

POLICY TRANSFER OF CHOICE-BASED LETTINGS TO BRITAIN AND AUSTRALIA: HOW EXTENSIVE? HOW FAITHFUL? HOW APPROPRIATE?

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- Not for quotation without authors' agreement -

Abstract

Within the burgeoning of literature on policy transfer there has been substantial emphasis on areas such as 'welfare reform' and labour market policies, with explanations ranging from the pivotal role of policy entrepreneurs and their networks to the reconfiguration of historically contingent institutional arrangements. This paper seeks to contribute to this literature by exploring the case of choice based lettings (CBL), a supposedly 'consumerist' approach to allocating social housing.

Originally developed in the Netherlands around 1990, CBL has subsequently attracted widespread interest in other developed countries as a quasi-market technique aimed at modifying the command and control style of operation traditional in this sector. In particular, we examine the implications of attempting to import the CBL concept to two different social housing contexts in the UK and Australia. Firstly, we ask why the CBL model has been found attractive in these jurisdictions and the extent to which it has been implemented in practice. Secondly, we explore the extent to which the model can be effectively installed and operated within policy and institutional contexts which differ substantially from the country of origin. Here, we ask whether ensuring compatibility with established legal and regulatory frameworks has rendered the import of CBL into the UK an empty gesture. Similarly, we analyse the obstacles to be overcome in reconciling CBL with the existing social housing context in Australia. And, thirdly, we consider the broader implications of the CBL case in relation to the appropriateness of international transfer of social policies across jurisdictions discussed in the literature.

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Introduction

There is a burgeoning of literature on policy transfer, much of which is stimulated by international trends in areas such as welfare reform and labour market policies. In this work, explanations of policy transfer range from the pivotal role of policy entrepreneurs and their networks to the reconfiguration of historically contingent institutional arrangements. This paper seeks to contribute to the policy transfer literature by exploring the case of choice-based lettings (CBL), a supposedly ‘consumerist’ approach to allocating social housing. Originally developed in the Netherlands around 1990, it has attracted widespread interest in other developed countries as a quasi-market technique aimed at modifying the command and control style of operation traditional in this sector. In particular, we examine the implications of attempting to import the CBL concept to two different social housing contexts, Britain and Australia.

While the post-2000 adoption of CBL in Britain has already been widely cited as a prime case of policy transfer from the Netherlands (Brown & King 2005; Brown & Yates 2005; Mullins & Pawson 2005), the process of adoption and adaptation is ongoing and has yet to be analysed in detail. Scope therefore remains to evaluate the phenomenon in terms of the policy analysis framework devised by Dolowitz & Marsh (1996, 2000) and broadly recognised as a useful analytical construct. Of particular interest is the linkage drawn by Dolowitz & Marsh (2000) between the circumstances and process of an instance of policy transfer and the likelihood of ‘policy failure’.

As to Australia, while CBL has attracted interest from policymakers it has yet to be implemented on any scale. The federal government has laid out an agenda for reform to social housing to be a ‘spring board’ to greater opportunity and economic independence. An important part of this agenda is more choice, referring to choice of provider and choice of where to live. Outlining this agenda, the minister suggested that ‘surely we should be able to provide people with a short list of available properties that they are eligible to rent and allow them to choose’, making clear reference to CBL (Minister for Housing 2009). Questions arise as to the obstacles preventing this and whether these are likely to be overcome.

Closely related to such considerations, questions have been raised as to the ‘appropriateness’ of implanting CBL into social housing contexts which differ markedly from the source country, the Netherlands. Stephens et al. (2003) argued that it could be mistaken to assume that a social market framework can be unproblematically imported and applied to the British social rental sector which is far more associated with poverty than in comparable European countries. This, in turn, reflects the fact that in Britain 19% of households were at risk of poverty in 2008 compared with only 11% in the Netherlands (Eurostat 2010).ⁱ In the case of Australia, the ‘inappropriateness’ argument relates more directly to the extremely residualised nature of the social rental sector given its safety net function and relatively small size, proportionately, less than one-third of the equivalent sector in Britain and only one-seventh of that in the Netherlands (see Table 1). Other questions have been raised about the applicability of CBL without attention to housing market conditions. For example, Haworth et al. (2004: 172) argued that policy transfer of CBL to Britain ‘does not pay sufficient attention to problems of supply and demand, common to many ... social housing providers’.

In analysing the impact of CBL in Britain and Australia, this paper seeks to address three key questions. Firstly, why has CBL been found attractive in these jurisdictions and how far has it, in fact, been implemented in practice? Secondly, how effectively can the model be installed and operated within policy and institutional contexts which differ substantially from

the country of origin? Here we ask whether ensuring compatibility with established legal and regulatory frameworks has rendered the import of CBL into Britain an empty gesture or an instance of purely symbolic policy. Similarly, we analyse the obstacles to the reconciliation of CBL with the existing social housing context in Australia. Thirdly, what are the broader implications of the CBL case in relation to the appropriateness of international transfer of social policies across jurisdictions discussed in the literature?

In addressing these and other questions raised by recent work on typologies of policy transfer, we draw on national studies of lettings/allocations in social housing undertaken by ourselves and others, as well as local evidence recently collected in the course of an evaluation of Glasgow Housing Association's CBL pilot project. While encompassing only around one-fifth of GHA's total housing, this made the scheme one of the largest in Britain.

The paper is structured as follows. First we discuss the concept of policy transfer and the processes through which this can occur. Next, drawing on these ideas, we investigate contexts and mechanism associated with the transfer of CBL. We then analyse the transfer of CBL to Britain and Australia empirically, using a typological framework developed by Dolowitz & Marsh (2000) for empirical investigation of policy transfer. Finally, in our conclusion, we return to the three key questions outlined above.

Policy transfer: concept and typologies

Policy transfer has been defined as 'The process by which the ideas ... policies ... and practices ... in one political system are fed into (and used) in the policy-making arena of another political system' (Dolowitz 2009: 318). The terms 'policy transfer' and 'lesson drawing' were formulated in the 1990s to theorise what was seen as an increasing incidence of policy instruments being transmitted across national boundaries (Rose 1991; Dolowitz & Marsh 1996, 2000). Explanations posited to explain this trend have included globalisation and the improvement of communications. Authors such as Di Maggio & Powell (1991) have argued that transfer is attractive to policymakers because of uncertainty: the introduction of an 'active foreign model' reduces the risk of deploying an untested innovation.

In considering instances of policy transfer, it is important to understand the mechanism involved. Whilst there are a number of possibilities, Marsh & Sharman (2009) in reviewing the literature suggest that these fall into four broad categories:

- Learning: where governments rationally decide to imitate foreign structures and practices to address identified problems (see also Rose 1991);
- Competition: where international competition drives the adoption of a range of economic and social policies converging on a low base due to the perceived need to attract footloose capital investment;
- Coercion: where policies are imported under pressure from international institutions, for example, via conditions attached to IMF or World Bank financial support for a developing country;
- Mimicry: sometimes known as emulation or socialisation, 'explains the process of copying foreign models in terms of symbolic or normative factors' such as the desire for status among peer nations (Marsh & Sharman 2009: 272). Di Maggio & Powell (1991), the authors of this concept, saw such emulation as 'driven by the deep, intertwined, structural forces of modernization and rationalisation' (Marsh & Sharman: 272).

Building on his earlier work, Dolowitz (2009: 328-9) reiterates the importance of classifying instances of policy transfer according to their position on a continuum from ‘purely voluntary’ to ‘purely coercive’. It is argued that this position is directly related to the extent to which transfer is associated with policy learning. In practice, however, most cases of policy transfer lead to ‘soft learning’ rather than ‘hard learning’. Harder forms of learning enable policymakers to ‘strip apart foreign models’, adapting the information to make it appropriate to their own political systems’. Soft learning does not enhance knowledge and ‘often leads to little more than mimicking or copying’, increasing the risk of policy failure.

Policy transfer of choice-based lettings: context and transfer mechanisms

Drawing on this conceptual work, how then can we understand the mechanisms involved in policy transfer around CBL? Originally developed in Delft in the late 1980s (and, hence, often known as the ‘Delft model’), CBL is a system where social landlords advertise ‘available to let’ properties, so that people seeking affordable rented housing may view and ‘express interest in’ (or ‘bid for’) suitable homes. Bidding is organised on a periodic cycle, with bids being ranked according to administratively determined criteria. In the model’s original incarnation, great stress was placed on simplicity and transparency, with bidders prioritised according to age (for newly forming households) and length of tenancy/residence (for existing households) (Kullberg 1997). Similarly, details of letting outcomes are published, partly to help inform bidding behaviour of aspirant home-seekers.

Most fundamentally, CBL differs from the traditional allocation of social housing in that the matching of properties and applicants is undertaken primarily by applicants themselves rather than by landlord staff. In this sense it has been portrayed as an aspect of the consumerisation of public services whereby quasi-markets are substituted for bureaucratic paternalist frameworks (Gibb 2005; Pawson & Watkins 2007).

CBL spread rapidly throughout the Netherlands (Kullberg 1997, 2002; Van Daalen & Van der Land 2008) where by the end of the 1990s it had been taken up by about 85% of all social landlords (Van Kempen & Idamir 2003; Haffner and Hoekstra 2006). It was then transferred to Britain. More recently it has been promoted in Australia.

In considering the mechanisms for policy transfer, we first need to consider the context for social housing in the three countries. By ‘social housing’ we mean housing for rent managed by not-for-profit landlords and usually let at below market rents where access is therefore rationed administratively rather than by price. As illustrated in Table 1, the three countries subject to our analysis are highly contrasting with respect to both the share of total housing accounted for by social housing and the internal structure of the sector.

Table 1: Social housing in Australia, Britain and the Netherlands

Jurisdiction	Social housing ownership %		Social housing as % of total housing stock	Year
	State	Housing association		
Australia	90	10	5	2008
Britain	53	47	18	2007
Netherlands	1	99	35	2006

Sources: AIHW (2009); Wilcox (2009); Fitzpatrick & Stephens (2007)

In the terms employed by Kemeny (1995), the residualised status of social housing in Australia and Britain contrasts with the more socially diverse sector found in the Netherlands

where the larger scale of provision facilitates the accommodation of a wider spectrum of the population (Stephens et al. 2003).

Related to this observation, the three countries are also contrasting in terms of pressures on the social housing system. In both England and Australia, the number of households registered for social housing in 2008/09 was approximately 8-9 times the annual number of new tenancies created by social landlords in that year (SCRGSP, 2010; CLG 2009; Wilcox; 2009). In London the figure was almost 15. Similarly, the value for Australian east coast capital cities would be substantially in excess of the national figure. While there is no precisely comparable figure for the Netherlands, the average waiting time for households entering their first rental home in the Amsterdam region in 2007 was six years (Van Bortel, 2010). Given that this is one of the most pressured housing markets, it would be expected that the figure would be lower in other parts of the Netherlands. Overall, these figures suggest that pressure on social housing may be somewhat greater in England and Australia than in the Netherlands.

A third key difference highly relevant to the mechanisms of policy transfer is the role and responsibilities of different levels of government. In the Netherlands, the key players in social housing are at a regional and local level, including municipalities, housing associations and residents. As explained by Haffner et al. (2009: 205), within a national framework local municipalities have their own rules and systems of allocations, and there may be more than one system operating within a municipality. The capacity to innovate at a local level may well have been important in the development of the original CBL system in Delft.

Likewise, in Britain, while there are national requirements around homelessness and according 'reasonable preference' to households 'in need', social housing allocations were traditionally considered very much a local matter. Stirling & Smith (2003: 146) refer to 'the long held view that whilst central government may legislate and guide, allocations policies should be determined and applied locally'. Arguably, this provides scope for policy transfer through experimentation in particular local contexts. However, in the context of CBL in England, it is clear that central government has played an unusually interventionist role, as we discuss later.

In Australia, by contrast, state/territory housing departments have determined social housing allocations policies across their jurisdictions with little consideration of local conditions. This reflects the weak role of local government generally and its lack of any substantive role in social housing. It also stems from the dominance of near monopoly providers in each state/territory resulting in inadequate information at a strategic level, and reluctance to share information about allocations, discuss alternatives and learn from initiatives that have been introduced (Hulse & Burke 2005: 81).

In terms of Marsh & Sharman's (2009) typology, policy transfer of CBL to the British and Australian contexts could potentially be construed as an instance of 'learning'. However, this would imply a rational process involving identification of problems affecting social housing, and evaluation of possible solutions, taking account of system outcomes in relation to policies operated elsewhere and considered potentially suitable for importation.

In the British case, there is no clear evidence such a process took place. More plausibly, CBL adoption by the Westminster government can be portrayed as essentially a case of mimicry underpinned by the ethic of 'modernisation' (Di Maggio & Powell 1991). This suggests that CBL policy transfer to England was 'voluntary but driven by perceived necessity' (Dolowitz

& Marsh 2000: 13). However, as further described below, it is important to recognise that policy implementation has involved social landlords being subjected to a degree of pressure to adopt. From the perspective of some local authorities, therefore, the description of CBL as 'voluntary' policy transfer might be questioned.

In the Australian context, while there is some support for more choice, including CBL, at the federal government level, and interest by social housing providers in some states/territories, there is no clear indication of its place in addressing key problems besetting social housing, in particular, a public sector which is not financially viable (Nygaard et al. 2007). The homelessness strategies of federal and state/territory governments have compounded pressures towards targeting assistance to the most needy, such that 51% of all new allocations were to those in 'greatest need' in 2007/08, up from 38% in 2004/05 (SCRGSP 2010: Table 16A.4). There is very little discussion of improved choice for households in the homelessness strategies recently developed by federal and state/territory governments.

Choice-based lettings as a case study of policy transfer: empirical findings

In this section, we consider empirical findings to illuminate the operation of policy transfer, as exemplified by the importation of CBL from the Netherlands to Britain and Australia. We address six questions recommended by Dolowitz & Marsh (2000) to facilitate empirical investigation of policy transfer:

- What are the motivating factors?
- Who are the key actors party to the process?
- What is the nature of the policy or programme transferred?
- From where are the lessons drawn?
- To what extent has transfer taken place?
- What factors facilitate or restrict the process?

Motivating factors

In understanding the take-up of CBL in Britain it is important to recognise that, under the 1999 devolution settlement, housing is a devolved service area and that, consequently, policy development on housing matters proceeds independently in England, Wales and Scotland. In practice, whereas central government in England has actively embraced and promoted 'choice' in this context (see, for example, DETR & DSS 2000), the national administrations in Cardiff and Edinburgh have adopted a more permissive and neutral stance. Hence, while councils and housing associations in England have been exhorted, cajoled and incentivised to implement CBL, any impetus to do so in Wales and particularly Scotland has come from landlords themselves.

In an earlier study of changing approaches to social housing lettings in England (Mullins & Pawson 2005) we analysed the way that, around the turn of the millennium, adherence to the 'choice agenda' displaced the previous 'industry consensus'. This former paradigm had favoured a rational, needs based, rule-bound allocations model under which, over the previous 10-20 years, policies had grown steadily more complex in an effort to align applicant priority with assessed need. Against this backdrop, the 'simple and transparent' features of the Delft model appeared an attractive prospect. We also attributed the receptiveness of the policy community to the 'newly discovered' Delft model to the growing regional differentiation of housing markets within England during the 1990s and associated

worries about the 'lettability' of social housing in some areas. Within this context, CBL appeared attractive as a means of improving organisational efficiency.

Also relevant to the ministerial enthusiasm for CBL model within the Westminster administration was a recognition of its apparent 'fit' with broader governmental priorities to 'modernise' public services through 'consumerisation', a concept underlying many reforms being pursued in health, education and elsewhere (Perri 6 2004; Rogers 2004). Another perspective on such reforms is that these are partly inspired by a pervasive New Labour ethic of 'responsibilising the consumer'. While this may be described as 'treat[ing] those in need of housing support in a more adult way' (Hills 2007: 168) it has also been interpreted as 'a wonderful example of the neo-liberal method of governing through freedom' (Cowan & McDermont, 2006: 72). This fits with the observation of Nikolas Rose, John Clarke and others that modern 'citizens' are not simply 'free to choose' but 'obliged to be free'.

In Australia, there are inherent difficulties in rationing social housing in an environment of decreased turnover and a preponderance of high need applicants. The federal government, the sector's main financier, is impatient with perceived inefficiencies of the states/territories in social housing provision. In its second economic stimulus package following the global financial crisis, it called for reforms to sector as a quid pro quo for the additional A\$6 billion (£3.5b or €3.9b) invested in social housing. However, while explicitly cited 'reform objectives' included greater efficiency in allocations 'through better matching of tenants with appropriate dwelling types', the mechanism for achieving this was not specified (COAG 2009: Attachment B). Neither was the funding made strictly conditional on the implementation of prescribed measures. In practice, the injection of funds has not stimulated reform of the sector, at least in the short term. Rather, it has exacerbated the states/territories' reliance on command and control measures, for example, through the employment of comptrollers employed by governments to centralise commissioning of new social housing dwellings from the private sector.

Key actors party to the process

Through exactly what channels of communication central government in England became aware of the Delft model is not known. Certainly important, however, was the role of Tim Brown, a housing academic who, as a consultant, had evoked interest in the model on the part of Harborough District Council, a small East Midlands local authority. Harborough's introduction of a pilot scheme in early 2000 was approvingly cited in the wide-ranging housing Green Paper in which government first staked its commitment to CBL (DETR & DSS 2000: 86). Also party to the popularisation of the CBL concept was the Chartered Institute of Housing, the professional body for housing managers, which commissioned two discussion papers to explore the possible benefits (Brown et al. 2000; Pawson 2002).

As regards Australia there is an ongoing, although largely one-way, exchange of policy ideas on social housing with Britain involving politicians, policymakers within government, academics with an interest in housing research and some practitioners. Some of these could be regarded as policy entrepreneurs. For example, the chief executive officer of an English housing association actively promoted CBL within the context of a secondment to advise the state government of Victoria on housing policy reform in 2008/09. British software developers with capability for CBL are also active in Australia pursuing opportunities in the social housing sector, although this appears to be intermittent in view of the relatively limited market for their product.

Nature of the policy transferred

In all but name, the Westminster government made clear in 2000 that it favoured the adoption of the Delft model by English social landlords to the maximum extent compatible with the 'safety net' role of social housing in Britain (DETR & DSS 2000). This refers, in particular, to the specific legal responsibilities of local authorities to secure rehousing for certain homeless households. Fulfilling these obligations effectively pre-commits a substantial proportion of annual social housing supply. In 2007/08, for example, homeless households accounted for some 28% of all local authority lettings to new tenants in England, 31% in Wales and 48% in Scotland (Wilcox 2009). These figures are substantially higher than the '10-20% of lettings' typically set aside for 'emergency cases' by Dutch social landlords (Stephens et al. 2003). British social landlords are also required by regulation and statute to prioritise, according to need, other households seeking accommodation.

Reconciling statutory obligations towards households in need with the 'choice' ethic has required British social landlords to structure CBL systems in quite complex ways. Accommodating statutory homeless households within CBL schemes has been a specific challenge. Commonly, such applicants are made eligible to 'bid' for advertised vacancies and given overriding priority. However, until they have been permanently rehoused, local authorities remain responsible for providing often costly temporary accommodation. To minimise such expenditure, top rehousing priority for homeless households is usually time-limited. When this expires the household will be offered a landlord-selected tenancy so that the council can 'discharge its duty'.

The way this can play out is exemplified by the Glasgow Housing Association's CBL pilot where, during the first few months, around 90% of homeless households needing to be rehoused were considered capable of participation in CBL. Those actually rehoused via bidding for advertised vacancies were equal in number to those obliged to accept a landlord-selected tenancy. Along with a few other 'special case' applicants, the latter absorbed a quarter of all lettings; hence, despite the objective of advertising all vacancies, the actual ceiling was 75%.

More broadly, most schemes structure applicants within several priority bands, ordered according to severity/urgency of housing need, broadly defined. Internally, bands are usually ranked by applicant registration date. At the same time, most schemes also incorporate 'vacancy labeling' which limits the range of applicants eligible to bid for an advertised property (Pawson et al. 2006). Part of the motivation here is retaining control over aggregate outcomes in the interests of equity. Such mechanisms have helped minimise the risk that CBL would exacerbate polarisation within the sector. For example, evidence shows that, under CBL, formerly homeless households have been slightly *less likely* to be rehoused in unpopular neighbourhoods than was previously the case (Pawson & Watkins 2007).

From the housing applicant perspective, however, it is arguable whether the type of structure described above will appear simple and transparent. Indeed, research evidence from interviews with service users suggests that while mechanisms for viewing available homes and entering bids are generally well understood, rules on rehousing eligibility and ranking have often been found confusing and obscure (Barnard & Pettigrew 2004; Pawson et al. 2006). Hence, the legitimacy of letting outcomes is not necessarily greater than was true under traditional allocations systems. To the extent that schemes tend to incorporate quite complex rules around applicant eligibility and ranking, it would be fair to question the extent

to which the form in which CBL has been implemented in Britain is a 'faithful' instance of policy transfer.

In Australia, it appears that the choice exercised by many households potentially eligible for social housing is not to apply. A 2004 survey of lower income households on public housing waiting lists and those in similar circumstances who remained unregistered found that the latter valued greater choice and flexibility associated with the private rental sector, notwithstanding the higher rents and lesser security of tenure. While the main reason for desisting from applying for public housing was the length of the list (cited by 61% of respondents), the next most common reason was that in public housing they could not choose their own dwelling and location (34%). Additionally, more than four in five households on the waiting list indicated willingness to pay more in order to obtain a property of higher quality, a suitable location and a high level of security (safety) (Burke et al. 2004). These findings suggest a desire for more choice beyond that available in the current system of administrative allocations.

From where are the lessons drawn?

As adopted by the Westminster government, the CBL concept was clearly drawn from the Netherlands. Within the wider field of social policy this contrasts with the more general tendency for British policy borrowing from North America (Kleinman 2000; Haworth et al. 2004). As taken up in Scotland, however, it can be argued that the source of 'lessons drawn' for 'late adopters' such as Glasgow Housing Association was England rather than the Netherlands, specifically.

In Australia, lessons drawn from social housing come predominantly from Britain, unlike ideas on homeownership and the private rental sector which come from a range of countries including North America. In recent years both federal and state/territory governments have been strongly influenced by the development of the British housing association sector and have adopted regulatory regimes modelled on the English regime. Most states/territories have also recently committed to the development of a small number of 'growth' housing associations. Interest in CBL is symptomatic of this orientation and undoubtedly stems from the experience in England rather than the original source in the Netherlands.

To what extent has transfer taken place?

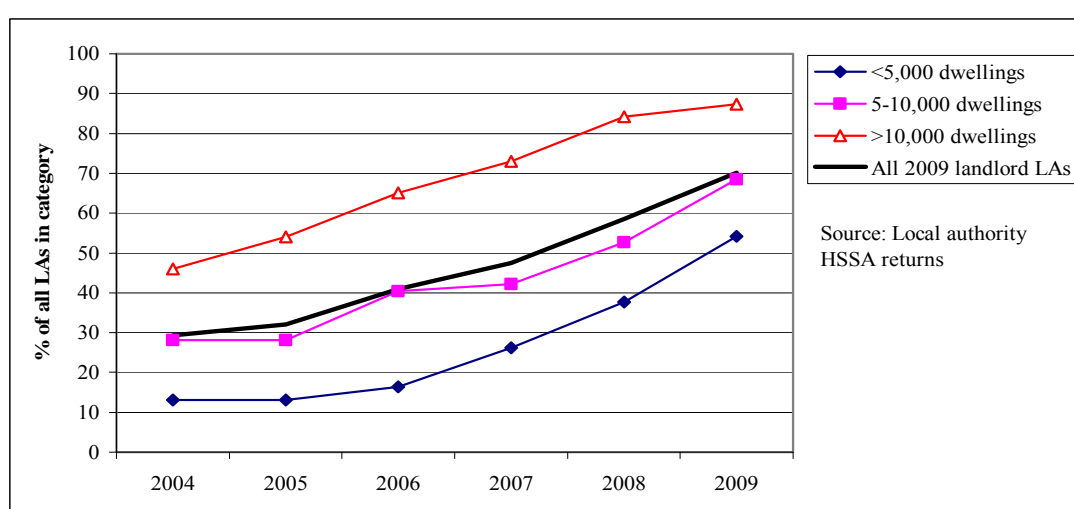
As noted by Evans & Davis (1999), policy transfer requires more than simply an official statement of intent. A borrowed policy aspiration becomes a genuinely transferred policy only when it has been implemented.

In seeking to 'roll out' CBL across England, the Westminster government employed several techniques. First, it made available start-up funding for which local authorities could submit bids. In all, some £20M has been disbursed in this way. Related to this was the incorporation within regulatory service standards of an ethic equating CBL to 'service excellence' (Audit Commission 2007).ⁱⁱ This acquired particular significance for the 66 mainly larger local authorities seeking additional public funding to upgrade their housing stock and who were required to be assessed as 'excellent' in order to access these resources (Pawson & Mullins 2010). Second, it commissioned evaluation research designed, in part, to address concerns which might deter social landlords from policy adoption. Third, it seconded staff from local authorities and deployed them as policy evangelists to encourage and shape policy adoption at the local level. Fourth, landlords were exhorted to take up CBL via publication of 'good

practice guidance' guidance and dissemination of such material through numerous conferences and events.

All of these techniques were designed to contribute to meeting the target, set by ministers in 2003, that all local authorities in England would be operating CBL by 2010. As shown in Figure 1, the actual proportion of (stock-holding) authorities reporting compliance had, by 2009, reached 70% (CLG 2009). Figure 1 also demonstrates a consistently higher take-up rate among larger authorities. Take-up rates have remained generally lower among housing associations. Nevertheless, by 2008/09, 46% of all housing association lettings in England were recorded as having been made via CBL (unpublished CORE data). Given the substantial top-down drive for policy adoption, the increase in take-up shown in Figure 1 might be seen as rather gradual.

Figure 1: Proportion of landlord local authorities operating choice-based lettings



In Scotland, just one of the 26 landlord local authorities had adopted CBL by 2008/09, with 14% of all housing association lets being achieved in this way (unpublished SCORE data). However, with Glasgow Housing Association poised to adopt CBL across its entire stock in 2011, the picture is expected to change substantially.

In interpreting these findings it is important to recognise that for the purposes of the monitoring underlying Figure 1, 'choice-based lettings' has been defined in only very general terms as meaning 'a [lettings] scheme that allows applicants to choose'. Similarly, official government guidance defines CBL simply as 'allocation policies and procedures which incorporate an advertising scheme' (CLG 2008, para. 2.7).

In Australia, advocacy of CBL has evoked scepticism mainly in the context of high demand for social housing relative to the supply. In workshops with housing policymakers and practitioners convened with the context of national research in 2005/06 participants saw the model as practicable only in low demand areas. The sole pilot project so far implemented was in Whyalla, South Australia, a regional town where local state housing authority staff saw the model as potentially beneficial in the efficient allocation of hard to let property (Hulse et al. 2007: 40). At the time, and unusually for Australia, Whyalla had some hard to let properties and a high turnover of tenancies. The pilot scheme was targeted on 'low need' applicants, with the traditional allocations model retained for others. While the pilot coincided with a dramatic reduction of un-let vacancies, it also coincided with rapid changes in the local

economy and housing market due to the resources boom. Consequently, it is difficult to judge what improvements can be attributed to the pilot itself.

Although the type of local initiative described above has been quite unusual in an Australian context (Hulse et al. 2007: 40-1), some of the larger, growth housing associations are, at the time of writing, investigating the possible adoption of the CBL model. However, they may lack the resources to proceed except through a consortium framework to mitigate some of the development and implementation costs.

Factors facilitating or restricting the policy transfer process

In addressing this issue, the policy transfer process is taken to include policy implementation. Key factors facilitating CBL rollout in England have been outlined above. Factors restricting the process have included a range of concerns on the part of social landlords themselves. A 2005 survey of local authorities showed that these included anxieties that CBL:

- Could impact negatively on vulnerable groups;
- Might incur financial costs outweighing benefits realised;
- Might damage housing management performance;
- Could lead to more lettings to non-local applicants at the expense of local people (Pawson et al. 2006).

In Australia, the primary concern is with the first of these, the impact on vulnerable groups. Whilst there is no statutory obligation to accommodate homeless people, there is currently a strong policy push on homelessness prevention and intervention, as outlined in the federal government's 2008 White Paper and in the homelessness strategies of state/territory governments. The latter are under pressure to contribute towards meeting the federal government's target of halving homelessness by 2020. Consequently, homeless people are being given greater priority in allocation of social housing but the trade-off is that consumer choice is minimal. Generally one offer of housing is made, determined wholly by the social housing provider. This emphasis accords with a strong ethos of welfare rationing, a top-down provider perspective and, arguably, the paternalistic culture of public housing. In these circumstances, widespread implementation of CBL appears unlikely in the foreseeable future.

A second factor inhibiting the policy transfer of CBL to Australia is the imbroglio over social housing rents. As in the US, Canada and New Zealand, most are set as a percentage of household income, irrespective of the location, quality or amenity of the dwelling. There is thus little incentive for households to make trade-offs between rent and these factors. As seen above, survey evidence suggests that households themselves do want to make trade-offs but this is not possible within the current rent setting regime. This context is quite different from the Britain and the Netherlands.

Policy transfer of CBL: informed, complete, appropriate?

Finally, we consider the extent to which policy transfer of CBL to Britain and Australia might be considered 'uninformed', 'incomplete' or 'inappropriate'. This relates to Dolowitz & Marsh's (2000: 6) observation that contrary to the (positivist) assumptions often underpinning research on the subject, 'policy transfer can, and often does, lead to policy failure'. This is argued to be more likely in circumstances where:

- The 'borrowing' country is *uninformed* about the way the policy operates in its home country;

- The transfer is *incomplete* because it omits components crucial to its effectiveness in its home country; or
- The transfer is *inappropriate* because ‘insufficient attention [is] ...paid to the differences between the economic, social, political and ideological contexts in the transferring and the borrowing country’ (Dolowitz & Marsh 2000: 17).

Given the detailed portrayal of the Delft framework in the 2000 Housing Green Paper (DETR & DSS 2000) it would be hard to argue that Westminster government policymakers were ignorant of its operation within the Dutch context. As regards ‘completeness’ it has already been noted that the Delft model has needed to be substantially modified for compatibility with British legal and regulatory requirements. Australian policymakers are generally well-informed about policy developments in Britain’s social housing sector. Notwithstanding this level of comprehension, the importation of CBL is clearly at only an embryonic stage.

As noted in our introduction, the ‘appropriateness’ of CBL within the British policy context has been questioned by some academic commentators. Stephens et al. (2003: 784), for example, queried whether policymakers had given sufficient consideration to the fact that ‘the Dutch social housing system caters for a much broader section of society’. This is related to John Hills’ (2007: 20) observation that social housing in Britain remains a highly rationed commodity and that the scope for enhancing choice is consequently limited to ‘some improvement at the margin’. In other words, the excess demand for social housing let at below market rents is such that only applicants with the highest priority can enjoy any real freedom of decision making.

Even in a city such as Glasgow, where the housing market is less pressured than in many other British cities, housing list applications to GHA were running at around 1,200 households per month in 2009, approximately six times the monthly number of homes let via GHA’s waiting list. Similarly, in the initial months of GHA’s CBL pilot the number of people submitting bids for advertised properties was around six times the number of GHA lets in the pilot area. To what extent, in these circumstances, can CBL facilitate any real choice?

To investigate this, we draw on an evaluation of the Glasgow scheme mentioned above. The research methods here included ‘customer surveys’ involving (a) CBL service users who had bid successfully for a tenancy, (b) CBL service users who had yet to secure a tenancy through bidding and (c) tenants rehoused under the pre-CBL traditional allocations system. In all, these surveys evoked 396 responses, a collective response rate of 31%. Albeit on the basis of rather a small sample and only a modest response rate, returns from cohorts (a) and (c) facilitated comparisons of tenant views of the old and new systems.

The surveys enable comparison of the responses of new tenants rehoused before and after the introduction of the new system. Asked how much choice they had in selecting their new home the proportion of CBL respondents who believed that they had enjoyed choice was somewhat higher than the pre-CBL figure although not by a great margin (see Table 2). At the same time, the relatively small sample sizes here mean that the comparison needs to be treated as indicative rather than conclusive.

Table 2: New tenant perceptions on the extent of choice in selecting their home (%)

	A lot	Some	Not much	None	Total	N=
Pre-CBL group	28	36	24	12	100	117
CBL group	42	32	17	9	100	81

Source: Pawson et al. (forthcoming 2010). Note: figures exclude non-responses

Similarly, the proportions of new tenants happy with their new home and neighbourhood were again modestly higher among those who selected their home via CBL than among those rehoused under the traditional allocations system (see Figures 2 and 3). Much more decisive, as shown in Figure 4, was the balance of opinion on the principle of advertising homes available for let. Even among CBL bidders who had yet to secure a tenancy (and who might well have found the experience frustrating) the system was overwhelmingly seen as preferable to the traditional model.

Figure 2: New tenants rehoused by Glasgow HA 2009: Satisfaction with accommodation – responses to statement: ‘I like my new home’

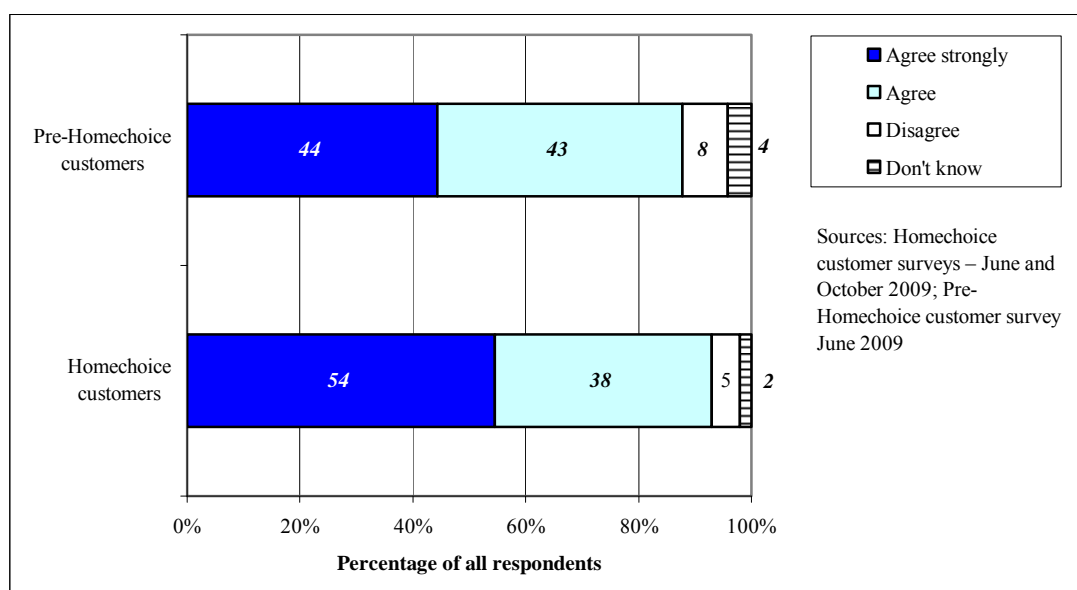


Figure 3: New tenants rehoused by Glasgow HA 2009: Satisfaction with neighbourhood – response to statement: ‘I like the local area’

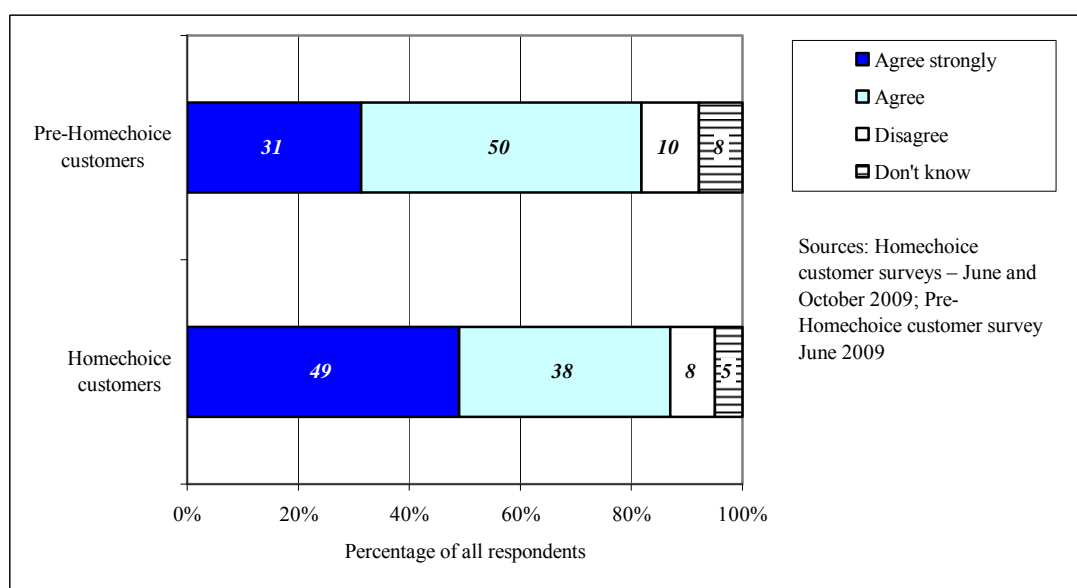
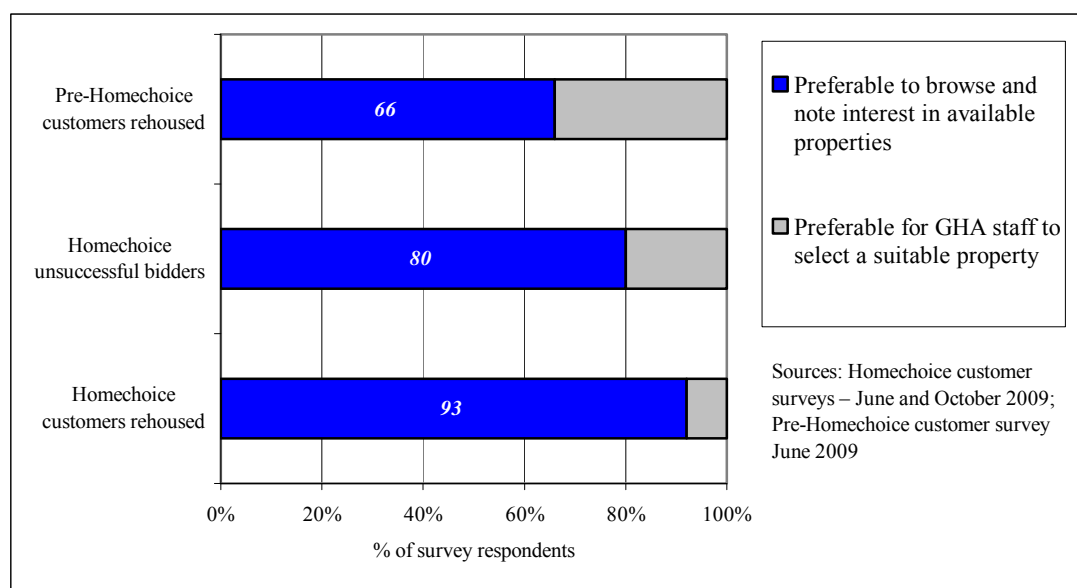


Figure 4: New tenants rehoused by Glasgow HA 2009 and those bidding unsuccessfully for vacancies via CBL: Survey respondent views on being able to browse and select from available properties



There is no comparable empirical evidence in Australia. Relatively little is known about tenant views on social landlord services other than via biennial surveys.ⁱⁱⁱ Views on choice are not sought; indeed, this word does not appear in the 158 page survey report which is framed very much within a performance management paradigm. However, results indicate relatively high levels of satisfaction with both dwellings and services (Roy Morgan Research 2007: 67). The most important aspects of housing to public housing tenants are safety and security of the dwelling, safety and security of the neighbourhood, and privacy (Roy Morgan Research 2007: 100), indicating the dimensions of housing that are likely to be of importance to tenants if CBL is implemented.

Conclusions

Returning to the key questions set out in the introduction, we conclude that CBL has been attractive to policymakers in Britain as chiming with the modernisation ethic pervading the government's entire social policy agenda. In Australia, by contrast, interest in the model does not reflect a broader agenda of modernisation of government but is being considered in the narrower context of developing the social housing sector through the designation of key 'growth' housing associations. For the not-for-profit sector, and as reflected in the federal minister's speech mentioned in the introduction, its potential is in helping to 'rebrand' and de-stigmatise the social housing sector.

How far has CBL, in practice, been transferred? Within a decade, the policy has been adopted – at least in name – by most English local authority landlords and by many housing associations. Even in Scotland where there has been little ministerial enthusiasm for the policy, it has attracted gradually increasing adherence. In Australia, CBL is attractive to federal policymakers as a stimulus to reform of the social housing sector and as a potential means of improving what is regarded as an inefficient system.

How effectively has it been possible to operate the model within policy and institutional contexts differing from those of the Netherlands? As we have shown, ensuring compliance

with the British legal framework has required the model to be made significantly more complex than the Delft model of the 1990s (Kullberg 1997). Empirical evidence on the extent to which system users genuinely enjoy more choice than was available under the traditional allocations model is hard to find, and findings from our Glasgow study suggest only a modest gain, even within this relatively unpressured housing market.

In Australia, despite widespread knowledge of CBL and some interest, policy transfer has yet to become a reality. In the context of high demand relative to supply, major institutional barriers include a small social housing sector dominated by large state/territory providers, little experience of innovation and experimentation at the local level, and a federal government which finances social housing but has little capacity to bring about change in practice. Further, the current emphasis on homelessness has accentuated welfare rationing, which limits the scope for choice. Finally, the system of income related rents in social housing is also a major obstacle.

In considering the broader implications for policy transfer, it is important to recognise that while CBL has been making inroads into Britain, the model has also been evolving in the Netherlands. Van Daalen & Van der Land (2008) reported that dissatisfaction on the part of many Dutch social landlords has led to policy innovations. While duration of registration has tended to replace age and length of residence as the main ranking criterion, more radical experiments have included greater marketisation via the abolition of income and household size as selection criteria and the introduction of ranking by lottery.

In making their case that ‘imperfect’ policy transfer is liable to result in ‘policy failure’, Dolowitz & Marsh seemed to assume that policy borrowing takes place only in relation to techniques which have proven an unqualified success on their ‘home turf’. Yet the sometimes quite far-reaching modifications to the Delft model as introduced in some parts of the Netherlands over the past few years (see above) suggest that this cannot be taken for granted in the case of choice-based lettings.

Finally, it appears from the case of CBL that instances of policy transfer need to be considered in the context of institutional and market factors which frame social policies. A key issue arising is the extent to which CBL is appropriate in the sense of responding to identified problems affecting the social housing sector, drawing on learning from overseas but adapting this to local conditions. Our tentative conclusion is that the importation of CBL from the Netherlands to Britain has involved a combination of hard and soft learning, that the process was not entirely voluntary and that there is an element of mimicry. These observations are notwithstanding the enthusiasm of social landlord staff to empower housing applicants, as identified in our research.

The projected importation of CBL to Australia, if this occurs, appears to be a clear case of mimicry from Britain. Although there may well be some initiatives which reflect soft learning, widespread adoption (and adaptation) will require a greater consumer focus in the dominant public housing sector together with injection of resources by governments. In both the British and Australian cases, the key question is whether the importation of CBL into other contexts can deliver better outcomes for people renting in the social housing sector in terms of more appropriate dwellings, and locations which facilitate social connectedness and participation in economic life.

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ⁱ 'At risk of poverty' in terms of receiving incomes below 60% of the median national value (equivalised income after social transfers).

ⁱⁱ 'Excellence' in allocating housing was defined as where a landlord 'Has a clear policy in place aimed at maximising choice for applicants in accordance with the allocation policy such as a choice-based letting scheme' (p. 6).

ⁱⁱⁱ These are now prepared by a market research firm with the assistance of state housing authorities and published by the Australian Institute of Health and Welfare. They have response rates of 46% for public housing tenants (13,246 responses) and 31% for community housing tenants (3,100 responses).