Getting the balance right

A submission from Queensland Shelter to the Review of the National Regulatory System for Community Housing

April 2019

SHELTER
because housing matters

Contents

1. Introduction

Queensland Shelter Incorporated (Q Shelter) is a statewide industry and peak body for the Queensland housing and homelessness sector with a broad-based membership base that includes passionate individual members, as well as not for profit (NFP) and for profit organisations. We provide an independent and impartial voice on behalf of the housing and homelessness sector, as well as on behalf of those Queenslanders who do not have access to secure and affordable housing. We also work to strengthen the capacity of community housing providers (CHPs) and specialist homelessness services to deliver better outcomes for those in need.

Q Shelter's members include CHPs registered as Tier 1, 2 and 3 providers under the National Regulatory System for Community Housing (NRSCH), as well as Local Governments, specialist homelessness services, and Indigenous Community Housing Organisations (ICHOs). Our members come from across Queensland and range from city based organisations to those providing services in regional, rural and remote areas. Q Shelter also works with housing and homelessness networks in fifteen areas across Queensland.

Given this role, and our diverse membership base, Q Shelter is uniquely positioned to understand, and provide feedback on, the impacts and operation of NRSCH in Queensland and we welcome the opportunity to do so. In this submission we:
- Propose four outcomes for a fair and effective future regulatory system for community housing;
- Explore the issues relevant to each of these outcomes; and
- Recommend future action by government that enables these outcomes to be achieved.

2. Q Shelter and the National Regulatory System for Community Housing

Throughout this submission we draw on our experience as a housing peak and on the diverse views of our members and of the broader community housing industry. Our experience has been informed by:
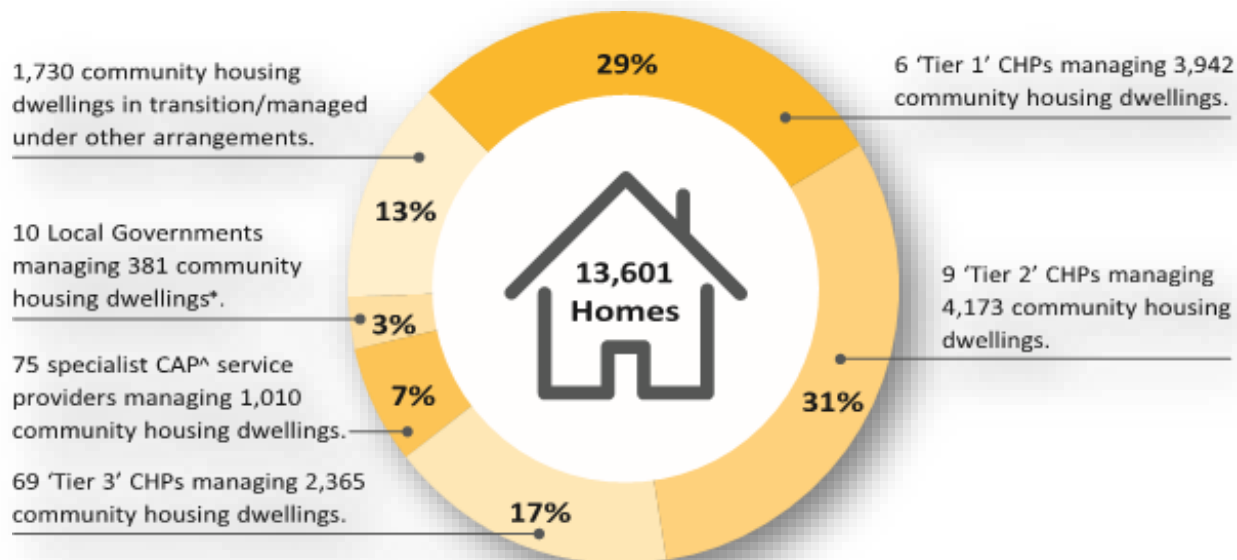
- *Q Shelter's role as a housing peak.* This role is founded on developing and sustaining effective working relationships with a diverse range of CHPs, as well as with other individuals and organisations that support affordable and social housing. We do this through our membership; our policy and advocacy work; and our industry development work. As a result, we have an extensive and detailed knowledge of CHPs across Queensland.

- *Our industry development role.* Since 2014, Q Shelter has provided many CHPs with expert support on NRSCH including in the areas of policy development and review; meeting NRSCH's evidentiary requirements; and strategies to strengthen future viability including partnerships, mergers and acquisitions. We have also developed products to support implementation of NRSCH, resulting in a comprehensive suite of tools for CHPs seeking to attain and sustain registration, including model policies and procedures, financial reporting tools and a registration self-assessment workbook.

- *Effective partnerships.* We have partnered on implementation of NRSCH with both the office of the Queensland Registrar[1] and the Queensland Department of Housing and Public Works (DHPW). For example, Q Shelter and Regulatory Services co-hosted a number of roadshows with Queensland CHPs and in September 2018, Q Shelter partnered with DHPW to host and facilitate workshops with Tier 3 CHPs across the state. Through these forums, we heard from many Tier 3 CHPs about the challenges they experience in attaining and sustaining registration.

---

[1] The Registrar's office in Queensland has recently changed its title to Regulatory Services.

3.   The Queensland landscape

The Queensland Community Housing Prospectus presents the following overview of the 13,601 homes provided through community housing in Queensland.[2]

1,730 community housing dwellings in transition/managed under other arrangements.

10 Local Governments managing 381 community housing dwellings*.

75 specialist CAP^ service providers managing 1,010 community housing dwellings.

69 'Tier 3' CHPs managing 2,365 community housing dwellings.

29%

13%

3%

7%

17%

13,601 Homes

6 'Tier 1' CHPs managing 3,942 community housing dwellings.

9 'Tier 2' CHPs managing 4,173 community housing dwellings.

31%

* Does not include Aboriginal and Torres Strait Islander Councils

The Prospectus also outlines the number of registered providers in Queensland in the diagram below.[3]

NRSCH registration activity applies to providers of community housing. Registered providers are placed on a single National Register in one of three tiers according to the scope, scale and complexity of their business activities.

6 'TIER 1' PROVIDERS IN QLD^

Housing providers with asset procurement and development functions and/or complex tenancy and property management functions that operate at scale.

9 'TIER 2' PROVIDERS IN QLD

Housing providers typically involved in moderately complex asset and tenancy management activities.

69 'TIER 3' PROVIDERS IN QLD

Housing providers typically involved in small-scale tenancy and asset management activities.

^ Three Tier 1 providers that operate within Queensland have an interstate primary jurisdiction.

---

[2] Page 6, Queensland Shelter, *Queensland Community Housing Prospectus: A time for growth*, November 2018. The Prospectus was developed by Queensland Shelter and funded by the Queensland Department of Housing and Public Works. Figures presented are as at 30th June 2017.
[3] Page 5, ibid.

Community housing in Queensland reflects a population that is decentralised across urban, peri-urban, regional and rural locations. CHPs play a vital role managing housing in every location type.

The map to the right [4] paints a picture of distributed service provision including 50 dwellings in Longreach, 702 in Mount Isa, and 896 in the Torres Strait.

This geographic picture presents particular challenges for NRSCH in Queensland, with smaller scale, more remotely-based providers being a critical part of service provision.

The importance of Aboriginal and Torres Strait Islander community housing in Queensland must also be emphasised with 11 of 84 registered CHPs being ICHOs and a total of 30 funded Indigenous housing providers across the state including 16 Aboriginal and Torres Strait Islander Councils managing approximately 5,000 homes.[5]

The link between housing provision by these CHPs and a wide range of social outcomes must also be highlighted. For example, the contribution appropriate housing makes to health outcomes is well known with research showing that "*housing stability, quality, safety and affordability all affect health outcomes as do the physical and social characteristics of neighbourhoods.*"[6] More specifically, access to stable housing can improve health and reduce healthcare costs.[7]

---
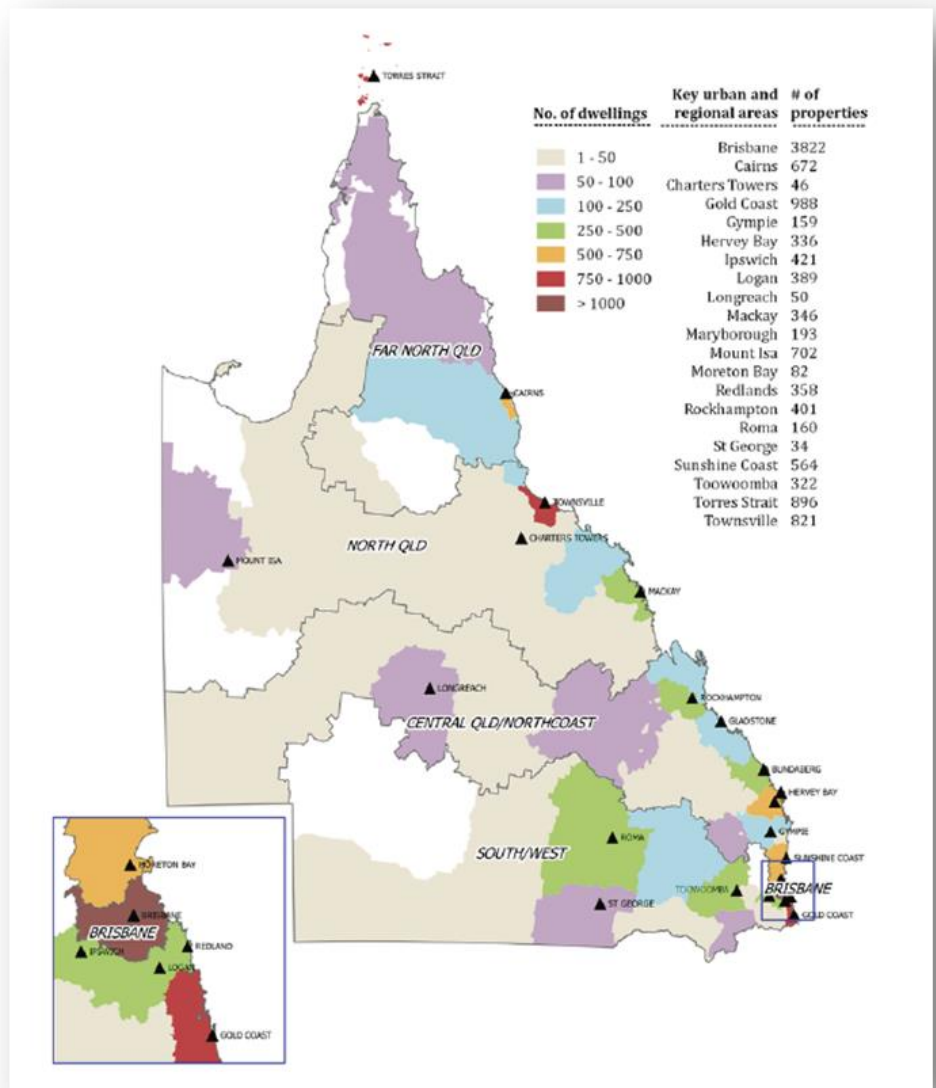
[4] Page 13, ibid.
[5] Pages 6 and 7, ibid.
[6] Page 1, Health Affairs Health Policy Brief, *Housing And Health: An Overview Of The Literature*. June 7, 2018 at hiips://www.healthaffairs.org/do/10.1377/hpb20180313.396577/full/
[7] Page 2, ibid.

4. The outcomes

In this submission, Q Shelter proposes four outcomes for a fair and effective future regulatory system for community housing. These outcomes are outlined in the table below.

Outcome	What this looks like…
1. NRSCH is an effective regulatory system for the future.	▪ A strong tenant voice helps us understand the outcomes for end users from regulation. ▪ Comprehensive evaluation tests whether NRSCH meets its objectives and is an effective system. ▪ Regulatory agencies are independent and checks and balances are in place to safeguard this. ▪ Tenant outcomes are protected for tenants in subsidised community housing. ▪ Government assets and funding used for community housing are protected and retained for future delivery of housing outcomes and as a financial resource to support future growth. ▪ NRSCH adapts in response to new and different subsidised affordable and community housing programs and regulates the outcomes these programs deliver as needed.

2. NRSCH is complementary to other regulatory and accreditation systems and to contract management approaches by funding bodies.	▪ Key national and state based regulatory and accreditation systems:
	  – Operate effectively and efficiently together;
	  – Ensure their activities and reporting are complementary; and
	  – Reduce red tape for CHPs.
	▪ Mechanisms and protocols are in place for information submitted by CHPs to be shared between regulatory and accreditation agencies, as well as funding agencies, to reduce the reporting burden for CHPs.[8]
	▪ Funding agencies are well versed in the requirements of regulatory and accreditation agencies and utilise consistent performance outcomes to administer funding contracts.

3. NRSCH is a streamlined, efficient and fit-for-purpose regulatory system.	▪ NRSCH assesses the inherent risk and the level of investment in affordable and community housing programs and regulates in a manner that is commensurate with this risk and investment. ▪ Performance outcomes are well-articulated and evidence requirements clear. ▪ Evidence requirements are consistently interpreted and applied.
4. Industry development strategies position CHPs well in relation to both NRSCH and growth opportunities.	▪ NRSCH data informs the community housing industry. ▪ Comprehensive industry development strategies are in place to support CHPs. ▪ CHPs seeking registration and undergoing compliance assessments can access resources and independent support.

---

[8] Any such arrangements would need to comply with privacy legislation.

5. The issues

5.1.   Towards an effective future regulatory system

The Discussion Paper issued as part of the Review of the National Regulatory System for Community Housing (the Discussion Paper) outlines NRSCH's original objectives (i.e., to protect vulnerable tenants and improve tenant outcomes, to protect government assets and funding and to facilitate private sector investment) and asks whether these objectives are still relevant. In addition, the Discussion Paper seeks views on what regulation should seek to achieve.[9]

Q Shelter believes that NRSCH's initial three objectives are still relevant and that regulation must seek to get the balance right between these objectives and sustaining a viable community housing industry. Regulation is an important contributor to quality outcomes and so, in principle, we support the continued operation of NRSCH into the future as well as the status of NRSCH as an independent regulatory system with strong checks and balances to uphold its independence.

However, we believe there is little evidence assessing whether NRSCH's objectives have been achieved and that NRSCH is yet to be substantially tested. In addition, the system is not yet at a mature enough stage to fully assess its impact. To test the success or otherwise of NRSCH in achieving its objectives in the future, we propose that robust evaluation work is needed, as well as better analysis of the data NRSCH collects.

In particular, there is currently little opportunity to hear the voice of end users on whether stronger housing outcomes are being achieved for them as a result of regulation and we propose that an appropriate forum through which tenant voices can be heard is needed to assess this vital regulatory outcome and provide input to future evaluation work.

The landscape for community and affordable housing will continue to change over time and NRSCH will need to respond to these changes by adapting its regulatory approach. The Discussion Paper asks whether NRSCH's coverage should be extended to include affordable housing providers, including for profit providers.[10]

Q Shelter has heard differing views about whether NRSCH's coverage should be extended to cover affordable housing providers. Consequently, we propose that a number of factors must be considered to ascertain whether extending NRSCH's coverage is appropriate:
▪   The nature of the affordable housing and the extent to which government investment, subsidies or support have been provided either initially or recurrently;
▪   Whether affordable housing will be accessed by vulnerable tenant groups for whom it is appropriate to put in place NRSCH coverage;
▪   Whether the nature and structure of affordable housing providers means they are readily or appropriately regulated by NRSCH, given that NRSCH currently struggles to adapt to the structures of long-term, larger providers who are not standalone CHPs (see page 10);
▪   Whether other existing regulatory regimes (e.g., residential tenancies legislation) adequately regulate the housing form in question; and
▪   The nature of regulation for any similar programs in other jurisdictions.

---

[9] Pages 8-10, NRSCH Review Working Group, *The Review of the National Regulatory System for Community Housing: Discussion Paper*.
[10] Page 10, ibid.

Q Shelter's recommendations

1. That, in principle, Q Shelter supports that NRSCH continues as the independent regulatory platform for CHPs.
2. That whether NRSCH is meeting its objectives is tested in the future by:
   – Robust evaluation;
   – Analysis of NRSCH data; and
   – Establishment of an appropriate forum through which the tenant voice can be heard.
3. That the following factors are taken into account in considering any future coverage of affordable housing by NRSCH:
   – The nature of the affordable housing and the extent to which government investment, subsidies or support have been provided either initially or recurrently;
   – Whether affordable housing will be accessed by vulnerable tenant groups for whom it is appropriate to ensure NRSCH coverage;
   – Whether NRSCH is an appropriate regulatory option for affordable housing providers, given these providers are likely to differ in organisational form and structure from standalone CHPs;
   – Whether other existing regulatory regimes adequately cover the housing form in question; and
   – The nature of regulation for any similar programs in other jurisdictions.

5.2. Working within the broader context

The current regulatory and quality environment for CHPs is characterised by inefficiency and duplication, with many providers needing to register and/or become accredited through a range of schemes including NRSCH, the Australian Charities and Not-for-profits Commission (ACNC) and schemes such as the Human Services Quality Framework (HSQF), which many Queensland CHPs who provide crisis accommodation and other community services must be accredited under. For broader organisations that are CHPs and that also deliver other types of services, this is even more complex with multiple sets of standards against which funding bodies either prefer or require accreditation, including ISO standards, the Aged Care Quality Standards and the National Standards for Mental Health Services.

This complex regulatory and quality environment has the following adverse consequences for CHPs:
- Each regulatory/accreditation scheme regulates or accredits specific aspects of governance and service delivery with much overlap occurring between the areas covered by these schemes.
- Each regulatory/accreditation scheme requires customised reporting/documentation in customised formats to assess compliance with regulation or achievement of accreditation. The topics of reporting and documentation frequently overlap but inevitably the data collected and the format it is collected in differ. For example, a number of CHPs have indicated to Q Shelter that financial returns for different agencies often cover the same ground but require data to be analysed differently and submitted in varying formats.
- CHPs spend a disproportionate amount of time and financial resources on reporting at the expense of their housing management responsibilities.

Q Shelter believes that reform is needed to remove duplication between regulatory and accreditation schemes, to make the schemes more complementary and to coordinate the activities and documentation and reporting requirements that are part of these schemes.

In addition, key funding agencies, such as DHPW, also require reporting to assess whether CHPs are adequately meeting the terms and conditions of their funding agreements. Whilst this is standard practice, and we support the need for funded organisations to be accountable for government funds, these reporting requirements further compound the picture painted above of a system that places onerous demands on CHPs and redirects their energy from service provision to meeting reporting and quality requirements.

CHPs also indicate to Q Shelter that staff of key funding agencies are not always well-versed in NRSCH and so, when undertaking contract management activities such as service reviews, they may be unaware of the nature of material that CHPs have already submitted for NRSCH compliance assessment and so, rather than working with the CHP to assess and build on these resources, they further complicate the situation for CHPs.

In addition to the potential for overlap and duplication outlined above, the timetables implemented by regulatory and funding agencies undertaking activities such as service reviews and compliance assessments often overlap, or are not coordinated, thus creating further challenges for CHPs.

This feedback from CHPs about the lack of synergy between NRSCH's regime and contract management demonstrates little evidence that compliance with NRSCH has any real benefit for CHPs in terms of their standing with funders and partners.

Q Shelter's recommendations

4. That, for each CHP, one set of standards or regulatory requirements should drive the shape of their accreditation and regulation requirements. This means that CHPs should be not required to demonstrate compliance over more than one set of standards/regulations when these standards/regulations cover the same territory. Regulatory/accreditation standards should then be supplemented or added where there is additional content (e.g., asset management, property and tenancy management).
5. That key regulatory, accreditation and funding agencies work together to standardise and streamline documentation and reporting requirements.
6. That a mechanism such as the ACNC's Charity Passport that allows for the exchange of reporting information between key agencies be considered. [11]
7. That protocols be implemented between Registrars' offices and key funding agencies (e.g., DHPW) that deliver education of funding agency staff on NRSCH and a coordinated compliance and service review work program.

---

[11] Any such arrangement would need to comply with privacy legislation.

5.3. A streamlined, efficient and fit-for-purpose regulatory system

Q Shelter's work supporting many CHPs to attain and sustain registration demonstrates that there is more to be done to achieve a streamlined, efficient and fit-for-purpose regulatory system.

This is illustrated by the following issues emerging from our work with CHPs:

- CHPs in Queensland report they experience inconsistent interpretation of the evidence guidelines by Regulatory Services. Through our work across organisations we also see inconsistent interpretation as organisations share with us determinations made by the Office that appear to be inconsistent with approaches taken with other CHPs.
- CHPs report that NRSCH's yearly compliance assessment approach is labour intensive, onerous and time consuming.
- The frequency of compliance assessments to retain registration is greater than for some other regulatory/accreditation schemes. NRSCH's current approach is that Tier 1 and 2 CHPs must undergo an annual compliance assessment to retain registration, while Tier 3 CHPs must undergo a compliance assessment every two years.
- CHPs report that the frequency of compliance assessments is compounded by the turnaround time for final reports from Regulatory Services, which are often not received within the specified timeframes. This gives CHPs a reduced timeframe within which to complete any improvement actions required by Regulatory Services before they must enter the compliance assessment cycle again. Thus, more time is allocated to finalising the compliance assessment than to implementing improvement actions.
- Tier 3 CHPs struggle with both NRSCH's evidence requirements and the intensity and frequency of compliance assessments. Q Shelter has received considerable feedback indicating that NRSCH's approach is not commensurate with the relatively low risk levels and small scale of many Tier 3 providers.

Q Shelter proposes that several issues need to be reconsidered to ensure that NRSCH becomes a more streamlined and efficient regulatory system. Registrars' offices needs to put in place mechanisms to improve the consistency of interpretation of the evidentiary guidelines so that CHPs are participating in a fairer and more equitable system.

We also urge reconsideration of the cycle of compliance assessments for all CHPs. While NRSCH's role is to support strong tenant outcomes and protect government investment, the frequency of compliance assessments must balance these important outcomes with sustaining a viable community housing industry and allowing CHPs to maximise the time they spend on housing management rather than on regulatory compliance. A contrasting example is provided by the HSQF, where accreditation occurs over a three-year cycle with a mid-term maintenance audit. HSQF also allows for a self-assessment for organisations receiving less than $1 million per annum from funding agencies requiring accreditation through HSQF.

Feedback from Tier 3 CHPs overwhelmingly points to the need to reform the evidentiary requirements for these providers and to reduce the frequency of compliance assessments. Queensland's Regulatory Services has made a commitment to reconsider the evidentiary requirements for these providers. We support this view, but also propose broader reconsideration of arrangements for these providers through the NRSCH review to ensure NRSCH is fit-for-purpose in relation to Tier 3 CHPs.

We urge consideration by the review of a new approach more strongly underpinned by risk management that takes into account the scale of service provision when regulating smaller providers

and considers application of components of the HSQF's approach, including identification of a funding/scale threshold below which a simpler, fit-for-purpose regulatory regime such as self-assessment is utilised.

Further issues have also emerged with regard to NRSCH's objective of being fit-for-purpose regulation. The current operation of NRSCH has shown that the regulation, and/or the way it is applied, does not always adapt well when:

- *CHPs are structured differently* (e.g., church based providers whose organisational structures differ from those specified in NRSCH). Q Shelter is aware of examples where organisations have worked towards registration, only to discontinue this process as progress was either challenging or a way forward was not identified. Anecdotal feedback suggests this may be an issue of particular note in Queensland and that CHPs have had more success in registering in other jurisdictions.

- *CHPs subcontract tenancy management to other registered providers.* Increasingly, CHPs take the opportunity to utilise more complex models to deliver housing and we believe that consideration needs to be given to NRSCH becoming more adaptable when applied to such models. An example is provided by one CHP who focuses on asset and property management and sub-contracts tenancy management to other registered CHPs. Each year, as compliance assessment occurs, the CHP focussing on asset and property management must re-submit existing correspondence to the Registrar to ''verify'' that they have been registered with this model in place rather than being able to proceed with compliance assessment on the basis of the delivery model that the Registrar has already accepted.

- *CHPs are tasked by government with only short term asset management.* In Queensland, some CHPs that deliver crisis accommodation and/or Same House Different Landlord lease government-owned properties to provide supportive accommodation. At times, these leases are short term and so CHPs have limited capacity to undertake an asset management planning process. However, CHPs are still required to comply with Performance Outcome 2 on housing assets and undertake activities such as development of an asset management plan when there is little or no opportunity to do so. This places an unreasonable regulatory burden on these CHPs.

In summary, our experience and feedback from CHPs shows that NRSCH has, at times, proven to be inflexible in response to the wide range of CHPs who deliver services and the program arrangements that government tasks CHPs with delivering services through. For NRSCH to operate effectively in the future, and to respond to what is likely to be a more diverse set of arrangements encompassing future affordable and community housing, reform is needed to maximise the adaptability of NRSCH and to make it truly fit-for-purpose into the future.

Q Shelter's recommendations

8. That Registrars' offices put in place mechanisms to ensure more consistent interpretation of the evidentiary requirements.
9. That the frequency of NRSCH compliance assessments be reconsidered with a view to reducing the burden on all CHPs.

10. That NRSCH needs to better take into account:
    - The diverse organisational structures of CHPs;
    - The range of service delivery models CHPs are utilising; and
    - The nature of government program arrangements that CHPs are funded through and the implications of these for the role of CHPs.
11. That the overall approach taken by NRSCH in relation to Tier 3 CHPs be reconsidered, including evidence requirements, frequency of compliance assessments and simpler fit-for-purpose options such as self-assessment, to ensure the approach is commensurate with the level of risk and scale of housing provision.

5.4. Industry development for CHPs

Q Shelter has been an active participant in industry development work with the community housing industry in the context of implementation of NRSCH. We see industry development as a critical part of successful regulation and believe that there is much more to be done in this area. Funding for industry development in Queensland has been limited and we propose that more extensive work is needed alongside future regulation.

Our work in this area and feedback from CHPs raises the following issues:

- Implementation of NRSCH in Queensland has not been adequately supported by industry development strategies.
- There is currently no vision in community housing for inclusion of end users in industry development strategies to ensure that feedback is sought on NRSCH's consumer protection outcomes (see section 5.1). Strategies to develop leadership potential by tenant representatives as part of industry development would bring us in line with other human services fields that have focused on this work including health care and mental health.[12]
- NRSCH's objective of facilitating private sector investment will not be met by building private sector confidence through registration alone. It also requires more comprehensive development work to strengthen the industry.
- Priorities for industry development include: workforce development to support CHPs to build their future capacity; active work on identifying future growth strategies for CHPs; and independent support for CHPs who do not want to become registered, or seek future growth opportunities, to identify options for the future.
- Registration and compliance assessment processes have resulted in NRSCH capturing substantial data about the industry and its operation. We acknowledge that the Registrars' annual reports provide some trend analysis using NRSCH data but believe there is much more that could be done in analysing and releasing data harvested via NRSCH that could help drive and shape future improvements to NRSCH and to the industry.

Q Shelter's recommendations

12. That strategies to develop leadership potential by tenant representatives as part of industry development are established.

---

[12] Work in healthcare is illustrated through the following publication - Health Consumers Queensland, *A Guide for Consumers Partnering with Health Organisations.* 2018.

13. That NRSCH is complemented by comprehensive industry development strategies that focus on:
    – Workforce development for CHPs to build their future capacity;
    – Active work on identifying future growth strategies for CHPs; and
    – Independent support for CHPs who do not want to become registered, or seek future growth opportunities, to identify options for the future.
14. That data harvested via NRSCH is:
    – Utilised to drive future improvements to NRSCH; and
    – Made available to the community housing industry to help drive and shape future industry-wide improvements.

6. Looking to the future

Getting the balance right between achieving strong housing outcomes for tenants and ensuring a viable community housing industry is at the heart of identifying improvements to NRSCH.

NRSCH also identifies facilitating private sector investment in the community housing industry as a key objective. Research by the Australasian Housing and Urban Research Institute (AHURI) indicates that overseas experience shows the challenge of regulation is to maintain a balance between different stakeholders and their interests.[13] AHURI also proposes that for affordable housing

> *"regulation should not be viewed as a primary growth strategy, but rather as a necessary condition for affordable housing growth alongside strategic investment."* [14]

Q Shelter proposes even broader settings are necessary for growth, rather than regulation alone. We believe that achieving growth in the community housing industry requires a tripartite approach – a consistent and well-articulated policy approach by both federal and state governments; investment by governments and the private sector; and industry-wide development of CHPs.

Industry wide development of CHPs

Well articulated government policy approaches

Investment by government & private sector
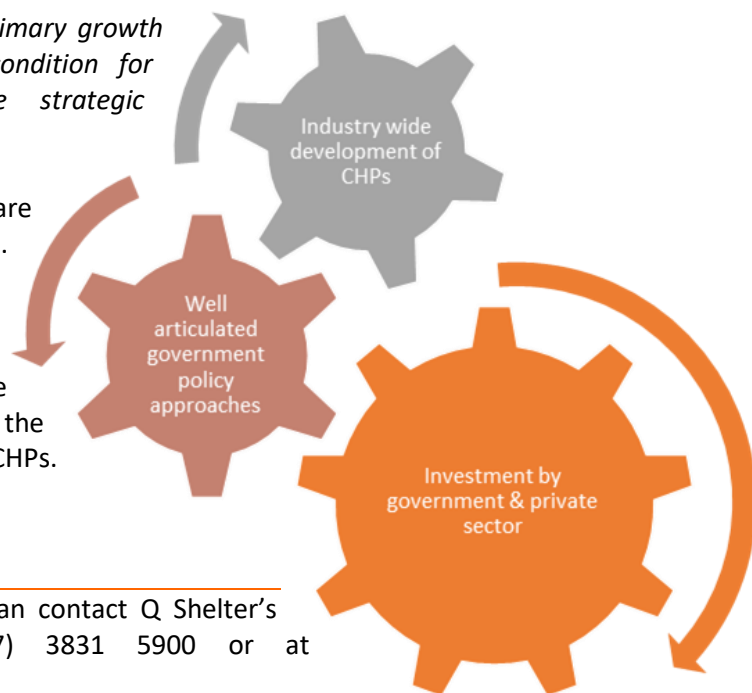
7. Contact details

For further details about this submission, you can contact Q Shelter's Executive Director, Fiona Caniglia, on (07) 3831 5900 or at Fiona.Caniglia@qshelter.asn.au

---

[13] Page 2, Australasian Housing Research Institute, *AHURI Research and Policy Bulletin: Stakeholder perspectives on the regulation of affordable housing providers*. Issue 141, June 2011.
[14] Page 3, ibid.

8. Appendix One: References

1. Australasian Housing Research Institute, AHURI Research and Policy Bulletin: *Stakeholder perspectives on the regulation of affordable housing providers.* Issue 141. June 2011.

2. Health Affairs Health Policy Brief, *Housing And Health: An Overview Of The Literature*. June 7, 2018 at hiips://www.healthaffairs.org/do/10.1377/hpb20180313.396577/full/

3. Health Consumers Queensland, *A Guide for Consumers Partnering with Health Organisations*. 2018.

4. National Regulatory System Community Housing, *Evidence guidelines*. Commonwealth of Australia. 2014.

5. National Regulatory System Community Housing, *Tier Guidelines*. Commonwealth of Australia. 2014.

6. National Regulatory System for Community Housing, *National Regulatory Code*. Commonwealth of Australia. 2014.

7. National Regulatory System for Community Housing Project Directorate, *National Industry Development Framework for community housing*. 2014.

8. National Regulatory System Community Housing, *Regulatory Framework*. Commonwealth of Australia. 2017.

9. National Regulatory System for Community Housing (NRSCH) National Office, *NRSCH Annual Overview 2017 - 2018*. 2018.

10. NRSCH Review Working Group, *The Review of the National Regulatory System for Community Housing: Discussion Paper* may be found at hiip://www.nrsch.gov.au/__data/assets/pdf_file/0009/644760/NRSCH -Review-Discussion-Paper.pdf

11. Queensland Shelter, *Queensland Community Housing Prospectus: A time for growth*. 2018.