

# REPORT

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TO Housing Register Reform External Stakeholders Reference Group  
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RE SOCIAL HOUSING REGISTER – *a Housing Association perspective*

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# 1 Introduction

The growth of housing associations in NSW over the last 5 years, has resulted in a sector that has a strong sense of purpose and identity. Housing associations have managed rapid growth and concomitant changes in structure, practice and culture in a way that many small businesses would be proud to claim. With this growth has come an independence of thought and the development of a new autonomy that has, at times, challenged our public housing counterparts and funding bodies. This is understandable and, to some extent, expected.

The shift towards a common housing register has important symbolic meaning for housing associations. On one hand housing associations now house enough people for their participation in a register to be meaningful – housing associations are proud of that achievement. On the other hand, housing associations are concerned that their distinctive competencies and, ultimately, their autonomy will be threatened by the development of some forms of the register.

This paper attempts to explain some of housing associations' concerns and to explain the historical context of these concerns. The NSW Federation of Housing Associations believes that this paper will assist in moving the debate forward to ensure the development of a common housing register does two things. Firstly, it must meet the needs of tenants and applicants. Secondly, it should support an effective multi-provider social housing system.

## 2 Current context

Housing registers are founded on partnerships between parties. Evidence from the private sector suggests that such partnerships must be based on equality, in order to foster the trust and cooperation required for a successful commercial relationship. However, housing associations in NSW are entering negotiations with the Department of Housing (DoH) with the assumption that the structure of the register is a *fait accompli*, despite the Department's assertions to the contrary.

There are a number of reasons why housing associations feel unable to trust the Department, which has given rise to such feelings of apprehension and cynicism. Firstly, housing associations have received messages regarding the Department's recognition of the sector's professionalism and autonomy, which appear to them to be conflicting. Secondly, the debacle over the community housing Information Technology (IT) strategy has left associations frustrated and pessimistic about future developments.

### 2.1 Sector professionalism & autonomy

Many housing associations are very concerned about a possible loss of independence and autonomy with the implementation of a common housing register. This is despite assurances from the Minister and Director General of Housing that the register will not undermine community housing's capacity to be a vibrant, innovative contributor to a multi-provider housing system. The source of such contrasting sentiments may be traced to housing associations perception that messages from senior departmental figures are conflicting.

Housing associations are promoted as significant players in the social housing system, managing over 6 000 properties, whilst also being told that they must demonstrate 'efficiency, professionalism and good management'. For example, at the NSW Community Housing Conference, in May 2000, Carol Mills, speaking on behalf of Andrew Cappie-Wood (Director General, DoH), told the sector that autonomy – in the form of title – could not be

granted until the Department was guaranteed that its investment would be protected and client outcomes were ensured. However, a few years ago associations were told they would receive title once they demonstrated their professionalism by gaining accreditation. Statements such as those made at the conference make housing associations feel that their skills, professionalism and expertise are still not recognised or valued. Similarly, with the development of the register, the Department insists that it recognises the sector's professionalism and the right of organisations to protect their autonomy, whilst not trusting associations to do their own needs assessment.

Housing associations want to be accountable and to be able to demonstrate this. However they are seeking an agreement on how many tests of professionalism they must pass – such as receiving accreditation, signing up to the Code of Practice, abiding by Housing Appeals Committee rulings, participating in the Best Value Inspection process and conforming with the National Accounting Framework – before they have satisfied the Department that they are in fact professional, trustworthy organisations.

Housing associations also felt the redevelopment site process was an attack not only on the sectors' autonomy but also on its professionalism and expertise. Housing associations have always had control over nominations and allocations and they are proud of their ability to establish sustainable tenancies based on carefully considered allocations. The small scale of community housing enhances its ability to meet tenant needs and this distinguishes it from Public Housing Services (PHS).

The nominations and allocations negotiation process was unsatisfactory for a number of reasons. It is suffice to say here that the sector was poorly consulted and the process was rushed. Not surprisingly, the outcome was a set of unworkable and unpopular protocols. At the time Adam Farrar (Chair, Community Housing Advisory Board) expressed concern that the nomination rights procedures would lock the sector into a position and preclude the Community Housing Advisory Board's discussions (CHAB minutes, 16 July 1999:5). However, Carol Mills (Executive Director, OCH) gave assurances that if a single register were to eventuate it would supersede all previous nominations & allocations protocols (CHAB minutes, 16 July 1999:5). Housing associations remain pessimistic as they do not believe that nominations and the register are unconnected.

If the model for a common register of housing need in NSW were to be extended to include common allocation policies or even simply common assessment of need, the innovation and diversity of management styles provided by community housing will be seriously constrained. This would undermine the important principles outlined in the Mant Report (1992), principally the need to develop a separate, autonomous community housing sector that would provide real competition to the Department of Housing. Mant's explanation of how community housing shifted from a small sector with variable service quality to where it is today is outlined in *Leaps & bounds: A History of the Federation* (1999:17-18).

## 2.2 Community Housing IT Strategy

In the late 1990s, OCH spent considerable time and resources researching and developing a tender document for the development of a comprehensive IT strategy for the community housing sector. However, the Department of Housing required that this project be shelved, pending the development of the Integrated Housing System (IHS). The IHS has since been developed without consultation with the community housing sector.

Housing associations are extremely frustrated at having to continue to endure poor IT and conflicting demands from OCH – instead of receiving a customised IT strategy that fulfils a range of IT functions. The impact has been twofold. Firstly, associations have been unable to plan ahead and so have been forced into making unsatisfactory interim planning decisions. Secondly, the sector may now be required to make unacceptable compromises

over the development of the social housing register, because it may not be possible to modify the IHS to meet association's 'waitlist' needs.

### *2.2.1 Impact of delayed Community Housing IT Strategy*

OCH has repeatedly assured the sector that it will receive a financial/tenancy management IT package. Understandably housing associations are extremely frustrated by the delay and they feel that their capacity to plan has been sabotaged.

The lack of a sector wide response to IT has had a significant impact on organisational operations. Housing associations have been prevented from addressing their IT problems whilst also being required to respond to changes in data collection for accreditation, the National Accounting Framework (NAF), the GST, use of *Centrepay* and increasingly rigorous Residential Tribunal data requests. As a result they have been forced to make a series of ad hoc decisions about their IT, despite their clearly stated desire to be more strategic. They are universally angry about this. For example:

- Many associations have purchased or developed their own software in order to respond to the NAF and GST. This has further increased the diversity of systems throughout the sector (see Gunn & Associates, 1999:5).
- Other housing associations, heeding OCH's advice to wait for a sector wide strategy, continue to struggle on with inefficient, outdated systems. This in turn produces poor performance indicators as organisations are unable to spend money on IT whilst being required to plan expenditure and use surpluses.

It is very difficult for the Federation to provide training and assistance to associations with such a wide range of systems. This issue was identified in the Federation's 1995 IT survey and in the context of the National Accounting Framework training.

### *2.2.2 Why a Community Housing IT strategy is needed*

The need for a sector-wide IT standards, including housing management software packages which incorporate tenant, financial and asset management, has been recognised by OCH and housing associations for many years.

In July 1999, the Federation conducted a survey of IT used by housing associations. The report shows that no two housing associations have IT systems that are directly comparable. This lack of standard IT impedes their ability to manage their services efficiently and effectively, particularly in a climate where there is increasing pressure to 'do more with less' and to be more accountable for public expenditure.

John Gunn & Associates, who were commissioned by OCH to identify resourcing priorities for the sector, supported these findings. They found that the "lack of a planned or consistent strategic approach to resourcing ... [was] an obstacle to the effective management of community housing" (1999:3) and that "access to IT and computers [was] a high priority support need for the sector" (1999:5).

OCH had previously identified IT as a key resourcing need, with the establishment of the Community Housing Information Technology Strategy (CHITS) Steering Group in 1996. The Steering Group's consultant argued for a decentralised IT system that had commonality between the OCH database and community housing provider systems. That is, each provider would use the same package of software, set up in the same way. OCH's systems would also be compatible. The consultant noted that training would need to be a significant priority.

### *2.2.3 Stalled development of a Community Housing IT strategy while Public Housing*

### *Services developed the Integrated Housing System*

In early 1998, the CHITS Steering Group produced a draft tender document for a consultant to acquire/develop an IT system for community housing providers. In February 1998 the CHAB strongly urged OCH to progress the implementation of the National Accounting Framework (NAF) and the computer based information and management systems. However the release of the tender for acquisition/development of housing management software was postponed, pending further advice from the DoH regarding the nature and capacity of its IHS. The CHAB expired, in December 1999, before this issue was resolved and its status is yet to change. The continuing absence of an overall IT strategy or a coherent approach to IT is hampering the best efforts of community housing providers.

#### *2.2.4 Lack of community housing consultation during development of the Integrated Housing System*

Best practice from the UK warns that no 'off the shelf' system is likely to meet all the requirements of differing providers, despite the room for user modification. Therefore, "*prior to procurement* [all partners should make decisions] about which aspects of the specification must be met in full and which can be compromised" (Charlesworth, 1998, p.73, italics added).

In NSW the IHS was purchased and developed without consultation with the community housing sector, despite the clear intention to use IHS software modules for the largest common housing register to date. Housing associations must now negotiate with the department in good faith, despite uncertainty as to whether the IHS can be adequately modified to incorporate the needs of community housing. This will in turn determine whether the common register is workable for all participants.

The community housing sector raised concerns on numerous occasions. For example, in July 1999 Eleri Morgan-Thomas inquired as to why community housing had been excluded from providing input into the new IT system that would affect community housing in the future. Andrew Cappie-Wood (Director General, Department of Housing) acknowledged her concerns and agreed that there was a need for discussion on this issue (CHAB Minutes, July 1999, p 3). Unfortunately the current consultation between the sector and the Department may be too late to address the needs of community housing:

While the [IHS] is flexible, it was designed to be configured enterprise, to enterprise. Therefore *meeting the needs of a range of providers within one 'enterprise' may be complicated*. A better understanding of what an ideal register should be will be required before it will be possible to say whether IHS could be amended to support such an ideal Register (Bill Barret, DOH IT consultant; Housing Register Reform External Stakeholders Reference Group, Minutes, May, 2000:5, italics added).

Furthermore, the IHS will not overcome the inadequacies in housing associations' current IT systems, as it does not include financial management systems for community housing – unlike the CHIST tender – which is a function providers desperately need.

The lack of a sector wide response to IT will have an impact on the implementation of common housing register:

- A common problem with housing registers in the UK is compatibility of platforms and systems, an issue that needs attention and considerable co-ordinated effort from all partners. The Federation's 1999 survey indicates that existing IT arrangements within community housing are too diverse to support a common register in their current format.

- To run a common register on a mainframe terminal, provider PCs will need to be linked with 'terminal emulation' software. That is, software that is loaded onto a PC that makes the PC act as a terminal of the mainframe system, thereby allowing access to all mainframe functions. The remote user can then call up records on the mainframe and transfer them to locally held software for processing. Since providers have different computer operating systems, software would be required to enable the differing operating systems to communicate (Charlesworth, 1998, p.84).

If the CHITS tender for the development of community housing software had not been abandoned, the above constraints would be less overwhelming today.

### *2.2.5 Summary*

One of the Housing Assistance Plan Advisory Committee's (HAPAC) concerns regarding the move of OCH into the DoH was that the DoH needs to demonstrate an understanding of community housing (CHAB correspondence with Dr. Refshauge, Nov 99). The lack of thought about the impact of the IT process – ie. the stalled community housing IT strategy and non-consultative development of IHS – on community housing organisations illustrates that this understanding is lacking. The CHAB also expressed concern over the likelihood that some aspects of infrastructure were to be altered in a way that may be detrimental for community housing. There was a perception – and clearly a real risk – that the interests of community housing could from time to time be subsumed to those of other parts of the system.

Housing associations still have no new IT in the year 2000 and IT within the sector has become more divergent since the Federation's 1999 study. The sector cannot develop its own IT, it is difficult for the Federation to provide suitable training and support products and associations must struggle against unnecessary inefficiencies in order to remain accountable and professional. Unfulfilled promises have led to feelings of frustration and mistrust; this is the climate into which SHR will be implemented.

### 3 Experiences from the UK

In the UK, Social Housing Registers have been operating since the early 1990s for Local Authorities and housing associations in particular areas. Each provider has access to the central database and applicants can enter themselves on the register at any participating organisation. A number of commercial software packages have been developed to manage common data bases, and the National Federation of Housing Associations (NFHA) in the England has developed a model application form which groups can adapt as necessary.

These registers have met with varying degrees of success. They have the potential to be very useful and flexible or, at the other extreme, to curtail the independence of small or specialist housing providers and to waste a lot of time and money in set-up and co-ordination.

Experience from the UK tells us that proper planning and protocols are essential for a workable and equitable system. This will be even more important in NSW, as nothing on the scale of what was originally proposed in the Government's Green Paper, in 1995, has been tried anywhere else in the world. Registers in Britain are locally based and consequently have been developed separately, on the basis of the local situation. We can learn much from their experience, whilst also being mindful of significant differences posed by distance in NSW.

The Department of Housing has committed itself to the establishment of a Register in NSW. To ensure any future register provides the best possible service to our applicants and tenants, it is essential that the community housing sector and potential applicants contribute to the Register's current development and future implementation.

To follow are a range of issues raised by common housing registers. The paper notes strategies adopted in the UK and issues that may arise if applied in NSW (see boxes).

#### 3.1 Policy & organisational issues

##### *1. Allocations*

Discussion about 'common waiting lists' and 'registers' often end in confusion due to the lack of clarity between two models:

##### **Common register (of housing need)**

A list of people registering their housing need, which would be accessed by many landlords from a central computerised database.

A single application form covers all the information needed to allow each participating organisation to apply it's own ranking criteria to the wisest possible list.

The register does not categorise housing need.

(Binns & Cannon, 1996:9)

##### **Common allocation system**

A list of people registering their housing need, which would be accessed by many landlords from a central computerised database.

A single application form is used to gather information for common needs assessment and prioritisation (with common needs criteria and points system).

(Binns & Cannon, 1996:10)

England's National Federation of Housing Association's (NFHA) advises that in most cases common registers, rather than common allocation systems, better service the interests of housing associations and applicants (Grayland, 1994:4).

*Issue in NSW*

Housing associations have also consistently expressed a preference for a *common register of housing need*. These organisations treat factors such as applicant debt, arrears, refusals and evictions in different ways. Provider control over allocations would allow these and other important differences to be maintained, therefore preserving the benefits of a multi-provider system. Furthermore, a system that allows individual providers to prioritise needs into broad groupings (eg. priority list and wait-turn list) recognises that urgent needs will vary between locations and over time.

*2. Eligibility criteria*

Eligibility restrictions are limited to those that are common to all landlords, for both common registers and common allocation systems (Grayland, 1994:5). If a common register were in place, such minimal restriction to entry allows for the application of different selection criteria and means that the database will "provide a more comprehensive picture of housing need" (Grayland, 1994:7).

*3. Voluntary participation*

Since it is essential that housing associations be considered equal partners in a register, participation must be voluntary; coercion would undermine the relationship. Furthermore, involvement should not be linked to funding (Grayland, 1994:12; Binns & Cannon, 1996:33)

Similarly, it is essential that applicants are able to exercise choice. Applicants must be able to elect not to be housed by particular providers, in particular areas or in particular housing types. While they should not be pressured to justify their reasons, applicants must be informed of the implications of their decision, eg. electing not to be housed in a particular area would limit the stock available to them and therefore the likelihood of being housed (Binns & Cannon, 1996:63)

*Issue in NSW*

Small providers who choose not to participate in the register should not be ineligible for growth funding.

Applicants should be informed of the implications of their choice not to be housed by a particular provider/ area/ housing type.

*4. Community Connection*

In the UK, those organisations that consider this factor must demonstrate that the prioritising of community connection is based on housing need (eg. access to health & education facilities, family/friends), in order to avoid unacceptable restrictions on access. Common application forms may have an explicit question asking about community connection or the computer program may be able to determine this by correlating the factors relating to housing need, such as access to health facilities etc. The explanatory material accompanying the application form would need to outline which providers consider

community connection when prioritising applicants (Binns & Cannon, 1996: 60; Grayland, 1994: 16)

*Issue in NSW*

When prioritising applications, some housing associations in NSW consider people's connection to the communities in which they provide housing.

4. *Interviews*

The approach to interviews amongst UK registers varies depending on the type of information to be gathered.

The purpose of interviewing applicants on a common register may simply be to confirm information on the application form. If this were the case, a common visit would be appropriate at time of application, as the information being gathered would be standardised. However, if the purpose of the interview is also to gather extra information necessary to make an appropriate allocation, then it may be necessary for the provider making the allocation to do the interview.

*'Late visit' provider interview*

When a particular landlord has selected a household, an interview is undertaken by that landlord. The interview is conducted with the first short-listed household only, immediately before an offer is made. The offer would then be confirmed unless the interview has shown that the applicant's circumstances have changed and/or the details on the register are incorrect. The landlord would then update this applicant's details on the register and proceed to interview the second short-listed applicant, and so on until an offer is accepted (Grayland, 1994:17; Binns & Cannon, 1996:81).

*Issues in NSW*

There is a clear preference amongst housing associations for interviews to be conducted by individual providers at point of offer. This approach, however has some (hopefully not insurmountable) limitations:

*Multiple interviews*

An applicant could be interviewed by more than one provider. One solution could be for the register to flag that an applicant had been short-listed and that an offer was pending. However it would be unacceptable if the applicant was overlooked by a second provider and did not end up being housed by the first.

There would have to be agreement amongst participants and tenant advocates about whether it is acceptable for an applicant to be interviewed by multiple providers. This is likely to occur in metropolitan areas, especially if applicants pick more than one zone.

In some regional areas in NSW there are only two or three providers (PHS and one or two housing associations). However, there is also the possibility that the number of providers in a particular area would increase if churches community housing and Aboriginal Housing were included on the register in the future.

*Distance*

A clear limitation of home visits or for the applicant to visit the organisation's office for an interview. Are the vast distances between some providers. A solution could be a telephone interview, however most of the recently surveyed housing associations feel that they would not be able to make an informed allocation without a face-to-face interview, especially when making allocations to leasehold stock. Furthermore, many feel that this personal contact is necessary to humanise the process and that this is one of the factors that distinguishes between community and public housing.

### 5. *Nomination rights*

While the NFHA recognises that there are many unresolved issues around nominations, it suggests that for common registration systems "existing nomination arrangements should continue in tact" (Grayland, 1994:19). For example, the Lichfield register allows providers to select applicants from the system using their own selection criteria for a letting that they will manage. The allocation is classed as a 'nomination' – from the local authority (compare PHS) to the housing association – if the applicant is one of the top 6 people that the local authority would have prioritised. The result of system is that 83% of housing associations' allocations are regarded as 'nominations' (Binns & Cannon, 1996:78). Binns and Cannon point out that "this is a very successful system which: reassures associations by allowing them to use their own allocations systems, demonstrates to the local authority that it is getting more nominations than the minimum 50%, and avoids many arguments, tensions and bureaucracy often inherent in nomination systems" (1996:78).

#### *Issues in NSW*

Many housing associations have local referral arrangements with support providers. Such relationships would not necessarily change with a common registration system, because all vacancies need not be filled using the register. Properties could be 'kept back' to meet local referral obligations. This recognises that it is in the best interest of the tenant that continuity be maintained between a local refuge and the association that provides exit accommodation, for example (cc Binns & Cannon, 1996:64).

### 6. *Transfers*

An assumed advantage of social housing registers is that they facilitate transfers across providers. The Bristol common register has a separate transfer list, from which providers aim to fill 25% of their lettings, with each landlord giving priority to its own tenants on the list (Greyland, 1994:18).

#### *Issues in NSW*

The NSW register application form could have a question asking applicants if they want to go on the transfer register. It could also inform them that they could apply to join at a later date.

There will need to be more thinking about how this and other transfer models would actually work, especially considering the diversity of stock, number of providers and different provider sizes in NSW.

### 7. *Communications & IT*

In order to apply individual eligibility criteria, providers require full access to data on the register and the ability to sort it. Therefore common registration systems must provide flexible communications systems that can accommodate organisations that do a handful of few lettings per year – due to low turnover – as well as those that do thousands. The NFHA stresses that IT should not drive policy (Charlesworth, 1998).

#### *Issues in NSW*

A degree of IT standardisation will be needed amongst community housing organisations, as the sector's current IT is too diverse to support a common register. Agreement will also be needed as to the best to link those associations that do not currently use computerised allocations systems eg. access via a 'buddy system'.

#### *8. Information for applicants*

UK experience indicates that the benefit of a register to clients will depend on whether people are able to make an informed choice (Mullins & Niner, 1996)

Therefore an information booklet for applicants should outline the following:

- what is a common housing register
- guidance on filling in the application form
- where to return the form
- what happens to the application, what further information/contact to expect and how to make a query
- how the register operates and how it is managed
- who the participating providers are
- what differences exist between tenancies
- what differences exist between providers including policies on:
  - eligibility
  - re-housing, rent, utilities etc.
- community connection for community housing & other eligibility criteria
- confidentiality procedures and compliance with legislation
- applicant's right to opt out from specified landlords, types of tenancies (eg. leasehold) and property types, and the implications of these decisions
- wait time in each zone & for each provider
- appeals systems
- how the information collected on the application form will be used and by whom.

Some UK register information booklets include a page per provider with the following information:

- stock location and type
- lettings criteria
- wheelchair access to offices and homes
- contact address & number.

(Greyland, 1994:11, 16)

#### *9. Management*

In the NFHA recommends that registers be managed by steering groups comprised of the range participating providers, who may be divided into core and associate groups (Binns & Cannon, 1996:37). A successful management model must reflect the diversity of participants and consider them equal partners.

Registers should be governed by an agreement covering decision-making mechanisms, performance standards and expectations, and regular reviews of the system including assessment of client satisfaction (Grayland, 1994:10).

#### *Issues in NSW*

There will need to be agreement amongst participants about the best way to manage a register in NSW. It is not acceptable that the dominant provider manages a *common* register. In 1999 the Director-General of the Department of Housing, Andrew Cappie-Wood, noted that the relative size of asset holdings between PHS and CH would not affect weight in policy debate (CHAB minutes, 16 July 1999, p3).

Management issues to be considered are:

- how to update the register (eg: 'sign-and-return' postcards and forms sent out annually)
- how to review those who are systematically missing out on housing.

#### *10. Confidentiality*

A common solution to data being shared by many organisations in the UK is to design a computer field which bars access to information by certain providers. Applicants can then approve access for particular providers to certain information on a need-to-know basis (Binns & Cannon, 1996:63).

#### *11. Resourcing*

The resourcing implications of a register, for large and small providers alike, should be considered at the planning stage.

#### *Issues for NSW*

Some providers will process more allocations than others (eg: PHS offices; housing association offices in towns where there is no permanent PHS office) and staff funding will need to reflect this.

#### *12. Staff Training*

All relevant staff need to be trained, in order to be able to advise applicants on the range of providers and property types; assist applicants filling in the application form; and enter the details on the housing register computer terminal. Some UK registers encourage staff from different organisations receive the same extensive training, in integrated groups, in order to guarantee consistent service and advice (Greyland: 1994:15). Maintaining consistency of staff knowledge can be a challenge, where there is high staff turnover.

## 4 Comparison of Common Registers & Common Allocation Systems

The benefits and disadvantages of registers cannot be understood unless the model on which the register is based is made clear. The following table distinguishes between a common allocation system and a common register, in terms of the way they would shape several of issues if introduced in NSW. In some cases, the impact of the register would be the same, regardless of the chosen model, however in others, there are important differences – the second and third columns in the table indicates these.

Issue	Common Allocation Systems	Common Registers
Increased Profile for housing associations & Increased client choice	If applicants were well informed, a register would raise the profile of community housing as an explicit alternative to PHS and indicate consumer preference for housing associations.	
Simplified application process	In order to be considered for all available social housing stock, applicants need only access one of the multiple providers using the register. In rural and remote areas where these providers do not exist, local government could be an option.	
Increased transparency	A common allocation system would ensure greater transparency as needs assessment and allocations would be standardised. Hence, the system would demonstrate that the community housing sector provides housing for people in greatest housing need.	A common register sector-wide application system would ensure greater transparency over provider policies, practices and procedures because providers would be required to demonstrate their professionalism and expertise in needs assessment and allocations through accreditation and review systems.
Eliminates need for multiple waiting lists	Housing associations do not need to maintain their own waiting list.	
Easier measurement of housing needs	A register would generate a more accurate picture of unmet housing needs and so would better inform public and community housing planning at a state, regional & local level. *	
Elimination of the need for nominations from PHS	In July 1999, Carol Mills, Executive Director, OCH, noted at the Community Housing Advisory Board (CHAB) meeting, that if a single register eventuates it would replace all previous policies on nominations to community housing from PHS (CHAB minutes, 16 July, 1999:5).	
Improved IT	Housing associations will have access to a sophisticated tool to assist in allocations.	

Issue	Common Allocation Systems	Common Registers
Reduced autonomy for housing associations	The standardisation of needs assessment would represent a significant loss of autonomy for housing associations.	Provider control over allocations and voluntary participation can mitigate against the loss of autonomy.
Register may limit access to social housing	By its very nature, the standardisation of needs assessment, at point of entry, means that some needs are passed over in favour of others. Rather than different needs being accounted for and met in different parts of the system – as is the aim of a multi-provider system – some people would not be housed at all.	If needs assessment is done at point of allocation, rather than point of application, the risk that some people could become ineligible for social housing is overcome. Eg: Age can be prioritised differently amongst providers, thereby allowing differing providers to accommodate niche needs.
Reduced chance of housing for some applicants	A negative outcome of community housing providers having access to a larger pool of applicants, via a register, is that those applicants who would have originally applied through a small provider will now have to compete with a larger group of people.	
Increased workload for HAs in areas with no local PHS office	If HAs are given management responsibility for PHS stock in regions without a PHS office, there will need to be a corresponding increase in funding to offset the increased workload.	

- \* A Register should not be used as a measure of need in isolation, as it cannot detect those in need who are not applying for social housing. For example:
- some homeless people
  - people in locations where there is no local PHS presence (especially in rural areas that are in decline),
  - people who do not apply because the waitlist is too long.

\*\* It remains to be seen whether other IT needs will be addressed and if access to a register based on the Integrated Housing System is actually beneficial to associations.

## 5 Unique challenges for NSW

While much can be gained from studying the process and outcome of register development in the UK, two significant differences – the large number of providers and distance – present unique challenges for NSW.

### 5.1 Large number of providers

The partnership between differing providers is the foundation on which a housing register rests. Naturally the more organisations participating in the register the more difficult it will be to reach consensus on key issues, such as the model on which the register will be based.

In NSW it is anticipated that there will be upward of 50 providers participating in the register - if only PHS and housing associations are counted - managing approximately 136 000 properties. This is clearly far more than any register in the UK (see Table 1). Since registers are based on multilateral (not bilateral) agreements, the number of participating providers may influence the type of register chosen for NSW. Clearly it will be far more difficult to gain the high level of consensus required for the standardisation of needs assessment between 50 participants compared to only 8.

**Table 1** An example of the number of organisations participating in different register types in the UK

<i>Common register (of housing need )</i>	<i>Number of participating organisations</i>	<i>Number of applicants on register</i>	<i>Number of properties on register</i>
Bristol	23 partners	16 500	42 000
Shepway	11 partners	na	na
Pembrokeshire	5 partners	na	na
Lichfield	3 partners	1 700	5 500
(Binns&Cannon, 1996:9-10)	(Binns&Cannon, 1996:34-35)	(Binns&Cannon, 1996:118)	(Binns&Cannon, 1996:118)

<i>Common allocation system</i>	<i>Number of participating organisations</i>	<i>Number of applicants on register</i>	<i>Number of properties on register</i>
East Cambridgeshire	8 partners	1 500	4 400
(Binns&Cannon, 1996:9-10)	(Binns&Cannon, 1996:34-35)	(Binns&Cannon, 1996:118)	(Binns&Cannon, 1996:118)

### 5.2 Distance

The previous section on interviews already points out some constraints caused by the distance between providers in NSW. Even if NSW were to develop separate registers on a regional basis, the distances for non-metropolitan registers would still be too large to make face-to-face interviews for all applicants possible.

Additional challenges presented by distance are:

- **Moving costs**  
If an applicant from Orange were to be offered accommodation by a provider in Lismore, who did not have a community connection requirement, applicants are unlikely to be able to raise the funds at short notice.
  
- **Storage of supporting documentation**  
The common application form could have a standard format for recording which supporting documentation is supplied with the application. However this paperwork would need to be stored somewhere - perhaps by the organisation that placed the applicant on the register or at a central storage point in Sydney. Providers may need to see the information in these documents in order to make an allocation and faxing the paperwork from its storage point would cause delays in filling the vacancy.

## **6 Conclusion**

Housing associations are willing to participate in the development of a common register, however these are not 'greenfields' negotiations; the current context for associations will shape discussions. Associations are keen demonstrate that they are professional, accountable managers, but they also want to ensure that they retain their distinctive competencies and are treated as the independent organisations that they are.

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