Stakeholder requirements for enabling regulatory arrangements for community housing in Australia

CHURCHES DATA REPORT

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Data Report

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INTRODUCTION

These data reports describe the responses from each of the seven stakeholder groups investigated in the project. The first five stakeholder groups are 'external' to community housing and their involvement has been seen as potentially important to the further development of the sector. They are financiers, developers, local government, churches and central agencies.

The remaining two groups are the providers and the administrators – the regulated and the regulators. Both of these two groups have a crucial interest in the outcomes to be achieved by regulatory arrangements. Unlike the external stakeholders, however, their interest is two dimensional. That is, it is an interest in both the new opportunities that might be opened up, and in how it will affect their current core business and achievement of social housing outcomes.

Information from the external stakeholders was gathered using semi-structured interviews. The broad questions, and their relationship to the project aims, are in the appendix to this data report. The informants were chosen because they had sufficient familiarity with the community housing sector to be 'information rich'.

Information from the internal stakeholders was gathered using workshops to identify issues and to get some responses to the external stakeholder views. In addition, four interviews with state based community housing peak bodies were conducted (prior to the workshops) for an assessment of:

- the strategic opportunities being limited by current regulatory arrangements; and

- the strategic opportunities that could be pursued through developments and trends in the local environment.

The informants' views have been presented in each of these data reports in six parts:

- The current context in which the informants are becoming engaged with the sector – or for internal stakeholders, pursuing regulatory reform and sector development.

- What might effective measures within the community housing sector enable or in other words the potential and emerging opportunities.

- The preconditions for realising or achieving these opportunities.

- The aspects of regulation that could help meet these preconditions.

- Principles for effective regulation.

- The informants' assessment of how much difference regulation or regulatory tools or elements might make.

In other words, stakeholders believe there is an opportunity for (and are interested in) achieving some outcomes, but they report a number of preconditions for realising these. This is of interest in itself, but in particular, they suggest ways that some of the preconditions might be met with appropriate regulation. (Table 3 in the main report starts to describe the relationships between the opportunities, preconditions and community housing regulation across the stakeholder groups).

This form of presentation has been adopted to provide an explanatory framework through which to understand the views of the informants. It is intended to help understand how the informants are currently engaged with the community housing system – the drivers and limitations on this involvement; what larger benefits might be enabled if there were some changes in the current system; and what role, if any, regulation might play in this. The overall findings of the research are presented in the findings section of main report.

Churches and community housing

Churches are a significant provider of community housing in Australia. The Community Housing Mapping Project estimated that 17% of community housing in Australia is managed by church-based organisations (AIHW NCHF, 1999:23). In Victoria, churches are the largest provider of community housing, owning and/or managing over 2,700 properties or

approximately one-third of community housing stock in that state (Ecumenical Housing Inc, 2000:V1:9). Churches are also a significant provider of housing in NSW, Qld and SA with some initiatives in other states and territories.

A significant proportion of church community housing is established through joint venture arrangements with State Housing Authorities (SHAs). Yet research describes a sector with largely unstructured relationships with state and federal governments and little consistency across the states (Ecumenical Housing Inc, 2000).

Within the context of joint venture relationships more broadly, partnership arrangements have tended to be driven by government programs involving a church, local government or community group in partnership with an SHA, with variable contractual arrangements across jurisdictions (Bisset, 2000:16). Consistent with this trend, the development and implementation of church joint venture projects have occurred on a largely individual and ad hoc basis.

In recent years there have been a number of initiatives that go some way to remedying this situation. State-based ecumenical community housing resource organisations were established in Vic.[1], SA and NSW in the late 1980s to early 1990s. These organisations introduced greater planning and cohesion in their respective states. Both NSW and the ACT are currently looking to consolidate and expand the role of the churches in community housing through the establishment of church housing associations.[2]

Following the steady growth of community housing partnerships over the past few years, there has been a trend by SHAs to consolidate and streamline joint venture arrangements, however discussions with informants for this research show there is still some work to be done.

The National Churches Community Housing Project, undertaken by Ecumenical Housing Inc. in the late 1990s, is the major piece of recent research on the churches capacity to play a stronger role in community housing and it continues to inform new church and community housing initiatives.

The project identified a number of benefits to the churches in their participation in community housing. In summary, these are: community housing offers a practical and structural response to social disadvantage, providing an effective avenue through which to implement the churches 'mission' to respond to the needs of the disadvantaged and the marginalised. In turn, joint ventures offer a way for the churches to develop under-utilised land resources consistent with their proposed social objectives. Finally, if well-managed, joint ventures can be financially self-sustaining, thereby not decreasing the churches resources, whilst enabling the churches to pursue their mission. (Ecumenical Housing Inc, 2000)

Of course, if poorly managed, community housing joint ventures expose the church to financial risks, with their assets provided as collateral against such events. The costs – and potential risks – are summarised in the National Churches Community Housing report as follows:

- Through joint venture arrangements the church's assets may be locked up for a considerable time, minimising the church's capacity to respond to changing local, community needs.

- The legal requirements of entering into joint venture arrangements demand increased expertise on governing bodies.

- Following this, the churches require structures through which this expertise can be accessed or skills learnt (Ecumenical Housing Inc 2000:V2:10-11).

Whilst there has been significant national research on the specific issues, opportunities and barriers faced by church stakeholders, this project will examine them in the context of the potential enabling outcomes a regulatory system could provide.

The informants

The four church informants interviewed for this research had different levels of engagement with the community housing sector. They can be summarised as follows:

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[1] It should be noted that Melbourne based Ecumenical Housing Inc, established in 1987, was finally forced to wind down its operations in early 2002 following the loss of government core funding over five years ago.
[2] Information from the National Churches and Community Housing Network.

- A provider of social services and large owner/manager of community housing (as well as crisis and medium term housing) looking to expand their church agency's involvement through joint venture partnerships (C2).

- Two informants were in the preliminary stages of their involvement with community housing. They have both been involved in lengthy discussion with government and church representatives about the possibilities. The denominations they represent either hold assets that could be used for joint ventures (C1), or can access assets through ecumenical bodies (C3). C3 is also exploring the possibility of taking on a community housing management role.

- A church agency that has been involved with joint ventures in the past but was ambivalent about any future involvement – "as far as I'm concerned they are very one-offs". This ambivalence was due in part to the complexity of negotiating agreements but largely attributed to a lack of confidence in the financial viability of social housing (C4).

The current context

The business environment

A general feeling of good will has been encouraging for church informants engaging with community housing: "my impression is that within the sector there is an enormous amount of good will so I think there is a desire …to actually get positive outcomes". Some informants also felt that governments are receptive to dealing with them: "having government's ear" so to speak. Informants also perceive a general government commitment to growth in community housing, and in one state at least, "a real commitment to sector development". But the positive rhetoric is overshadowed by a persistent concern: "where that growth is going to come from is the big question mark".

Despite some positive dealings between various churches and SHAs, there was a strong message from all informants that difficulties in dealing with governments at a practical level was one of the major barriers to churches expanding their involvement in community housing.

What might effective measures enable?

Key points:

- The opportunity to use surplus land, assets and capital for social purpose

- An increase in the available housing through joint ventures, affordable housing and a general growth in low income stock

- An avenue for churches to meet social need through the provision of housing

The opportunity to use surplus land, assets and capital for social purpose

The churches have capital or assets that can be used for social purposes including the development of community housing. The resources vary from one-off bequests (earmarked specifically for housing) to high-value assets and land.

> There is not much call for building convents and monasteries these days and we've got quite a number around the place that are very well built, in very good spots, that are going to, please God, last a long, long time. So the question really is what to do with these things?[3]

More limited resources did not preclude a willingness to contribute capital to partnerships. One informant (C2) who already has a large stake in community housing said,

> It is fair to say that the income base for our housing is fairly low so there is not a great chance of building up capital reserves under the current arrangements. But that certainly is the aim… to continue to enter into equity joint ventures where it is possible".

In some cases there was a distinction between the types of contribution that a church could comfortably make. In meetings about developing a role in community housing, members of an

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[3] This informant (C1) noted that the assets and land are not always in locations amenable to housing development and some are better suited to other purposes, for instance, a commercial reception centre.

ecumenical body had, it was reported by C4, "made it very clear there is no money coming from their coffers… [but] there are assets they can utilise".

An increase in available housing through joint ventures, affordable housing and general growth in low income stock

Joint ventures are the traditional way for churches to 'buy-in' to community housing however, this is not always a straightforward experience. The advantage of joint ventures is they provide a mechanism to leverage a contribution that is not necessarily sufficient "to buy a decent house". However, joint ventures are often negotiated on a project by project basis which creates duplication of effort and a variety of arrangements in the field that cannot necessarily be replicated.

Reaching a joint venture arrangement can also be a complex business covering everything from rates to parking to maintenance. One experienced negotiator (C4) said of his dealings with a SHA:

> We have fairly reasonable resources. We are not a small, local community organisation. We are used to dealing with lawyers and accountants and have a bit of internal expertise. Yet we found it difficult… you hardly think a small community group would be able to cope.

Nonetheless when the board of this church agency asked C4 'what the point' was the response indicated a strong view that at least the amount of the church joint venture contribution freed up state funds to use elsewhere in the housing system.

Other church informants were aware of and interested in the possibilities presented by new models for delivering low- to moderate-income housing such as those proposed by the National Affordable Housing Research Consortium. While affordable housing models like that proposed by the Consortium may be directed at the second or even third quintile of income – this organisation's tenants are almost all on statutory incomes – they are "coming to grips with it" because they believe innovation is going to be the key to overcoming the challenges in increasing the supply of housing.

Affordable housing has the added benefit in its potential to "take the pressure off" social housing for people on very low incomes or with high and complex needs. But crucially, for this church agency working with people in crisis, affordable housing needs to deliver additional supply rather than be a substitute for traditional housing assistance.

An avenue for churches to meet social need through the provision of housing

So why would churches and church agencies want to put their capital, whether it be substantial or scant, into housing? The short answer from the informants was that community housing offers a fitting way for churches to meet social need. In other words, "churches have a spiritual and doctrinal view of things, but they also see a very strong social responsibility and the two are linked… community housing falls very much within the church's perception of their own role in social issues".

There was a strong belief amongst church informants that they can have a positive impact in people's lives or, in other words, achieve tenant outcomes. For instance, "housing of course has been a feature of churches looking after the poor and disadvantaged …in examples where churches have become involved there is a happy community".

C2's organisation has a long history of working in the area of homelessness services and crisis housing (including "a significant capital contribution") because of their commitment to serving marginalised people. In other words:

> We have effectively a support base we are looking at clients who are coming to the agency for a whole range of issues - criminal justice, adolescent health, addiction, D&A, all of those things – and that client group is viewed as [our] client group.

The organisation is working towards the creation of a continuum of housing that will operate in tandem with its continuum of support for people in crisis.

Preconditions for achieving these opportunities

Key points:

- Improved trust and practical dealings between the churches and government

- Greater government understanding of internal church structures, rules and processes

- Assurances of the financial viability of the community housing sector

- Accessing sources of capital and models for growth

- Addressing the limitations around title

Improved trust and practical dealings between churches and government

Difficulty dealing with SHAs was strongly stated by informants as a major barrier to churches expanding their opportunities within the community housing sector. The main problems were identified as: a lack of responsiveness and accountability; the absence of a clear policy framework; and an uncertain funding base.

For C1, basic attempts at doing business were being overcome by what was described as the "'impenetrable barriers you seem to strike in the [SHA]". This is primarily manifested as a lack of responsiveness: "submissions and all the rest of it disappear somewhere into the government and you just never see it again". The perception of your potential partner as a "black hole" hampers the development of workable relationships.

In another case, a colleague with experience in the sector had told one of the church informants (C3) that, "if I was you I would forget it, you can't trust it, you can't trust the system". There is some resonance between this comment on trust and the observations of other stakeholders, particularly providers (see the provider data report for more detail).

Underpinning the challenge in working with state government is the nature of the funding relationship between state and federal jurisdictions. One observation from C4 was that all SHAs can manage at the moment is "plugging a hole". There was an active awareness that the relationships between levels of government that fund community housing are "undergoing some negotiation at the moment and we, like everybody else, are waiting anxiously to see the outcome of the CSHA and what it is going to look like". Some church informants are actively seeking to influence the negotiations, in collaboration with other social service organisations, in pursuit of their commitment to the growth of social housing.

Understanding internal church structures, rules and processes

The churches "have their own legal obligations as well". The notion of 'stewardship' or holding the assets of the church in trust is one of the key roles of financial and investment decision makers in the churches. "Part of [church law] regulates what happens with the temporal goods of the church, like land and buildings …and one of the things it doesn't encourage is giving it away to government."

Churches are not immune to organisational processes such as centralisation, which will affect levels of control and the management decisions about assets and services. If a service grows, and aged care was used as one example, then "all of a sudden it was pulled back to central office and …they said we don't want you local boards anymore but would you stay on as volunteers".

There are also stumbling blocks at the parish level. For instance, C3 said that local volunteers would be willing to provide support to tenants but they had to consider a 'reliability' risk. This is because "one congregation or parish could be very active while a particular priest or leader is in that congregation but if that person moves on the emphasis of that group may change, they start to look overseas, Africa or something like that".

Assuring the financial viability of the sector

"Somewhere money has to come in, either up-front to help with the building costs or as a capital subsidy as you go along." Working to secure the financial viability of involvement with the sector was an important precondition for church informants. C4 concluded that at this point social housing is not financially viable. For that reason the particular agency is not seeking to be actively involved in housing unless they receive specific bequests for the purpose. In short:

"there is a funding problem and this is the thing that bedevils all housing problems – the rent is not enough to pay for the maintenance".

In one joint venture this informant came to an agreement with the relevant department so that it would provide additional money for the sinking fund, which took the "hardest time to negotiate". However, C4 considered this arrangement was more likely to be a reluctant one-off rather than a precedent.

Other churches have not always been able to negotiate agreements to manage their financial risks such as maintenance shortfalls. Such "bitter experience" appears to permeate discussions when other churches are preparing to become involved. For instance, C3 – who is interested in pursuing a management role – said, "[an] issue I hear is that the government gives money but it is never enough. It is always that 5, 10, 15 per cent short. It is not necessarily an intentional thing but because people want to run it properly, meet compliance standards and things like that, they need the extra add-on and where do they find it? The people [in churches] we are talking to now to try and get this off the ground have experienced that background".

Churches who have lost money in housing ventures are not rushing to come back. The result is that "the people who matter are saying we've been there and done that". Churches that are considering going in to community housing recognise that "you have to be commercially smart".

Accessing sources of capital and models for growth

At the heart of the viability issues is the reality that "in the end this stuff costs a lot of money". For C2, who is a large player in the sector already, "the obvious barrier is the capital" and the hub of this problem and its solution starts system-wide. A clear policy framework and funding arrangements would support growth through innovation and potentially new delivery models, rather than the more recent reliance on stock transfers from public housing, which have not added to the overall pool of social housing.

Government and sector commitment to accessing and creating new markets is a precondition to growing the community housing sector and simultaneously dealing with the shortage of funds. C2 asks, "how can we create new asset classes? How can we involve private investors? What are the corporatist approaches where you've got three way partnerships… in the end all of the parties need to being their resources to the table".

Addressing limitations around title

A NSW based informant said that title was the primary barrier to churches entering into partnerships. That is, "one of the major stumbling blocks in all of this is who ends up with what". There was a degree of perplexity about why arrangements could be reached in other areas such as education and health but "unfortunately community housing doesn't work this way, it is a bit of a mystery as to why". This led back to the most frequently mentioned precondition - improved trust and practical dealings with governments.

What aspects of regulation could help meet these preconditions?

Key points:

- Regulation should enable growth and strategic planning

- Possible regulatory tools considered by the churches were: standards, codes of practice, model/consolidated agreements and legislation

- The cost of regulation is a factor but not an inhibiting one

Regulation should enable growth and strategic planning

Broadly speaking, regulation was considered by church informants to be an appropriate and productive approach to help meet the preconditions for pursuing opportunities in the community housing sector. There was recognition that there is already significant regulation by program – through funding agreements, program guidelines etc – and that to embark on the reform of this model should be more visionary and enable growth and innovation.

One view (C2) was that, "if the regulatory framework was attached to a growth model, that makes a lot of sense". In other words regulation should be "enabling the sector to grow and embrace innovation" rather than "focusing on the micro-management". As an example, C2 suggested that finance and debt-raising could be appropriately dealt with by regulation but not allocations or rent policies.

Three church informants also considered that regulation should assist with sector-wide strategic approaches through the generation of data and publicly available information: "it needs to be regulation that is meaningful and allows strategic planning and the information about what is happening in the sector to come back to the regulatory body". The UK Housing Corporation was mentioned by C2 as a successful model for achieving this outcome.

There was a cautionary note about keeping sight of the identity of the community housing sector in the process of developing or reforming regulation: "what I would be concerned about is that regulation recognises the unique abilities of community housing".

Regulation was also considered a useful starting point for the churches beginning to engage with community housing for the first time: "if we were starting out with a housing organisation and they said here are the requirements we had to meet, that would be absolutely essential". It would assist not only with the decision of how to go ahead, said C3, but whether to go ahead at all. A regulatory framework could facilitate a more robust assessment of what is involved in community housing rather than unearthing problems "down the track".

Possible regulatory tools: standards, codes of practice, model/consolidated agreements, legislation

A number of possible regulatory tools were canvassed by church informants:

- Standards

- Codes of practice

- Model/consolidated agreements

- Legislation

- *Standards* – C3 was clear that standards would be the most useful regulatory element from the perspective of a church representative considering becoming a housing developer and/or manager.[4] This is because "we have nothing to go on, it is unfamiliar territory". C3 added that standards would also assist in developing the at times problematic relationship with government because the expectations of the parties should be clearer. In other words, "people are easier to adapt to change when they know what the ground rules are".

- *Codes of practice* – were mentioned as a useful mechanism for achieving assurances of quality service. They also have extra weight as a regulatory tool because they are a relatively simple, sector driven mechanism and so have greater levels of ownership. The caveat on this claim does introduce some more complexities: while codes of practice can be simple C1 said if they are not enforceable they are "not really worth having".

- *Model/consolidated agreements* – Other churches, particularly those focussed on establishing individual joint venture projects, are looking for model agreements to structure their involvement in community housing.

- One informant (C1), who is from a church with some of most assets, acknowledged that there is work to be done in setting up these models but it should be worth the effort.

- I think it would be very hard work if you had to resign yourself to going from start to finish, treating every new project as a new project. On the other hand, it may be worth investing that time and effort into the first few projects and then to develop from that a model, or one, two or even three models that are acceptable which you can then put in place in future.

- Agreements should ensure the church group retains title to its property and that the money government invests is accounted for in a way that meets their requirements.

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[4] This informant (C3) was not aware that National Community Housing Standards already exist and are being used as the basis of accreditation systems in NSW and Qld.

- *Legislation* – was seen as having a quite specific role by C2 who commented that, "some arenas of activity are more amenable to legislation than others". For instance, it may be useful for setting minimum standards of housing quality but not so useful in determining the details of service delivery. Legislation and regulation should be geared to enabling strategic sector-wide outcomes rather than being proscriptive or too intrusive, C2 said.

Cost of regulation

The potential cost of regulation was not considered prohibitive by the two informants who commented. C1 said that effective regulation should be a cost-neutral exercise: "I think if it is properly done it should be a zero-sum arrangement. In some areas there may be costs imposed but there ought to be savings that compensate for that because things would be operating more efficiently." For C2 – who believes that there needs to be sector-wide change "in the face of a crumbling social housing system" – the additional cost could be factored in to his organisation's operations. The pay-off would be a good regulatory system capable of generating information and data to be used for much more strategic planning.

Principles for effective regulation

Key points:

- Regulation that supports growth and innovation

- Regulating for outcomes rather than processes

- Greater organisational and sector-wide strategic planning based on publicly available information

Regulation that supports growth and innovation

Regulation should not be introduced or reformed for its own sake but rather, it should be attached to the goal of achieving growth in community housing. One informant (C1) said that regulation should also enable innovation in the pursuit of growth. That is, regulation should protect those groups – whether existing community housing organisations or external stakeholders seeking to expand their opportunities – who are "prepared to aim high and take risks". In seeking to encourage the sector towards growth and innovation, C2 noted that regulation should also recognise the unique abilities of community housing organisations and build on the strong foundation and culture that exists already.

Regulating for outcomes not processes

C2 stated that regulation should be confined to the areas where it was necessary. That is, over regulation and micro-management are to be avoided. One way of ensuring this is, said C2, is a regulatory focus on outcomes rather than processes. C1 favoured 'half as many regulations and twice as many inspectors". Or, in other words, that there are fewer proscriptions in favour of ensuring that regulation actually works and is adhered to.

Greater strategic planning

C2 saw one important outcome of an effective regulatory regime would be publicly available data on the sector that could improve strategic planning at an organisational and sector wide level. The UK regulator – the Housing Corporation – was cited as a body playing an effective role in this respect.

How much difference would such regulatory elements make?

Key points:

- Greater transparency could be achieved through regulation

- Accountability by all parties - which adds confidence and ownership – could be improved

- Risk management would be an outcome to support viability and promote innovation

- Better sector wide information would be available to promote strategic planning

Transparency

A regulatory framework would be one pillar of a more transparent system for external stakeholders to engage with. C1, who is from a large church, said, "that sort of [regulatory] framework would help because it could be used to define what outcomes we are expecting and more particularly when we are expecting them. In other words it would force government agencies to react within a certain time, that would certainly help". Transparency would enable churches and government to start to overcome some of their difficulties and misunderstandings. In an environment of "not knowing what the other does and having a healthy suspicion, when you've got the same template before you, you can say we are having trouble in this area… ask questions and dialogue starts". A clearer operating environment would also contribute to more strategic methods according to C2: "they would support …increasing transparency and increasing the ability of planners to know what is actually happening". Transparency, as a result, would also "increase confidence across the sector".

Accountability by all parties

The accountability that would result from a more transparent system was also emphasised, and not just for the churches, government and sector. If other players, developers in particular, were to assume a more significant role in the future growth of community housing, C1 at least would be supportive of a framework that held them accountable to the values of the sector. "If somehow or other developers got involved in this sort of operation …it seems to me it would probably give a degree of comfort to a lot of people who might have worries about this as a way of doing business it there was some sort of code of practice for example." In a transparent, accountable environment all parties should be able to "achieve their objectives".

Improved risk management

Risk management was an important outcome for a number of the church informants, not only from the point of view of financial viability but to also promote innovation. C1 said that "often it's the people who are prepared to take risks who lead innovation because you can't really have innovation without risk". The UK model for regulating housing associations was considered by C2 to provide a good example for achieving growth through the regulation of raising capital and financial activities within the sector. In this context they said, "I think it would help grow the sector because it gives certainty, it gives confidence in the system".

Better sector wide information and strategic planning

Using a model such as the one in the UK, with an established regulatory body, also supports the sector to take a more strategic approach because of the information generated by the regulatory environment. "I think it promotes strategic knowledge of the sector, it promotes good data collection, all of those things. It would add to costs, and those costs would have to be factored in [but] you get a really good knowledge of what is actually happening… and that helps strategically." C2 concluded that:

> Regulation really is about enabling, it is about engendering an environment where you can have innovation, where you can have growth and all of those things… but if it affects the flexibility or value of community housing then I think it can be a problem.

Summary

The findings from across all stakeholders interviewed are presented in the final report. However, some general conclusions can be drawn from the church responses. Churches have a strong history of involvement in community housing in Australia and are seeking to build on that foundation. They have assets that can be bought into the system and a commitment to many social justice principles shared by community housing providers themselves. However, a number of preconditions would enable the churches to realise their opportunities more fully: in particular better dealings with government and assurances of the financial viability of the sector. Regulation was considered to meet some of the needs of the churches, particularly if it is focused on the growth of the sector and achieving housing outcomes, but also if it helped shape a system that enabled greater transparency, accountability and strategic planning.

APPENDIX: PROJECT AIMS & CORRESPONDING RESEARCH ELEMENTS

Stakeholder requirements for enabling regulatory arrangements for community housing in Australia (60118)	
Project Aims	*Research elements (including interview questions)*
To identify the **outcomes** looked for from a community housing regulatory system by external stakeholders - private financiers, local government, developers, church partners and central agencies	*External stakeholder interviews* 1. What is your current involvement with community housing or what do you understand about the sector? 2. What opportunities does the community housing sector present? 3. What are the barriers to expanding these opportunities? *(prioritise importance)* 4. How could these barriers be overcome? (*if ways of overcoming the barriers relate to regulation, discuss for more detail on the types of mechanisms that would be useful*) 5. If the barriers you have identified could be overcome in the ways we have discussed what would it change in your dealings with the community housing sector? (*ie: how would it impact on the risk assessment?*) 6. How would these types of changes affect the costs of expanding your opportunities within the community housing sector? (n.b. questions modified for central agencies)
To identify the limitations of current arrangements and the enhanced **capacity** of community housing providers that might flow from improved regulatory arrangements	*Peak interviews* 1. What are the new developments in your jurisdiction in relation to regulatory arrangements? Or, what are the emerging trends? 2. What are the strategic directions/opportunities for the sector in your state that might be affected by regulatory arrangements? 3. What are the difficulties or limitations that have arisen from current regulatory arrangements? 4. What are the difficulties or limitations that have been identified with respect to the new developments or emerging trends? 5. What are the strategic opportunities that could be opened up for the sector from new developments or trends, as they are now or if they were modified? What are the policy implications? 6. What are the strategic directions for the sector now? *Literature review* *Workshops* *Analysis and final report*
To identify the **criteria** for regulatory arrangements that would optimise the flexibility and efficiency of providers as well as robust and transparent accountability	*Literature review* *Workshops* *Analysis and final report*
To identify the aspects of the operations of UK and other international community housing regulatory systems that provide similar benefits to those being sought by the above stakeholders and to assess their applicability to the Australian context	*International literature review* *International interviews (mainly finance sector)* *Analysis and final report*
To familiarise administrators and providers with the findings and test their applicability in the existing community housing systems - including Indigenous housing	*Joint findings seminars*

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