

# Summary Report – Submissions on the Discussion Paper: Future Directions for the NRSCH

---

## Executive Summary

This report synthesises stakeholder submissions to the *Discussion Paper: Future Directions for the National Regulatory System for Community Housing (NRSCH)* to inform intergovernmental consideration of options to sustain a nationally consistent regulatory assurance framework as the community housing sector scales and delivery models evolve (including complex financing, group structures and Special Purpose Vehicles (SPVs)). Consultation ran from 18 February to April 2026 and comprised 22 written submissions and 23 survey responses, with strongest representation from community housing providers and peak bodies, complemented by regulators and government agencies.

**Methodology note:** This report applies the methodology set out in *Appendix B: Methodology*. All written submissions and survey responses were reviewed in full and then systematically coded using an iterative framework aligned to the discussion paper themes (T1–T7). The coded results were aggregated to identify recurring issues, areas of convergence and divergence, and cross-cutting implications. Findings are presented at a system level without attributing views to individual respondents. Divergence was not always pronounced, but strongly expressed individual views were noted to provide a balanced account.

## Summary insights

- **Strong support to retain a national system:** Stakeholders broadly support continuation of the NRSCH as national housing infrastructure that provides assurance to governments and investors and protects tenants.
  - **Clear appetite for reform:** Respondents consider current arrangements only partially fit for purpose as sector scale, financial sophistication, SPVs and multi-jurisdiction operations increase; reform is framed as modernisation, not abandonment.
-

- **Primary pressure points are systemic:** governance and decision-rights, shared systems (data/ Community Housing Regulatory Information System (CHRIS)), consistency and proportionality, and the ability to generate timely national risk insight.
- **Burden and duplication are undermining delivery:** repeated reporting and inconsistent requirements are diverting capacity away from housing delivery and tenant outcomes, particularly for multi-jurisdiction providers, smaller providers and Aboriginal community-controlled organisations.
- **Intergovernmental commitment is the critical dependency:** stakeholders emphasise that durable improvements require coordinated cross-jurisdiction action, sustainable funding for shared assets, and clearer stewardship arrangements.

## Areas of convergence

- **Maintain a national assurance baseline** and avoid fragmentation into wholly jurisdiction-specific regimes.
- **Reduce duplication** through “submit once, use many times” approaches and greater reliance on NRSC registration by funders and contracting agencies.
- **Improve governance and role clarity** across regulators, jurisdictions and any national function—particularly for shared assets, national guidance and escalation of systemic risks.
- **Invest in shared national infrastructure** (especially IT platforms, data standards and reporting tools) with clearer custodianship and sustainable resourcing.
- **Strengthen proportionality** so regulatory effort better reflects provider scale, structure and risk, including culturally safe pathways for Aboriginal community-controlled providers.
- **Build system intelligence** via consistent data definitions and improved analytics to enable earlier detection of emerging prudential/governance risks.

## Where views differ

- **Degree of national standardisation:** stronger national uniformity (definitions, artefacts and application) versus maintaining greater jurisdictional flexibility to reflect local policy and market conditions.
  - **Role and authority of a national function:** coordination/ stewardship of shared assets and guidance versus stronger authority over national standards and settings.
  - **Pace and scale of reform:** transformational redesign to address structural misalignment versus incremental improvement to avoid destabilising providers.
  - **Operationalising proportionality:** clearer tier-linked requirements and streamlined evidence expectations versus greater reliance on regulator judgement and discretion.
  - **Use of technology and analytics:** expanded automation/ AI-supported insight versus caution about over-reliance and the need for human judgement and verification.
-

## Implications

- **Reform will not succeed in isolation:** stakeholder feedback indicates that improvements to proportionality and burden require concurrent decisions on governance, shared systems and sustainable resourcing.
- **National confidence depends on consistency in practice:** even without legislative change, disciplined national guidance, common artefacts and aligned reporting can materially improve outcomes.
- **SPVs and group structures are now mainstream delivery mechanisms:** the regulatory model must provide clearer group-level and project-level expectations to avoid added friction without commensurate assurance.
- **Equity considerations are material:** a “one size fits all” approach risks excluding Aboriginal community-controlled and smaller/remote providers unless culturally informed pathways and capability supports are embedded.
- **Intergovernmental arrangements are the main risk:** fragmented participation and short-term funding for shared assets (including IT systems) are widely seen as undermining system credibility and efficiency.

## Proposed next steps

Invite the **Community Housing Regulatory Modernisation Working Group** to incorporate these findings into its options development to provide staged reform proposals.

---

# Contents

1	Purpose of this Report .....	6
2	Overview of consultation.....	6
2.1	<b>Profile of respondents.....</b>	<b>6</b>
2.1.1	Written submissions .....	6
2.1.2	Survey responses .....	8
3	Overall sentiment.....	9
3.1	<b>Support for the NRSCH .....</b>	<b>9</b>
3.2	<b>Appetite for reform .....</b>	<b>9</b>
4	Key themes emerging from submissions .....	9
4.1	<b>Theme 1-Effectiveness of the NRSCH as a national system .....</b>	<b>9</b>
4.1.1	Assurance vs delivery.....	10
4.1.2	Special Purpose Vehicles (SPVs).....	10
4.1.3	Areas of convergence.....	11
4.1.4	Areas of divergence.....	12
4.2	<b>Theme 2- Governance, roles and decision-making .....</b>	<b>12</b>
4.2.1	Areas of convergence.....	13
4.2.2	Areas of divergence.....	14
4.3	<b>Theme 3 - Shared national systems, tools and assets (e.g. IT systems, guidance, regulatory artefacts).....</b>	<b>15</b>
4.3.1	Areas of convergence.....	15
4.3.2	Areas of divergence.....	16
4.4	<b>Theme 4 - Regulatory consistency and proportionality .....</b>	<b>16</b>
4.4.1	Areas of convergence.....	17
4.4.2	Areas of divergence.....	18
4.5	<b>Theme 5- System intelligence and responsiveness (Data quality, timeliness, risk insight and ability to respond to emerging issues) .....</b>	<b>19</b>
4.5.1	Areas of convergence.....	19
4.5.2	Areas of divergence.....	20
4.6	<b>Theme 6 - Regulatory burden and efficiency .....</b>	<b>21</b>
4.6.1	Areas of convergence.....	21

---

4.6.2	Areas of divergence.....	22
<b>4.7</b>	<b>Theme 7 - Cross-cutting intergovernmental issues .....</b>	<b>23</b>
4.7.1	Areas of convergence.....	23
4.7.2	Areas of divergence.....	24
<b>5</b>	<b>Implications for the future direction of the NRSCH .....</b>	<b>25</b>
<b>6</b>	<b>System enablers and dependencies (Themes 2, 3 &amp; 7) .....</b>	<b>26</b>
6.1	Key enablers .....	26
6.2	Critical dependencies.....	27
6.3	Overall message for decision-makers .....	27
<b>7</b>	<b>Matters requiring further analysis, policy direction, or outside scope .....</b>	<b>28</b>
7.1	Future form of national regulatory arrangements.....	28
7.2	Alignment between regulation, funding and procurement.....	28
7.3	Jurisdictional participation in the national system .....	28
7.4	Extension of regulatory coverage beyond registered CHPs .....	28
7.5	Use of NRSCH performance tiers outside the regulatory context .....	29
7.6	Tenant representation in the regulatory system.....	29
7.7	Workforce standards and professional accreditation .....	29
7.8	Long-term funding models for national regulatory infrastructure .....	29
<b>8</b>	<b>Next steps.....</b>	<b>30</b>
<b>9</b>	<b>Appendix A: Traceability of implications to stakeholder groups .....</b>	<b>31</b>
<b>10</b>	<b>Appendix B: Methodology.....</b>	<b>32</b>
10.1	Coding Framework – NRSCH consultation submissions .....	33
10.2	How this supports synthesis.....	35

# 1 Purpose of this Report

This report summarises submissions received in response to the *Discussion Paper: Future Directions for the National Regulatory System for Community Housing (NRSCH)*. It synthesises stakeholder feedback to identify key themes, areas of convergence and divergence, and matters requiring further consideration, providing an evidence base to inform future policy development and system design work. The primary audience for this report is government policy officials, regulators and other decision-makers with responsibilities for the future operation and oversight of the NRSCH. Findings are presented at a system level and do not attribute views to individual respondents unless prior agreement has been obtained.

## 2 Overview of consultation

Consultation commenced on 18 February 2026. The initial closing date for submissions was 27 March 2026; this was subsequently extended to 10 April 2026 to provide stakeholders with additional time to prepare and lodge submissions. A short public survey was also made available and closed on 22 April 2026 (revised from the original closing date of 28 March 2026). Written submissions were accepted up to 21 April 2026.

On 19 March 2026, Registrars from the NRSCH, Western Australia and Victoria met with National industry peak bodies representing Shelter, Australian Community Housing and Faith Housing Australia to discuss the intent and path forward following the consultation process. The National Aboriginal and Torres Strait Islander Housing Association (NATSIHA) was also invited to attend.

Information about the Discussion paper was also disseminated to all NRSCH registered providers, Housing Australia and state-based industry peak bodies. Links to the previous NRSCH review (2018-2021), the current discussion paper and the survey were made available on the NRSCH website.

### 2.1 Profile of respondents

#### 2.1.1 Written submissions

Written submissions reflect a broad cross-section of the community housing system, with contributions from community housing providers, peak body organisations, regulators and government agencies, and stakeholders working in or closely aligned to the sector, including academics and consultants. Peak bodies and providers accounted for the largest share of submissions, ensuring strong representation of operational, advocacy and system-wide perspectives. Regulatory and government submissions provided oversight, stewardship and policy viewpoints, while sector experts and research contributors offered analytical and forward-looking insights. Collectively, the submissions provide a balanced evidence base,

combining delivery-focused experience with regulatory, policy and system-design considerations.

**Table 1: Profile of respondents – Written submissions**

Stakeholder group	Description / notes	Number of submissions
<b>Community Housing Providers (CHPs)</b>	Individual registered community housing providers, including Tier 1–3 providers and Aboriginal community-controlled housing providers, with direct delivery and operational responsibilities.	5
<b>Peak body organisations</b>	National and state-based peak and representative bodies, including Aboriginal and faith-based housing peaks, providing system-level, advocacy and member-based perspectives.	8
<b>Regulators and government agencies</b>	State and territory housing regulators, Registrars, relevant government departments, and the NRSCH National Office with oversight, stewardship or policy responsibilities.	5
<b>Working in the sector / other</b>	Academics, consultants, sector-wide working groups and individual experts providing analytical, advisory or research-based perspectives on the operation and future design of the NRSCH.	4
<b>Total</b>		<b>22</b>

**Notes:**

1. A total of 22 written submissions were received and analysed as part of the consultation process.
2. A draft *CHIA Regulatory Findings Report* was referenced by stakeholders and included for contextual analysis only; it was not counted as a formal submission.
3. Stakeholder groups include organisations with differing roles within the system; as a result, perspectives span provider delivery, regulatory oversight, sector representation and advisory or research expertise.
4. Housing Australia was classified under “Regulators and government agencies” to reflect its role as an Australian Government statutory authority with national system stewardship, funding and investment assurance responsibilities.

## 2.1.2 Survey responses

Survey responses were dominated by community housing providers, reflecting the perspectives of organisations directly affected by the day-to-day operation of the NRSCH and its regulatory and reporting requirements. Peak body organisations and regulators were also represented, providing system-level insights on governance, proportionality and national consistency. A smaller number of responses were received from consultants, advisors and other sector participants, alongside limited tenant or applicant input. Overall, the composition of survey respondents broadly mirrors the written submissions, with a strong provider presence complemented by regulatory, advocacy and advisory perspectives, supporting triangulation of findings across stakeholder groups.

**Table 2: Profile of respondents – Surveys**

Stakeholder group	Description / notes	Number of respondents
<b>Community Housing Providers (CHPs)</b>	Staff and executives working within registered community housing providers, including organisations of varying scale and operating models.	13
<b>Peak body organisations</b>	Representatives of national or state-based peak and member organisations advocating on behalf of the community housing sector or specific cohorts.	3
<b>Regulators and government agencies</b>	Respondents working in housing regulation or government policy, oversight or stewardship roles at state or territory level.	2
<b>Working in the sector / other</b>	Consultants, advisors, academics and other sector participants, as well as tenant or applicant respondents providing lived-experience perspectives.	5
<b>Total</b>		<b>23</b>

Notes:

1. While 24 survey responses were submitted, seven were incomplete. Question 1 (respondent role) received 23 responses, reflecting one partially completed survey that did not progress beyond initial demographic questions.
2. Survey respondents were grouped into aggregated stakeholder categories to align with the presentation of written submissions in this report.
3. “Working in the sector / other” includes consultants and advisors working in the housing sector, as well as a small number of tenant or applicant respondents.

4. No survey responses were recorded from funders or investors, or from Australian Government policy representatives, under the predefined role categories.

## 3 Overall sentiment

### 3.1 Support for the NRSCH

Across both written submissions and survey responses, stakeholders express strong underlying support for the continuation of the NRSCH as a nationally consistent assurance framework. Respondents widely acknowledge the role the NRSCH has played in supporting sector maturity, providing confidence to governments and investors, protecting tenants, and enabling jurisdictions to rely on a shared regulatory baseline. Many submissions explicitly recognise the value of a national framework and caution against fragmentation or a return to wholly jurisdiction-specific regulatory approaches. Overall, there is broad consensus that the NRSCH remains a critical piece of national housing infrastructure worthy of retention.

### 3.2 Appetite for reform

At the same time, there is a clear and consistent appetite for reform across stakeholder groups. Submissions and survey responses indicate a shared view that, while the NRSCH remains fundamentally sound, current arrangements are not keeping pace with the scale, complexity and financial sophistication of the contemporary community housing sector. This sentiment is reflected in survey results showing a majority of respondents do not consider the current system fully fit for purpose without evolution, and in submissions calling for changes to governance, proportionality, data and system stewardship. Reform is generally framed as necessary to sustain the credibility and effectiveness of the NRSCH over the next 5–10 years, rather than as a rejection of the system itself. The prevailing tone is constructive and forward-looking, with strong support for targeted, carefully sequenced reform that strengthens national coordination, reduces duplication, modernises data and digital capabilities, and improves responsiveness to emerging risks, while avoiding unintended impacts on smaller providers and Aboriginal community-controlled organisations.

## 4 Key themes emerging from submissions

### 4.1 Theme 1-Effectiveness of the NRSCH as a national system

A dominant theme across responses is that while the NRSCH is broadly valued as a national assurance framework, it is increasingly misaligned with the scale, complexity and operating realities of the contemporary community housing sector. Many stakeholders consider the system only partially fit for purpose, noting that current settings were designed for a smaller, less financially complex sector and struggle to accommodate growth-oriented providers,

group structures, SPVs and emerging delivery models. There is strong support for reform that positions the NRSCH as relevant national infrastructure, relied upon by governments and investors, rather than a baseline compliance exercise.

#### 4.1.1 Assurance vs delivery

Responses suggest a strong tension between assurance and delivery: respondents broadly support a national regulatory function, but argue the system needs to reduce duplicated compliance, improve national consistency, and become more risk-based and proportionate so it can support scale, complex structures (e.g. SPVs), and better tenant outcomes—without creating barriers for smaller and Aboriginal community-controlled providers.

Respondents indicate the tension between assurance and delivery shows up when assurance mechanisms (especially duplicated reporting and *inconsistent* cross-jurisdiction requirements) start to consume capacity and slow decisions, so that:

- staff effort shifts from delivery/ tenants to compliance (T6.1/ T6.2),
- development and SPV timelines don't match funding/ delivery cycles (T1.3/ T4.4),
- “one size fits all” settings over-scrutinise low risks and miss big ones (T4.2),
- smaller and Aboriginal community-controlled providers face disproportionate burden or barriers (T4.2/ T6.2).

Stakeholders want a strong national assurance baseline, but they're signalling that poorly designed or duplicated assurance can actively reduce housing delivery and tenant outcomes, which undermines the purpose of the system.

#### 4.1.2 Special Purpose Vehicles (SPVs)

Special purpose vehicles (SPVs) have become increasingly common across housing delivery as governments and delivery partners seek to separate individual projects, attract third-party capital, and strengthen accountability for delivery performance. This approach has been reinforced in recent years as larger funding programs and more complex partnerships have encouraged project-level structures and more formal risk allocation.

In practice, each development is established as a standalone legal entity with its own governance, funding arrangements and contracts. This “ring fences” financial, legal and delivery risks so that cost overruns, defects, insolvency or claims are contained at the project level rather than affecting the broader program. Housing Australia has played a central role in *normalising* this model by structuring finance, contracting and assurance settings in ways that encourage project-by-project vehicles and require stronger security, reporting and performance assurance—helping protect the balance sheet and continuity of the overall pipeline while enabling multiple partners to participate in delivery.

For regulators, increased use of SPVs shifts the task from overseeing discrete providers to assuring complex delivery ecosystems and group arrangements. If regulatory design does not adapt, SPVs may increase compliance burden, fragment oversight and slow delivery, while adding limited additional assurance. Conversely, well-designed reform could use SPVs to sharpen risk-based regulation (including clearer group-level and project-level expectations), improve national consistency and focus oversight where it materially protects tenants, public investment and system integrity.

In Theme 1, the system faces high convergence on the problem and direction of travel, but divergence on scale, pace and design of reform. Most stakeholders agree the NRSCH must evolve to remain effective, yet differ on whether change should be transformational or incremental, and how to balance national consistency with provider and jurisdictional diversity

### 4.1.3 Areas of convergence

Stakeholders from across providers, peaks, regulators and governments show strong alignment on several core points:

1. **Broad support for a national regulatory framework**

There is widespread agreement that the NRSCH has played an important role in providing baseline assurance, sector credibility and confidence for governments and investors. Even critical respondents generally support retaining a national system rather than reverting to entirely jurisdiction-specific models.

2. **Recognition that the NRSCH is under pressure from sector growth and complexity**

Most respondents agree the current framework is no longer well matched to the scale, financial complexity and operating models now emerging—particularly large development pipelines, group structures, SPVs and multi-jurisdictional operations. This is consistently expressed through T1.3 (Fitness for future regulatory environment).

3. **Need for evolution rather than abandonment**

There is strong convergence that reform should focus on modernisation and adaptation, not dismantling the system. Many stress the NRSCH needs to evolve into infrastructure that supports contemporary delivery and investment rather than functioning mainly as a compliance checklist.

4. **Desire for the NRSCH to be relied upon by governments and funders**

A recurring and shared view is that registration should function as a meaningful proxy for capability and assurance, reducing duplication through state contracting and tender processes. The current failure of governments to rely on NRSCH registration is widely seen as undermining its effectiveness.

#### 4.1.4 Areas of divergence

Despite broad agreement on the need for reform, there are clear points of divergence within Theme 1:

##### 1. Extent and urgency of change required

- Some stakeholders argue the NRSCH is fundamentally misaligned and risks becoming irrelevant without significant redesign (strong T1.2 and T1.3 signals).
- Others consider the system broadly sound, arguing that incremental improvement is sufficient and warning that major reform could destabilise providers that have already adjusted to existing requirements.

##### 2. Who the system currently works best for

Divergence emerges around sector fit:

- Larger, growth-oriented providers are more likely to emphasise misalignment with complex finance, development and group structures.
- Smaller providers and some Tier 3 organisations express concern that reform could worsen burden or impose growth-centric assumptions if not carefully designed.

##### 3. Treatment of diversity and non-standard models

While there is consensus that diversity should be recognised, views differ on how far the system should stretch:

- Aboriginal community-controlled housing providers and their representatives emphasise that the NRSCH is currently a poor fit and risks exclusion without culturally informed redesign.
- Other respondents acknowledge this issue but frame it as one of proportional application rather than system redesign.

##### 4. National uniformity vs. contextual flexibility

- Some stakeholders advocate strongly for a more unified, fully national model, seeing partial nationalisation as a core weakness.
- Others caution that too much uniformity risks creating a “common denominator” system that fails to reflect jurisdictional policy settings, local housing markets, and distinct provider roles.

## 4.2 Theme 2- Governance, roles and decision-making

Responses highlight persistent uncertainty around roles, decision authority and coordination between national, jurisdictional, policy and funding bodies. Providers and regulators report

that unclear escalation pathways and fragmented stewardship undermine timely decision-making, particularly in fast-moving development and financing environments. Many respondents call for stronger national stewardship, clearer separation of policy, funding and regulatory roles, and improved intergovernmental decision-making arrangements to support consistent system-wide responses to emerging risks.

For Theme 2, there is high convergence that governance, role clarity and escalation arrangements are no longer well matched to the sector's complexity, but divergence on the preferred governance future state. Stakeholders broadly agree on the problem—fragmented roles, weak coordination and slow decision-making—but differ on whether the solution lies in stronger national authority, improved intergovernmental cooperation, or incremental strengthening of existing arrangements.

#### 4.2.1 Areas of convergence

There is strong alignment across providers, peak bodies, regulators and policy respondents on the following points:

**1. Lack of clarity in roles and responsibilities is a system weakness**

Many respondents converge on the view that roles between regulators, policy agencies, funders and national bodies are insufficiently clear, creating confusion for providers and inefficiencies in oversight. This is consistently reflected in T2.1 (Clarity of roles) and is often linked to duplication between regulatory assurance and contract or funding management.

**2. Current governance arrangements struggle to support timely, coordinated decision-making**

Respondents broadly agree that existing governance and escalation pathways are too slow, fragmented, or unclear to respond effectively to emerging risks in a rapidly changing and growth-oriented sector. This convergence appears in frequent references to T2.3 (Accountability and escalation), particularly where complex financing, SPVs or major development pipelines are involved.

**3. Need for stronger national coordination and stewardship**

There is shared recognition that effective governance of a national system requires stronger national coordination, clearer stewardship of system-wide issues, and forums capable of addressing cross-jurisdictional risks. Many respondents link weak governance outcomes to the absence of clear national decision rights and coordinating authority.

**4. Intergovernmental arrangements are a critical dependency**

Across stakeholder groups, there is high convergence that governance improvement is dependent on effective intergovernmental cooperation, particularly in relation to alignment across independent regulatory systems in Victoria and Western Australia,

shared decision-making, and sustained commitment to national arrangements. This is consistently coded under T2.4 (Intergovernmental arrangements).

## 4.2.2 Areas of divergence

Despite agreement on the existence of governance issues, views diverge on how governance should evolve:

### 1. Centralisation vs. jurisdictional autonomy

- Some stakeholders advocate for stronger national decision-making authority, including clearer escalation pathways and, in some cases, movement toward a single or more centralised regulatory model.
- Others caution that increased centralisation risks undermining jurisdictional responsiveness or creating a “one-size-fits-all” governance model that does not reflect local policy settings or housing market conditions.

### 2. Role of the Australian Government

Divergent views emerge on the appropriate role of the Australian Government:

- Many respondents argue for a more active Australian Government role in governance, funding and system stewardship to match national investment exposure.
- Others express concern that a stronger Australian Government role could increase bureaucracy or blur boundaries between policy, funding and regulation.

### 3. Extent of reform required

- Some stakeholders see current governance weaknesses as structural, requiring significant redesign of decision-making, escalation and coordination mechanisms.
- Others frame the problem as one of implementation and practice, suggesting existing governance structures could work if roles were clearer, guidance more timely, and resourcing improved.

### 4. Balance between assurance and enabling functions

There is divergence in how governance should balance regulatory independence and assurance with a more enabling, advisory posture. Some respondents favour a system focused strictly on oversight, while others argue governance must evolve to actively support provider capability, early engagement and system learning.

## 4.3 Theme 3 - Shared national systems, tools and assets (e.g. IT systems, guidance, regulatory artefacts)

There is broad agreement that shared national systems (particularly data and reporting platforms) are not adequately equipped to support a growing and increasingly complex sector. Limitations in IT functionality, interoperability and usability constrain both providers and regulators, reinforcing reliance on manual, retrospective compliance processes. Stakeholders consistently identify modernised digital platforms and better custodianship of shared assets as critical enablers of more efficient regulation, reduced duplication and improved system intelligence.

For Theme 3, there is very high convergence on the problem definition—shared national systems are essential, currently under-resourced, and not well matched to sector complexity. Divergence arises primarily around governance models, funding mechanisms, and the degree to which technology should drive regulatory transformation. Most stakeholders agree that without sustained investment and clearer custodianship, weaknesses in shared national systems will continue to undermine consistency, efficiency and confidence in the NRSCH.

### 4.3.1 Areas of convergence

There is strong and consistent alignment across stakeholder groups on the following issues:

1. **Shared national systems are critical infrastructure** Stakeholders converge on the view that systems such as CHRIS, national reporting tools and shared data artefacts are foundational to the NRSCH's effectiveness. Many explicitly characterise these as *critical regulatory infrastructure* that underpin consistency, transparency and national assurance. This view is shared by providers, peak bodies and regulators alike.
2. **Current systems are not fit for the sector's scale or complexity** There is broad agreement that existing national systems have not kept pace with sector growth, financial complexity, SPVs, group structures and increased reporting expectations. Limitations in functionality, usability, interoperability and automation are repeatedly cited as constraining both regulatory effectiveness and provider efficiency (T3.1).
3. **Under-resourcing of shared assets is a systemic risk** Strong convergence exists around T3.4 (Resourcing and sustainability of shared assets). Respondents consistently argue that short-term, fragmented or reactive funding models undermine system stability, create risks to continuity, and slow reform delivery. Under-resourced systems are widely seen as exposing governments to avoidable regulatory and reputational risk.
4. **Need for modernised, integrated digital platforms** Across responses, there is shared support for modernising national systems to enable streamlined reporting, better data quality, reuse of information ("collect once, use many times"), and stronger

system-level insight. Technology is widely viewed as a key enabler of reduced burden, improved comparability and more proactive regulation.

### 4.3.2 Areas of divergence

Despite agreement on the importance of shared systems, stakeholders diverge on *how they should be governed, funded and used*:

1. **Custodianship and governance arrangements** While many agree that clearer custodianship is needed (T3.2), views diverge on where responsibility should sit:
  - Some advocate for a strong national custodian or coordinator with clear authority over shared assets.
  - Others are more cautious, preferring shared or collaborative custodianship models to avoid central overreach and preserve jurisdictional influence.
2. **Role of technology in regulation** Stakeholders differ on how far technology should reshape regulatory practice:
  - Many providers and peak bodies emphasise technology as an enabler of streamlining, automation and forward-looking risk monitoring.
  - Some regulators express caution about over-reliance on automated tools or AI, stressing the need for professional judgement, verification and human oversight, particularly in assessing governance and organisational health.
3. **Pace and scope of system modernisation** Divergence exists between those calling for substantial, system-wide redesign of shared platforms and those favouring incremental improvements to existing tools. Concerns are raised that major system changes, if poorly sequenced or under-resourced, could disrupt providers already operating under capacity constraints.
4. **Balance between national standardisation and local flexibility** While national consistency is widely supported, some stakeholders caution that overly rigid national systems may struggle to accommodate jurisdiction-specific policy settings, provider diversity, or Aboriginal community-controlled models, unless flexibility is built into system design and guidance.

## 4.4 Theme 4 - Regulatory consistency and proportionality

Challenges associated with proportionality and consistency feature prominently throughout the document. Providers report that regulatory effort is often perceived as “one size fits all”, focusing on lower-value process compliance while missing material risks associated with growth, finance and structural complexity. Jurisdictional variation—particularly where Victoria and Western Australia sit outside the NRSCH—reportedly exacerbates these issues,

increasing burden and uncertainty for multi-jurisdictional providers. There is strong support for proportionate, risk-based oversight that better reflects provider scale, structure, capability and context (including Aboriginal community-controlled and smaller providers).

For Theme 4, there is very high convergence on the problem definition: inconsistent interpretation, jurisdictional variation and weak proportionality materially undermine the effectiveness and efficiency of the regulatory system. Divergence arises primarily around how far national consistency should be pushed, and how proportionality should be operationalised without creating new rigidity or risk. The dominant signal is not rejection of consistency, but a call for smarter, risk-aware consistency that supports diversity while reducing duplication and friction.

#### 4.4.1 Areas of convergence

There is strong and repeated alignment across providers, peak bodies, regulators and policy stakeholders on the following points:

- 1. Inconsistency across jurisdictions materially increases burden and risk**

Stakeholders consistently converge on the view that jurisdictional variation and inconsistent interpretation can create significant operational challenges, particularly for providers operating across multiple jurisdictions or managing group structures and SPVs. Differences in data definitions, evidence expectations, reporting templates and timing are widely seen as undermining efficiency, comparability and confidence. This is reflected most strongly in T4.1 (Consistency of regulatory interpretation), T4.3 (Jurisdictional variation) and T4.4 (Impacts on providers operating across jurisdictions).
- 2. Current proportionality does not adequately reflect provider diversity**

There is broad agreement that although the NRSCH is intended to be risk-based, proportionality is not consistently experienced in practice. Many stakeholders report that requirements often feel “one-size-fits-all”, insufficiently differentiated by provider scale, maturity, structure or risk profile. This concern is particularly pronounced for smaller providers, Aboriginal community-controlled housing organisations, and regional or remote operators (T4.2).
- 3. Group structures and SPVs expose weaknesses in consistency settings**

Respondents converge on the view that SPVs and complex group structures amplify inconsistency, with differing registration, reporting and oversight expectations applied across NRSCH participating and non-participating jurisdictions and even within the same provider group. This is widely regarded as generating duplication without commensurate gains in assurance, and as a growing barrier as national funding programs drive more complex delivery models (T4.4).
- 4. Consistency is seen as foundational to national effectiveness**

Across submissions, regulatory consistency is repeatedly framed not as an end in

itself, but as essential to achieving national assurance, reducing duplication, and enabling the regulatory system to function as trusted national infrastructure. Many respondents link inconsistency directly to reduced reliance on the NRSCH by governments and funders.

#### 4.4.2 Areas of divergence

While there is strong agreement on the existence of consistency and proportionality problems, divergence emerges around solutions and trade-offs:

1. **National standardisation vs. jurisdictional flexibility**
  - Some stakeholders advocate for much stronger national standardisation, including tighter definitions, harmonised artefacts and more uniform application of requirements across all jurisdictions.
  - Others caution that excessive standardisation risks eroding the ability of regulators to respond to local policy settings, market conditions or distinct provider cohorts, especially in remote, Aboriginal or thin-market contexts.
2. **How proportionality should be operationalised** Although proportionality is widely supported, views diverge on how it should be implemented in practice:
  - Some respondents argue for clearer, more formal differentiation (e.g. tier-linked reductions in evidence, reporting frequency or compliance review intensity).
  - Others emphasise the need for professional judgement and contextual discretion, warning against rigid rules that may simply shift burden elsewhere.
3. **Treatment of small and non-growth providers** Divergence is evident in perceptions of risk:
  - Some stakeholders argue that smaller or Tier 3 providers are over-regulated relative to their risk and face disproportionate administrative burden.
  - Others caution that smaller providers may, in some circumstances, pose greater operational or governance risk due to limited capacity, requiring tailored but still robust oversight rather than blanket relaxation.
4. **Relationship between consistency and innovation** A further point of divergence concerns whether stronger consistency settings would enable or constrain innovation:
  - Many providers and peaks see clearer, more predictable rules as enabling growth, partnerships and investment.
  - Some regulators express concern that hard-wiring consistency could reduce flexibility to address novel or high-risk arrangements as they emerge.

## 4.5 Theme 5- System intelligence and responsiveness (Data quality, timeliness, risk insight and ability to respond to emerging issues)

A recurring theme is the system's limited capacity to generate timely, forward-looking risk insight. Poorly aligned data definitions, inconsistent reporting standards and retrospective reporting cycles constrain early identification of financial, governance and operational risks. Stakeholders consistently emphasise the need for nationally consistent data standards, coordinated reporting and improved analytics to strengthen transparency, enable proactive intervention and support confidence among governments, providers and investors.

For Theme 5, there is very high convergence that the NRSCH currently lacks timely, reliable and forward-looking system intelligence, and that this limits its ability to respond effectively to emerging risks in a more complex sector. Divergence centres on how far to automate risk insight, how intensive national monitoring should be, and whether improved intelligence will genuinely reduce regulatory burden without parallel reform to governance, capability and resourcing. The dominant message is that better data and analytics are necessary conditions for a more responsive regulatory system.

### 4.5.1 Areas of convergence

There is strong and consistent convergence across providers, peak bodies, regulators and policy stakeholders on the following points:

- 1. Current system intelligence is too retrospective and reactive**

Stakeholders broadly agree that the NRSCH relies heavily on backward-looking, periodic reporting, which limits its ability to identify emerging financial, governance or service-delivery risks in a timely way. Many respondents argue that by the time issues are visible through current reporting and assessment cycles, opportunities for early intervention have already passed (T5.2, T5.3).

- 2. Data quality and consistency are foundational weaknesses**

There is high convergence that inconsistent data definitions, poor alignment across jurisdictions, and fragmented reporting arrangements undermine confidence in system-level insights. Respondents consistently link weak data foundations to reduced comparability, duplicated effort and limited national visibility (T5.1). Poor data quality is widely seen as constraining both regulatory assurance and policy decision-making.

- 3. Strong demand for improved national risk insight**

Many stakeholders converge on the need for a stronger national view of risk and performance, particularly as providers scale, leverage increases and group structures become more common. Respondents repeatedly emphasise the importance of

sector-wide visibility, trend analysis and stress-testing to support confidence among governments, providers and investors (T5.4).

#### 4. **Technology and analytics are widely seen as key enablers**

There is broad agreement that modern digital platforms, consistent data standards, and improved analytics could materially strengthen system intelligence. Many respondents support shifting from manual, retrospective compliance toward more continuous, data-driven oversight as a way to improve responsiveness while reducing unnecessary burden (T5.1, T5.3).

### 4.5.2 Areas of divergence

Despite strong alignment on the need for better intelligence and responsiveness, divergence emerges around implementation, risk appetite and balance:

#### 1. **Role of automation and AI in regulatory judgement**

- Many providers and peak bodies view analytics and AI-enabled tools as critical to enabling earlier detection of risk, proportional oversight and reduced administrative burden.
- Some regulators express caution, warning against over-reliance on automated analysis and stressing the continued importance of professional judgement, contextual understanding and verification—particularly for complex governance or organisational health risks.

#### 2. **Depth and scope of national risk visibility**

There is divergence on how expansive national risk monitoring should be:

- Some respondents advocate for comprehensive, system-wide dashboards and real-time monitoring, including group-level and SPV-level risk signals.
- Others caution that overly broad or intensive monitoring could increase perceived surveillance or lead to inappropriate intervention, particularly for lower-risk or smaller providers.

#### 3. **Relationship between risk insight and regulatory burden**

While many stakeholders see better data and analytics as a pathway to lower burden over time, some express concern that, without clear discipline, enhanced intelligence could instead drive more frequent information requests, deeper scrutiny, or expanded reporting expectations. This creates divergent views on whether improved intelligence will be experienced as enabling or intrusive.

#### 4. **Readiness of the system to act on intelligence**

Some respondents question whether improving data and risk insight alone will be sufficient, noting that weak escalation pathways, limited capability, and resourcing constraints may prevent timely or effective response even when risks are identified.

Others are more confident that incremental improvements to intelligence will naturally lift responsiveness.

## 4.6 Theme 6 - Regulatory burden and efficiency

Regulatory burden remains a significant concern, particularly for providers operating across jurisdictions or managing multiple SPVs. Duplication of reporting, misaligned data requirements and repeated evidentiary requests divert resources away from core delivery and tenancy management functions. Many respondents stress that burden is not solely a volume issue, but a function of inefficient processes and low-value compliance activity, reinforcing calls for streamlining, “report once, use many times” approaches, and better alignment between regulatory and funding requirements.

For Theme 6, there is exceptionally high convergence on the existence and impact of regulatory burden, particularly due to duplication, inefficient processes and misalignment with risk. Divergence arises primarily around how streamlining should be implemented, how far differentiation should go, and how to balance efficiency with assurance and stability. The dominant message is not opposition to regulation, but a strong call for smarter, risk-aligned regulation that reduces low-value effort and refocuses resources on material risks and tenant outcomes.

### 4.6.1 Areas of convergence

There is very strong convergence across providers, peak bodies, regulators and consultants on the following points:

- 1. Regulatory burden is material and increasing**

Stakeholders widely agree that the day-to-day administrative effort required to comply with the NRSCH has grown significantly, particularly as reporting requirements, evidentiary expectations and interaction with parallel state systems have expanded. This is most consistently reflected in T6.2 (Administrative burden on providers) and is evident across providers of all sizes, though impacts are felt most acutely by small, regional and Aboriginal community-controlled organisations.

- 2. Duplication of effort is a primary driver of inefficiency**

There is strong alignment that duplication between NRSCH reporting and state-based contract, funding and policy reporting is a key source of low-value burden. Multi-jurisdictional providers consistently report having to submit the same information multiple times in different formats, with limited reuse by regulators or funders (T6.1). This duplication is widely seen as diverting resources away from service delivery, risk management and tenant outcomes.

- 3. Current processes are often process-driven rather than risk-driven**

Respondents converge on the view that regulatory effort is frequently experienced as transactional and retrospective, with repeated evidence requests and limited

recognition of organisational maturity or prior compliance history. Many stakeholders argue that this approach does not proportionately target risk and does not reliably translate into improved regulatory or tenant outcomes (T6.3).

#### 4. **Streamlining is widely supported as both feasible and necessary**

Across submissions and surveys, there is strong support for practical streamlining measures—including clearer guidance, reliance on previously accepted evidence, reduced frequency of reporting for lower-risk providers, and “report once, use many times” models (T6.4). Importantly, most respondents frame streamlining not as deregulation, but as a way to improve efficiency while maintaining or strengthening assurance.

### 4.6.2 Areas of divergence

While there is broad agreement on the burden problem, divergence emerges around how burden reduction should be achieved and managed:

#### 1. **Extent to which burden is a design issue vs. an implementation issue**

- Some stakeholders view regulatory burden as largely the result of system design flaws—including fragmented regimes, misaligned data standards and outdated processes—requiring structural reform.
- Others suggest burden could be materially reduced through better implementation, including clearer guidance, improved consistency of interpretation, and more disciplined use of regulator discretion, without major redesign.

#### 2. **Risk of streamlining undermining assurance**

There is divergence—most often between providers and regulators—on the risks of streamlining:

- Many providers emphasise that streamlined processes would free capacity and improve outcomes without weakening assurance.
- Some regulators caution that reducing evidence or reporting frequency could limit visibility of emerging risks, particularly where provider capability is uneven or deteriorating.

#### 3. **Differentiation by provider maturity and tier**

Views differ on how strongly regulatory effort should be differentiated:

- Larger and more mature providers often argue for greater reliance on attestations, exception-based reporting and tier-linked reductions in burden.
- Some respondents caution that smaller or less mature providers may require more, not less, regulatory engagement, even if this feels burdensome, to protect tenants and public investment.

#### 4. Tolerance for change-related burden

While many stakeholders argue current burden is unsustainable, some providers express concern that frequent changes to reporting or assessment criteria can themselves be destabilising, particularly for small organisations that have invested heavily in adapting to existing requirements. This creates divergence between calls for reform and calls for stability.

### 4.7 Theme 7 - Cross-cutting intergovernmental issues

Capability and resourcing constraints cut across all themes. Both providers and regulators report that increasing organisational, legal and financial complexity has not been matched by sufficient investment in workforce capability, specialist skills or sustainable funding for national functions. Intergovernmental dependencies—particularly in relation to participation by all jurisdictions, funding continuity and shared infrastructure—are widely recognised as critical risks to reform implementation. Without sustained commitment and coordinated action, respondents caution that the system’s effectiveness and credibility will continue to erode.

For Theme 7, there is very high convergence that resourcing, capability, funding and intergovernmental dependency are foundational constraints on the NRSCH’s effectiveness. Divergence arises primarily around who should carry responsibility for funding and capability uplift, and how much unevenness within a federated system is tolerable. Overall, stakeholders signal that without sustained investment and coordinated intergovernmental commitment, reforms in other themes (governance, systems, proportionality and intelligence) are unlikely to deliver their intended benefits.

#### 4.7.1 Areas of convergence

There is strong alignment across stakeholder groups on several cross-cutting issues that shape the effectiveness of the NRSCH as a national system:

##### 1. Resourcing constraints are a material system risk

Providers, regulators and peak bodies converge on the view that current resourcing levels are insufficient to support the scale, complexity and pace of change in the sector. Regulatory capability, shared national functions, and system reform activities are widely seen as under-resourced, creating risks to continuity, credibility and timely oversight (T7.1).

##### 2. Capability and skills gaps are increasing with sector complexity

There is broad agreement that both regulators and providers require enhanced capability—particularly in financial oversight, group structures, SPVs, data analytics and governance—to manage increasingly sophisticated operating models. Workforce constraints are seen as amplifying risk and limiting the system’s ability to operate in a genuinely risk-based way (T7.2).

### 3. Sustainable funding is a prerequisite for national effectiveness

Stakeholders consistently emphasise that short-term, fragmented or reactive funding arrangements undermine national consistency, system stability and reform delivery. There is strong convergence that sustainable, multi-year funding is essential to support national systems, regulatory capability and intergovernmental coordination (T7.3).

### 4. Intergovernmental dependencies shape what is achievable

Across responses, there is clear recognition that progress on reform, consistency and system intelligence is highly dependent on cooperation between jurisdictions, including Victoria and Western Australia. Intergovernmental commitment is widely viewed as a critical dependency for any meaningful strengthening of the NRSCH (T7.4).

## 4.7.2 Areas of divergence

While agreement is strong on the existence of cross-cutting challenges, divergence arises around roles, responsibilities and implementation pathways:

### 1. Who should fund and lead national capability

- Many stakeholders argue for a stronger Australian Government role in funding and supporting national functions, reflecting the scale of national investment and policy reliance on the sector.
- Others are more cautious, warning against cost-shifting, unclear accountability or expanded central roles without clear governance arrangements.

### 2. Focus of capability investment

Divergence exists on where limited capability investment should be prioritised:

- Some respondents emphasise regulator capability (e.g. financial, data and systems skills) as the primary gap.
- Others place greater weight on provider capability—particularly for smaller, regional and Aboriginal community-controlled organisations—to enable equitable participation without increasing regulatory burden.

### 3. Risk of dependency vs. risk of fragmentation

While intergovernmental dependency is widely acknowledged, views differ on whether this represents:

- an acceptable feature of a federated system that must be actively managed, or
- a fundamental weakness that will continue to limit national coherence unless structural change occurs.

#### 4. Tolerance for uneven implementation

Some stakeholders accept that capability and resourcing will improve unevenly across jurisdictions and cohorts, while others warn that uneven progress risks entrenching inconsistency, further undermining trust in the national system.

## 5 Implications for the future direction of the NRSCH

The key implications set out below synthesise themes emerging across both written submissions and survey responses and translate them into considerations for system design, governance, national capability and regulatory practice. These implications are derived from consistent patterns identified across stakeholder groups, rather than from individual positions or proposals, and are intended to highlight areas where the current system appears most sensitive to change as the sector evolves. To support transparency and evidentiary integrity, **Appendix A: Traceability of implications to stakeholder groups** maps each implication area to the stakeholder cohorts most strongly associated with the underlying themes, demonstrating how these implications arise from multiple perspectives across the consultation.

**Table 3: Key implications mapped to consultation themes (T1–T7)**

Implication area (linked themes)	Summary of implications identified
<b>System design (T1)</b>	The themes indicate that the current regulatory system design is under increasing pressure from provider scale, diversification, SPVs and group structures. This implies a need for a system architecture capable of accommodating diverse operating models and levels of complexity while maintaining national coherence and proportionate assurance.
<b>Governance and decision-making (T2, T7)</b>	Recurrent themes on roles, authority and intergovernmental arrangements imply that system effectiveness is sensitive to clarity of stewardship, decision-rights and escalation pathways for nationally shared issues. Ambiguity in governance arrangements is identified as a constraint on timely, coordinated responses to emerging system-wide risks.
<b>National consistency and coordination (T1, T2)</b>	Strong convergence around jurisdictional variation implies that national consistency is influenced as much by practice, guidance and shared artefacts as by formal system settings. Sustained coordination mechanisms appear central to reducing duplication and managing cross-jurisdictional provider activity.
<b>National capability</b>	Themes relating to resourcing, skills and sustainability imply that

Implication area (linked themes)	Summary of implications identified
<b>and resourcing (T7)</b>	regulatory capability has not consistently scaled with sector growth and financial complexity. The effectiveness of the system appears closely linked to access to specialist skills, continuity of expertise, and resilient resourcing for nationally shared functions.
<b>Data, systems and digital infrastructure (T3, T5)</b>	Convergence on data and systems issues implies increasing reliance on consistent, high-quality data and fit-for-purpose digital infrastructure to support assurance, transparency and early risk identification. Fragmented or duplicative data practices are identified as weakening system-level insight.
<b>Regulatory practice and proportionality (T4, T6)</b>	Themes on burden, duplication and proportionality imply that outcomes are strongly shaped by how regulation is applied in practice. The consultation highlights sensitivity to uniform application of requirements across providers with differing scale, context and risk profiles, particularly for smaller and Aboriginal community-controlled organisations.
<b>System adaptability and future focus (T1, T5)</b>	Recurrent future-focused themes imply that credibility of the NRSCH depends on its capacity to adapt to changing policy, funding and delivery environments. Responsiveness to emerging risks, rather than reliance on retrospective compliance alone, is identified as an important system characteristic.

## 6 System enablers and dependencies (Themes 2, 3 & 7)

Stakeholder feedback converges on the view that the effectiveness of the NRSCH is increasingly constrained by system-level enablers and dependencies, rather than individual policy settings. Across governance, shared systems and intergovernmental issues, three core enablers and four critical dependencies emerge.

### 6.1 Key enablers

#### 1. Clear national governance and stewardship

Effective regulation in a more complex sector requires clearer national roles, decision-rights and escalation pathways. Stronger stewardship and identifiable national forums are seen as essential to enable timely, system-wide responses to

emerging risks and to reduce duplication between regulation, policy and funding oversight.

2. **Modern, well-governed shared systems**

Shared national systems (including CHRIS and reporting platforms) are widely viewed as critical regulatory infrastructure. Modernised digital systems—with clear custodianship and authority—are key enablers of national consistency, improved data quality, stronger risk insight and reduced regulatory burden.

3. **Capability uplift and sustainable funding**

Stakeholders consistently identify the need for enhanced capability (particularly in financial oversight, group structures, SPVs and data analytics) across both regulators and providers. This is dependent on stable, multi-year funding for national functions and shared assets; short-term or fragmented funding is seen as a systemic risk.

## 6.2 Critical dependencies

1. **Intergovernmental commitment and cooperation**

Progress on governance reform, shared systems and national consistency is highly dependent on sustained intergovernmental commitment, including Victoria and Western Australia. Partial participation is widely seen as undermining credibility and impact.

2. **Alignment across governance, systems and funding**

Stakeholders emphasise that reform in one area will not succeed in isolation. Improvements to systems and intelligence depend on governance arrangements that provide clear authority, while governance reform is dependent on adequate resourcing to be operationalised.

3. **Capacity to act on improved intelligence**

Better data and analytics alone will not deliver improved outcomes unless governance, escalation pathways and resourcing enable timely regulatory response. Without this alignment, improved intelligence risks increasing expectations without improving performance.

4. **Managing uneven progress in a federated system**

Capability, resourcing and system maturity vary across jurisdictions and provider cohorts. There is an implicit dependency on agreement about how much unevenness can be tolerated without undermining national confidence and consistency.

## 6.3 Overall message for decision-makers

The strongest signal from stakeholders is that strengthening the NRSCH requires coordinated action on governance, systems, capability and funding within a sustained intergovernmental framework. Without addressing these foundational enablers and dependencies, reforms

aimed at reducing burden, improving proportionality or strengthening risk intelligence are likely to have limited or fragile impact.

## 7 Matters requiring further analysis, policy direction, or outside scope

The consultation identified a number of issues that were raised consistently by stakeholders but either fall outside the scope of the *Future Directions for the NRSCH* paper or would require further analysis and policy consideration beyond this process. These matters are set out below and will be referred to the *Community Housing Regulatory Modernisation Working Group* for consideration.

### 7.1 Future form of national regulatory arrangements

Stakeholders raised questions regarding the long-term form of the NRSCH, including whether current intergovernmental arrangements remain appropriate as sector scale and complexity increase. Consideration of alternative regulatory models, including any shift toward strengthened national authorisation or a standalone national regulator, would require legal, constitutional and policy analysis beyond the scope of this paper.

### 7.2 Alignment between regulation, funding and procurement

Submissions highlighted growing misalignment between NRSCH registration and state and territory funding, contracting and procurement frameworks, with registration increasingly treated as a baseline rather than a proxy for capability. Addressing these issues would require broader whole-of-government coordination across housing, treasury and procurement portfolios, and is not limited to regulatory design alone.

### 7.3 Jurisdictional participation in the national system

The absence of some jurisdictions from the NRSCH framework was raised as an ongoing source of inconsistency and duplication for providers operating nationally. Decisions relating to jurisdictional participation, legislative alignment or accession are matters for intergovernmental consideration and fall outside the scope of this consultation.

### 7.4 Extension of regulatory coverage beyond registered CHPs

A small number of submissions proposed extending regulatory oversight to private sector affordable housing delivery or introducing new categories of regulated entities. These proposals raise wider housing policy and market-regulation questions and are beyond the current focus on regulation of registered community housing providers.

## 7.5 Use of NRSCH performance tiers outside the regulatory context

Concerns were raised about the informal use of NRSCH tiers as proxies for governance quality, service performance or procurement readiness in funding and tendering processes. Addressing this issue may require policy direction across funding and market settings (including how funders reference NRSCH status), rather than changes to the regulatory framework alone. Some stakeholders also suggested that a review of the current tiering approach could be considered as an alternative or complementary way to clarify intended use and reduce unintended reliance.

## 7.6 Tenant representation in the regulatory system

Some respondents called for stronger tenant representation and lived-experience input within the regulatory system, to complement provider, regulator and government perspectives and help ensure that assurance settings remain grounded in tenant outcomes. Examples raised (or implied) through submissions included:

- establishing a tenant advisory mechanism (e.g., panel/reference group) to provide input on national guidance, reporting artefacts and reform priorities
- including tenant/lived-experience representation on relevant governance or steering forums (where appropriate)
- embedding structured tenant feedback loops (e.g., periodic tenant experience surveys) as an input to system intelligence and risk monitoring
- using complaints and dispute themes (de-identified and aggregated) to inform assurance focus and early warning signals
- strengthening expectations for provider-level tenant engagement (and how it is evidenced) while maintaining proportionality for smaller providers

## 7.7 Workforce standards and professional accreditation

Submissions from a small number of stakeholders proposed national workforce standards or professional accreditation for sector roles.

## 7.8 Long-term funding models for national regulatory infrastructure

While there was strong convergence on the importance of sustainable funding for nationally shared systems and assets, the design of long-term funding models and cost-sharing arrangements between jurisdictions is a broader fiscal and intergovernmental matter.

*The above matters are acknowledged as important contextual issues emerging from stakeholder feedback. They are either outside the scope of this consultation or require further detailed analysis and intergovernmental policy consideration. For this reason, they will be referred to the Community Housing Regulatory Modernisation Working Group for consideration.*

## 8 Next steps

The findings from this consultation will be used to inform next-stage regulatory design and decision-making for the NRSCH and the broader regulatory environment for the community housing sector.

Registrars will review the consultation findings to determine which actions sit within their remit and can be progressed through administrative, operational or guidance-based changes (without requiring intergovernmental policy decisions). This review will help separate short-term implementation improvements from longer-term reform options that depend on policy direction, legislative change, funding or inter-jurisdictional agreement.

The information collected through the consultation will also be shared with the *Community Housing Regulatory Modernisation Working Group* and integrated into the Working Group's assessment of the current regulatory environment and development of practical modernisation options (including options relevant to the NRSCH's settings, governance and shared infrastructure). The working group is expected to examine current regulatory settings (including those operating under the NRSCH) and identify practical modernisation options that maintain effective sector operations and support ongoing growth.

## 9 Appendix A: Traceability of implications to stakeholder groups

**Tale 4: Traceability of implication areas**

Implication area (linked themes)	Stakeholder groups most strongly associated
<b>System design (T1)</b>	Community Housing Providers (particularly Tier 1 and multi-jurisdictional providers); Peak body organisations; Government agencies. Providers and peaks most frequently highlighted pressures arising from scale, SPVs and group models, while government agencies focused on assurance and system fit
<b>Governance and decision-making (T2)</b>	Regulators and government agencies; Peak body organisations; National Office. These groups most consistently raised issues relating to role clarity, stewardship, escalation pathways and intergovernmental arrangements
<b>National consistency and coordination (T1)</b>	Community Housing Providers operating across jurisdictions; Peak bodies; Regulators. Cross-jurisdictional providers and peaks most frequently cited duplication and inconsistency, while regulators noted coordination challenges and dependencies
<b>National capability and resourcing (T7)</b>	Regulators; Peak bodies; Government agencies; National Office. These stakeholders emphasised skills gaps, sustainability of resourcing and the need for specialist capability to manage increasing complexity.
<b>Data, systems and digital infrastructure (T3)</b>	Community Housing Providers; Regulators; Peak bodies. Providers highlighted reporting burden and system usability; regulators and peaks emphasised reliance on consistent, high-quality data for assurance and risk insight
<b>Regulatory practice and proportionality (T4, T6)</b>	Community Housing Providers (including smaller and Aboriginal community-controlled organisations); Peak bodies; Regulators. Smaller providers and Aboriginal sector representatives raised proportionality concerns, while regulators focused on evidentiary quality and consistency.
<b>System adaptability and future focus (T1, T5)</b>	All stakeholder groups. Providers, peaks, regulators and sector experts consistently referenced the need for the system to adapt to future settings, emerging risks and evolving delivery models.

## 10 Appendix B: Methodology

Submissions received in response to the *Discussion Paper: Future Directions for the NRSCH* were analysed using a structured qualitative methodology designed to ensure consistency, transparency and neutrality.

All submissions and survey responses were reviewed in full to develop an overall understanding of issues raised. A coding framework was then established, aligned to the key themes and questions outlined in the discussion paper. The framework was refined iteratively during the review process to capture emerging issues while maintaining alignment with the consultation scope.

Each submission was systematically coded against the framework to identify recurring issues, areas of commonality and points of difference. Coding focused on system-level perspectives, including governance arrangements, national regulatory effectiveness, shared systems and tools, regulatory consistency, system intelligence and efficiency. Individual organisational positions or proposals were not assessed or evaluated.

Following coding, results were aggregated and synthesised to identify:

- areas of convergence across stakeholder groups
- areas of divergence or tension
- cross-cutting issues raised across multiple themes
- implications for future system design, governance and regulatory practice

Findings are presented without attribution to individual respondents, consistent with consultation principles. The synthesis does not propose solutions, make recommendations or indicate preferred policy positions. Its purpose is to accurately reflect stakeholder input and inform consideration of future directions for the NRSCH.

## 10.1 Coding Framework – NRSCH consultation submissions

### Purpose

To systematically capture, categorise and synthesise issues raised in submissions at a system level, enabling identification of themes, convergence, divergence and implications without attribution.

**Table 5: Level 1 Primary theme codes and Level 2 – sub codes**

Code	Level 1 Theme	Level 2 Sub codes
<b>T1</b>	Effectiveness of the NRSCH as a national system	<ul style="list-style-type: none"> <li>• T1.1 Overall system strengths and achievements</li> <li>• T1.2 System gaps or limitations</li> <li>• T1.3 Fitness for future regulatory environment</li> <li>• T1.4 National vs jurisdictional operation</li> </ul>
<b>T2</b>	Governance, roles and decision-making	<ul style="list-style-type: none"> <li>• T2.1 Clarity of roles</li> <li>• T2.2 Decision-making authority</li> <li>• T2.3 Accountability and escalation</li> <li>• T2.4 Intergovernmental arrangements</li> </ul>
<b>T3</b>	Shared national systems, tools and assets (e.g. CHRIS, guidance, artefacts)	<ul style="list-style-type: none"> <li>• T3.1 IT system functionality and reliability</li> <li>• T3.2 Custodianship of national assets</li> <li>• T3.3 Consistency of guidance and regulatory artefacts</li> <li>• T3.4 Resourcing and sustainability of shared assets</li> </ul>
<b>T4</b>	Regulatory consistency and proportionality	<ul style="list-style-type: none"> <li>• T4.1 Consistency of regulatory interpretation</li> <li>• T4.2 Proportionality of regulatory responses</li> <li>• T4.3 Jurisdictional variation</li> <li>• T4.4 Impacts on providers operating across</li> </ul>

Code	Level 1 Theme	Level 2 Sub codes
		jurisdictions
T5	System intelligence and responsiveness	<ul style="list-style-type: none"> <li>• T5.1 Data quality and availability</li> <li>• T5.2 Timeliness of intelligence and guidance</li> <li>• T5.3 Ability to respond to emerging risks/issues</li> <li>• T5.4 National risk insight and foresight</li> </ul>
T6	Regulatory burden and efficiency	<ul style="list-style-type: none"> <li>• T6.1 Duplication of effort</li> <li>• T6.2 Administrative burden on providers</li> <li>• T6.3 Efficiency of regulatory processes</li> <li>• T6.4 Opportunities for streamlining</li> </ul>
T7	Cross-cutting / intergovernmental issues	<ul style="list-style-type: none"> <li>• T7.1 Resourcing constraints</li> <li>• T7.2 Capability and skills</li> <li>• T7.3 Funding and sustainability</li> <li>• T7.4 Dependencies between jurisdictions</li> </ul>

In addition to the theme codes, additional tags were applied to written submissions to support synthesis. These were not applied to survey responses.

**Table 6: Level 3- Analytical tags (applied across all themes)**

Analytical Markers / Tags	Description
Convergence	Broadly shared views across stakeholder groups
Divergence	Differing or conflicting perspectives
Risk	Identified risks to system effectiveness or integrity
Opportunity	Potential improvements or enhancements
Dependency	Reliance on intergovernmental or external factors

**Table 7: Example Coding in Practice**

Submission Extract	Theme Code	Level 2 Sub-code	Analytical Tag
“The lack of timely national guidance has resulted in inconsistent approaches across jurisdictions.”	T5	T5.2 Timeliness of guidance	Convergence
“CHRIS is critical to national consistency but is not adequately resourced.”	T3	T3.4 Resourcing of shared assets	Risk
“Jurisdictions should retain autonomy in decision-making.”	T2	T2.2 Decision-making authority	Convergence

## 10.2 How this supports synthesis

This framework enables reviewers to:

- aggregate issues by theme rather than stakeholder
- distinguish systemic issues from localised concerns
- clearly identify areas of agreement and tension
- translate coded insights into implications, without proposing solutions or decisions

This approach directly underpins the *Key Themes* and Implications sections of the report.