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Discussion Paper: Future Directions for the NRSCH

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1 Introduction

This discussion paper was prepared by the NRSCH National Office and was initially conceived to inform consideration of National Office funding ahead of the current agreement’s expiry on 30 June 2026. It became clear early that the issues extend beyond funding, creating an opportunity for informed dialogue on how the NRSCH can continue to respond to the evolving needs of both governments and the community housing sector.

The paper has been intentionally crafted to provoke thought and stimulate critical reflection among readers. Its aim is to challenge conventional perspectives, spark meaningful dialogue, and inspire fresh thinking on the issues at hand.

The paper reflects the collective views of Registrars nationally with input from individual Treasury and Housing Australia representatives. There are differences in individual perspectives, priorities, and proposed solutions but, despite these differences, the key issues, challenges, and opportunities identified are similar across the group. The core topics—such as governance, funding, regulatory practice, data, technology, and collaboration—were recognised as important.

The consistency of themes suggests that the information collected is reliable for identifying the major challenges facing the NRSCH. Even if there isn’t agreement on every point, the repeated emergence of certain themes means these are likely to be genuine, widely recognised issues within the sector. For policy makers and stakeholders, this means the discussion paper provides a solid foundation for understanding what matters most—even if the path forward is debated.

Areas where there is no consensus, highlight where further dialogue or negotiation may be needed, but the consistent themes offer clear starting points.

While national peak bodies were not directly involved in the development of this document, their expertise and perspectives are recognised as essential to the success and credibility of the regulatory system. As key stakeholders, community housing providers and peak bodies bring valuable sector-wide insights and help shape policy direction. Their feedback and contributions will be actively sought and meaningfully integrated during this consultation process, ensuring that any future modernisation of the regulatory system is informed by their experience and reflects the needs and priorities of the broader community housing sector.

The collective insights of stakeholders ensure a comprehensive approach to addressing the challenges and exploring the opportunities for the NRSCH and related state-based systems.

2 Executive Summary

2.1 Purpose of this Discussion Paper

The NRSCH has played a significant role in supporting nationally consistent regulation of community housing providers across participating jurisdictions for more than a decade. Over this period, the system has provided a stable framework for regulatory oversight, supporting confidence in provider capability and contributing to the growth and maturity of the community housing sector.

This discussion paper has been developed to support consultation on the future direction of the NRSCH. It is intended to prompt reflection and informed dialogue on whether the system's current settings remain well aligned to the operating environment in which it now functions, and what considerations may be relevant as governments and the sector look ahead.

2.2 Changing operating environment

The context in which the NRSCH operates has continued to evolve. Community housing now underpins a growing share of national housing policy objectives and public investment, including through major Australian Government funding initiatives. At the same time, the sector itself has become more complex, with new provider models, increasingly sophisticated financial structures and heightened expectations for regulatory assurance, transparency, and performance.

These developments raise important questions about the scale, scope and nature of regulatory oversight required to support long-term housing outcomes, protect public value, and maintain confidence across governments, investors, providers, and tenants.

2.3 Current authorising environment

The NRSCH was originally conceived as a nationally consistent regulatory framework, supported by Australian Government stewardship and formal national governance arrangements. Following changes to this policy architecture—including the withdrawal of direct Australian Government involvement and the absence of the governance structures initially envisaged—the system has continued to operate through a collaborative, multi-jurisdictional model.

In this environment, Registrars have increasingly taken on broader responsibilities for coordination, system stewardship, and risk management, alongside their core statutory functions. These arrangements have enabled the system to adapt and remain operationally effective; however, they also invite consideration of sustainability, clarity of roles, decision-making pathways, and the system's capacity to respond strategically to emerging pressures.

2.4 Key issues and opportunities for consideration

This paper explores seven interconnected themes identified through engagement with Registrars: governance and structural arrangements; funding and resourcing; regulatory framework effectiveness; data, reporting and transparency; sector complexity and emerging challenges; technology and innovation; and collaboration and sector engagement.

Across these themes, the paper highlights opportunities to strengthen alignment between policy ambition, regulatory capability and the scale of public investment now underpinned by the NRSCH. It also notes the potential risks associated with relying on incremental or ad-hoc adjustments in the absence of a more deliberate and coordinated approach to system evolution.

2.5 Exploring future directions

Importantly, this paper does not propose a preferred model or predetermined reform pathway. Rather, it is framed to support consultation and the sharing of perspectives on what a modern, fit-for-purpose regulatory system could look like in the current and future housing environment.

As part of this discussion, the paper explores a potential future-oriented framing of modern regulation—one that emphasises collaboration, effective use of data, clearer governance, and shared capability, while continuing to respect jurisdictional autonomy. The evolving role of the National Office is presented as one illustrative example of how shared services or system-level functions might support greater national coherence and efficiency, without centralising regulatory control.

2.6 Invitation to contribute

The questions posed throughout this paper are intended to support constructive engagement. They invite consideration of what level of assurance is required as community housing continues to expand; how governance, funding and regulatory settings might best support confidence in long-term outcomes; what roles different levels of government could play in enabling system capability; and how the consequences of inaction compare with the opportunities presented by thoughtful, collaborative reform.

Through consultation, this paper seeks to gather diverse views to help inform future decisions about the NRSCH—ensuring that any evolution of the system is grounded in practical experience, supports public value, and remains responsive to the needs of governments, regulators, providers, and the communities they serve.

3 Background

The NRSCH was conceived as a nationally consistent regulatory framework, underpinned by Australian Government stewardship and shared governance arrangements. Bodies such as the Select Council on Housing and Homelessness and the National Regulatory Council were intended to provide national policy leadership, strategic oversight, and an independent advisory environment to support consistent regulation across jurisdictions and continuous improvement.

This policy architecture changed fundamentally following the Australian Government’s withdrawal from the system in 2014 and the decision by Victoria and Western Australia to maintain autonomous systems. These developments significantly altered the authorising environment in which the NRSCH operates. In the absence of national policy leadership, formal oversight structures, and Australian Government resourcing, the system evolved in ways not originally envisaged. Registrars increasingly assumed responsibility for maintaining national coherence, system stewardship, and cross-jurisdictional coordination—roles extending beyond their core statutory compliance and assurance functions. (*See Appendix A – Functions of Registrar*).

The governance arrangements originally envisaged were not implemented, and the system evolved in response to these changes. The National Office (formerly the Secretariat) was established and funded entirely by participating states and territories. This placed responsibility for administering, coordinating, and sustaining a national regulatory framework on jurisdictions, without the policy authority or funding base that had been anticipated at the system’s inception.

To address the loss of national coordination mechanisms, Registrars established the Regulatory Advisory Group in 2016. This forum sought to support consistent regulatory practice, manage system-wide risks, and maintain engagement with policy agencies and peak bodies. While it restored a degree of national coordination and sector input, its effectiveness diminished over time. Declining continuity and capability among policy representatives, combined with growing membership and limited decision-making authority, constrained the Regulatory Advisory Group’s ability to progress substantive reform or provide clear policy direction.

The 2018–2021 Australian Government - State Review was expected to provide a pathway for addressing structural and operational challenges. Although the review identified critical issues, it did not result in changes to the regulatory framework. In the absence of a reform program, Registrars were left to pursue incremental operational improvements while systemic issues remained unresolved.

Over the same period, the community housing sector commenced a rapid expansion in scale and complexity. Registrars faced increasing registration demand, more sophisticated financial and corporate structures, and the introduction of major national funding initiatives. These developments significantly increased regulatory risk and complexity, placing pressure on a framework that was not designed for the current operating environment.

Registrars became a critical source of system intelligence. Through registration assessments, compliance monitoring, and risk-based oversight, they developed detailed insights into provider capability, emerging risks, and the practical impacts of policy and funding settings. However, in the absence of clear policy escalation pathways or mechanisms to translate this intelligence into

system-level reform, Registrars were often required to manage policy gaps while mitigating increasing risk exposure. This blurred the boundary between regulatory oversight, policy interpretation, and strategic stewardship.

The cumulative effect is that Registrars now hold significantly expanded operational, strategic, and coordinating responsibilities without the governance structures, authority, or sustainable resourcing originally intended to support them. This evolution—driven by necessity rather than deliberate design—highlights a critical policy issue: the regulatory system underpinning national housing investment has outgrown its authorising environment. Addressing this misalignment will require renewed policy leadership, strengthened governance, and sustainable investment to ensure the NRSCH remains effective, coherent, and fit for future national housing objectives.

Table 1: Strategic intent v’s operational reality – impact on Registrars

| Strategic intent | Operational reality |
|--------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|
| National governance (SCOHH) and advisory structures (NRC) provide high-level oversight and direction. | Registrars became the primary stewards of a national system with no formal ministerial oversight. |
| National policy leadership supply strategic direction and reform pathways. | Registrars gained additional responsibilities for identifying system gaps, inconsistencies, and emerging risks |
| Australian Government funding supports intended governance models. | Registrars were required to maintain national coherence under limited state-funded resources. |
| Decisions escalated to national bodies. | Decision-making became slower and reliant on jurisdictional consensus, with no escalation pathways. |

3.1 Why this matters for government

For governments, the current regulatory system raises important considerations about the alignment between policy objectives, investment scale, and regulatory capability. This is particularly relevant in the context of increasing public investment in community housing, which is supported by a regulatory system operating without a clearly articulated national authorising framework, enduring governance arrangements, or a long-term funding base. As governments consider future investment and policy settings, decisions regarding governance, policy stewardship, and funding will play a key role in shaping the system’s capacity to provide confidence in long-term outcomes and support effective delivery of housing programs.

4 NRSCH - A system at the crossroads

4.1 National, federated or collaboration

The NRSCH was conceived as a nationally consistent regulatory framework, —but its reality is more nuanced. Rather than a centralised model, it operates through a federated structure where each participating state and territory appoints its own Registrar. NRSCH Registrars work under a shared National Law and regulatory code, fostering alignment across jurisdictions. Yet, the absence of direct Australian Government involvement—and Victoria and Western Australia operating autonomous regulatory systems—marks the NRSCH as something distinct: neither wholly national nor traditionally federal.

What emerges is a hybrid model of intergovernmental collaboration—one that relies not on central authority, but on shared stewardship and mutual accountability. It’s a system built on trust, coordination, and collective intent.

But this raises a fundamental question:

1. To what extent can national aspirations be pursued without federated mechanisms; including a clear and unified policy position from the Australian Government on the future of community housing regulation?

4.2 Policy leadership and regulatory oversight

At the core of the NRSCH is a uniquely interdependent model of regulation—one in which Registrars and policy leads should hold distinct but complementary mandates. Registrars fulfil a statutory role, safeguarding provider capability, financial sustainability and governance performance through ongoing registration, risk monitoring and, where required, enforcement action. They also serve as the principal source of regulatory assurance for governments whose programs increasingly rely on Registrar assessments to monitor long-term viability and act as an early warning of provider distress.

While Registrars anchor the operational oversight of the system, policy leads carry responsibility for its long-term design. Shaping the legislative environment, responding to emerging market conditions, and stewarding the system’s evolution—ensuring coherence across jurisdictions and alignment with whole-of-government priorities. The partnership between policy and regulatory functions is essential for building a fit-for-purpose, future-ready regulatory framework.

However, the current system does not always enable this partnership to work. The absence of clear escalation pathways, inconsistent policy engagement, and limited national coordination mechanisms all restrict the ability to drive strategic reform. These constraints highlight the need for a refreshed authorising environment—one that enables timely decision-making, clearer roles, and stronger alignment between regulatory practice and national housing objectives.

2. In what ways do our current regulatory structures support – or potentially limit – innovation, accountability, and responsiveness?
3. How well do the current foundations of the NRSCH support its current state and long-term ambitions, and what kinds of recalibration might be needed to secure its future and strengthen its role?
4. In what way must the policy–regulator partnership evolve to better support long-term system stewardship, strategic reform, and a future-ready regulatory framework?

4.3 The National Office: Role, resourcing and capability

Following the withdrawal of Australian Government’s oversight and the absence of intended national governance arrangements, the National Office was established (2016) as a coordinating function funded by participating states and territories. The current intergovernmental funding agreement, in place since 2021, supports 2.9 FTE and core operating costs and is scheduled to expire on 30 June 2026. Over time, the National Office’s role has expanded beyond a secretariat and coordination function prompting consideration of how its mandate, resourcing and governance align with the functions it now performs. Registrars and the National Office operate as an integrated partnership that underpins the effectiveness and coherence of the NRSCH. Registrars provide frontline statutory assurance, while the National Office enables system-level controls through shared data and systems, coordination and reporting that mitigate fragmentation risk inherent in a federated model. Where this partnership is adequately resourced, it strengthens control effectiveness by improving national consistency, reducing duplication, and increasing risk visibility. However, funding constraints weaken these controls by limiting national coordination, data capability, and analytical capacity, increasing residual risk across the system. Without sufficient, stable funding, fiscal exposure increases as assurance gaps widen and reliance shifts to jurisdiction-level mitigations to manage system-wide risks.

In addition to its core function of supporting the administration of the NRSCH, the National Office delivers support services to Western Australia, including access to an independent community within the Community Housing Regulatory Information System (CHRIS). This arrangement reflects the NRSCH’s broader commitment to regulatory alignment and consistency across jurisdictions and provides a modest contribution to national system priorities. However, providing services to an autonomous regulatory framework through a short-term, annually renewed agreement constrains governance and system planning. It reduces certainty, limits longer-term investment and workforce planning, and does not generate sufficient revenue to expand capability. As a result, there is a risk that effort and resources are diverted from core NRSCH functions, with implications for the National Office’s capacity to support national coordination and system stewardship.

As we look ahead, the question is:

5. What role should the National Office play and what resourcing and skill set would be required to sustain these roles?
6. What are the long-term implications of relying on limited and time-bound funding to sustain and strengthen a national regulatory system – and what alternatives might better support its future?

4.4 The future demands more

The NRSCH has demonstrated its capacity to deliver consistent regulation across participating jurisdictions. Since its inception, over 470 community housing providers¹ have been registered under the scheme, collectively managing more than 100,000 dwellings—a testament to the system’s reach and relevance.

However, the system now faces a convergence of pressures that warrant closer examination of the strategic recalibration and modernisation of national regulatory systems.

- **Rising demand for registration:** The introduction of the Housing Australia Future Fund Facility (HAFFF) and the National Housing Accord Fund (NHAF) has significantly increased the number of providers seeking registration to access funding. In 2023–24 alone, several jurisdictions reported a 30–50% increase in registration inquiries.
- **Resource constraints:** Despite this growth, most Registrar offices have not seen proportional increases in staffing. The National Office operates with just 2.9 FTE, supporting a system that spans multiple jurisdictions and complex regulatory functions.
- **Sector transformation:** The rise of Special Purpose Vehicles (SPVs), institutional investment, and blended finance models is reshaping the sector. Expansion in the number and complexity of SPVs driven by new funding streams such as HAFFF and NHAF are increasing the workload for regulators, adding to registration pressures and amplifying the demands on limited regulatory resources. As of October 2025, SPVs represented almost 17% of all NRSCH registered providers with significant growth reflected over the past two years. These developments require more sophisticated regulatory oversight, yet current governance and resourcing models were not designed with this complexity in mind.
- **Escalating construction costs:** The rise in housing construction costs due to increased costs for raw materials and rising labour costs from skilled tradesperson shortages has driven developers and providers to seek more affordable financing options—often through Housing Australia—further increasing the regulatory burden.
- **Regulatory expectation:** While the national focus remains on boosting affordable housing supply, regulatory oversight is shifting to ensure the Australian Government’s investment

¹ Since 2014, 471 CHPs have registered under the NRSCH. Despite 80 cancellations due to voluntary deregistration or enforcement actions, the net growth underscores the sector’s resilience and expanding capacity. Figures as of October 2025.

delivers sustained, long-term housing outcomes—raising expectations for accountability, performance, and sector alignment.

- **Jurisdictional variation:** Victoria and Western Australia operate independent regulatory systems, enabling them to tailor regulatory approaches to local operating environments and sector needs. These arrangements allow for more direct governance and decision-making within their jurisdiction, in contrast to the collective, consensus-based structures that characterise the NRSCH. However, their continued engagement with the NRSCH highlights a shared responsibility for regulatory alignment, quality, and effective oversight across the regulatory landscape.
- **Funding uncertainty:** The current intergovernmental funding agreement with NRSCH participating jurisdictions, which underpins the operations of the National Office, is set to expire on 30 June 2026. Without a recalibrated funding model, the system risks stagnation at a time when agility and innovation are most needed to protect the Australian Government’s investment.

These factors point to a clear misalignment between the role the NRSCH now performs and the structure and resourcing that underpin it. While the system has provided a stable foundation, it has not evolved at the pace required to match the scale, complexity and expectations associated with contemporary national housing investment.

This challenge has been exacerbated by the limited impact of the 2018–2021 Australian Government–State review, which, despite identifying structural issues, did not translate into an agreed reform pathway or implemented change. As a result, the regulatory framework enters the next phase of sector expansion without the benefit of reform momentum, increasing the risk that regulatory capability, national coherence, and assurance mechanisms will fall behind policy ambition. This heightens the case for modernisation, clearer national policy direction, and sustained investment to ensure the regulatory system remains fit-for-purpose, protects public value, and supports long-term housing outcomes.

The Australian Government is well placed to play a stronger role in mitigating systemic risk and strengthening assurance over its growing investment in community housing. This could include articulating a clearer national policy position, establishing more effective co-governance arrangements, and targeted investment in regulatory systems that are proportionate to the scale and complexity of public funding exposure. Investment in community housing regulation can be seen as a value-for-money proposition, with the potential to enhance confidence in provider capability, improve risk visibility, and reduce the likelihood of downstream fiscal, delivery, or reputational risks. A well-designed and adequately resourced regulatory framework would be expected to support sustainable sector growth, safeguard public value, and help ensure government housing investments deliver durable outcomes aligned with national policy objectives.

7. What new oversight mechanisms might be needed in the future as the focus shifts from housing supply to tenancy management?
8. How do Registrars plan and adapt without a clear national policy position for the future or involvement in decisions that impact the regulatory landscape?
9. What strategies, resources and regulatory supports are needed to ensure providers can sustainably manage increased operational demands, maintain service quality, and continue to deliver positive outcome for tenants and communities as the sector rapidly expands?
10. What role should the Australian Government have in enabling regulatory transformation?

5 What we have heard - challenges and opportunities

The current regulatory framework is subject to a set of interconnected structural, operational, and strategic limitations that increasingly constrain its effectiveness and future sustainability. This paper explores seven issues identified during interviews that highlight the need for modernisation across governance, funding, regulatory design, data, sector complexity, technology, and collaboration. These factors create material assurance risks for government at a time of expanding reliance on the community housing sector to deliver national housing objectives. In the absence of a recalibrated system, these pressures heighten the risk of inconsistent oversight, reduced visibility of emerging provider stress, and misalignment between policy ambition and system capability. This creates potential downstream fiscal, delivery, and reputational consequences for governments. While there is broad agreement across jurisdictions on the need for modernisation, approaches to reform remain contested. Notwithstanding these constraints, Registrars have continued to adapt to the changing operating environment and remain focused on strengthening regulatory capability to protect public investment, manage systemic risk, and support the delivery of durable housing outcomes.

The opportunities outlined in this section are linked and are best considered as part of an integrated set of options for modernisation rather than as standalone initiatives. Feedback throughout this section highlights that progress in one area is likely to depend on progress in others. For example, improvements in data, reporting and transparency may be difficult to achieve without sustained investment, while potential changes to the regulatory framework may rely on clearer governance arrangements to support shared decision-making and consistent implementation across jurisdictions. By looking at these opportunities collectively, we can lay the groundwork for conversations about advancing funding, governance, regulations, data capability, technology, and collaboration in a unified manner. A system-wide approach may help ensure that any future reform efforts are mutually reinforcing, support confidence across governments and the sector, and translate into practical improvements for regulators, providers and housing outcomes for tenants and communities.

5.1 Governance and structural challenges

The absence of Australian Government involvement has shaped the current authorising environment and governance arrangements. In this context, decision-making has relied on consensus-based processes across participating jurisdictions. While this approach supports collaboration and shared stewardship, it can also influence the pace of decision-making and the availability of clear escalation pathways for system-wide issues. Over time, Registrars have assumed broader roles in system coordination and stewardship, prompting reflection on whether existing governance settings, mandates and resourcing remain well aligned with the scale and significance of the regulatory system.

The experience of Victoria and Western Australia illustrates how autonomous regulatory arrangements can enable more direct governance and responsiveness to local operating environments. By contrast, the NRSCH operates through a collaborative, multi-jurisdictional model that seeks to balance national consistency with jurisdictional autonomy. While this diversity of regulatory approaches can introduce complexity, it also brings a breadth of perspectives, expertise and operational experience that can inform more robust and well-considered outcomes at a national level.

Stakeholders noted the absence of a clearly articulated national policy position and reflected on how this may influence strategic planning, system stewardship, and the capacity for coordinated reform. Views differed on what governance mechanisms might best support more agile and timely decision-making, and there was no single perspective on what a future national authorising environment might comprise. These differing views suggest an opportunity for further dialogue on how policy leadership, governance arrangements and accountability mechanisms could evolve to support a modern, future-ready regulatory system.

Community housing providers are recognised as key contributors to national housing objectives, despite the Australian Government not holding a formal role in the regulatory system that sets standards, monitors compliance, and enforces regulation. This raises broader considerations about how regulatory settings can continue to provide assurance of provider capability and viability, remain responsive to major national initiatives such as the HAFFF, and support greater harmonisation through outcomes-focused and risk-proportionate regulation. Exploring these considerations may assist in identifying how the regulatory system can continue to support sector growth, innovation, and long-term housing outcomes.

Opportunity

Governance and structural settings present a clear opportunity to strengthen the system's capacity to respond more quickly and cohesively to emerging risks, sector growth, and major national housing initiatives. By recalibrating roles, decision-making pathways and national alignment, the regulatory system can better support Registrars in focusing on their core statutory functions while enabling strategic reform and modernisation. Addressing these areas would enhance consistency in regulatory practice, accelerate innovation, and improve assurance over provider capability and public investment—reinforcing confidence in the regulatory system's credibility and its ability to support Australia's national housing objectives at scale.

11. How can the regulatory systems, nationally, evolve to a more cohesive framework while respecting jurisdictional autonomy?
12. Without change, what is the pathway to identify and implement innovation within the NRSCH?
13. What governance mechanisms could enable more agile and timely decision-making?
14. What impact does the absence of a national policy position or policy leadership have on the strategic development of the NRSCH?
15. What might a national authorising environment look like, and how could it support strategic planning and, reform?

5.2 Funding and resource constraints

The NRSCH is operating within a funding and resourcing model that raises material questions about its capacity to sustain effective regulatory oversight in the context of growing scale, complexity, and public investment. Current arrangements rely on time-limited and jurisdiction-funded contributions, applied through an adjusted cost-sharing formula that competes with other state and territory priorities. This creates ongoing uncertainty and limits the system's ability to plan, invest and respond strategically over the medium to long-term.

Registrars observed that constrained and episodic funding settings restrict the NRSCH's capacity to modernise regulatory practice, including investment in digital systems, data capability, and core infrastructure such as the Community Housing Regulatory Information System (CHRIS). Over time, under-investment in these areas can increase regulatory and compliance costs, contribute to duplication across jurisdictions, and reduce the effectiveness of assurance mechanisms relied upon by governments and funders.

These issues invite consideration of whether the current funding model remains proportionate to the scale of public funding exposure now underpinned by the regulatory system. A more coordinated and sustainable approach to funding could support stronger regulatory capability, improve data quality, and risk visibility, and deliver efficiency gains across jurisdictions. Without more stable and predictable investment, regulatory capacity may not keep pace with policy ambition. This increases reliance on manual workarounds and elevates long-term fiscal, delivery, and reputational risks. Establishing a durable, government-backed funding framework is therefore a key issue for consideration in strengthening assurance, supporting value-for-money, and safeguarding national housing investment over time.

Opportunity

Sustainable funding presents a clear opportunity to lift regulatory effectiveness—enabling efficiency gains, modern regulatory practice, stronger national data and reporting, and greater adaptability to sector change. With the right investment, the system can reinforce its integrity, strengthen national alignment, and remain relevant as Australian Government housing priorities continue to evolve. This investment would help maintain stakeholder confidence and reinforce the NRSCH's role as a trusted, effective regulatory system.

16. To what extent does limited investment in shared digital systems and data capability affect the regulatory burden on CHPs?
17. What sustainable funding or service delivery models could support the operational and strategic needs of the NRSCH and broader regulatory systems?
18. To what extent should the Australian Government contribute to funding the NRSCH systems and initiatives? If so, under what conditions?

5.3 Regulatory system effectiveness

As the community housing sector continues to expand in scale, complexity and national significance, there is an opportunity to step back and consider how well the current regulatory framework is responding to this changing environment. Increased public investment, more diverse provider models and growing cross-jurisdictional activity raise important questions about whether existing regulatory settings remain fit for purpose, and where adaptation may be needed to support both assurance and innovation.

In particular, the emergence of more complex financing and delivery structures, including SPVs, prompts consideration of how regulatory assurance, consistency and proportionality can be maintained in practice. These developments also invite reflection on the role and operation of the existing Performance Outcomes and tiered registration system, and how effectively these elements continue to support regulatory objectives within a more complex and dynamic sector.

Registrars shared a range of perspectives on the relevance and effectiveness of current Performance Outcomes and tier-based arrangements. While there was broad recognition that aspects of the framework may need to evolve, views differed on where change should be prioritised and how it might best be implemented. This suggests an opportunity for further dialogue to explore potential pathways, trade-offs and unintended consequences before any future directions are settled.

A number of issues were raised for consideration, including how the regulatory system should respond to the growing use of SPVs and increasingly sophisticated financial structures; how regulators can be confident that compliance decisions are informed by information that is current, accurate and reflective of providers' real-time operations and tenant outcomes; and whether the existing compliance regime is sufficiently risk-based, or whether it continues to rely on relatively uniform approaches driven primarily by registration tier.

Registrars also reflected on how the tiered registration system is interpreted and experienced across the sector. Questions were raised about perceptions of hierarchy, assumptions about capability, and whether assessment frequency and engagement approaches—particularly for Tier 3 providers, who make up a considerable proportion of the registered cohort—remain appropriate and proportionate. These reflections point to opportunities to reconsider how regulatory engagement is structured to encourage meaningful participation while maintaining assurance.

More broadly, there was interest in exploring whether greater alignment between regulatory and funding reporting requirements could reduce duplication, improve data consistency, and

strengthen real-time insight into provider performance. This raises wider questions about data interoperability, shared assurance frameworks, and the extent to which existing data could be better leveraged to support outcomes-focused regulation.

Taken together, these issues suggest an opportunity to collectively explore how the regulatory system might evolve to remain responsive to sector growth and diversity, reduce unnecessary burden, and continue to provide strong assurance for governments while supporting sustainable, long-term outcomes for tenants and communities.

There is growing interest in exploring how the regulatory system might further reduce the compliance burden on community housing providers, particularly in the context of increasingly complex data and reporting requirements. Stakeholders have noted that fragmented information systems, varying definitions and differing data standards may be influencing how effectively information can be shared or relied upon across regulators and funders. It is worth considering whether the absence of shared assurance frameworks contributes to duplicated reporting and limits the extent to which existing data can be used to support regulatory decision-making. These observations raise broader questions about how data interoperability, consistency and confidence might be strengthened to better support providers, enhance regulatory effectiveness, and inform future system design.

Opportunity

The current environment presents a significant opportunity to modernise and strengthen the regulatory system to better reflect the scale, complexity, and diversity of the sector. By refreshing tier-based compliance arrangements, updating guidelines, and making greater use of timely, high-quality data, the system can enhance the consistency, proportionality, and effectiveness of regulatory oversight. Improving data standards and interoperability would reduce duplication and administrative burden, strengthen assurance, support earlier identification of emerging risks, and improve alignment between regulatory capability, sector expectations, and the Australian Government's growing investment in community housing.

19. To what extent does the current regulatory system remain fit for purpose?
20. How can the regulatory system better reflect risk-based and outcomes-focused principles?
21. To what extent are the current Performance Outcomes fit for purpose in delivering assurance, protecting tenants, and driving improvement?
22. How can data currency, interoperability and shared assurance be strengthened to support better regulatory decision-making?
23. What changes, if any, could reduce regulatory burden while maintaining confidence in provider capability and tenant outcomes?

5.4 Data, reporting and transparency

A national regulatory system depends on access to information that is consistent and comparable if it is to effectively support assurance, monitoring, risk assessment, and accountability. There is growing interest in how data might play a stronger role in enhancing regulatory effectiveness

across the community housing sector. A more data-informed approach has the potential to support a shift from reactive compliance activities toward more proactive risk management and continuous improvement. It also raises questions about how real-time insights, risk indicators and performance measures could better inform timely and targeted regulatory decision-making.

Initiatives, such as the Australian Institute of Health and Welfare's (AIHW) data alignment project, represent a key step toward greater national consistency in housing and homelessness data. By seeking to address long-standing differences in definitions, collection practices and reporting methods, this work has laid useful groundwork. However, it also highlights that fragmented data standards continue to limit opportunities for benchmarking and deeper analysis across jurisdictions, prompting consideration of what further alignment might be needed.

Building on this foundation, the National Agreement on Social Housing and Homelessness (NASHH) signals a shared commitment to improving data and reporting through the development of a nationally consistent dataset and an outcomes-based reporting framework. This presents an opportunity to reflect on how the principles established through earlier alignment efforts could be embedded more systematically into performance monitoring, progress measurement, and policy development.

Despite the volume of data collected across the system, questions remain about how effectively this information is being used. National-level reporting is limited, and the scope for richer narrative and analysis is constrained. Without dedicated resources to support coordinated national reporting, jurisdictions will continue to divert limited capacity to meeting reporting requirements rather than extracting broader system-level insights. Exploring more effective, shared approaches to reporting could help strengthen transparency, support shared learning, and build public confidence.

In the future, it could be beneficial for governments to work together on systems that avoid repeating efforts and make information more consistent and accessible, like using a "collect once, share often" model. Achieving this would require investment in integrated systems, clear governance arrangements, and sustained collaboration between the AIHW and state and territory partners. These considerations raise broader questions about what level of data integration is needed to support responsive regulation, stronger accountability, and more sustainable housing outcomes over time.

Opportunity

Strengthening national data standards and coordinated reporting presents a significant opportunity to enhance the effectiveness and credibility of community housing regulation. Unified data practices would enable regulators to more readily identify emerging risks, benchmark performance, and support continuous improvement across the sector. Improved integration would reduce duplication, minimise inefficiencies, and enhance transparency—building stronger public trust and sector confidence. Establishing a dedicated national reporting function would further unlock the value of sector-wide data, supporting deeper analysis, shared learning, and more informed strategic planning at both jurisdictional and national levels.

24. How can the NRSCH shift from collecting data to actively using it as a regulatory tool for performance improvement?
25. What data is most valuable for regulatory oversight, and how can reporting be streamlined to focus on meaningful metrics?
26. What would meaningful national reporting look like for stakeholders?
27. How can stakeholders be more actively involved in defining data priorities and interpreting insights?
28. To what extent, if any, would longitudinal studies play in shaping future regulation and policy?

5.5 Sector complexity and emerging challenges

Emerging sector developments—including new funding mechanisms, evolving service delivery models, and increasing expectations around transparency and accountability—raise questions about whether existing regulatory approaches remain sufficiently agile, data-informed, and proportionate. As the community housing sector continues to expand and diversify, with new entrants bringing a broader range of motivations and funding structures, there may be value in considering how regulatory oversight could evolve to reflect this complexity. This is particularly relevant as the policy focus increasingly extends beyond supply-side development to longer-term tenancy management and monitoring.

Some jurisdictions have reported an increase in applications from entities that satisfy the legal requirements for registration but may not demonstrate clear housing objectives or viable delivery pathways. This experience suggests an opportunity to consider whether clearer or more consistent guidance could support decision-making on suitability, while maintaining transparency, procedural fairness, and regulatory confidence.

There has also been interest in examining whether the *Community Housing Providers (Adoption of National Law) Act 2012* continues to operate as intended in the context of contemporary sector structures. In particular, the current requirement for each subsidiary within a corporate group to be registered individually has been identified as potentially contributing to increased administrative burden for both providers and regulators. This raises the question of whether alternative approaches—such as group registration models—could provide an appropriate balance between regulatory assurance and administrative efficiency.

Regional variation further highlights the importance of regulatory approaches that are responsive to local contexts and operating environments. Cultural considerations, inclusion, and flexibility are especially relevant for Aboriginal Community Controlled Organisations (ACCOs), which often operate within distinct governance arrangements and community-led service models. This invites consideration of how regulatory and reporting settings can uphold nationally consistent standards while remaining sufficiently adaptable to avoid unintended barriers to participation. Engagement with stakeholders, including through co-design of data priorities and shared interpretation of regulatory information, may support more culturally appropriate and effective regulatory practice, while continuing to meet sector-wide expectations for accountability and performance.

Opportunity

As financial structures become more sophisticated and provider models more diverse, there is a timely opportunity to modernise regulatory systems to ensure they remain fit-for-purpose. Proactive adaptation can strengthen oversight, enhance consistency, and improve the assessment of provider viability and risk exposure. By evolving in step with sector developments, the regulatory system can build stakeholder confidence, support compliance, and reinforce alignment with national housing policy objectives—strengthening the credibility and resilience of both the regulatory system and the Australian Government’s housing investment.

- 29. How should regulatory oversight adapt to the increasing diversity of provider profiles and funding arrangements?**
- 30. What models are needed to support the shift from supply-side development to long-term tenancy management?**
- 31. How can regional and cultural differences be better addressed?**
- 32. What regulatory tools or approaches are needed to effectively regulate SPVs and complex financial structures?**

5.6 Technology and innovation

Registrars noted a marked increase in registration activity, with assessments becoming more complex and compliance demands growing as the sector expands. At the same time, these pressures have not always been accompanied by increases in regulatory resources. This has led to questions about how current systems and approaches are coping with rising workloads, and whether existing arrangements are well positioned to support effective and responsive regulation over time.

There has been interest in how technology might help address some of these pressures. Digital and data-enabled tools are seen as having potential to streamline processes, support more consistent assessments, and improve the identification of emerging risks. Some stakeholders suggested that technology could help regulators manage increasing demand more sustainably, alongside—rather than instead of—traditional resourcing approaches.

There has also been enthusiasm for exploring the role of Artificial Intelligence (AI) and other digital tools in areas such as assessments, reporting, risk identification, and data quality. Platforms including Salesforce and Tableau were raised as enablers of automation and improved insight. More broadly, Registrars highlighted interest in strengthening identity management, security, and national reporting arrangements for the NRSCH, particularly where these could reduce duplication and improve information sharing.

Registrars acknowledged that progress in this area is shaped by limited and time-bound funding, jurisdictional investment decisions, and the need to work within consensus-based governance arrangements. These constraints were seen as influencing both the pace of innovation and the capacity of the National Office to coordinate system-wide initiatives. Together, these observations point to an opportunity for further discussion about what conditions—governance, funding, and

capability—would best support the considered adoption of new technologies and a more adaptive, future-ready regulatory system.

Opportunity

Investing in modern technologies and innovative regulatory models presents a significant opportunity to strengthen the effectiveness, agility, and credibility of the NRSCH. The adoption of contemporary digital tools can enable regulators to better manage increasing workloads and sector complexity, respond more proactively to emerging risks, and deliver timely, data-informed oversight. Modern systems can streamline processes, enhance visibility of provider performance, and support earlier, more targeted regulatory interventions. Strategic investment in technology also creates opportunities to reduce duplication, improve stakeholder engagement, and align regulatory practice with broader government digital transformation priorities. Over time, these reforms can build trust in the regulatory system, support continuous improvement, and enhance the NRSCH’s capacity to enable sustainable sector growth and innovation.

- 33. How do current regulatory systems and processes affect providers as the sector grows in scale and complexity?**
- 34. Where could technology most effectively support regulatory oversight and consistency, while also reducing unnecessary burden or duplication for providers?**
- 35. What opportunities exist to improve data quality, consistency, and risk identification across jurisdictions?**
- 36. What challenges do providers experience with existing data, reporting or digital systems?**

5.7 Collaboration and sector engagement

Effective collaboration and engagement are widely seen as important foundations for a resilient and high-performing housing sector. This raises questions about how information is currently shared, how coordination occurs across key bodies, and how the visibility and strategic role of Registrars might be strengthened. It also invites reflection on whether existing policy settings are sufficiently responsive to sector change, and how clearer, forward-looking policy frameworks could better support Registrars in administering regulation. Ongoing dialogue between agencies, regulators and providers may be critical in anticipating emerging risks and opportunities, and in enabling the regulatory system to adapt to an evolving community housing landscape.

Strengthening these elements prompts consideration of how stakeholders—regulators, governments, funders, providers, and Housing Australia—can be better aligned in their capacity to respond collectively to emerging challenges. This suggests that sector engagement may need to extend beyond consultation alone, towards partnerships that build trust, encourage shared learning, and clarify accountability for outcomes. Improved transparency and clearer mechanisms for collaboration and information sharing could play a role in safeguarding public investment and supporting more sustainable housing solutions.

While there is a general assumption that providers will remain viable and housing outcomes will be delivered, it is also worth exploring how the system responds when pressures emerge or risks

materialise. In these circumstances, governments often look to regulators as an early warning mechanism—able to provide timely insights and signal potential distress to investors and funders. However, Registrars noted that limited information sharing and transparency can sometimes constrain this role. This raises questions about what changes to alignment, processes or culture might support earlier intervention and more effective protection of public investment.

Developments, including the recalibration of the Regulatory Advisory Group and the increasing number of cross-jurisdictional service providers, present an opportunity to reconsider how Registrars engage with the sector. Registrars have indicated an interest in strengthening collaboration and engagement, including through ongoing discussions with national peak bodies about new and more effective ways of working together.

At the same time, it is acknowledged that Registrar resources are currently under pressure. Increasing the frequency and visibility of engagement may, under existing conditions, require trade-offs with core regulatory functions. This tension invites reflection on how engagement can be strengthened in a way that is sustainable and does not inadvertently weaken regulatory oversight, or create perceptions that engagement is not a priority.

For collaboration to be both meaningful and durable, there may be a need to consider what additional time, resources or structural supports are required. Well-designed engagement mechanisms could reinforce the importance of regulatory functions, support sector stability, and contribute to a more resilient and responsive regulatory environment overall.

This also invites reflection on the role of regulators in shaping national housing policy and funding decisions. Beyond policy advocacy, how might regulators best engage with Ministers, Treasury officials, and sector leaders to ensure regulatory perspectives are understood and inform high-level decision-making? Given that policy changes can have significant downstream impacts on regulatory requirements, funding streams, and sector priorities, building trust and credibility with senior decision-makers may be an important enabler of future reform. Strengthening communication across stakeholders could therefore be central to developing a shared vision for the future of community housing.

Opportunity

Strong collaboration and sector engagement present a significant opportunity to enhance the resilience, effectiveness, and long-term sustainability of the regulatory system. By strengthening information sharing, coordination and transparency across stakeholders, regulators and governments can improve early identification of emerging provider risks, support timely and proportionate interventions, and build confidence in regulatory oversight. Well-resourced, proactive engagement mechanisms can foster trust, enable more informed decision-making, and reinforce shared accountability for housing outcomes. In a sector responsible for delivering critical social infrastructure, deliberate investment in coordinated collaboration offers a pathway to stronger assurance, improved system performance, and more durable outcomes for tenants and communities.

37. How effective are current mechanisms for collaboration, information sharing and engagement between regulators, governments, funders, providers, and Housing Australia?
38. In what ways could collaboration move beyond periodic consultation toward more sustained partnerships that support shared learning, early risk identification, and cleaner accountability for outcomes?
39. What would 'good' collaboration and engagement look like in a future-ready regulatory system, and how would success be measured from the perspectives of governments, providers, and tenants?
40. To what extent should Registrars be involved in shaping future reform and system stewardship, and where might responsibility more appropriately sit?
41. What trade-offs, if any, arise between increased engagement and core regulatory functions, and how might these managed?

6 Modern regulation unpacked: What it could be

Building on the discussion of modern regulation in Section 5, this section examines an approach to how the regulatory system might evolve in response to current and emerging pressures. It does not propose a preferred model or predetermined reform pathway. Rather, it supports consideration of how an outcome-focused regulatory system *could* operate in practice, and what this might imply for governance, data capability, collaboration, and system stewardship. The discussion is framed to inform policy deliberation by exploring how design choices may support regulatory effectiveness, proportionality, and assurance in the context of growing public investment and sector complexity.

This section proceeds on the basis that meaningful improvement is unlikely to be achieved through isolated initiatives or conceptual frameworks alone. Instead, it invites reflection on whether more coordinated and sustained engagement between governments, regulators and the sector may be required to address structural misalignments and capability gaps that have emerged over time. As the NRSCH looks ahead, there is an opportunity to consider how practical and inclusive approaches might reconcile jurisdictional differences while supporting greater national coherence, clearer accountability, and more consistent regulatory outcomes. Enhanced collaboration, improved use of data, and more adaptable governance arrangements are potential enablers of a system that is better positioned to respond to change, rather than as ends in themselves.

From a forward-looking perspective, the discussion also considers what it might mean for the regulatory system to move beyond a compliance-focused role toward one that more explicitly supports risk management, early intervention, and long-term assurance over housing outcomes. Such an approach would not diminish the importance of statutory oversight, but may place greater emphasis on timely information sharing, coordinated responses and the effective translation of regulatory intelligence into system-level insight. This is explored as one pathway for strengthening confidence in the sector and safeguarding public value, while recognising that alternative models may also warrant examination.

In this context, a modern, outcome-focused regulatory system can be understood as one that seeks to balance consistency with flexibility, and assurance with efficiency. It may require regulatory settings that are sufficiently scalable to accommodate sector growth, while allowing jurisdictions to tailor implementation to local operating environments. Reducing reliance on rigid structures could create scope for innovation, more proportionate regulatory effort, and better use of data to inform decision-making. Viewed this way, regulatory change is not a discrete reform event but an ongoing process of adjustment. This warrants careful consideration of trade-offs, costs and benefits, and the consequences of inaction.

6.1 Modern regulation: Adaptive, inclusive, future-ready

A modern regulatory system can be viewed as one that places greater emphasis on outcomes, while continuing to provide appropriate assurance and consistency. Rather than relying primarily on prescriptive compliance processes, this perspective invites consideration of how regulation might evolve to better support jurisdictions to respond to change, manage complexity, and foster

continuous improvement across the sector. Exploring this approach raises questions about how flexibility and scalability could be incorporated in ways that strengthen impact and support improved outcomes for tenants, providers, and communities.

Table 2: The characteristics of a modern regulatory system

| Characteristics | Description |
|----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Outcome based standards and oversight | <ul style="list-style-type: none"> • Focus on impact rather than procedural compliance – measuring success by improvements in tenant wellbeing, housing stability, and community outcomes. • Clear performance indicators aligned with strategic goals at both national and jurisdictional level reflecting quality, equity, and sustainability |
| Adaptive and scalable framework | <ul style="list-style-type: none"> • Allows for jurisdictional flexibility, enabling states and territories to tailor implementation based on local housing needs, demographics, and market conditions. • Supports modular reform, where components can evolve independently without disrupting the entire system. |
| Collaborative governance | <ul style="list-style-type: none"> • Embeds co-governance structures that give jurisdictions a meaningful role in shaping national direction. • Encourages shared and timely decision-making and strategic planning across regulators, providers, and government. |
| Integrated data and intelligence | <ul style="list-style-type: none"> • Leverages shared data platforms to monitor performance, identify trends, and support evidence-based decision-making. • Promotes transparency and accountability through accessible reporting and benchmarking. • Enables evidence-based regulation and continuous learning through data insights. |
| Continuous improvement culture | <ul style="list-style-type: none"> • Promotes a learning culture where feedback, innovation, and sector engagement drive system evolution. • Supports providers in building capacity and improving outcomes. |

| Characteristics | Description |
|---------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Streamlined systems and processes | <ul style="list-style-type: none"> • Reduces duplication by centralising administrative functions. • Enables regulators to focus on core oversight activities and strategic priorities. |
| Sector engagement and responsiveness | <ul style="list-style-type: none"> • Maintains open channels for dialogue with providers, tenants, and peak bodies. • Responds to emerging trends and challenges with agility and transparency. |

42. Does this approach feel appropriate for the future direction of the NRSCH? Are there any aspects you feel could be strengthened or reconsidered? What other elements or perspectives might be important to include?
43. As the community housing sector transforms, what kind of regulatory change will truly support its future?

6.2 Opportunities for collaboration and shared services

A contemporary regulatory approach invites consideration of how regulation might evolve beyond a primary focus on process compliance toward greater emphasis on outcomes, sustainability, and risk visibility. A journey Victoria has commenced. Exploring this shift raises the possibility of earlier risk identification, more proportionate regulatory intervention, and stronger confidence in provider capability and long-term delivery. While Western Australia and Victoria have retained independent regulatory systems to reflect local priorities, there is scope to examine whether a modernised, outcome-focused federated model could enhance national consistency while continuing to respect jurisdictional autonomy and strengthen system-wide assurance.

Greater alignment across outcomes, data and performance expectations also presents an opportunity to improve value for money. Reducing duplication—especially for cross-jurisdictional providers and nationally funded programs—could support greater efficiency, consistency, and stewardship of public investment through more coordinated data standards, benchmarking, and reporting.

Importantly, this is not about centralising regulatory control. Rather, it invites reflection on how the regulatory system might remain robust, efficient, and proportionate to the scale, complexity and risk exposure associated with a growing national housing investment. In this context, consideration could also be given to the role of the Australian Government in supporting system capability through investment, shared data and performance benchmarks, co-governance

arrangements, and selective shared services—strengthening national assurance while preserving jurisdictional autonomy.

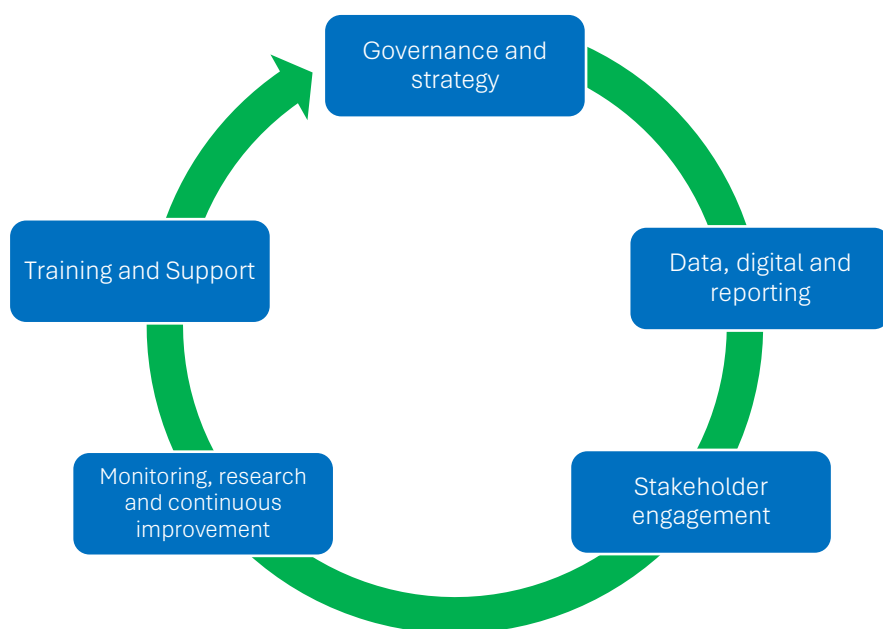
44. What factors might influence Western Australia and Victoria to reconsider their participation in a reimagined national framework? Are there opportunities or conditions that could make renewed engagement more viable?

6.3 Regulation in motion: Align, Reveal, Collaborate, Empower

At the heart of this framework is a cyclical process that reinforces strategic alignment, operational transparency, stakeholder collaboration, and sector capability—elements essential to a modern, enabling regulatory system. Each component reinforces the others, creating a resilient system capable of evolving with the sector’s needs. This model has the potential to support regulatory integrity and growth and empower the community housing sector to deliver better outcomes for tenants and communities.

Diagram 1 illustrates a dynamic, interconnected framework to support continuous improvement across regulatory systems. While aligned with the original vision for the NRSCH, the system has remained unchanged for over a decade. The framework presented here reflects an aspirational direction—toward a more adaptive, data-informed, and strategically aligned approach that leverages technology and collaboration to support improved outcomes for tenants, providers, and communities.

Diagram 1: Reimagining the regulatory system



1. **Governance and strategy** provide the foundation, ensuring that regulatory objectives are clearly defined, aligned with national priorities, and supported by robust leadership and oversight.
2. **Data, digital, and reporting** enable evidence-based decision-making, transparency, and accountability. Leveraging digital tools and consistent reporting mechanisms ensures that insights are timely and actionable.
3. **Stakeholder engagement** fosters trust, responsiveness, and inclusivity. By actively involving state and Australian Government officials, providers, tenants, and investors/funders, the system remains grounded in real-world needs and experiences.
4. **Monitoring, research and continuous improvement** drive innovation and adaptability. Regular evaluation and research inform policy refinement and operational enhancements.
5. **Training and support** ensure that all participants—regulators, providers, and stakeholders—have the skills, knowledge, and resources needed to operate effectively within the system.

7 Exploring shared functions and delivery models: The National Office as an example

Consistent with the intent of this discussion paper, the following section is presented to support consultation and informed discussion, rather than to advance a preferred or predetermined reform pathway. It outlines one approach to a shared service unit within a modern regulatory system, recognising that other models may be equally viable. For illustrative purposes, the National Office is used as an example to explore how shared capability could support regulators and the broader system through coordination, data, technology, and system stewardship. Importantly, any shared service model would need to be appropriately resourced to provide effective sector-wide coordination, leadership, and stewardship, commensurate with the scale and national significance of the regulatory task. Alternative structures, roles, and delivery models are deliberately left open for consideration through the consultation process.

7.1 A digitally enabled anchor: coordination, data, and shared intelligence

In a modern regulatory system, the National Office could be seen as an anchoring point—supporting strategic alignment, sector-wide coordination, and more streamlined administrative processes. Rather than functioning solely as a coordination hub, it may play a role in setting direction, supporting alignment, and assisting regulators and the sector to navigate increasing complexity. As regulation becomes more dynamic and responsive, there is scope to consider how the National Office (or an alternative shared service model) might evolve from a custodial role toward one that helps guide, connect and enable the system—supporting transparency, collaboration, and capability.

There is also an opportunity to explore whether this central function could become more digitally enabled over time, using technology to support more informed, timely and consistent decision-making. Moving beyond a traditional coordination role, it could potentially develop as a focal point for data analytics, shared intelligence, policy and guidance development, professional assurance, digital collaboration and selected centralised administrative services. Any such evolution would depend on appropriate governance arrangements and sustained investment.

Viewed this way, the model points to a more agile and connected business unit—closely linked to both regulators and the sector. It suggests a regulatory system that places greater emphasis on outcomes, supports provider capability, and strengthens stewardship of the Australian Government’s housing investment.

At present, national initiatives often draw heavily on jurisdictional capacity, at times diverting regulatory effort from local priorities. A more federated approach invites consideration of whether some functions—such as policy and guidance development, strategic planning, or data coordination—might be more effectively supported through a shared national capability, whether within the National Office or an equivalent structure.

Extending this thinking, there is the possibility of consolidating activities such as complaints handling, appeals and registration enquiries into a central function. If supported by appropriate systems and technology, such an approach could reduce administrative burden on jurisdictions, enable greater focus on frontline regulatory practice, and strengthen national coherence. In this model, the central function is less about control and more about enabling consistency, learning and strategic alignment as the sector continues to evolve.

- 45. To what extent is this approach appropriate for the future direction of the regulatory system? Are there any functions you feel could be strengthened or reconsidered? What other functions or perspectives might be important to include?**
- 46. What functions or capabilities should be prioritised to best support regulators and the broader community housing sector in the future?**
- 47. What alternative service delivery models could be applied to support a modern regulatory system?**
- 48. The National Office currently sits within Homes NSW (Department of Communities and Justice) as host jurisdiction of the Community Housing (Adoption of National Law) Act 2012. Structurally, to what extent is this appropriate in a modern federated regulatory system. What is the alternative?**

APPENDIX A – Functions of Registrar

Section 10 of the *Community Housing Providers (Adoption of National Law) Act 2012* sets out the functions of registrars.

Functions of Registrar

(1) A Registrar has the following functions:

- (a) to maintain the National Register of Community Housing Providers jointly with the Registrars of other participating jurisdictions,
- (b) to assess the suitability of entities to be registered as registered community housing providers,
- (c) to register entities as registered community housing providers and to cancel the registration of registered community housing providers,
- (d) to monitor compliance by registered community housing providers with community housing legislation and to exercise enforcement and intervention functions under that legislation,
- (e) to investigate complaints about the compliance of registered community housing providers with community housing legislation,
- (f) to provide information about the registration of entities and information about the compliance of registered community housing providers with community housing legislation,
- (g) to share information and to cooperate with Registrars of other participating jurisdictions for the purposes of community housing legislation,
- (h) to provide information and advice to the relevant Minister and Housing Agency in relation to the registration of entities and the regulation of registered community housing providers and any other matter under community housing legislation,
- (i) any other function conferred or imposed on the Registrar by or under this Law or any other law.

(2) In exercising functions under this Law, a Registrar is required to comply with any guidelines made jointly by the relevant Ministers of each participating jurisdiction and published in the New South Wales Government Gazette or on the NSW legislation website.

(3) A Registrar and any delegate of the Registrar is not personally liable for any matter or thing done or omitted to be done in good faith in the exercise of his or her functions under this Law.