



Policy: Data Management and Publication

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Approval Fiona Fitzgerald,
Head of CHRA

Purpose

1. The purpose of this document is to set out the Community Housing Regulatory Authority's (CHRA) operating principles, authority, and high-level policy settings for managing, sharing, and publishing data and information collected from registered Community Housing Providers (CHPs) during our annual regulatory assessments.
2. This policy establishes the framework where decisions about data use and publication are made. CHRA manages regulatory information through a structured data lifecycle. This lifecycle supports regulatory decision-making, ensures data quality, protects confidentiality, and supports appropriate sharing and publication.
3. Detailed publication scope, staging, and decision controls are set out in CHRA's Data Publication Strategy.

Scope

4. This policy applies to the management, sharing, and publishing of information and data collected through the CHRA annual monitoring process. The information collected through annual monitoring relates to registered CHPs as organisations, their property portfolios, and their housing-related activities. It does not include tenant-level information, and this policy does not apply to information about individual tenants. It is not intended to be applied to information and data collected from registered CHPs through our other regulatory activities, for example, through engagement meetings or the change and disclosure process.
5. This policy does not define performance measures, indicators, or reporting rules. These are set out separately in monitoring guidance and reporting templates, which may be updated over time following sector engagement.
6. Nothing in this policy limits CHRA's ability to collect, use, or rely on information obtained through other regulatory activities in carrying out its statutory functions.



Background

7. CHRA collects a range of property, performance, and financial information and data from registered CHPs through our annual regulatory assessment process, to carry out our statutory functions under the Public and Community Housing Management Act 1992 (PACHMA). This data is used to assess registered CHPs against the Performance Standards contained in the Public and Community Housing Management (Community Housing Provider) Regulations ('the regulations').
8. Our regulatory framework is underpinned by a high-trust model. This means that we depend on positive and effective relationships with the community housing sector to garner the information and data we need to make informed regulatory decisions. Sometimes this means working with information and data that is incomplete or sensitive and is not appropriate to share with our colleagues or sector partners, as this could unfairly prejudice their decisions. We will not release the raw or incomplete data collected through these assessments for public publication.
9. This need for independence in the way we collect, manage, and share information and data needs to be balanced against the capacity for our information and data to support and streamline decision-making across the Ministry for Cities, Environment, Regions and Transport (MCERT) and the wider community housing sector. A positive working relationship with our colleagues and sector partners contributes to each of our abilities to prudently perform our roles and responsibilities.
10. Recent changes to the way in which we collect property, performance, and financial information and data from registered CHPs open new opportunities to strengthen that working relationship and help meet our objectives to support the growth of a fair, efficient, and transparent community housing sector, and ensure that tenants are appropriately housed. These opportunities must be considered against our need to maintain independence, fairness, and proportionality.

Operating principles

11. Our approach to managing, sharing, and publishing information and data is underpinned by a set of best practice principles that guide our behaviours and aspirations. These principles include, but are not limited to:
 - a) **Accuracy and validity:** The information and data we share and publish must be complete, accurate, and trustworthy. We aim to ensure that our data provides certainty to people who rely on that data to inform their decision-making.
 - b) **Authority and stewardship:** CHRA is responsible for the stewardship, governance, and appropriate use of the information and data it collects in carrying out its statutory functions. We recognise that data may also carry legitimate interests for the organisations it relates to, including Māori organisations. We have a responsibility to ensure data is interpreted, shared, and reused appropriately and in ways that do not cause harm, including by limiting access to raw regulatory data and applying appropriate government security controls.
 - c) **Māori data and Te Tiriti consistent practice:**
CHRA recognises that data relating to Māori individuals, whānau, hapū, iwi, and Māori CHPs is a taonga and that Māori have legitimate collective interests in how that information is collected, used, protected, interpreted, and published. CHRA will take particular care to ensure that such data is managed in ways that uphold dignity and

mana, avoid deficit framing, and consider collective impacts, consistent with Te Tiriti principles and CHRA's statutory functions under PACHMA.

- d) **Usability:** The information and data we make available to others should be accessible and easy to interpret and use. We aim to ensure that the information and data we share and publish is explained in plain language, sensibly structured, clearly titled, and appropriately caveated to reduce the risk of misunderstanding or misuse.
- e) **Privacy protection:** We do not intentionally collect personal information through annual monitoring; however, personal information may be provided to us at other times, such as through complaints. Any personal information we hold is managed securely and in accordance with the information privacy principles and protected from unauthorised access or disclosure.
- f) **Transparency:** We will share information in accordance with the Official Information Act 1982 and any information sharing agreements or memorandum of understandings we hold with other agencies or teams within MCERT.

Policy

Policy Framework

Identifying information needs

CHRA determines what organisational, property, performance, and financial information is required through annual monitoring to support its statutory functions under PACHMA. This includes information needed to monitor compliance with the Performance Standards, assess financial viability, understand sector performance and trends, and support public reporting and sector transparency initiatives.

Designing collection requirements

CHRA develops and maintains the reporting templates, monitoring guidance, data definitions, validation requirements, and publication frameworks needed to collect and use annual monitoring information consistently. These requirements are reviewed periodically following sector engagement and operational experience.

Building and maintaining collection systems

CHRA, with the support and input of digital and data teams in MCERT, establishes and maintains the systems, tools, and processes used to collect, store, validate, manage, and analyse annual monitoring information. This includes Business Connect, RAD, Microsoft Fabric, reporting dashboards, and supporting analytical tools.

Evaluating and improving

CHRA periodically reviews data quality, collection processes, reporting templates, publication approaches, and user and sector feedback. Findings are used to improve future monitoring and publication activities.

Operational Requirements

Collection and management of property, performance, and financial data

- 12. Registered CHPs who own or let property must complete a property and performance reporting template to meet their annual reporting obligations. This information provides us with a cross-section of data relating to key performance risk areas and oversight of the scale, focus, and geographic distribution of registered CHPs' housing activities.
- 13. Registered CHPs must also provide copies of their audited financial statements, budget documents, details of any capital expenditure, and their business or strategic plan to meet

their annual reporting obligations. This information underpins our assessment against the financial viability performance standard for each CHP, and in aggregate, helps us form a view of the financial standing and health of the sector.

14. Annual monitoring information and data is submitted to us by registered CHPs through Business Connect, a secure all-of-government form and file sharing platform, administered by the Ministry of Business, Innovation and Employment. Once we receive this information, it is then transferred to the Regulatory Authority Database (RAD) hosted on Microsoft SharePoint, which is only accessible by approved CHRA staff. Access to information stored in the RAD is restricted to authorised CHRA staff and managed in accordance with MCERT information security and access control requirements. Other teams do not have direct access to RAD or raw regulatory data.
15. CHRA uses approved all-of-government digital platforms and manages data in accordance with government information security requirements. Decisions about data storage locations and infrastructure are governed by those platform standards rather than by this policy. Data is stored securely, access is restricted to authorised users, and controls are applied to prevent unauthorised use or disclosure.
16. Once we receive an annual monitoring return, the Regulatory Advisor Operations will conduct an initial quality check of the information provided. This check is about ensuring that the correct financial information has been submitted, the property and performance data templates have been completed correctly, and that the reported property data is consistent with the number of places known to be managed by that provider.
17. Following our initial quality check, the annual monitoring return is allocated for a formal assessment. The Regulatory Advisor will then undertake an in-depth review of the supplied information and may request explanations and clarifications from the provider. This might involve having a discussion with the provider to better understand the supplied data and their data collection processes. Any caveats identified will be added to the comments section of the reporting template.
18. CHRA's Financial Advisor will conduct a review of the provider's audited financial statements and budget documents. This process will involve copying the supplied financial and budget data into a master financial spreadsheet, for that provider, to assist our analysis.
19. Once both assessment processes are complete and our annual regulatory assessment has been issued, the provider's supplied raw property, performance, and financial data will be considered final for the purposes of annual monitoring and publication.
20. Once that data is finalised, it will be copied into our data repository hosted on Microsoft Fabric (or similar). Data held in the repository is managed as regulatory information and is not accessible outside CHRA except through approved, purpose-specific outputs.

Data storage, management, security, access and sharing property, performance, and financial data

21. One of the benefits of collecting standardised property, performance, and financial data is the opportunity for that data to be used to support decision-making across MCERT and streamline contractual reporting and monitoring processes for registered CHPs with an Income-Related Rent Subsidy (IRRS) Services Agreement. This benefit, however, must be balanced against our need to maintain independence and trust in carrying out our regulatory functions and to ensure regulatory judgement and assurance material is not shared outside CHRA.

22. We will manage this balance by establishing and maintaining a series of curated dashboards based on the data we receive. These dashboards will be made available to MCERT staff in the Housing Delivery team and will be updated annually once our monitoring round is complete, usually sometime between September and December each year.
23. The dashboards will include the following information:
 - a) **Property dashboard:** This dashboard will provide an overview of the property portfolios of all registered CHPs, including a breakdown of their geographic distribution (down to the suburb level), ownership status, tenure type, occupancy, dwelling type, number of bedrooms, and accessibility features.
 - b) **Performance dashboard:** This dashboard will provide all performance data reported by registered CHPs with an IRRS Services Agreement and an overview of the average result reported by the registered CHP sector.
 - c) **Financial dashboard:** This dashboard will provide an overview of the sector's aggregate financial performance and health over time.
24. The property-level data may also be used to support quality assurance of other property-related data held by MCERT. This work may require the Data and Products team to access property-level annual monitoring data to compare, reconcile, and improve the accuracy of MCERT datasets. Any use of this information must be purpose-limited, confidential, and consistent with the access restrictions and governance controls set out in this policy.
25. The Data and Products team will also have access to the dashboards and relevant data repository information on a confidential basis to assist CHRA in establishing, maintaining, and quality assuring this data. Access is provided on a confidential and purpose-limited basis and does not include access to provider-level assurance judgements, internal decision-making material, or regulatory assessment commentary. Any sharing of data with other MCERT business units occurs under formal information-sharing arrangements and does not alter these access restrictions.
26. The Head of CHRA, or their delegated authority, may approve access to property-level annual monitoring data for quality assurance purposes, subject to the confidentiality, purpose limitation, and access controls set out in this policy.

Publication of select property, performance, and financial data

27. The standardisation of property, performance, and financial data across the registered community housing sector also creates an opportunity to establish a public repository of information about the sector's growth and performance that is not available elsewhere. In developing this, we must ensure that publicly available data accurately portrays provider performance, protects personal and commercially sensitive information, and does not create any perverse operational incentives.
28. Where data relates to smaller-scale or rural CHPs, CHRA will take steps to ensure that publication does not unfairly represent performance. For example, rural-based CHPs may have more difficulty securing contractors for repairs in a timely way. Where data relates to Māori CHPs, CHRA will aim to ensure that publication does not contribute to deficit framing.
29. CHRA may publish aggregated property, performance, and financial information on its website, where this supports transparency and public understanding and where publication risks can be appropriately managed.
30. Any publication decisions are subject to CHRA's Data Publication Strategy, including staging, readiness assessment, and approval controls.

31. Examples of aggregated, sector-level information that may be considered for publication include:
 - Number of properties (by city, tenure type, and owned versus leased).
 - Total rent charged and rent arrears.
 - Average days to re-let tenantable vacancies.
 - Occupancy rate.
 - Median days to resolve complaints.
 - Percentage of urgent repair requests completed within 24 hours.
 - Percentage of non-urgent repair requests completed within 14 days.
 - Percentage of tenants satisfied or very satisfied with the provider's tenancy management services, repairs and maintenance, and the extent to which their views have been considered across the registered CHP sector.
32. This data may be published following completion of an annual monitoring cycle, once data has been assessed as final and all publication decision points set out in the Data Publication Strategy have been met.
33. Provider-level publication may occur where required by legislation, as part of formal regulatory action, or where CHRA determines that publication is proportionate, fair, and in the public interest, consistent with the Data Publication Strategy.

Managing data accuracy, validity, and fairness issues

34. In order to manage accuracy, validity, and fairness risks, and to provide safeguards should publication settings change over time, it may be appropriate for us to caveat or withhold from publication select property and performance data relating to individual providers to avoid unfairly representing that provider's performance or diminishing the accuracy and reliability of our publicly available dataset. This might be because:
 - a) A provider's operations were impacted by an unexpected adverse event (e.g. natural disaster) that led to poorer than usual performance results during the reporting period.
 - b) A provider's poorer than expected performance result can be wholly explained by the unique nature of that providers' operations (for example, as noted, a rural provider that may take longer to arrange qualified tradespeople to undertake repairs) and that result does not represent a potential breach of the performance standards.
 - c) A provider has supplied no or low-quality data, either by prior agreement (e.g. a transitional year granted while their data collection systems are improved) or by failure to meet the regulatory reporting requirements.
35. In these cases, we may consider taking a range of actions to help ensure that published data accurately and fairly reflects the performance the relevant provider. This could include, but is not limited to:
 - a) Including a caveat on the relevant data to provide additional context.
 - b) Withholding the relevant data from publication for that annual monitoring round.
 - c) Withholding the relevant data from publication for that provider entirely.

36. Registered CHPs are welcome to request any of these actions. This request should identify the relevant datapoint and the reason they believe publication might unfairly represent its performance or diminish the accuracy of our publicly available dataset. It should be noted that while CHRA may withhold the relevant data from publication on our website, it may still be required to be released under the Official Information Act 1982.
37. CHRA will not publish information where publication would compromise regulatory independence, including where it could be interpreted as a performance rating, influence regulatory decision-making, override statutory processes, or create external pressure for regulatory action

Governance and decision-making authority

CHRA retains discretion over all decisions relating to the sharing and publication of regulatory data. Final accountability for publication decisions rests with the Head of CHRA or their delegated authority.

Additional information

Relevant legislation

- Official Information Act 1982
- Privacy Act 2020
- Public and Community Housing Management Act 1992
- Public and Community Housing Management (Community Housing Provider) Regulations 2014

Relevant policies, procedures and guidance

- CHRA Annual Monitoring and Reporting Framework
- HUD Data Standards
- HUD Data Strategy
- HUD Māori Data Governance Framework
- HUD Personal Information Use Framework (where applicable)
- Performance Standards and Guidelines 2024

HUD policies will remain in place until the relevant MCERT policies have been approved and implemented. Once implemented, the MCERT policies will replace the corresponding HUD policies.