

Questions	Comments (if applicable)
<p>Is regulation still required and relevant for the community housing sector? Why/why not? What do you think regulation of this sector should aim to achieve?</p>	<p>Yes, regulation and registration gives reassurance to clients, funders, investors and partners. The bulk of social housing stock in Qld is held by the State government yet they are excluded from any NRS regulatory audits. Now that the NRS has resulted in housing providers closing down then perhaps it can focus on the macro issues for the sector.</p>
<p>Should community housing regulation apply to all forms of affordable housing, including for-profit providers? What modifications to the NRSCH would be required to appropriately support their inclusion?</p>	<p>Whilst I am unsure who are the for-profit providers mentioned I think all providers should be included. There is probably more reasons for these providers to be audited given the vested interest is profit.</p>
<p>What do you think the vision for regulation of the sector should be moving forward and how could the design and operation of the NRSCH support this? What role should the National Industry Development Framework have in the NRSCH?</p>	<p>The regulator should be about improving the overall quality and facilitating housing stock increases. At times the process is “clunky” so streamlining processes could assist. It would be great if the NRS could concentrate on eliminating road blocks in State Government processes. The NIDF don’t seem to have any impact on housing transfers in Qld at this point. Need for a higher regulatory standard if NRSCH is to fulfil broader opportunities in roll out of national investment through NHFIC and Federal Government initiatives.</p>
<p>What is the impact (positive or negative) of having three different regulatory systems across Australia? Would there be benefits in WA and Victoria joining the NRSCH?</p>	<p>It is not truly national. CHPs who operate across jurisdictions could benefit – we only operate in Qld. The benefit with systems like the VRS is that one system would mean that duplication is reduced and there is likely to be more consistency.</p>
<p>Are the purpose and objectives of the NRSCH and the IGA still relevant? Do they appropriately address current and future challenges (such as those outlined in this paper)? Why/why not? What changes might be needed?</p>	<p>The NRSCH has as its purpose to grow social housing stock and reduce regulatory burden, I don’t think this has been achieved. Whilst the NRSCH was established to ensure a clear separation between regulations and policy/funding, it has led to 2 systems of reporting, often with different parameters.</p>
<p>Is there sufficient flexibility in the NRSCH to achieve its purpose and objectives? Why/why not?</p>	<p>Limited flexibility ie we now have two wind-up clauses in our constitution (the ACNC clause and the NRSCH clause) because our registration was at risk if we didn’t include the NRS clause.</p>

	Some of the ratios are irrelevant eg working capital ratio, liquidity and equity ratio for NFP. For example, if funds are in a term deposit over 3mths they are not deemed liquid.
Are there existing forms of regulation that overlap with the NRSCH (e.g. the ACNC)? What is the impact of this? What should community housing regulation offer that is not covered by existing schemes?	The DHPW reports create duplication of effort, the CHAFR is the most obvious as it requires different parameters. Other reporting includes the quarterly reports, the monthly asset reports, the annual survey and the statistics on tenancies and properties.
Is there any other role the NRSCH should be undertaking that it is currently not?	We never see any national results from all this reporting but there must be a wealth of data. Alignment of state regulations and perhaps reviewing some of the DHPW processes. The rigour applied to CHPs seems more strict than to public housing provision.
Is the current design of the NRSCH conducive to efficient and effective regulation of the sector? Could the design of the NRSCH be improved or streamlined? If so, how?	There is probably a view from those outside of the housing industry that Tier 1s are the highest performing and so on to Tier 3. This may be misleading. The current design does seem to focus on trivia rather than the big picture eg one issue noted was that not all of our complexes had notice boards, another was our complaints policy said that a complaint needed to be in writing but our newsletter said you could discuss complaints with staff. We had to change our policy to be consistent. Need to have a balance or not between regulatory focus on investors and the interests of tenants.
Is there currently sufficient oversight over the operation of the NRSCH, or are the governance arrangements listed in the IGA required (a Ministerial Council, a Ministerial Advisory Committee and a National Regulatory Council)? Why/why not?	No more layers please!! There is enough complexity without adding more levels of oversight.
Should the NRSCH be modified to better regulate smaller CHPs? What would be needed to achieve this?	I don't think Tier 3s need any additional regulations as this could result in some of these CHPs disappearing. They probably need support rather than more regulations.
Are the indicators and thresholds in the Evidence Guidelines appropriate for demonstrating compliance with the National Regulatory Code and do they provide sufficient confidence to stakeholders regarding CHP financial viability, governance and management? Why/why not?	Some of the indicators are too stringent and make the organisation look unviable. (as mentioned above).
Are registrars' enforcement and investigative powers sufficient to protect tenants and public	The NRSCH doesn't appear to be looking at the protection of tenants or public assets. They have plenty of power if they can de-register a

<p>assets allocated to CHPs? Why/why not? How could this be improved?</p>	<p>company. At times they use their role to look at very operational aspects of the business. Once we had an on-site audit and the auditors visited some of the properties and started talking to tenants who were at the complexes. There is no way of knowing whether the tenant's comments are valid given the level of mental health, drug taking etc and whether the auditor is in a position to manage this interaction with a tenant. This practise has implications for the tenant and the validity of the report.</p>
<p>Has the NRSCH been implemented in a way that is consistent with its regulatory principles (namely that it is proportionate, accountable, consistent, transparent, flexible and targeted) and the regulatory philosophy and practice articulated in the National Regulatory Code? Why/why not?</p>	<p>Whilst the responsiveness and timeliness has improved over time, it is not seen as flexible and creates duplication with the State govt and the systems in place for reporting.</p>
<p>How could CHPs' data reporting requirements be better streamlined to reduce compliance burden, including overlap with other regulatory systems?</p>	<p>Remove duplication of task eg CHAFR and FPR. A couple of years back there was a trial to modify the CHAFR to simplify it and the results were very positive but it was never changed. One financial analysis that has a streamlined reporting format would be preferable. This needs to be negotiated between the State govt and the NRSCH. I am assuming that Victoria and WA don't have these issues.</p>
<p>Does the NRSCH provide sufficient information to stakeholders, including tenants, providers, investors and governments? Why/why not? What ways could it be improved?</p>	<p>Some documents are one in the same eg Business Plan and Operational Plan but both are requested. Feedback with best practice examples could be beneficial for continuous improvement.</p>
<p>Are NRSCH communications with stakeholders effective in demonstrating the purpose, operation and performance of the NRSCH and relative performance of CHPs? Why/why not?</p>	<p>Whenever there is a power differential communication can be challenging. At one post audit discussion there was an inference that leaders of the company had made decisions outside of the board process. This related to a Precinct development that is still years away but made the officers feel that their integrity was being challenged.</p>
<p>Does the NRSCH provide CHPs with clear guidance and feedback regarding registration, compliance assessment and enforcement? Are there any issues with the operation of CHRIS or of any user guidance or forms? Why/why not?</p>	<p>CHRIS is a little clunky at times and often asks for duplication of information, especially over years eg the constitution is provided each year even if there are no changes to it. Overall feedback is thorough.</p>
<p>How has the NRSCH affected tenant outcomes? Have tenant outcomes improved?</p>	<p>Very little direct impact but has made us question procedures and terminology.</p>
<p>Should the NRSCH be modified to better regulate Aboriginal and Torres Strait Islander CHPs? What would be needed to achieve this?</p>	<p>This question is better asked to Aboriginal and Torres Strait organisations.</p>

<p>Is the current risk management approach to the NRSCH appropriate given the current and emerging community housing environment? Do you think the current tiered registration system is adequately targeted and flexible enough to capture the level of risk for CHPs of varying sizes? How could this be improved?</p>	<p>Seems overly cautious and could be overwhelming for small CHPs. We have had both on-site and desk top audits and it would seem feasible that if the NRSCH doesn't have concerns re the operation of the company, that desk top audits should be more cost effective. Often the report back to the CHP only occurs a few months before the next audit is to take place.</p>
<p>Has the NRSCH reduced regulatory compliance costs for multi-jurisdiction and/or multi-function CHPs?</p>	<p>I can't imagine how but we are not a multi-jurisdictional CHP.</p>
<p>How has the NRSCH impacted CHPs' decisions to enter new jurisdictions? Have barriers to entry been reduced? Has it encouraged registration across participating jurisdictions?</p>	<p>Not contemplating working in other states.</p>
<p>What role should the NRSCH have in building organisational capacity in the sector?</p>	<p>Identify organisations that have capacity for growth, especially regional orgs and work with them to build capacity. Skill development such as project management for developments, financial plans for NHFIC proposals. If NRSCH has all our financial information then they could advise whether we are able to apply for a NHFIC loan or we are wasting our time.</p>
<p>Could CHPs' data reporting requirements better support increased investment in the sector? For example, do NRSCH reporting requirements need to be more regular and more responsive? Why/Why not? What is a reasonable level of regular reporting?</p>	<p>Information that is more regular but perhaps less intensive would be more valuable. Waiting for a report that focuses on data that is 12 months old is not helpful to drive increased investment.</p>
<p>Has the NRSCH impacted sector growth and development? For example, has the NRSCH contributed to increased access to private finance and improved organisational capacity within CHPs?</p>	<p>Not in regional areas or for Tier 2 and 3s.</p>
<p>General comments/issues:</p>	<p>It would be great if documents such as current FPR were available early after EOFY so that as soon as the audit is complete you could start on the FPR. Instead this becomes available generally when the CHAFRs are due and you have limited time to allocate to this work. Because we are always looking back a considerable time for the NRSCH reporting some of the issues have been rectified that appear in the report. It is also difficult to provide out dated information when you know that the situation has changed.</p>

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