site agreement to be a standard form contract and the Tribunal has order a refund of site fees overpaid under section 68 *Residential Land Lease Communities Act.* 

# Unfair termination notice in a land lease community

On 21 February 2025 the Tenants' Union filed a Tribunal application within the 90 day time limit under section 123(4) Residential Land Lease Communities Act on behalf of our clients, Robert and Noelene Delezio, to challenge a Termination Notice given to terminate their site agreement.

The Termination Notice required vacant possession of the residential site to facilitate repairs and upgrading for new stormwater pipes and sewer infrastructure at Aspen Lifestyle Sweetwater Grove, a land lease community at Tomago.

We asserted that the scope of the local Port Stephens Council approval did not clearly indicate the extent of any works required on our clients residential site. Additionally, pursuant to s123 of the *Residential Land Lease Communities Act* we submitted that the termination notice served on our clients was of no effect because vacant possession is not necessary in order for the operator to comply with the obligation. The termination notice was misconceived as there is no obligation under Council Approval (15-2021-19-1) that relates to the client's site. At a Tribunal hearing in Newcastle on 25 March 2025 orders were made by consent as follows:

- 1. The termination notice dated 25 November 2024 may not be enforced by the respondent.
- 2. The applicants are to be paid the costs of temporary accommodation and associated expenses as required by the disconnection of services to site [69]. It is agreed that those costs are to be capped at \$140 per day.
- 3. Site fees for site [69] are to be waived for the duration of the period in which the services are disconnected.
- 4. The respondents agree to remediate site [69] to its present condition following the services works, or at an earlier time agreed by the parties.

The elderly residents were very relieved with the outcome of their application at NCAT.

# **A STRONG & DYNAMIC ORGANISATION**

## **Effective management and governance**

This year we reached two big milestones that are evidence of the strength and determination of the Tenants' Union – the celebration of 30 years of the Tenants Advice and Advocacy Program (see more on the following page), and the implementation of the end of no-grounds evictions in NSW.

We also welcomed a funding increase which ensured TAAP program funding was not reduced in real terms and continue to work to restore the funding to meet community needs. To keep up with the changing context we've moved our client records to Actionstep CRM which continues to solidify the move away from paper-based records, and enhances our ability to analyse the needs of NSW's renters.

#### In 2024-2025 we also:

- Met all our performance indicators and reporting requirements.
- Ensured staff undertook staff professional development, including attending discrete training in Community Legal Centres NSW Quarterlies.
- Held regular staff, legal practice and social club meetings to connect, communicate and collaborate across the organisation.
- Successfully continued hybrid workfrom-home and training operations with improved health and safety precautions.
- Our Board met seven times during 2024-2025, including a strategic planning day.
- Our Finance and Human Resources subcommittee formally met six times during 2024-2025 and received monthly financial statements, and made additional decisions by circular.
- The Board maintained its other subcommittee meetings as needed in Governance & Membership, and Organisational Policy Review.
- Worked with the Tenants Advice and Advocacy Services including initiating the Advocate Skills Review to help ensure the network's service delivery continues to meet community needs.
- Continued bargaining for a new Enterprise Agreement to ensure the organisation maintains fair working conditions.

#### **Our Board**

- Melissa Brooks (Chairperson)
- Charles Dalgliesh (Deputy Chair)
- Hayley Winchcombe (Treasurer)
- Lauren Stubbs (Secretary from Feb 2024)
- Lina Przhedetsky

- · Giancarlo de Vera
- Brendon McKeon
- Olivier Gonfond
- Penelope Bowyer-Pont (Appointed Nov 2024; Resigned Mar 2025)
- Maree O'Halloran (Resigned/Retired as term limited Nov 2024)

#### **Our Staff**

- Grant Arbuthnot (Principal Solicitor)
- Patrycja Arvidssen (Learning & Development Coordinator)
- Paula-Rose Bassett (Paralegal)
- Zuzia Buszewicz (Policy and Campaigns Officer)
- Katharine Cooke (Finance Coordinator)
- Anwen Crawford (Training Officer)
- Lehana De Silva (Solicitor Aboriginal Support, on secondment from April 2025)
- **Justin Dowswell** (Technology Coordinator)
- Amanda Elgazzar (Acting Land Lease Communities Officer from January 2025)
- **Keisha Galbraith** (Administration Coordinator)
- **Jeremy Kerbel** (Communications Coordinator)
- Julie Lee (Rental Forum Project Officer)
- **John Mewburn** (Solicitor, Aboriginal Support from Apr 2025)
- Riley Michelmore (Media and Communications Officer)
- Jack Moon (Data and Research Coordinator)
- Jemima Mowbray (Policy and Campaigns Manager to December 2024)
- Olivia Nielsen-Gurung (Advocacy Officer)
- Eloise Parrab (Land Lease Communities Officer to Dec 2024, Acting Policy & Campaigns Manager from Dec 2024)
- Leo Patterson Ross (Chief Executive Officer)
- Seema Sanghi (Rental Forum Project Officer)
- Paul Smyth (Land Lease Communities Solicitor)
- Isobel Stockler (Administration Officer)
- Charlie Wilde (Community Education Coordinator)
- Cass Wong (Solicitor Strategic Litigation)

#### **Holiday Hotline staff – summer 2024-2025**

- · Rebecca Bryant
- Samir Pokharel
- Marc Westley
- Sharyn Semmens

## A STRONG & DYNAMIC ORGANISATION

## **Standing Together: 30 years of TAAP**

In October 2024, in Parramatta on Dharug Country, Tenant Advocates came together to stand for housing justice and celebrate 30 years of the Tenants Advice and Advocacy Program (TAAP).

TAAP is the main source of funding for the 15 generalist Tenants Advice and Advocacy Services (TAASs) and the four specialist Aboriginal TAASs across NSW. The TAAS network responds to approximately 30,000 requests annually for tenancy advice and provides ongoing assistance to approximately 10,000 tenants every year.

The special event, **Standing Together. Action for Housing Justice**, was organised by the Tenants' Union to celebrate the milestone of three decades of TAAP. The event saw Tenant Advocates past and present from across NSW come together to share memories and hopes for the future. We were

welcomed to Country by Auntie Kerrie Kenton. Long-time Aboriginal Tenants Advocate Brett Webb spoke about the particular struggles of Aboriginal renters. A panel of Tenant Advocates also shared their most memorable moments of victories achieved for renters. Jemima Mowbray, Tenants' Union Policy and Advocacy Manager spoke about the end of 'no grounds' evictions, and about Tenants' Union founding member and staunch campaigner Robert Mowbray.

As well as talks, there was a **Tenancy and TAAS photo slideshow** and a dramatic exhibition of tenancy and housing posters from the last three decades – including works from renowned postermaking collectives of the Tin Sheds and Redback Graphix. Sharon Pusell, one of the original artists from Redback Graphix, was present and reflected on some of the powerful artistic and political actions of the 1980s – including interventions by squatters, unemployed workers, and renters.













Tenants' Union of NSW Co-operative limited | ABN 88 984 223 164

## **Extract from the Financial Report for the year ended 30 June 2025**

What follows is an extract from the Tenants' Union's financial statements. The full financial statements are available at **tenants.org.au**, and are also available from the Australian Charities Register, on the Australian Charities and Not-for-profits Commission website, **acnc.gov.au** 

# Tenants' Union of NSW Co-operative Limited Statement of Profit or Loss and Other Comprehensive Income For the Financial Year Ended 30 June 2025

	Notes	2025 \$	2024 \$
Revenue		Ş	Ą
Revenue from contracts with customers	4	2,873,873	2,652,917
Other income	5	131,059	127,670
Total revenue	_	3,004,932	2,780,587
Expenses			
Administration and other operating costs		(403,259)	(363,878)
Depreciation	6	(174,093)	(162,238)
Employee benefits	6	(2,348,551)	(2,169,349)
Finance costs	6	(34,830)	(33,385)
Impairment loss on receivables		-	(380)
Lease payments for short-term/low-value leases		(2,469)	(614)
Net foreign currency exchange losses		(3)	(3)
Total expenses	_	(2,963,205)	(2,729,847)
Surplus for the year	=	41,727	50,740
Income tax expense		-	-
Surplus after income tax	=	41,727	50,740
Other comprehensive income		_	-
Total comprehensive income		41,727	50,740

The accompanying notes form part of these financial statements.

FINANCIAL STATEMENTS
Tenants' Union of NSW Co-operative limited | ABN 88 984 223 164

**Tenants' Union of NSW Co-operative Limited Statement of Financial Position** As at 30 June 2025

	Notes	2025 \$	2024 \$
Assets		•	•
Current			
Cash and cash equivalents	7	867,674	1,632,187
Trade and other receivables	8	182,370	151,902
Other financial assets	9	1,011,770	-
Other assets	10	36,585	33,735
Total current assets	_	2,098,399	1,817,824
Non-current			
Other financial assets	9	35,475	35,475
Property, plant and equipment	11	126,465	168,829
Right-of-use assets	12	394,087	509,565
Total non-current assets	_	556,027	713,869
Total assets	_	2,654,426	2,531,693
	=	, ,	,,
Liabilities			
Current			
Trade and other payables	13	321,182	276,036
Provisions	14	634,610	596,456
Lease liabilities	15	113,652	99,394
Contract liabilities	16	473,036	412,176
Total current liabilities	_	1,542,480	1,384,062
Non-current			
Provisions	14	123,204	103,226
Lease liabilities	15	305,073	402,463
Total non-current liabilities	_	428,277	505,689
Total liabilities	_	1,970,757	1,889,751
Netseeds	_		644.040
Net assets	=	683,669	641,942
Equity			
Reserves		-	-
Accumulated funds		683,669	641,942
Total equity	_	683,669	641,942

The accompanying notes form part of these financial statements.

Tenants' Union of NSW Co-operative limited | ABN 88 984 223 164

#### **Director's declaration**

This declaration relates to the full financial statements.

The full financial statements are available at **tenants.org.au**, and are also available from the Australian Charities Register, on the Australian Charities and Not-for-profits Commission website, **acnc.gov.au** 

Tenants' Union of NSW Co-operative Limited Directors' Declaration For the Financial Year Ended 30 June 2025

The directors of the Tenants' Union of NSW Co-operative Limited (the registered entity) declare that:

- a) the financial statements and notes are in accordance with the *Australian Charities and Not-for-profits Commission Act 2012*, including:
  - i) giving a true and fair view of the registered entity's financial position as at 30 June 2025 and of its performance for the year ended on that date; and
  - ii) complying with Australian Accounting Standards Simplified Disclosures and the *Australian Charities and Not-for-profits Commission Regulations 2022*; and
- b) there are reasonable grounds to believe that the registered entity is able to pay all of its debts, as and when they become due and payable.

Signed in accordance with subsection 60.15(2) of the *Australian Charities and Not-for-profits Commission Regulations 2022*.

Melissa Brooks

Chairperson

30 October 2025

Hayley Winchcombe

Treasurer

30 October 2025

Tenants' Union of NSW Co-operative limited | ABN 88 984 223 164

### Independent Auditor's Report to the Members of the Tenants' Union of NSW



SDJ Audit Pty Ltd t/a SDJA

**ABN:** 11 624 245 334 **P:** PO Box 324

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Tenants' Union of NSW Co-operative Limited
Independent Auditor's Report to the Members of Tenants' Union of NSW Co-operative Limited
For the Financial Year Ended 30 June 2025

#### Opinion

We have audited the financial report of Tenants' Union of NSW Co-operative Limited (the registered entity), which comprises the statement of financial position as at 30 June 2025, the statement of profit or loss and other comprehensive income, the statement of changes in equity, and the statement of cash flows for the year then ended, and the notes to the financial statements, including a summary of material accounting policy information and the directors' declaration.

In our opinion, the financial report of Tenants' Union of NSW Co-operative Limited has been prepared in accordance with Division 60 of the *Australian Charities and Not-for-profits Commission Act 2012 (ACNC Act)*, including:

- (a) giving a true and fair view of the registered entity's financial position as at 30 June 2025 and of its financial performance for the year then ended; and
- (b) complying with Australian Accounting Standards Simplified Disclosures and Division 60 of the *Australian Charities and Not-for-profits Commission Regulations 2022*.

#### **Basis for Opinion**

We conducted our audit in accordance with Australian Auditing Standards. Our responsibilities under those standards are further described in the *Auditor's Responsibilities for the Audit of the Financial Report* section of our report. We are independent of the registered entity in accordance with the ethical requirements of the Accounting Professional and Ethical Standards Board's APES 110 *Code of Ethics for Professional Accountants* (the Code) that are relevant to our audit of the financial report in Australia. We have also fulfilled our other ethical responsibilities in accordance with the Code.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

#### Information Other than the Financial Report and Auditor's Report Thereon

The directors are responsible for the other information. The other information is the directors' report accompanying the financial report.

Our opinion on the financial report does not cover the other information and accordingly we do not express any form of assurance conclusion thereon.

In connection with our audit of the financial report, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial report or our knowledge obtained in the audit or otherwise appears to be materially misstated.

If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

Liability limited by a scheme approved under Professional Standards Legislation

Tenants' Union of NSW Co-operative limited | ABN 88 984 223 164

## **Independent Auditor's Report to the Members of the Tenants' Union of NSW**

Tenants' Union of NSW Co-operative Limited Independent Auditor's Report to the Members of Tenants' Union of NSW Co-operative Limited For the Financial Year Ended 30 June 2025

#### **Responsibilities of Directors for the Financial Report**

The directors of the registered entity are responsible for the preparation and fair presentation of the financial report in accordance with Australian Accounting Standards – Simplified Disclosures and the ACNC Act, and for such internal control as the directors determine is necessary to enable the preparation of the financial report that is free from material misstatement, whether due to fraud or error.

In preparing the financial report, the directors are responsible for assessing the registered entity's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the directors either intend to liquidate the registered entity or to cease operations, or have no realistic alternative but to do so.

The directors are responsible for overseeing the registered entity's financial reporting process.

#### Auditor's Responsibilities for the Audit of the Financial Report

Our objectives are to obtain reasonable assurance about whether the financial report as a whole is free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with Australian Auditing Standards will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the financial report.

A further description of our responsibilities for audit of the financial report is located at the Auditing and Assurance Standards Board website at: <a href="http://www.auasb.gov.au/Home.aspx">http://www.auasb.gov.au/Home.aspx</a>. This description forms part of our auditor's report.

SDJA

Simon Joyce Director

30 October 2025

Sydney, New South Wales

# **ACKNOWLEDGEMENTS**

The Tenants' Union would like to extend our thanks and acknowledgement to all the renter champions, supporters and colleagues – too many to list individually – who make this work possible. You fill us with strength and hope!

We acknowledge the crucial work of the Tenants Advice and Advocacy Services who provide frontline advice and advocacy to NSW tenants. Our work in law and policy reform and resource development is dependent on your invaluable experience and insight.

We acknowledge the funding provided by: the Australian Government through the National Legal Assistance Partnership; the NSW Government through both the Rental Bond Board administered by NSW Fair Trading and through the Community Legal Centres Program administered by Legal Aid NSW and the Public Purpose Fund; and the City of Sydney.

We value our members who continue to support our work and contribute their knowledge and experiences.

We also acknowledge and thank the many individuals and partner organisations who have provided advice, support, expertise and labour over the past year.

## **Barristers and legal staff**

Paul Batley, Frederick Jordan Chambers Julie Boland, Costs Plus Nick Eastman, Martin Place Chambers

David Evans of Mourd Evans Solicitors
Greg James AM KC, 11 Garfield Barwick Chambers

Liam James, Level 22 Chambers

Michele Kearns, Martin Place Chambers

Chris Koikas, 11 Garfield Barwick Chambers

Pat Lane, Level 22 Chambers

Laura Lombardo (Gilbert & Tobin)

Ross Nicholas. Costs Plus

Lara Nurpuri, Martin Place Chambers

Zach Rymer, Eleven Wentworth

Mark Seymour SC, Martin Place Chambers

Andrew Tokley KC, 5 Wentworth

#### **Our Volunteers**

#### **Advice Line**

Hilary Chesworth Oliver He
Merrilyn Kennedy Magnus Yim
Steven Menteith Luca Butterworth
Katia Fita Ariana Haghighi
Emma Croft Rex Stuckey
Hamish McPherson Eesha Jamthe

#### Students and interns

Louise Hewson Joy Xu

Jennifer Lord

## **Standing Advisory Groups**

#### **Aboriginal Advisory Committee**

Zachary Armytage Michelle Craig Olli Wynyard Gonfond Gemma McKinnon Lucinda Walder

# Residential Land Lease Communities Forum

Alison Correia John McCabe Anita Jowitt Jock Plimmer David Dodge Lyn Tupaea Charles Dalgleish Lynn Harvey Dorothy Hudson Mary Preston Nancy Earl Emma McGuire Franya Repolusk Nicole Grgas Noleen Robinson Lyn Wilson **Gregory Skinner** Garry Warfield Hazel Grosman Rebecca Bryant Anne Holmes Margaret Nicoll Ian Finlayson **Bob Morris** Judith Janczuk Russell Miller Jill Edmonds Sandy Gilbert John MacKenzie Steve Climpson

## **Aboriginal Tenancy List Support**

Nerida Blaxland – Financial Councillor, Salvation Army Bob O'Hare – Financial Councillor, Salvation Army Quinton Quinton Reeks – Indigenous Service Officer, Centrelink Allienttia Weldon-Oti – First Nations Access Officer, Welfare Rights Centre

## **Renter forum and community champions**

Diana Olmos Jessica Harrison Nusrat Zabeen Islam Seema Sanghi Julie Lee

Ernest Henry – Vinnies NSW
Sheik Adid Al Rubai – Muhajirin Association for Community Development
Emilia Nicolas – Sisters of St Joseph
Amity Lynch – Better Renting
Sajeda Bahadurmia – Australian Rohingya Women's Development Organisation
Sandra Olarte – Shelter NSW



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